CITY OF ESCALON CONNECTION TO NICK DEGROOT WATER TREATMENT PLANT
DRAFT INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION
ESCALON, SAN JOAQUIN COUNTY, CALIFORNIA

LEAD AGENCY:

CITY OF ESCALON

2060 MCHENRY AVENUE, ESCALON, CA 95320

PREPARED BY:

ARDURRA GROUP

SEPTEMBER 6, 2024

INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION

Draft

FOR THE

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2060 McHenry Avenue

Escalon, CA 95320

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TABLE OF CONTENTS

FIGURES

TABLES

MITIGATION MONITORING AND REPORTING PROGRAM (Separate Document)

APPENDICES

APPENDIX A: Air Quality and Greenhouse Gas Impact Study/Energy (Ganddini 2023)
APPENDIX B: Biological Resources (ELMT 2024)
APPENDIX C: Cultural/Archaeological/Tribal/ Paleontological Resources Report (BCR Consulting 2023)
APPENDIX D: Noise Study (Ganddini 2023)

ABBREVIATIONS

AB	Assembly Bill
APN	Assessor's Parcel Number
ADT	Average Daily Traffic
BMP	Best Management Practice
BPS	Booster Pump Station
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalFIRE	California Department of Forestry and Fire Protection
CalGREEN	California Green Building Standards Code
CalTrans	California Department of Transportation
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CNDDB	California Natural Diversity Data Base
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
CO_2e	Carbon Dioxide Equivalent
CWA	Clean Water Act
dB	Decibel
dBA or dB(A)	Decibel "A-Weighted"
dBA Leq	Average Noise Level over a Period of Time
DTSC	California Department of Toxic Substances Control
EIR	Environmental Impact Report
ESA	Endangered Species Act (federal)
ESJGWA	Eastern San Joaquin Groundwater Authority
FCF	Flow Control Facility
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
GAMAQI	Guide for Assessing and Mitigating Air Quality Impacts
GHG	Greenhouse Gas
Gpm	Gallons per minute
GSA	Groundwater sustainability agency
IS/MND	Initial Study/ Mitigated Negative Declaration
Ldn	Day-Night Average Sound Level
LF	Linear feet
Mgd	Million gallons per day
SJMSHCP	San Joaquin Multiple Species Habitat Conservation Plan
MS4	Municipal Separate Storm Sewer System
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NOx	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
OID	Oakdale Irrigation District
OPR	California Governor's Office of Planning and Research
PM 10	Particulate matter 10 micrometers or less in diameter
PM 2.5	Particulate matter 2.5 micrometers or less in diameter
ROG	Reactive organic gases
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill

SCADA	Supervisory control and data acquisition
SJCOG	San Joaquin Council of Governments
SJMSCP	San Joaquin Multi-Species Open Space and Habitat Conservation Plan
SJVAPCD	San Joaquin Valley Air Pollution Control District
SLF	Sacred Lands File
SR	State Route
SSJID	South San Joaquin Irrigation District
SWMP	Storm Water Management Program
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic air contaminant
USFWS	U.S. Fish and Wildlife Service
U.S. EPA	U.S. Environmental Protection Agency
VMT	Vehicle Miles Traveled

1.0 BACKGROUND INFORMATION

Project Title: City of Escalon Connection to Nick DeGroot Water Treatment Plant Project

Public Comment Period: September 6, 2024, to October 7, 2024

Lead Agency: City of Escalon
2060 McHenry Avenue
Escalon, CA 95320

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General Plan Designation: Existing San Joaquin County and City of Escalon public right-of-way; Escalon's Sphere of Influence (SOI) (Agricultural Urban Reserve)

Zoning: County right-of-way; Agricultural Urban Reserve (AU-20)

Specific Plan or Master Plan: The proposed Project is outlined in the City of Escalon's Water Master Plan adopted in January 2007. This document has been incorporated by reference and can be found on the City's website using the following link:

https://cdnsm5-hosted.civiclive.com/UserFiles/Servers/Server_10745808/File/Government/Departments/Development%20Services/Engineering/Water_Master_Plan_.pdf

Description of Project: The City of Escalon (Lead Agency) in coordination with South San Joaquin Irrigation District (SSJID), the County of San Joaquin, and Oakdale Irrigation District (OID) proposes to install the following Project Components: approximately 19,500 linear feet (LF) of 18-inch PVC potable water line using along existing Escalon-Bellota asphalt roadway and County easement; flow control facility (FCF) on existing agricultural land; and booster pump station (BPS). The construction of the proposed Project and Project Components will connect the City of Escalon to SSJID's surface water for increased reliability.

Project Location Unincorporated San Joaquin County, CA

Surrounding Land Uses and Setting: The surrounding land uses are primarily agricultural fields that plant various types of produce (i.e., Almond Orchards).

Reference *Table 2: Surrounding Adjacent Land Uses at Project Components* for more detail.

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

The State of California and San Joaquin County Guidelines identify Native American consultation as an important aspect of the cultural resource evaluation. To identify potential Native American resources, a Sacred Lands File (SLF) Search was conducted at the Native American Heritage Commission (NAHC). A current SLF Search response from the NAHC was received on March 13th, 2023 (See **Appendix C**). The results from the SLF were negative, indicating no resources have been previously identified near the proposed Project Components. However, the SLF search does not indicate the absence of cultural resources in any Project area; therefore, additional sources including Native American Tribes who possess knowledge of the cultural resources will be contacted.

The NAHC provided a list of Native American tribes that may have information on cultural resources within the Project's Local Vicinity. The City contacted the following tribes: Buena Vista Rancheria of Me-Wuk Indians, California Valley Miwok Tribe, Chicken Rancho Rancheria of Me-Wuk Indians, Ione Band of Miwok Indians, Nashville Enterprise Miwok-Maidu-Nishinam Tribe, North Valley Yokuts Tribe, The Confederated Villages of Lisjan, Tule River Indian Tribe, Wilton Rancheria, Wuksache Indian Tribe/ Eshom Valley Band, and the United Auburn Indian Community of the Auburn Rancheria. On September 5, 2024, the City received a response from the California Valley Miwok Tribe. The tribe indicated that they understood the nature and purpose of the proposed Project and the tribe did not have any further comments or concerns (see **Appendix C**). Mitigation Measures to reduce potentially significant impacts on Tribal resources have been included in Section 5.18 of this document and the Mitigation Monitoring and Reporting Program (MMRP) for this Project.

Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement)

- State Water Resources Control Board (SWRCB), Division of Drinking Water (DDW)
- San Joaquin County
- SSJID
- Pacific Gas and Electric (PG&E)
- OID
- Capital Program Services Division
- Watershed Management Division
- Water Utilities Operations Division
- Water Supply Division

2.0 INTENDED USE OF THE DOCUMENT

2.1 PURPOSE AND NEED

The purpose of this Initial Study (IS) is to evaluate the level of significance of anticipated temporary and permanent physical changes in the environment from the construction of the City of Escalon Connection to Nick DeGroot Water Treatment Plant, which is hereafter referred to as the "Project" for environmental analysis pursuant to the California Environmental Quality Act (CEQA). This IS documents the levels of significance of the individual Project impacts and cumulative environmental impacts from the implementation of the Project pursuant to the CEQA Statutes (Public Resources Code 21000-21189) and the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000- 15387).

Levels of significance of environmental impacts from the Project are evaluated within Section 5.0 of this document under the thresholds of significance listed in Appendix G of the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387). This IS provides the City of Escalon, the Lead Agency, with information and an administrative record that can be utilized for making decisions regarding the Project and determining whether the Project should require an EIR, Mitigated Negative Declaration, or Negative Declaration for clearance under CEQA. The environmental analysis in this IS incorporates a review of all Project phases, including planning, implementation, and long-term operations.

The Project was approved conceptually under previously certified EIR for the South County Surface Water Supply Project (SCSWSP) (SCH #98022018) approved by the South San Joaquin Irrigation District (SSJID) to reduce groundwater use and overdraft. The Project also supports regional plans for groundwater sustainability, such as the Eastern South San Joaquin Groundwater Subbasin Sustainability Plan by the Eastern San Joaquin Groundwater Authority (ESJGWA) to manage groundwater resources. The Project is proposed to implement regional plans for groundwater sustainability. The Project was considered part of the City's 2007 Water Master Plan; however, the design process for the Project has resulted in modifications from the Project originally certified as compliant with CEQA in the "SCSWSP EIR". The Project that will be evaluated throughout the IS is the City of Escalon Connection To Nick DeGroot Water Treatment Plant, which will implement a connection, treated water turnout, conveyance, and storage infrastructure by the City of Escalon.

This IS evaluates the short-term, long-term, and cumulative impacts expected from the Project and documents the levels of potentially significant impacts to the environment from the Project pursuant to CEQA; the CEQA process is intended to ensure appropriate mitigation is applied to the Project and that full public disclosure of the level of significance of Project impacts with mitigation is fulfilled pursuant to requirements in the CEQA Statute and Guidelines. The City of Escalon is the Lead Agency for this Project and is responsible for compliance with CEQA. The City and other Responsible Agencies will utilize the information within this IS for decision-making and approvals on discretionary permits for the Project. Likewise, the information in this IS will be used to certify the Project as compliant with CEQA.

Environmental Concerns

Environmental Concerns include potentially significant impacts during construction on the following resources: aesthetics, air quality, biological resources, cultural and tribal cultural, paleontological resources, hydrology and water quality, land use and planning, noise, public services, utilities and services, transportation, and wildfire. The Project proposes to install equipment, which has the potential to permanently increase noise levels within proximity to residential land use, which is considered a sensitive receptor.

Sensitive Receptors

The Local Vicinity is essentially flat and consists of surrounding agricultural, and low-density residential land uses in all directions. Escalon-Bellota Road, where the pipeline is proposed to be installed, is paved. Existing residential developments and ancillary agricultural structures are adjacent to Escalon-Bellota Road in the west and east, approximately 50 feet from the Project alignment. Project construction has the potential to impact these sensitive

receptors temporarily and intermittently. Equipment installations that are proposed with the Project, within proximity to sensitive receptors, have the potential to result in long-term impacts.

As the Project alignment gets closer to city limits, more residential neighborhoods are present. Specifically, on the eastern perimeter of Escalon-Bellota Road, across from Hogan-Ennis Community Park and community commercial land uses, residents living in the Low-Density Residential (R-1) neighborhood may be primarily affected by the construction and long-term operation of the proposed City Tank and Booster Pump Station (BPS). Approximately 17 homes are located off Deck Road, approximately 8 homes on Mahon Road, and approximately 100 homes on Libby Drive.

Additionally, there is a creek that crosses under Escalon-Bellota Road, near the midpoint of the Project alignment. The creek is formally known as Lone Tree Creek and has the potential to be considered as Waters of the State or Waters of the United States as well as contain sensitive biological resources. For this reason, a qualified biologist will evaluate the Project alignment for native plant and animal species; in addition, determine if Lone Tree Creek is jurisdictional. During Project construction, jack and bore construction is proposed to occur under Lone Tree Creek, approximately 20 feet by 45 feet, and oriented lengthwise parallel to Escalon-Bellota Road.

Chlorine sampling and analysis will be incorporated into the BPS. The closest residential development is located approximately 200 feet from the tie-in pit.

Decision to Prepare a Mitigated Negative Declaration

The Project Description (Section 3.0) describes the proposed installation of 19,500 LF of potable water pipeline, wet well, storage tank, FCF, and BPS, which would increase Escalon's capacity to serve its growing consumer base identified in the City's General Plan. Technical studies prepared for the Project indicate the Project has the potential to result in significant impacts on sensitive resources. Therefore, the Project is ineligible for a CEQA exemption. Section 4 of this document for the Project identifies potentially significant effects on aesthetics, air quality, biological resources, cultural and tribal cultural, paleontological resources, hydrology and water quality, land use and planning, noise, public services, utilities and services, transportation, and wildfire which require Project-specific mitigation measures. Mitigation measures have been proposed for the Project to reduce such effects to less than significant levels; and as a result, this IS/MND indicates Project consistency with CEQA Guidelines §15070, that a mitigated negative declaration is appropriate when:

The Project Initial Study identifies potentially significant effects, but:

a. Revisions to the Project plan were made that would avoid, or reduce the effects to a point where clearly no significant effects would occur, and
b. There is no substantial evidence that the Project, as revised, may have a significant effect on the environment.

Public Review Period

This Draft IS/MND will be circulated to local and state agencies, interested organizations, and individuals who may wish to review and provide comments on the Project Description, the proposed Mitigation Measures, or other aspects of this IS/MND. The publication of this document with the State Clearinghouse and San Joaquin County's Clerk's office will initiate the 30-day public review period per CEQA Guidelines §15105(b) beginning on September 6, 2024 and concluding on October 7, 2024.

The Draft IS/MND and supporting documents are available for review at the City of Escalon Planning Department (2060 McHenry Avenue, Escalon, CA 95320), and on the City's website:

http://cityofescalon.org/government/departments/development_services/planning

2.2 DEFINITIONS

Environmental Checklist Terminology

The Initial Study is based on the Environmental Checklist Form within Section 15063 (d) (3) of the State CEQA Guidelines (CEQA 2022). The responses to questions about the proposed Project, found in Section 3.4, indicate less than significant environmental impacts with mitigation are anticipated from Project implementation. The Form in Section 3 is used to evaluate impacts and includes an explanation for each answer within Section 5.0. The following terminology is used to describe the level of significance of Project-related impacts.

Impact: A physical change in the environment on a sensitive or regulated resource.

Less Than Significant Impact: Level of changes in the environment from a project when there is potential for an impact based on the location of resources or the location or nature of the project; however, the extent of the change is not expected to exceed thresholds of significance identified in the Appendix G Checklist and other agency standards.

Less Than Significant Impact with Mitigation: The level of changes in the environment with the implementation of a project, which includes the application of mitigation measures or avoidance measures and regulations, intended to reduce changes in the environment from a project when a project has the potential to significantly change the environment, and impacts are reduced to below thresholds of significance of Appendix G and other agency standards.

Local Vicinity: The area and parcels surrounding a location planned for improvement or an APE, where direct or indirect impacts from Project implementation may occur.

Mitigation: Feasible measures that could be applied to project design and construction to minimize significant adverse impacts, which are tailored to specific circumstances of a particular project and place. Mitigation places requirements on a project beyond standard applicable ordinances and is intended to tailor a project and project activities to a particular location.

No Impact: Level of changes in the environment from a project when there are either no related resources that could be affected by a project or there are no project-related changes that could result in a change in the environment.

Potentially Significant Impacts: The level of substantive changes that will result from project implementation resulting in significant changes to the environment, and expected with a project, after avoidance and mitigation measures have been applied, exceeding thresholds of significance.

Project: An activity undertaken by an agency or private entity that requires discretionary approval leading either to a direct physical change in the environment or a reasonably foreseeable indirect change in the environment.

Threshold of Significance: A guideline or standard established for public health, safety, welfare, protection of natural resources, or stewardship of the environment.

Significant: Substantial or potentially substantial adverse change to any of the physical conditions within the area affected by the project.

Project-related Terminology

A-Weighted Sound Level, dBA: The all-encompassing noise environment associated with a given environment, at a specified time, usually a composite of sound from many sources, in many directions, near and far, in which usually no particular sound is dominant.

CNEL: Community Noise Equivalent Level. CNEL is a weighted 24-hour noise level that is obtained by adding five decibels to sound levels in the evening (7:00 PM to 10:00 PM), and by adding ten decibels to sound levels at night (10:00 PM to 7:00 AM). This weighting accounts for the increased human sensitivity to noise during the evening and nighttime hours.

Decibel, dB: A logarithmic unit of noise level measurement that relates the energy of a noise source to that of a constant reference level; the number of decibels is 10 times the logarithm (to the base 10) of this ratio.

DNL, Ldn: Day Night Level. The DNL, or Ldn is a weighted 24-hour noise level that is obtained by adding ten decibels to sound levels at night (10:00 PM to 7:00 AM). This weighting accounts for the increased human sensitivity to noise during the nighttime hours.

Equivalent Continuous Noise Level, Leq: A level of steady-state sound that in a stated time period, and a stated location, has the same A-weighted sound energy as the time-varying sound.

Forest Land (§12220 G); land that can support 10-percent native tree cover of any species including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, and other public benefits (CA Public Resources Code).

Hazardous Materials Site (§ 65962.5): hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, the Department of Toxic Substances Control (DTSC) shall compile and update as appropriate, but at least annually, and submit to the Secretary for Environmental Protection (CA Public Resources Code).

L_{max}, L_{min}: Lmax is the RMS (root mean squared) maximum level of a noise source or environment measured on a sound level meter, during a designated time interval, using fast meter response. Lmin is the minimum level.

Transit Priority Area (TPA) (§ 21099): an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planned horizon including a Transportation Improvement Program or applicable regional transportation plan (CA Public Resources Code).

Timber Land (§ 4526): land, other than land owned by the Federal government and land designative by the Board as experimental forest land, which is available for, and capable of growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the Board on a District basis after consultation with the District committees and others (CA Public Resources Code).

Timber Land Production Zone (§51104 G): areas that have been zoned and are devoted to uses for growing and harvesting timber, or for growing and harvesting timber and compatible uses (CA Public Resources Code).

2.3 FINDINGS OF THIS INITIAL STUDY

Upon analyzing the environmental impacts outlined in the Environmental Checklist Form within Section 15063 (d) (3) of the State CEQA Guidelines (CEQA 2022), the Project indicated multiple instances of potentially significant Impacts on aesthetics, air quality, biological resources, cultural and tribal cultural, paleontological resources, hydrology and water quality, land use and planning, noise, public services, utilities and services, transportation.

Impacts are anticipated to be less than significant with the implementation of Project-specific Mitigation Measures, BMPs, and Standard Conditions.

3.0 PROJECT DECRIPTION

Background

Currently, the City of Escalon's water distribution system relies solely on potable well water and other groundwater supplies. Escalon is within the SSJID service area and currently supplies potable water from groundwater and water wells. The City does not receive allocated water resources from SSJID, due to the absence of available infrastructure connecting the SSJID water distribution system to the City of Escalon's potable water system. Therefore, the City of Escalon Connection to Nick DeGroot Water Treatment Plant is being proposed by the City of Escalon to accept and convey the allotted water into City Limits (SSJID UWQMP 2020). The Project will provide a connection, turnout, conveyance, and storage of surface water from the SSJID's SCSWSP for distribution within the City of Escalon that maintains water quality and reliability. The Project is intended to supplement the City of Escalon's potable well water.

In this regard, the Project will install infrastructure for tie-in, flow control, conveyance, pumping, and storage for City use. The Project is intended to bring the City of Escalon into compliance with the approved Eastern San Joaquin Groundwater Subbasin Groundwater Sustainability Plan, SCSWSP City of Escalon Water Master Plan, and General Plan assumptions; in this regard, the Project will implement an important component of the approved SSJID Urban Water Management Plan. The SCSWSP was approved and certified for CEQA compliance under EIR (SCH#98022018) by SSJID in 1999. The SCSWSP has been partially implemented. The SCSWSP intends to supply treated potable water to participating cities within the SSJID service area (Cities of Manteca, Escalon, Lathrop, Tracy, and Ripon) pursuant to SSJID Urban Water Management Plan (2020) and City of Escalon's Water Master Plan (2007). The Project will facilitate the delivery of potable water to adequately fulfill current water demand, based on the City of Escalon's water use data, as well as fulfill future potable water demand indicated in the City's approved General Plan and General Plan EIR.

The Project analyzed in this IS/MND is the City of Escalon Connection to Nick DeGroot Water Treatment Plant and is hereafter referred to as the "Project" in this report. The Project was included in the City of Escalon's approved 2019-2020 Capital Improvement Program (CIP) for the purpose of providing essential infrastructure and water services within the City of Escalon. The environmental analysis in this document is tiered from the EIR (SCH#98022018) that was prepared and certified by SSJID in 2019 for the SCSWSP. The analysis in this IS/MND utilizes information from SCH#98022018 and additional data from current research and site visits to analyze Project-specific impacts from the construction and long-term operation and maintenance of new water infrastructure for connection, storage, and conveyance of the City of Escalon's water allocation from SSJID from the Stanislaus River. The Project will include a BPS/FCF, and storage tank, in addition to the City of Escalon's "City connection" to the SSJID regional water distribution and treatment system. The Project is proposed to fulfill the intended purpose of the SCSWSP Project that was previously analyzed and certified for CEQA compliance under the SCSWSP EIR (SCH#98022018), certified by the SSJID Board of Directors in 1999.

SCSWSP

The purpose of the SCSWSP is to supply treated potable water to local Cities including Manteca, Escalon, Lathrop, Tracy, and Ripon (Participating Cities), that have been under contract with the SSJID since the Water Supply Agreement in 1995. SSJID has constructed 36.5 miles of pipeline ranging from 16 to 54 inches that would carry treated water from a new water treatment plant (WTP) near Woodward Reservoir to turnouts for each Participating City. The SCSWSP's primary objective is to "provide a secure reliable supply of water for the local cities within South Joaquin County to meet current and future water needs within their communities, to reduce dependence on groundwater, and to improve overall water quality for their customers" (SSJID DEIR 1999). If the SCSWSP is not fully constructed, SSJID will not be able to meet future water supply commitments or its obligations outlined in the Eastern San Joaquin Groundwater Subbasin Groundwater Sustainability Plan (Eastern San Joaquin Groundwater Authority, 2019). Connecting the City of Escalon to the SCSWSP will supplement the City's current potable well water sources with surface water from SSJID, which will help the City meet future water demand that is expected from the buildout of the City's approved land use map and full implementation of the City's approved General Plan.

Components of the SSJID SCSWSP that were originally proposed include new conveyance/ storage facilities including a new WTP, transmission pipelines, and pump stations for distribution to each Participating City, see **Figure 3: South**

County Surface Water Supply Preferred Pipeline Alternatives. *Table 1: Proposed SSJID Treated Water Transmission Pipelines* provides approximate dimensions for each turnout and their status of installation. SCWSP components that have already been implemented include the South San Joaquin WTP and the SSJID 48" transmission line running east-west along Dodds Road from the Nick DeGroot Water Treatment Plant.

TABLE 1: PROPOSED SSJID TREATED WATER TRANSMISSION PIPELINES

Reach Name	Route Description	Length (feet)	Pipe Size (inches)	Trench Dimensions (width by depth)	Excavation Amount (CY)	Status of Installation
Woodward Reservoir to WTP	**All Alignments** Located within the right-of-way along the Main Canal.	5,000	66-inch	11 feet by 12 feet	52,000	Alternative Not Chosen.
WTP to Escalon Turnout	**Dedicated right-of-way Alignment** West along Dodds Road, traversing open lands primarily on existing dirt access roads to Escalon Bellota Road	32,600	54-inch	8 feet by 10 feet	106,000	Alternative Not Chosen.
	Dodds Road Alignment West along Dodds Road to Escalon Bellota Road. South along Escalon Bellota Road	27,200	54-inch	8 feet by 10 feet	123,000	Installed.
	Lone Tree Road Alignment West along Dodds Road to Escalon Bellota Road. South along Escalon Bellota Road to Lone Tree Road	37,900	54-inch	8 feet by 10 feet	207,000	Part of proposed Project.
Escalon Turnout to Manteca Turnout	**Dedicated right-of-way Alignment** West from Escalon Bellota Road across lands to Van Allen Road. South parallel to Van Allen Road within private ROW, cutting across open land to Lathrop Road. West on Lathrop Road to Austin Road. South on Austin Road to Louise Avenue Tidewater Southern Railway.	71,500	48-inch	9.5 feet by 7.5 feet	207,000	Alternative Not Chosen.

Source: SSJID SCSWSP DEIR, 1999

At the time of the Water Supply Agreement, the City of Escalon only had four wells that were considered reliable, and water demand was projected to increase by about 40 percent (approximately 3,149 AFY) by 2025. Although demand for surface water has increased in the City of Escalon at a slower rate than what was originally expected; the City experiences intermittent deficiencies in water quality and reliability and will utilize its surface water allocation to maintain system reliability and meet projected future water demands. Therefore, the "City connection" was initially proposed with the SCSWSP as a 16-inch potable water pipeline connected to a 48-inch transmission line along Dodds Road (Dodds Road Alignment). The City of Escalon's turnout would convey water south along Escalon-Bellota Road within unincorporated San Joaquin County to the northern Escalon's City Limits resulting in approximately 27,200 LF of potable water pipeline (See SSJID DEIR, *Figure 3-10: Proposed Project Facilities*).

Plans for the Project, to connect the City of Escalon to SSJID's WTP, are consistent with the analysis within the SCSWSP DEIR. However, SSJID's SCSWSP did not analyze Project-specific impacts from a BPS, the FCF, or the storage tank needed for to make Escalon's "City connection" feasible. Nonetheless, the SCSWSP DEIR has been utilized to evaluate Project impacts and mitigation to reduce potentially significant impacts. *Table 6: SSJID SCSWSP EIR Previously Approved Mitigation Measures* shows which mitigation measures from SCSWSP DEIR will be implemented along with the proposed Project.

Eastern San Joaquin Groundwater Authority (ESJGWA)

In 2014, the California legislature enacted the Sustainable Groundwater Management Act (SGMA) in response to continued overdraft of California's groundwater resources. The Eastern San Joaquin Groundwater Subbasin is one of 21 basins and sub-basins identified by the Department of Water Resources as being in a state of critical overdraft.

SGMA requires the preparation of a Groundwater Sustainability Plan to address measures necessary to attain sustainable conditions in the Subbasin. Within the framework of SGMA, sustainability is generally defined as long-term reliability of the groundwater supply and the absence of undesirable results.

The ESJGWA is a joint power authority formed by the 16 groundwater sustainability agencies (GSAs) within the Eastern San Joaquin Subbasin for the purpose of groundwater management. Currently, the Eastern San Joaquin Groundwater Subbasin is critically over drafted; as a result, the ESJGWA adopted a Groundwater Sustainability Plan (GSP) in 2019 to manage and use groundwater in a manner that does not cause undesirable results during planning and implementation of future projects (CA DWR, 2018; Eastern San Joaquin GSP, 2019). The GSP seeks to promote long-term sustainability efforts that locally-manage groundwater resources. Through ESJGWA's collaboration with GSAs, projects have been identified throughout the Subbasin that help achieve sustainability goals. (Eastern San Joaquin GSP, 2019) which include:

- Achieve groundwater sustainability by 2040.
- Replace or reduce groundwater use by 78,000 acre-feet per year.
- Recharge groundwater.

According to their measurable objectives on pages 3-10 (*Table 3-3: Interim Milestones for Chronic Lowering of Groundwater Levels*), groundwater levels, on average, are 22.2 feet AMSL (2013-2016). The GSP established an interim milestone, that states groundwater levels should be 23.1 feet AMSL by 2030; and eventually return to 24 feet AMSL, to "allow a reasonable margin of operational flexibility between minimum thresholds to allow for active management of the Subbasin during dry periods without reaching the minimum threshold" (Eastern San Joaquin GSP, 2019).

The proposed Project is within the South San Joaquin (SSJ) GSA, comprised of 64,000 acres with participating entities including SSJID and the City of Escalon, and has identified as a Project that will reduce Escalon's groundwater demand. Since the Project is an in-lieu recharge, using renewable surface water supplies instead of groundwater, reductions in groundwater demands are anticipated to be 2,015 AF per year. Benefits are expected to accrue for 50 years, through 2073.

ESJGWA Integrated Regional Water Management Plan (IRWMP)

The ESJGWA IRWMP is designed to protect and improve water quality and supplies by identifying feasible agricultural and urban water use efficiency strategies, considering the drinking water quality of communities within the plan area, and recognizing significant threats to groundwater resources from over-drafting. To achieve these objectives, the IRWMP includes a comprehensive, prioritized menu of projects and actions that align with the mission of the Greater San Joaquin County Regional Water Coordinating Committee (GSJCRWCC) and support the ESJGWA. The GSJCRWCC aims to ensure the long-term sustainability of water resources in the San Joaquin Region by implementing projects and programs that mitigate and prevent the impacts of long-term groundwater supply-demand imbalances.

The Project is consistent with regional long-term sustainability plans, as it will provide surface water to the City and address potential supply-demand imbalances resulting from Escalon's current reliance on groundwater and water wells for drinking water supplies.

SSJID Urban Water Management Plan

Due to a lack of available infrastructure, the City of Escalon does not receive potable water from SSJID's SCSWSP. Currently, the City of Escalon's allotment is transferred and sold to the City of Tracy temporarily. As a result, SSJID's Urban Water Master Plan has set a goal to terminate the transfer of potable water from Tracy to Escalon by 2025. This goal will be achieved through implementation of the Project's proposed potable pipeline connection along with the proposed water main, FCF, BPS, and storage tank.

City of Escalon Water Master Plan and CIP

The City of Escalon's Water Master Plan analyzes data on water use, supplies, and sources to establish a long-term vision for water management. The Water Master Plan is a tool used by the City of Escalon to systematically plan and

budget infrastructure maintenance and improvements that are needed to adequately deliver water service to the City's existing consumer base as well as support future growth anticipated under the approved general plan. One of the objectives of the 2007 Water Master Plan, includes the "integration of surface water from the SSJID SCSWSP into the City's water system." Through SSJID's SCSWSP, the City was initially slated to take 2,015 acre-feet of potable water upon the competition of Phase I, then 2,799 acre-feet upon the competition of Phase II (Escalon Water Master Plan 2007). However, the City deferred delivery of surface water until Phase II, where they have planned to develop a transmission pipeline, storage tank, and BPS to adequately convey water resources to City Limits.

The Water Master Plan is used to develop the City's CIP which prioritizes funding infrastructure improvements within specific timeframes so that needed infrastructure is available to support population and land use within the City. The SSJID SCSWSP was included in the City of Escalon's 2019 – 2020 CIP with the intent to complete the City of Escalon's connection with SSJID SCSWSP by constructing the following Project Components:

- Tie in at the SSJID transmission main in Dodds Road.
- Approximately 19,500 LF (3.4 miles) of 18-inch diameter PVC pipe
- A FCF, approximately 50-feet by 70-feet within APN 207-190-06.
- A BPS and 0.10 MG underground potable water storage tank (WST).

Environmental Setting

The Project is within the San Joaquin Valley Region, nestled between the Sierra Nevada foothills in the east and Diablo Range in the west. San Joaquin Valley is generally characterized by topography that is gently sloping in a southwesterly direction and containing important infrastructure and water resources which support local agriculture and urban uses throughout California. In southeast San Joaquin County, where the Project is located, the San Joaquin River and the San Joaquin River Watershed relate to significant groundwater reserves and natural surface waters which are tributary to the Sacramento-San Joaquin Delta to the north. The numerous aquifers, manmade reservoirs and aquifers, lakes, rivers, and tributaries within the County are essential to agriculture within San Joaquin Valley as well as urban land use throughout the state.

The County's climate generally consists of "hot, dry summers and foggy, rainy winters" with temperatures reaching over 90° degrees Fahrenheit (°F) during summers and temperatures above 35°F in the winter (CA Climate Adaption Strategy 2022). Annual rainfall within the San Joaquin Valley region averages about 12.2 inches in the wet season, which occurs between October to May (SSJID UWQMP 2020). The County's climate and gently sloping terrain make the region perfect for agriculture, approximately 75 percent (681,212 acres) of the County's land use is designated for agricultural purposes (San Joaquin County GP EIR 2035). The County's agricultural lands contain rich soils from sediment left behind by major rivers flowing from the Delta in the north and draining into the San Joaquin Valley. However, 88% of annual precipitation is confined to the wet season; therefore, significant amounts of irrigation are required for agriculture and urban use during the dry season (summer months) within the County.

Urban development within the County is minimal compared to the amount of farmland; however, increased urban development has been induced by growth pressures from the San Francisco Bay Area. As a result, cities within the County have undergone tremendous growth through the annexation of land for development, emerging 7 cities and 12 planning areas. The City of Escalon is one of the cities within the County experiencing these increased growth pressures (San Joaquin County GP 2035).

Project Location

The Project is in northern San Joaquin Valley, within southeastern San Joaquin County. The Project is approximately 6.4 miles west of Woodward Reservoir Regional Park and approximately 4 miles north of downtown Escalon (**Figure 1: Regional Location Map**). The closest cities to the Project are Oakdale (approximately 8.5 miles southeast), Riverbank (approximately 11 miles south), and Modesto (approximately 9.4 miles south). The Project extends between Dodds Road and the northern City Limits for the City of Escalon, within the OID and SSJID service area boundaries and will be constructed in unincorporated San Joaquin County.

The Project will be implemented within or adjacent to the paved public right-of-way (Figure 2. Local Vicinity Map). On the north end, the Project begins on Dodds Road (approximately 75-feet west of the Escalon-Bellota Road/Dodds Road intersection at Latitude 37.856611 °N/Longitude -120.998710°W), within the OID service area, in the unincorporated San Joaquin County. At Dodds Road, an existing SSJID 48" transmission main runs east to west and will serve as a point of connection for the City of Escalon with the SSJID system (See Figure 2A: Northern Project Alignment Local Vicinity Map). The Project will install a tee connection with the SSJID 48" Transmission main and extend the water main to the south.

The FCF will be constructed directly southwest of the Dodds Road and Escalon-Bellota Road intersection within a portion of the Assessor's Parcel Number (APN) 207-190-06. The FCF will contain a flow meter vault, electrical panel, propane generator, communication equipment, and valve vault. The following components of the FCF are proposed within a 50-foot by 70-foot (3,500 sq ft.) fenced area. The FCF borders the western perimeter of Escalon-Bellota Road and contains gated driveway access via Escalon-Bellota Road. APN 207-190-06 and adjacent land uses are currently designated for agriculture under the County's General Plan. Agricultural ancillaries and single-family developments are located approximately 50 feet south, southwest, and west of the proposed FCF. The FCF is approximately 3.3 miles north of Escalon City Limits and at approximately 108 feet above mean sea level (AMSL).

The Project will install a water main going south along Escalon-Bellota Road for approximately 3.4 miles until reaching 17407 Escalon-Bellota Road, a parking lot adjacent to the north of the Escalon City Limits (Figure 2B. Proposed Booster Pump Station Local Vicinity Map). The Project terminates in an existing gravel-lined overflow parking lot designated as Semi Agricultural and Incidental to Agriculture under the County's General Plan (Figure 4. San Joaquin County Land Use Map); this parcel is zoned for Agricultural Urban Reserve (AU) according to the County Zoning Code and is owned by the City of Escalon (Figure 5. San Joaquin County Zoning Map). The AU Zone is intended to retain agriculture within areas planned for future urban development to ensure compact and orderly growth within City Limits. Allowable uses within AU Zones include "compatible public, quasi-public, and special uses (e.g. parks)" (San Joaquin County GP EIR, 2016). At this location, the City of Escalon has approved plans for phased expansion of the Hogan-Ennis Community Park with a skate park at this location (See Figure 6: Master Plan of Hogan-Ennis Community Park). The parking lot is located approximately one-half mile north of downtown Escalon within the northwestern portion of the City's SOI; and within the City's Planning Area (Figure 4A: City of Escalon General Plan Boundaries Map; Figure 5A: City of Escalon Zoning Map). The proposed storage tank and BPS are proposed in the southeastern corner of the parking lot, along the western perimeter of Escalon-Bellota Road (See Figure 2B: Proposed Booster Pump Station Local Vicinity Map). This component of the Project is approximately 118 feet AMSL within an area that gently slopes toward the south.

While some of the Project Components are proposed within OID, the Project will serve SSJID's service area and provide overall reliability to SSJID's consumers. Most of the Project is within the SSJID service area and has been planned by SSJID and the City of Escalon in cooperation with the OID.

Local Vicinity

The area surrounding the Project is referred to as the Local Vicinity and includes primarily residential, open space, and agricultural land uses. Local streams, stemming from the Delta, flow within the Local Vicinity of the Project. Lone Tree Creek is a prominent stream running through the Local Vicinity, which traverses the Project at Escalon- Bellota Road. The Project will be constructed within the paved street and public right-of-way for Dodd Road and Escalon- Bellota Avenue utilizing open trenching. Jack and bore construction will be implemented under Lone Tree Creek and where existing underground utilities need to be protected in place along Escalon- Bellota Road. At the Lone Tree Road and Escalon-Bellota Road intersection, existing utilities including high-tension power lines, manholes, sewer lines, and storm drains are present. The tank and BPS will be installed in the southeastern corner of an existing parking lot that is located northeast of the existing boundary of Hogan Ennis Community Park. The location of the proposed FCF is surrounded by residential land use northeast, east, and southeast. Agriculture as well as existing and planned Open space parkland surround the BPS and tank. This includes existing Hogan-Ennis Community Park facilities that is approximately 100 feet southwest and Dinosaur Park is approximately 250 feet of the proposed BPS and wet well site. Community commercial land use is located directly south of the BPS within City Limits. The existing parking lot is

currently utilized for sports field overflow parking and is proposed as the site for the BPS and wet well is utilized by the community commercial land uses south of the Project.

The Local Vicinity for the Project primarily consists of a north/south transportation grid that is the foundation for land subdivisions and semi-rural land use patterns. Local streams, stemming from the Delta, flow through the Local Vicinity in an east/west direction. Developed land use includes mainly agriculture and low-density residential with supporting low profile/low-intensity commercial and industrial businesses. A prominent stream running east/west through the Project alignment is Lone Tree Creek which is approximately 7.4 miles from Farmington via Escalon- Bellota Road. Project implementation will require jack and bore construction under Lone Tree Creek and existing utilities. At the Lone Tree Road and Escalon-Bellota Road intersection, existing utilities including high-tension power lines, manholes, sewer lines, and storm drains are present. The tank and BPS will be installed in the southeastern corner of an existing developed parking lot.

Areas surrounding the transmission main that is proposed with the Project along Escalon-Bellota Road consist primarily of agricultural fields that plant various types of produce (i.e., Almond Orchards) and single-family residences (See *Table 2: Surrounding Adjacent Land Uses at Project Components* below; see **Figure 7: Photo Location Map; Figure 8-8A: Site Photos**).

TABLE 2: SURROUNDING ADJACENT LAND USES AT PROJECT COMPONENTS

	Land Use	General Plan	Zoning
Potable Pipeline Alignment			
Project Component	County and City right-of-way	---	---
North	Large-scale agriculture	General Agriculture (40 acres)	AG-40
South	Incorporated City of Escalon; Residential; Commercial	Low-Density Residential; Community Commercial	R-1; C2
East	Small-scale Agriculture	Limited Agriculture (10-acres)	AL-10
West	Large-scale agriculture	General Agriculture (40 acres)	AG-40
Tie-in Pit at SSJID 48-inch Transmission Line			
Project Component	County right-of-way	---	---
North, West	Large-scale agriculture	General Agriculture (40 acres)	AG-40
South, East	Large-scale agriculture; Small-scale agriculture	General Agriculture (40 acres); Limited Agriculture (10-acres)	AG-40; AL-10
FCF			
Project Component	Limited Agriculture; Private Property of APN 207-190-06	Limited Agriculture (10-acres)	AL-10
North, South	Large-scale agriculture; Small-scale agriculture	General Agriculture (40 acres); Limited Agriculture (10-acres)	AG-40; AL-10
East	Small-scale Agriculture	Limited Agriculture (10-acres)	AL-10
West	Large-scale agriculture	General Agriculture (40 acres)	AG-40
BPS, Subterranean Storage Tank, and Wet Well			
Project Component	Existing gravel-lined Parking Lot; Escalon SOI	Agriculture Urban Reserve	AU-20
North	Large-scale agriculture; Small-scale agriculture	General Agriculture (40 acres); Limited Agriculture (10-acres)	AG-40; AL-10
Northeast	Single-Family Residential; Escalon Dinosaur Park	Low-Density Residential; Open Space/ Park	R1; OS

East, Southeast	Commercial; Single Family Residential	Community Commercial; Low-Density Residential	C2; R1
South	Commercial	Community Commercial (Escalon Feed and Supply Store)	C2
Southwest	Hogan-Ennis Community Park	Open Space/Park	OS
West	Almond Orchard (Agriculture)	Agriculture Urban Reserve	AU-20

Hogan-Ennis Community Park

The site of the proposed BPS, storage tank, and wet well is on land owned by the City of Escalon and was originally planned for the future expansion of Hogan-Ennis Community Park. This improvement Project is part of the City's CIP. The City of Escalon has approved a plan to expand the park into parcels currently utilized for Agriculture, northeast and north of the existing park. The parcels were planned for future park development during Phase Two, in a location planned for a skate park see *Table 3: Hogan-Ennis Community Park CIP Phases*. These parcels currently contain vacant land from a recently removed almond orchard, other orchards, and ancillary agricultural structures, designated under the County's General Plan for Agricultural-Urban Reserve (AU).

Future park improvements are planned to be implemented in three phases. The phases are outlined in *Table 3: Hogan-Ennis Community Park CIP Phases* below.

TABLE 3: HOGAN-ENNIS COMMUNITY PARK CIP PHASES

Phase	Description
Phase One	**West Parking and Soccer Fields-** development of the west side of newly acquired acres with Soccer fields, Parking lot, horseshoe pits, basketball courts, restroom, playground equipment, and BBQ acres.
Phase Two	**East Parking and Baseball/ Softball Fields-** development east side of newly acquired acres with baseball/softball fields, concession stand, restrooms, announcer booth, parking lot with drop off area, and other amenities including benches, sports lighting, and batting cages.
Phase Three	**South Parking and Reconstruction of Softball Fields-** reconfigure the existing parking lot, add a lot, update current fields, install walkways, and update lighting, fencing, and other amenities.

Source: City of Escalon CIP 2018-2019 through 2020-2021.

Project Description

The City of Escalon's potable water distribution network is currently supplied by groundwater wells. The City's Sustainable Groundwater Management Plan indicates the City is in groundwater overdraft and needs to supplement well water with "surface" water to meet potable water demand and maintain water quality. Water quality is an issue in several of the City wells, especially during the summer months. The Project is proposed to create a more reliable water supply during the summer months for the City of Escalon and to provide a large long-term supply of high-quality water for land use allowed under the approved general plan. Project Components are summarized as follows (See *Table 4: Temporary and Permanent Project Components*):

- The Project will receive potable water from an existing SSJID 48-inch transmission main with a tee connection underground near the intersection of Escalon-Bellota Road and Dodds Road within OID service area, in unincorporated San Joaquin County (**Figure 2A: Northern Project Alignment Local Vicinity Map**).

- A pipeline extension of approximately 19,500 LF (3.4 miles) of 18-inch diameter PVC pipe within City and County right-of-way along the alignment to the gravel-lined overflow parking lot (See **Figure 2: Local Vicinity Map**). Construction of the potable water pipeline will require a total of 12 jacking pits and 12 receiving pits (12 separate locations). See *Table 4: Temporary and Permanent Project Components* for more information.

- A proposed SSJID FCF will be constructed within a 50-foot by 70-foot area and located within APN 207-190-06. The following parcel is located at the southwest corner of Dodds Road and Escalon-Bellota Road

intersection and borders the western perimeter of Escalon-Bellota Road. The FCF will include an above-grade value vault (20 feet x 10-feet), flow meter vault (10-feet x 10-feet), electrical panel (10-feet x 4-feet), propane generator (10-12 kW with an estimated 200-gallon fuel storage tank; 6-feet x 4-feet), communications equipment (including wall mount cellular antenna), and five removal bollards along the eastern perimeter of the location of the electrical equipment. The FCF will be enclosed by 220 LF of 6-foot-tall chain link fence with three (3) strands of barbed wire within a 50-foot by 70-foot area (approximately 3,500 total sq. ft). The components of the FCF will be above-ground and underlain with gravel. See **Figure 9: Flow Control Facility Site Plan**.

Equipment contained within the FCF will control the potable water flow to the rate requested by the City, flow rates will be continuous and maintained at a minimum pressure with the SSJID's transmission main. Additional on-site improvements consist of site security, SCADA, paving, gated access (12-foot swing gate), installation of a new 12-foot storm drainpipe approximately 56 LF, and rerouting of a new irrigation ditch leading to a 12" irrigation pipe with headwall. Access to the facility will be available from Escalon-Bellota Road, via a gated gravel driveway with a 16-foot metal frame swing gate. Both the pump station and FCF will have similar appurtenances.

- A City-owned BPS and 0.10 MG underground potable water storage tank at the existing parking lot between Libby Drive and Escalon Bellota Road intersection and Miller Avenue and Escalon-Bellota Road intersection and will include site security, emergency generator, SCADA, paving and surface drainage (**Figure 2B: Proposed Booster Pump Station Local Vicinity Map**). The tank will have a standpipe that will allow overflow from the tank. The overflow will be conveyed to a storm drain located along Escalon-Bellota Road, to the east of the tank location. The BPS will be constructed within a 64-foot by 100-foot area enclosed with a 6-foot-high chain link fence with three (3) strand barbed wire containing the pump station (30-ft by 30-ft), 125-kW diesel generator, and CMU block electrical room. In addition, the BPS will store four pumps; two will be running 24/7 during the Project's long-term operation and two pumps will be on standby for the highest flow requirement (3 of 875 gpm (50 HP), 162 ft pumps; 1 of 450 gpm (25 HP), 162 ft pump). For long-term operation, the BPS will be equipped with a 125-kW diesel emergency standby generator with a 655-gallon fuel storage tank.

  Two four (4) foot wide concrete valley gutters with 1 percent grade east are proposed parallel to the northern and southern perimeter of the pump station. At the eastern terminus of each concrete gutter, access to the facility is available from Escalon-Bellota Road, via two (2) 10-foot swing gates. Reference **Figure 9A: Proposed Booster Pump Station Site Plan** and **Figure 10: Project Component Elevations**.

  The storage tank and BPS will be located north of downtown Escalon, in the southeastern corner of an existing parking lot north of City Limits; it will have a finished grade elevation of approximately 121 feet AMSL. The proposed SSJID discharge will tie into the existing City distribution network along Escalon- Bellota Road through a 16" diameter pipe. The station will be controlled based on pressure consistent with that of the existing City wells. The BPS, storage tank, wet well, and FCF will include fencing around the perimeter enclosing the future 1MG storage tank, and 40-feet-8-inch x 26-feet-8-inch concrete masonry unit (CMU) pump station.

TABLE 4: TEMPORARY AND PERMANENT PROJECT COMPONENTS

Item No.	Proposed Structure	Location	Finished Area/ Permanent Footprint	Area of Temporary Disturbance
Temporary Structures				
1	Tie in Pit at SSJID 48-inch Transmission Line	unincorporated County	Will be returned to pre-Project conditions in the County's right-of-way.	15-foot wide square by 8-feet deep
2	Jack and Bore Construction under Lone Tree Creek (1	unincorporated County	Part of pipeline construction activities.	20-feet by 45-feet

	jacking pit & 1 receiving pit)			
3	Jack and Bore Construction within paved City & County ROW (**11 jacking pits** & **11 receiving pits**)	unincorporated County	Part of pipeline construction activities.	**Jacking Pit**: 20 feet x 35 feet x 13 feet **Receiving Pit**: 20 feet x 10 feet x 13 feet
Permanent Structures				
4	Potable Pipeline Alignment	unincorporated County; Escalon SOI	**Length**: 19,500 LF (3.4 miles) **Depth**: 6-feet	**Trench excavation**: 4-feet wide by 6-feet deep for 19,500 LF (3.4 miles)
5	FCF	unincorporated County; Escalon SOI	**Value Vault:** 20 feet x 10 feet **Flow Meter**: 10 feet x 10 feet **Electric Panel:** 10 feet x 4 feet **Propane Generator**: 6 feet x 4 feet **Communication Equipment:** 10 feet x 10 feet **Total FCF Footprint**: 50-feet x 70-feet	**Work Truck Staging Location**: 50 feet x 25 feet
6	BPS	unincorporated County; Escalon SOI	**Height**: approximately 14-ft **Pumps:** 4 total (two running 24/7; two backup pumps) **CMU Electrical Room** **Water Vault:** 30-ft by 30-ft by 15-ft **Total BPS Footprint:** 64-ft by 100 ft	Construction staging will occur within the paved, overflow parking lot.
7	Underground Storage Tank	unincorporated County; Escalon SOI	**Capacity**: 10,000-gallon tank	
8	Wet Well	unincorporated County; Escalon SOI	N/A	

Plans for the Project indicate the installation of the following ancillary equipment to support and primary functions and permanent structures above:

Project Component	Above- or Below Grade	Equipment
FCF	Below-Grade	**Flow Meter and Control Valve Vaults**, cast-in-place vaults.
	Below-Grade	**10-inch Flow Meter**
	Below-Grade	**10-inch Flow Control Valve**
	Below-Grade	**Pressure Transmitters**
	Above-Grade	**Site Security**: Cameras, fence with barbed wire
	Above-Grade	**Gate**
	Above-Grade	**Radio Transmitter** (20-foot-high lattice tower)
	Above-Grade	**10 kW propane generator**
	Below-Grade	**Check Valve**
	Above-Grade (ground-level)	**Irrigation Ditch Reroute Culvert**
	Above-Grade	**Water Quality Sampling Facility**
	Above-Grade	**Electrical Equipment**

BPS	Above-Grade	**Overflow pipe** coming off the top of the BPS to allow overflow water to flow to the nearby storm drain with an air gap.
	Above-grade	**Pumps**: 4 total with three 825gpm and one 450gpm. Large pumps operate in a 2+1 setup. i. Discharge check valves ii. Pressure relief line and valve iii. Discharge isolation valves
	Below-Grade	**Wet well Tank**: 0.1 MG capacity
	Above-Grade	**Prefabricated Electrical Building**
	Above-Grade	**Chlorine sampling point and analyzer**
	Above-Grade	**Flowmeter**: Magmeter
	Above-Grade	**Level Elements for sensing level in wet well**: 2 redundant ultrasound level elements
	Above-grade	**Security**: Fence with barbed wire, manual gate

Project Objectives

The City of Escalon's potable water distribution network is currently supplied by groundwater wells and the Project will supplement the City of Escalon's well water to consistently meet water quality standards and demand documented by the City's water use data as well as anticipated future demand identified in the City's approved General Plan. To meet future demands, the City's Sustainable Groundwater Management Plan indicates the City is in groundwater overdraft and needs to supplement well water with "surface" water to meet future projected demand.

The Project will supplement the City's current potable well water with surface water provided by SSJID. The Project will provide the City with infrastructure for treated potable water storage with constant turnover of a small storage basin with pumps that operate on VFDs. The Project is proposed to be operated and maintained in a manner that is consistent with the City's existing potable water system operations and maintenance and will be aligned with approved regional plans concerning water treatment, distribution, and use.

The intended outcome of the Project is to implement the following objectives of the City's Water Master Plan:

- Construct a turnout that is consistent with the approved SCSWSP, which was analyzed for CEQA compliance under (SCH #98022018)

- Accommodate storage for additional surface water from SSJID up to allotted quantities established under existing agreements, with constant turnover of a small storage basin via pumps that operate on variable frequency drives (VFDs).

- Accomplish the following objectives outlined within the City's Water Master Plan:
    - Integration of surface water from the SSJID SCSWSP into the City's water system.
    - Identification of water infrastructure meeting the goals and objectives of the General Plan including supply, storage, pumping, and distribution facilities.

Project Construction

Construction Activities

Project construction is anticipated to begin in October 2026 and conclude in February 2028, lasting for a year and 4 months. Construction activities will occur between 7:30 AM and 4:30 PM, Monday through Friday; weekend work will be avoided when feasible, however, weekend or night work might occur to accommodate traffic. It is anticipated that the Project contractor will simultaneously construct the Project in two locations: the pipeline up to the connection with SSJID and the existing parking lot, and Project Components including the FCF, BPS, storage tank, and wet well.

Interconnection to existing pipelines and testing will be the last construction tasks for the Project; the tee connection with SSJID 48-inch transmission main, located at the north end of the pipeline alignment at Dodds Road and Escalon-Bellota Road intersection will be the last component constructed for the Project. The installation rate of the potable water pipeline is expected to average 100 feet per day.

Construction activities will involve approximately six to eight crew members at any one time at each of the two locations, resulting in a total of 16 people on the job. Crew members will arrive at the construction site utilizing personal vehicles, approximately 16 vehicles at any one time, accessing the construction site via local roadways (Dodds Road, Escalon-Bellota Road, Mariposa Road) or regional transportation routes (State Route (SR) 120). Personal vehicles will be parked along the County or City right-of-way, adjacent to the Project alignment, or in a designated laydown yard between Dodds Road and Escalon-Bellota intersection and the proposed location of the BPS, storage tank, and wet well site. The Project is anticipated to result in approximately 99,600 sq. ft.[1] of temporary disturbances during Project construction and will include approximately 3,348 cubic yards (CY) of export and 4,680 CY of import. Temporary fencing will be constructed around each work area to control access and for safety and security overnight and will be closed, concluding daily construction activities. Active construction within the paved right-of-way will either be backfilled or covered with trench plates by the end of each workday. Water for construction and potable water during construction activities will be supplied by the City of Escalon Municipal Water System.

Construction Equipment

During Project implementation, construction activities will utilize various diesel-powered equipment along various locations of the Project alignment for the duration of Project construction. Potential equipment on-site during construction include up to two (2) scrapers, seven (7) tractors/loaders/backhoes, six (6) off-highway trucks, seven (7) material handling equipment, seven (7) skid steer loaders/track loaders, four (4) excavators, five (5) general construction equipment, and one (1) rubber-tired dozer for the demolition and earthwork. Up to eight (8) tractor/loaders/backhoes, three (3) off-highway trucks, five (5) material handling equipment, four (4) forklifts, four (4) pumps, one (1) excavator, three (3) skid steer loaders/track loaders, 2 concrete trucks, one (1) concrete pump truck, one (1) general construction equipment, and one (1) crane will be utilized for installation of the pipeline, including cut-in, and installation of pipe, piping valves, tank construction, pumps, and valves. Up to 9 tractors/loaders/backhoes, six (6) off-highway trucks, 6 plate compactors, two (2) paving equipment, four (4) skid steer loaders/track loaders, two (2) concrete trucks, and two (2) general pieces of construction equipment will be utilized for backfill/resurfacing/fencing/restoration of all areas disturbed during construction; and two (2) off-highway trucks, two (2) other construction equipment, and two (2) striping machines will be utilized for striping of all restored areas.

Staging

Staging areas will be located inside existing County and City right-of-way adjacent to various locations of the 3.4-mile Project alignment. These staging locations will depend on the portion of the alignment under construction. Staging will also be located at the existing parking lot for the construction of the BPS, storage tank, and wet well.

In addition, staging will be located near the Dodds and Escalon-Bellota intersection during the construction of the tee connection with the SSJID 48-inch transmission main.

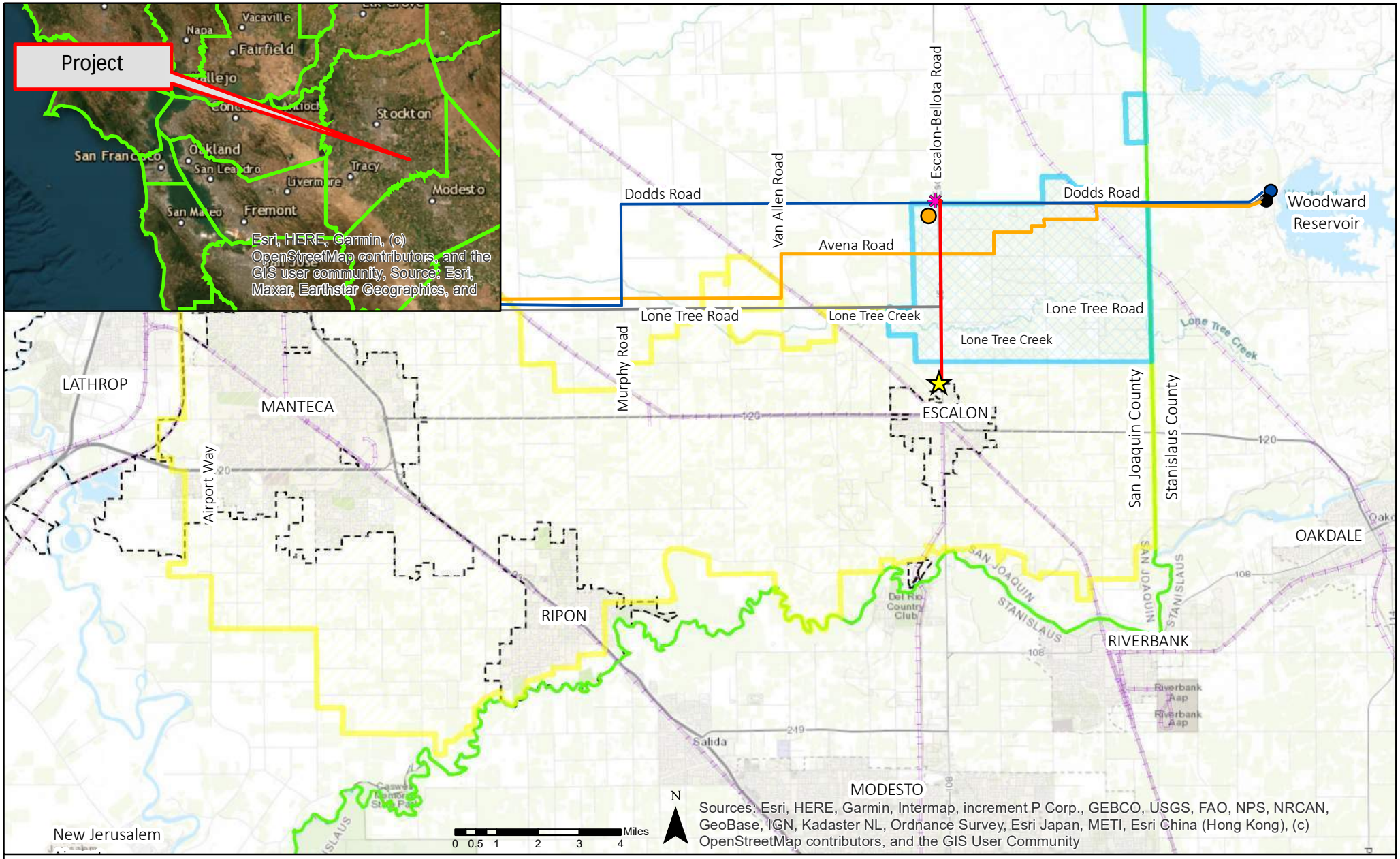
Schedule and Phasing

The Project will not be phased. However, the Project contractor may simultaneously construct the Project in two locations along the Project alignment.

[1] Total disturbance area estimated based on 19,500 LF of pipeline with trench 6 ft deep x 4 ft wide (19,500 x 4 ft = ~78,000 sf disturbance area); 13 jacking pits at 20x35x13ft = 700sf x 13 = ~9,100 sf and 13 receiving pits at 20x10x13ft = 200sf x 13 = ~2,600 sf for jack and bore; FCF is ~50x70 ft (~3,500 sf disturbance area); and BPS is ~64x100 ft (~6,400 sf disturbance area). Therefore, total disturbance area of ~99,600 sf.

Long-Term Operations and Maintenance

The proposed Project Components are anticipated to be operational for 50 or more years upon initial construction. Existing City Staff will operate the FCF, BPS, Storage Tank, and wet well, which will facilitate potable water deliveries to Escalon residents and businesses. The City of Escalon does not anticipate additional staffing needs for the long-term operation and maintenance of the proposed Project-related facilities. However, daily worker trips are anticipated to conduct routine inspections and ensure proper long-term maintenance.



Legend

- Railroads
- Limited Access
- Highway
- County Line
- City Limits
- Proposed Flow Control Facility
- Tie in Connection with SSJID 48-inch Transmission Main
- Propsoed Project Alignment
- Proposed BPS Site
- Dedicated right-of-way Alignment (Not Installed)
- Dodds Road Alignment (Installed)
- Lone Tree Road Alignment (Part of proposed Project)
- Water Treatment Plant Site
- Raw Water Intake
- OID
- SSJID

City of Escalon

City of Escalon Connection to Nick DeGroot Water Treatment Plant

Figure 1. Regional Location Map

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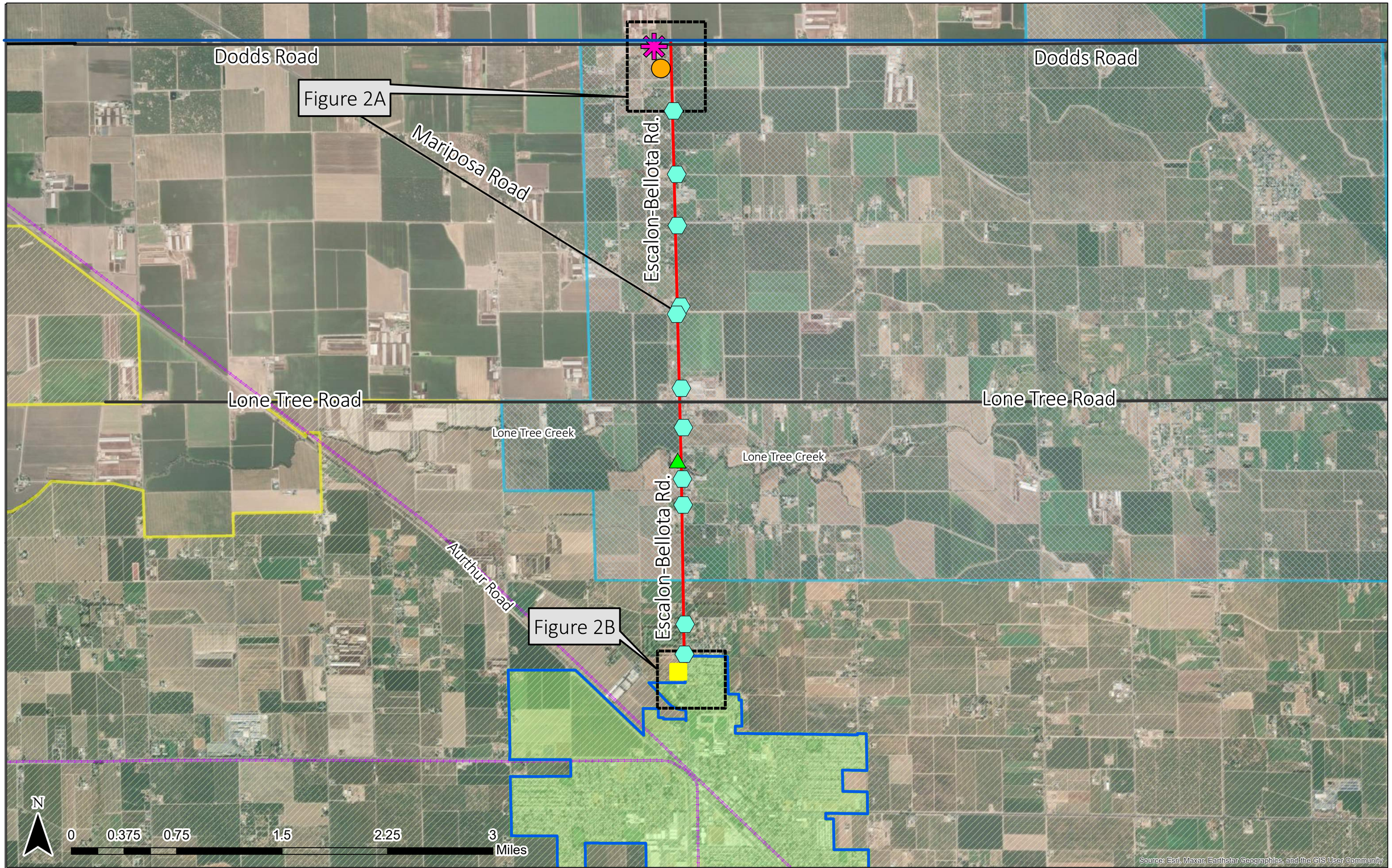


Legend

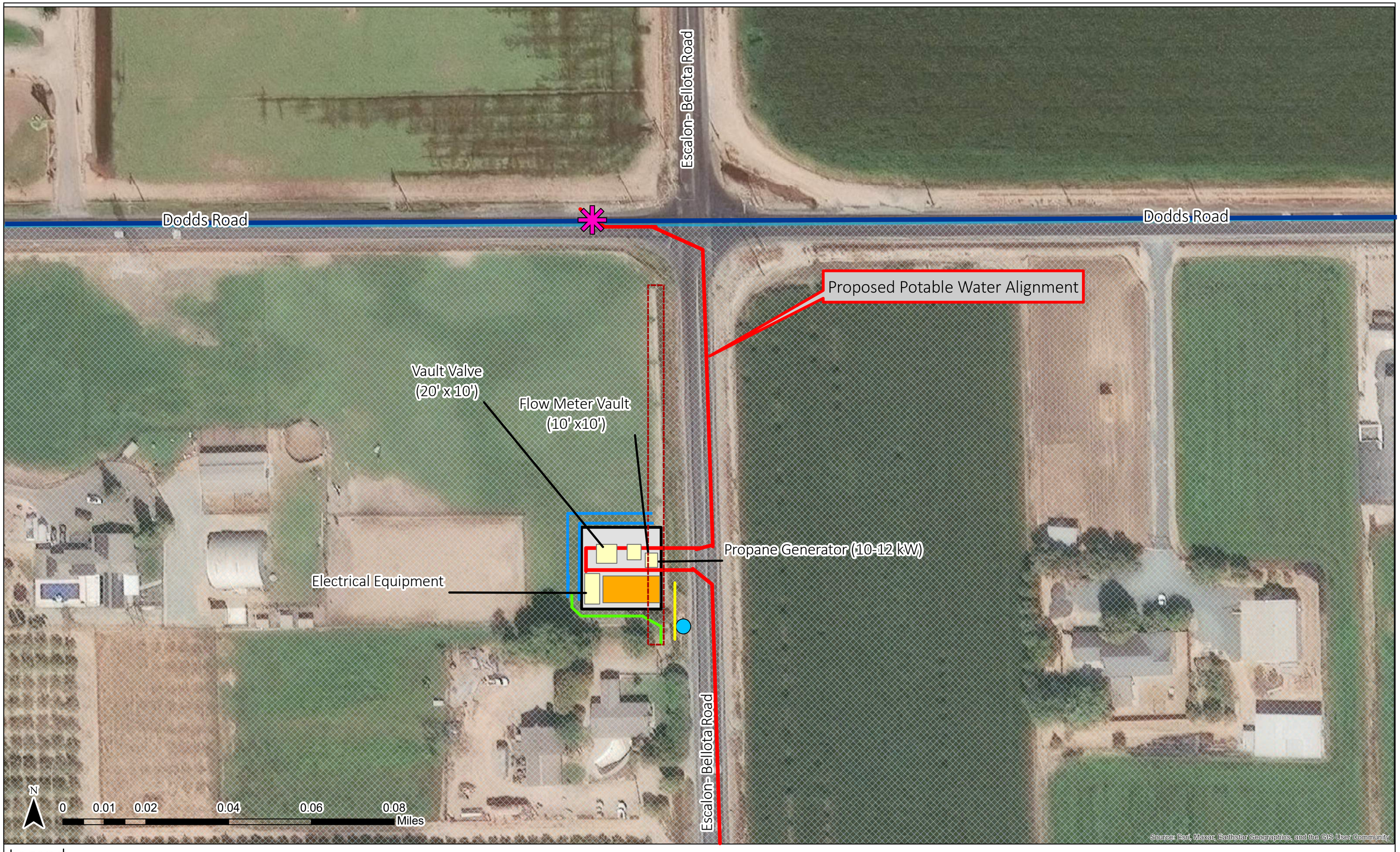
- U.S. Railroad Tracks
- City Limits
- Local Roadways
- Proposed Potable Water Alignment
- Local Vicinity Maps of Project Components (Figure 2A through 2B)
- Proposed Flow Control Facility
- Oakdale Irrigation District (OID)
- South San Joaquin Irrigation District (SSJID)
- Proposed BPS Site, Storage Tank, and Wet Well
- Connection to SSJID 48'' Transmission Line
- SSJID 48'' Transmission Line
- Lone Tree Creek Crossing (Jack and Bore Construction)
- Jack and Bore Construction

City of Escalon

City of Escalon Connection to Nick DeGroot Water Treatment Plant Project

Figure 2. Local Vicinity Map

ARDURRA



Legend

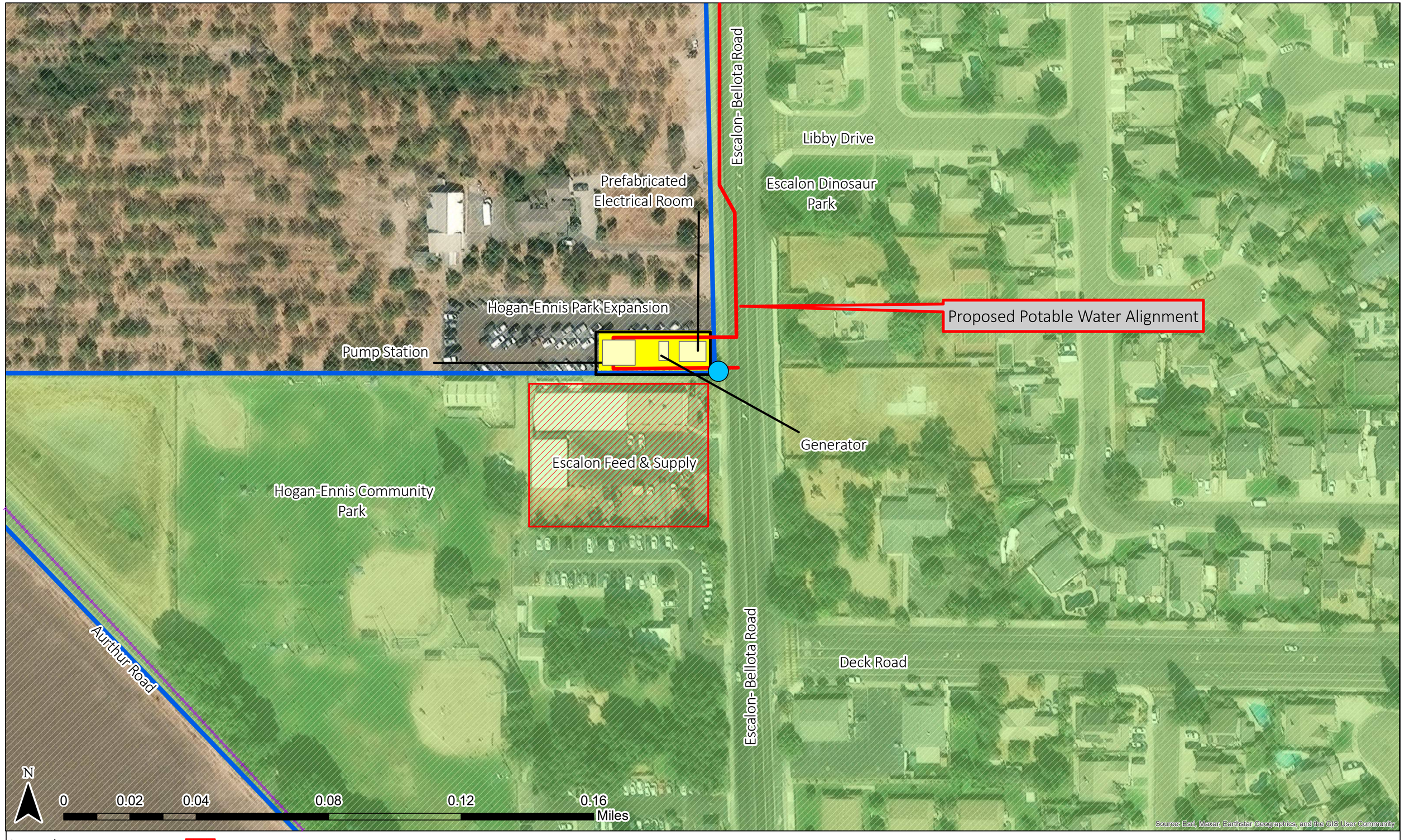
- Proposed Potable Water Alignment
- Flow Control Facility
- Tee Connection with SSJID 48" Transmission Main
- Storm Drain
- SSJID 48" Transmission Main
- Oakdale Irrigation District
- Flow Control Facility Components
- Work Truck Staging Location (25' x 50')
- 12" Irrigation Pipe
- Driveway access
- Existing Irrigation Ditch
- New Irrigation Ditch

City of Escalon

City of Escalon Connection to Nick DeGroot Water Treatment Plant

Figure 2A: Northern Project Alignment Local Vicinity Map

ARDURRA



Legend

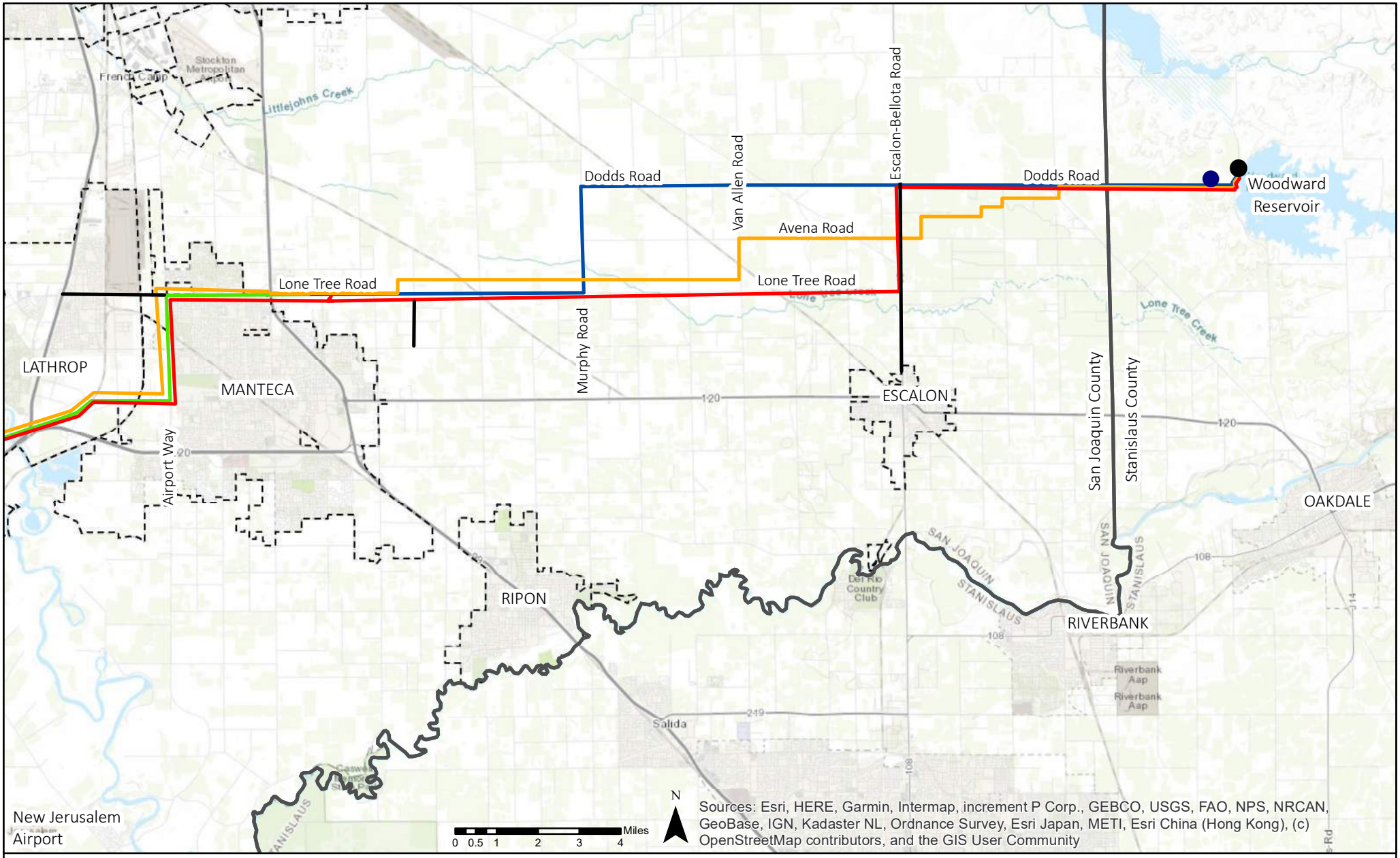
- City Limits
- Access to BPS
- Railroad Tracks
- Proposed Potable Water Alignment
- Proposed BPS Site
- Fence Line
- South San Joaquin Irrigation District (SSJID)
- City of Escalon
- Community Commercial
- Components of BPS

City of Escalon

City of Escalon Connection to Nick DeGroot Water Treatment Plant

Figure 2B. Proposed Booster Pump Station Local Vicinity Map

ARDURRA



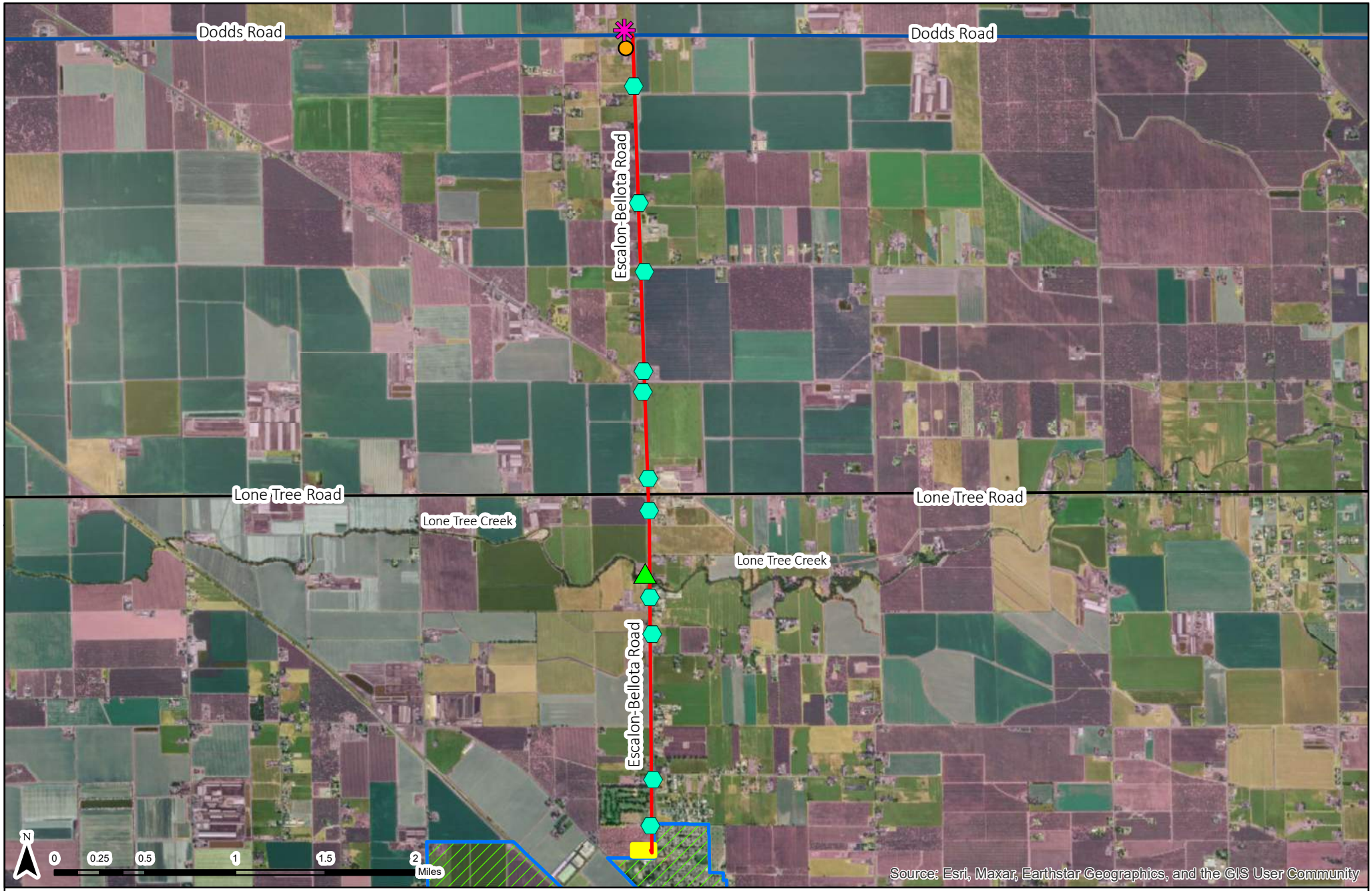
Legend

- City Connection
- Lone Tree Road Alignment (Part of proposed Project)
- Water Treatment Plant Site
- Raw Water Intake
- Limited Access
- Highway
- County Line
- City Limits
- Dedicated right-of-way Alignment (Not Installed)
- Dodds Road Alignment (Installed)

City of Escalon
City of Escalon Connection to Nick DeGroot Water Treatment Plant

Figure 3. South County Surface Water Supply Preferred Pipeline Alternative Alignments

ARDURRA



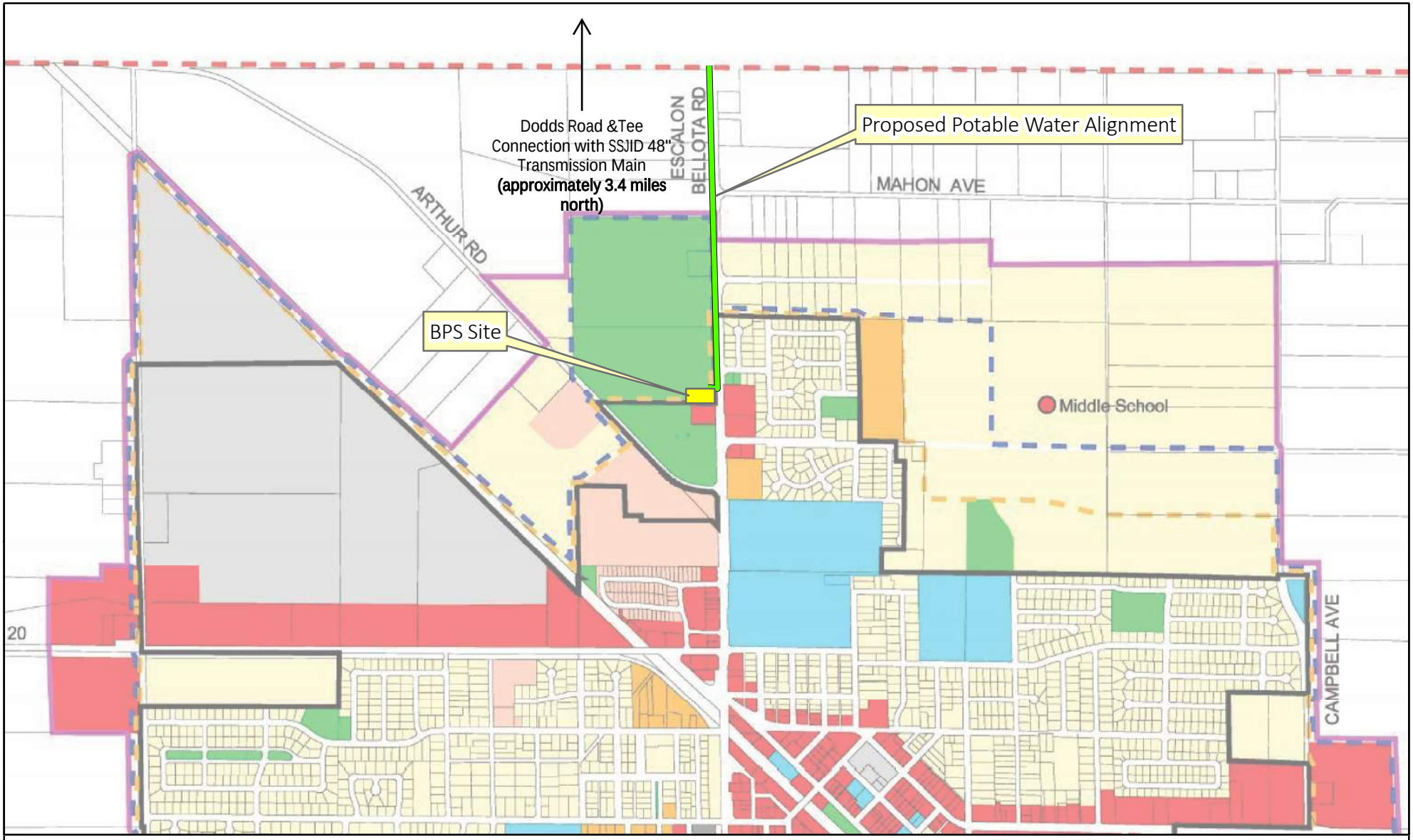
Legend

- City of Escalon
- R | RICE
- P | PASTURE
- G | GRAIN AND HAY CROP
- T | TRUCK NURSERY AND BERRY CROPS
- F | FIELD CROPS
- D | DECIDUOUS FRUITS AND NUTS
- Proposed BPS Site
- Proposed Flow Control Facility
- V | VINEYARD
- I | IDLE
- NB | NATIVE BARREN
- NV | NATIVE VEGETATION
- NW | NATIVE WATER
- S | SEMIAGRICULTURAL AND INCIDENTAL TO AGRICULTURE
- Connection to SSJID 48" Transmission Line
- Proposed Potable Water Alignment
- SSJID 48" Transmission Line
- Lone Tree Creek Crossing (Jack and Bore construction)
- Jack and Bore Construction
- City Limits

City of Escalon
City of Escalon Connection to Nick DeGroot Water Treatment Plant

Figure 4. San Joaquin County Land Use Map

ARDURRA



Legend

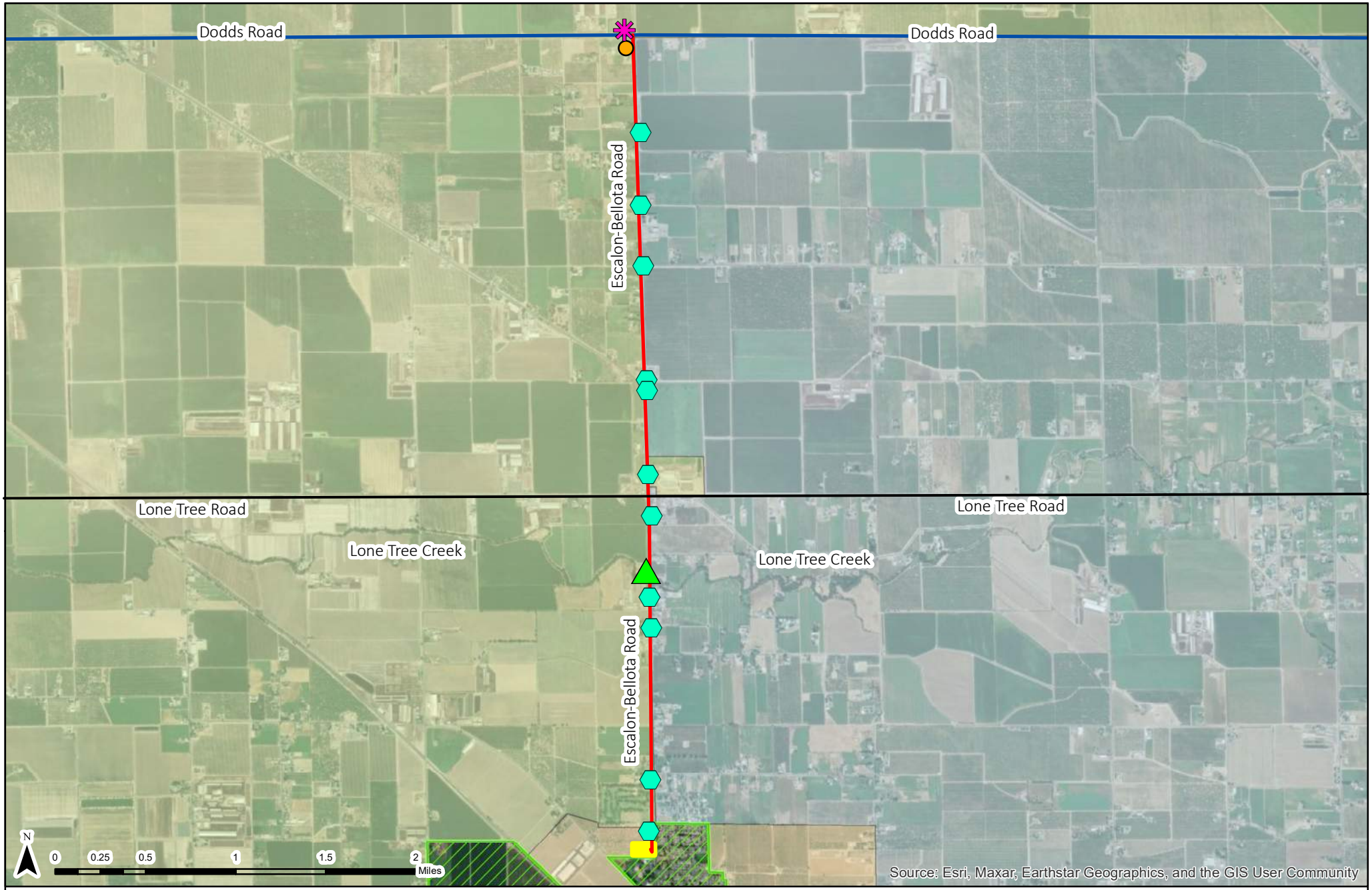
- Future School Site (Approx. Locations)
- City Limits
- Lot Lines
- Low-Density Residential
- Medium-Density Residential
- High-Density Residential
- Commerical
- Heavy Industrial
- Open Space/ Park
- Growth Boundaries: 2015, 2025, 2035
- Planning Area
- BPS Site
- Proposed Potable Water Alignment

Source: City of Escalon
Not to Scale

City of Escalon
City of Escalon Connection to Nick DeGroot Water Treatment Plant

Figure 4A. City of Escalon General Plan Boundaries Map

ARDURRA



Legend

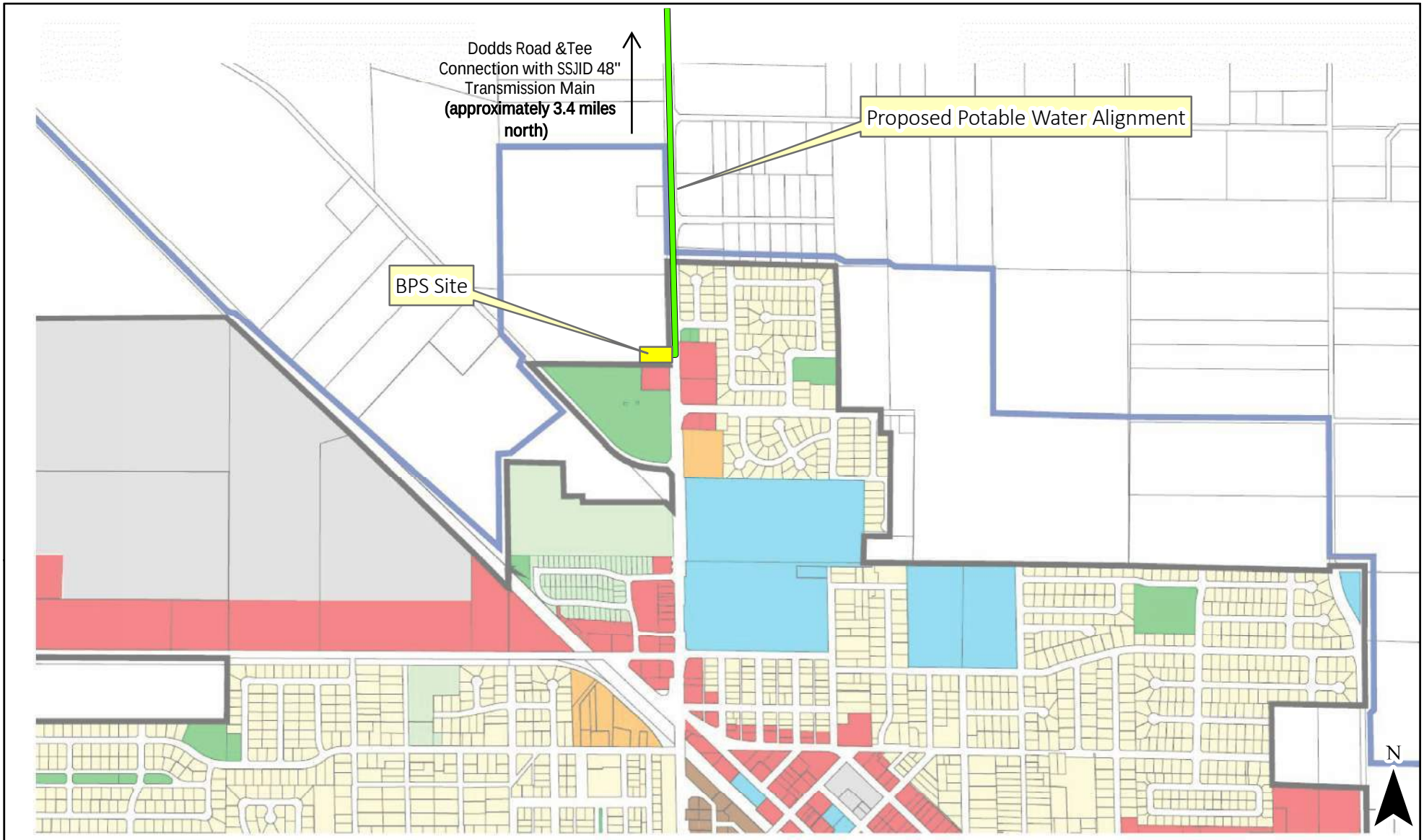
- Proposed Flow Control Facility
- Proposed BPS Site
- Proposed Potable Water Alignment
- Connection to SSJID 48" Transmission Line
- SSJID 48" Transmission Line
- Lone Tree Creek (Jack and Bore Construction)
- Jack and Bore Construction
- AU-20: Agriculture- Urban Reserve
- AG-20: General Agriculture (20 acres)
- AG-40: General Agriculture (40 acres)
- AL-10: Limited Agriculture (10 acres)
- City of Escalon

City of Escalon

City of Escalon Connection to Nick DeGroot Water Treatment Plant

Figure 5. San Joaquin County Zoning Map

ARDURRA



Legend

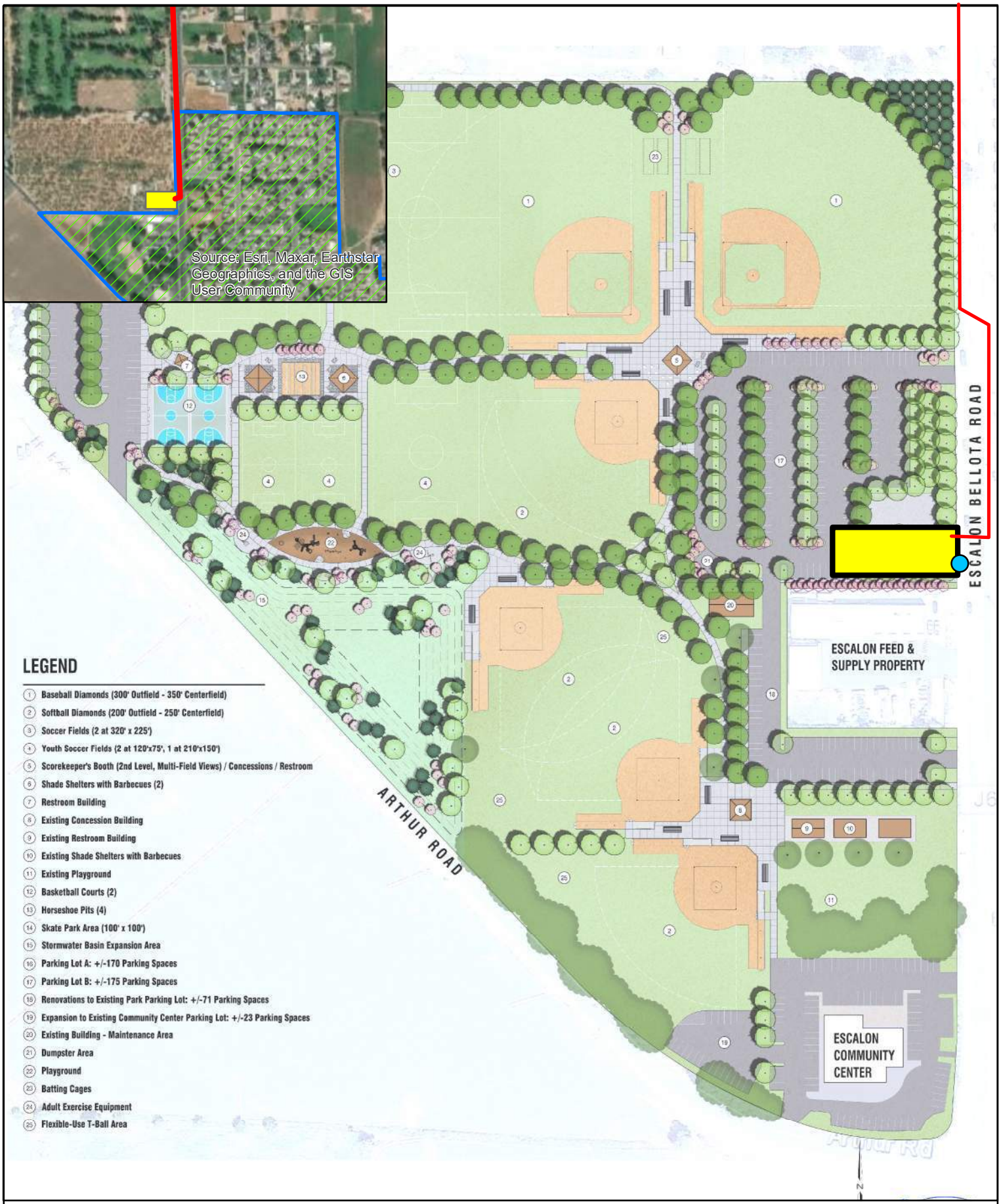
- Sphere of Influence
- City Limits
- (M-1) Light Industrial
- Lot Lines
- (R-1) Low-Density Residential
- (R-2) Medium-Density Residential
- (R-3) High-Density Residential
- (C-2) Community Commerical
- BPS Site
- (C-1) Neighborhood Commercial
- (CM) Commerical Manufacturing
- (M-2) Heavy Industrial
- (OS) Open Space/ Park
- (PF) Public Facility
- Proposed Potable Water Alignment

Source: City of Escalon
Not to Scale

City of Escalon
City of Escalon Connection to Nick DeGroot Water Treatment Plant

Figure 5A. City of Escalon Zoning Map

ARDURRA



Legend

- Proposed BPS Site
- Fence Line
- Proposed Potable Water Alignment
- Access to BPS
- City of Escalon
- City Limits

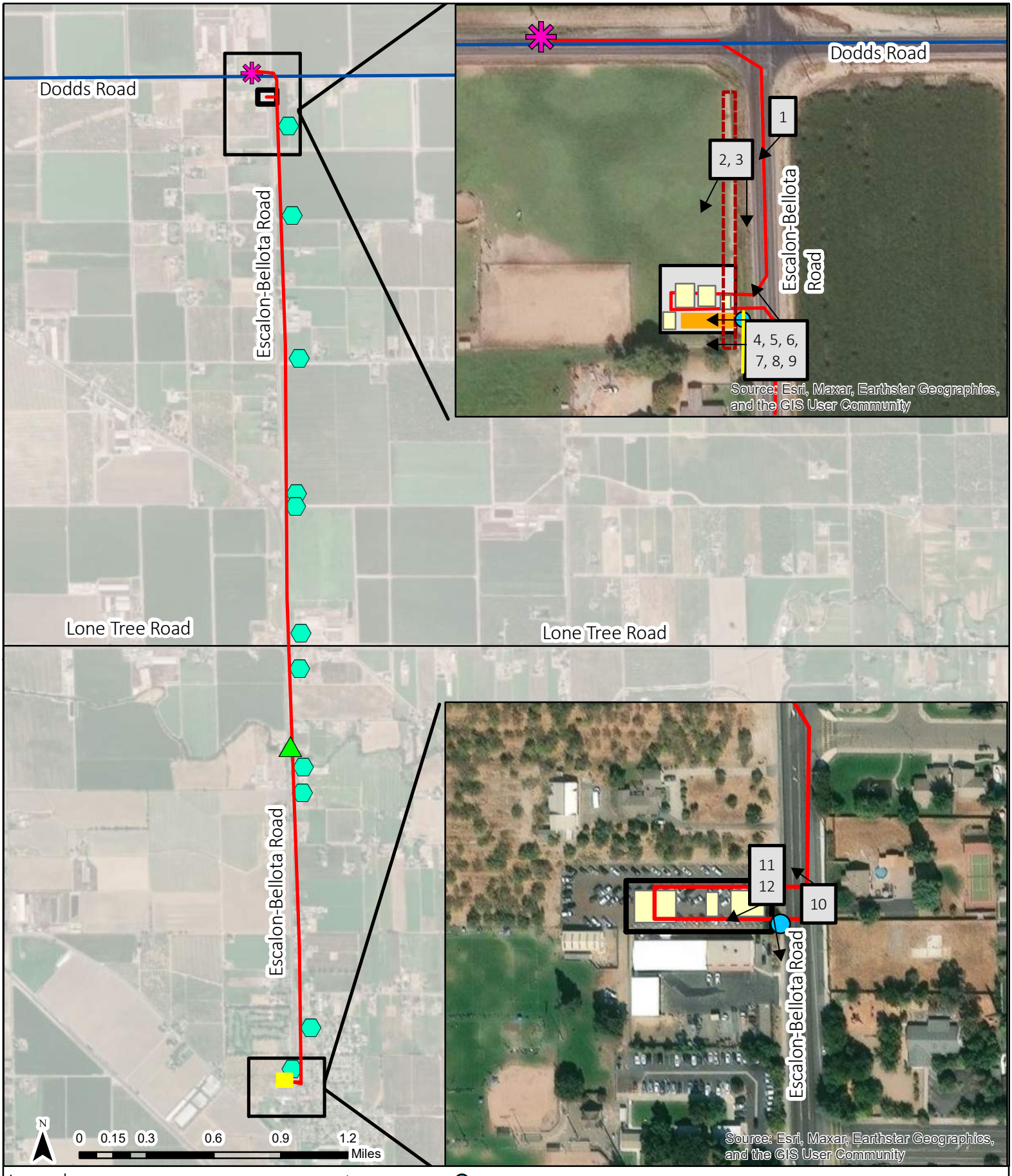
Source: O'Dell Engineering; City of Escalon (2015)

Not to Scale

City of Escalon
City of Escalon Connection to Nick DeGroot Water Treatment Plant

Figure 6. Master Plan of Hogan Ennis Community Park

ARDURRA



Legend

- Tee Connection with SSJID
- 48" Transmission Main
- Flow Control Facility
- Existing Irrigation Ditch
- FCF + BPS Components
- Proposed Potable Water Alignment
- Lone Tree Creek Crossing (Jack and Bore Construction)
- BPS
- SSJID 48" Transmission Line
- Jack and Bore Construction
- Driveway Access
- Storm Drain

City of Escalon

City of Escalon Connection to Nick DeGroot Water Treatment Plant

Figure 7. Photo Location Map

ARDURRA

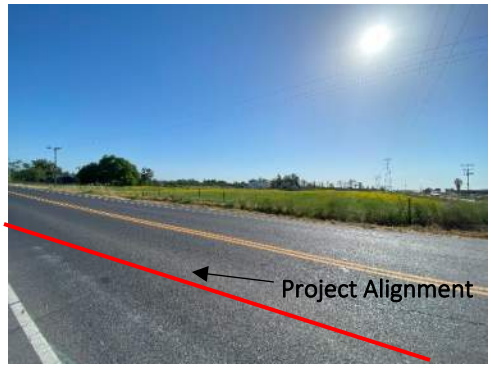


Photo 1: Looking Southwest at the proposed Flow Control Facility from the northbound lane of Escalon-Bellota Road.

Photo 2: Looking Southwest at the proposed Flow Control Facility from in the southbound lane of Escalon-Bellota Road.

Photo 3: Looking South from the western perimeter of Escalon-Bellota Road.

Photo 4: Looking West at the access gate to the proposed Flow Control Facility from the western perimeter of Escalon-Bellota Road.

Photo 5: Looking West at the southerly property line from the western perimeter of Escalon-Bellota Road.

Photo 6: Looking West at the proposed location of the FCF from the western perimeter of Escalon-Bellota Road.

Photo 7: Looking Northwest along the western perimeter of Escalon-Bellota Road towards the proposed location of the FCF.

Photo 8: Looking Northwest along the western perimeter of Escalon-Bellota Road towards the existing access gate.

Photo 9: Looking Northwest from the southeastern corner of the proposed FCF.

City of Escalon
City of Escalon Connection to Nick DeGroot Water Treatment Plant

Figure 8. Site Photos

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Photo 10: Looking West from the eastern perimeter of Escalon-Bellota Road towards the site for the proposed BPS.

Photo 11: Looking Southeast towards the City of Escalon from the proposed location of the BPS.

Photo 12: Looking South towards the City of Escalon from the proposed location of the BPS.

City of Escalon
City of Escalon Connection to Nick DeGroot Water Treatment Plant

Figure 8A. Site Photos

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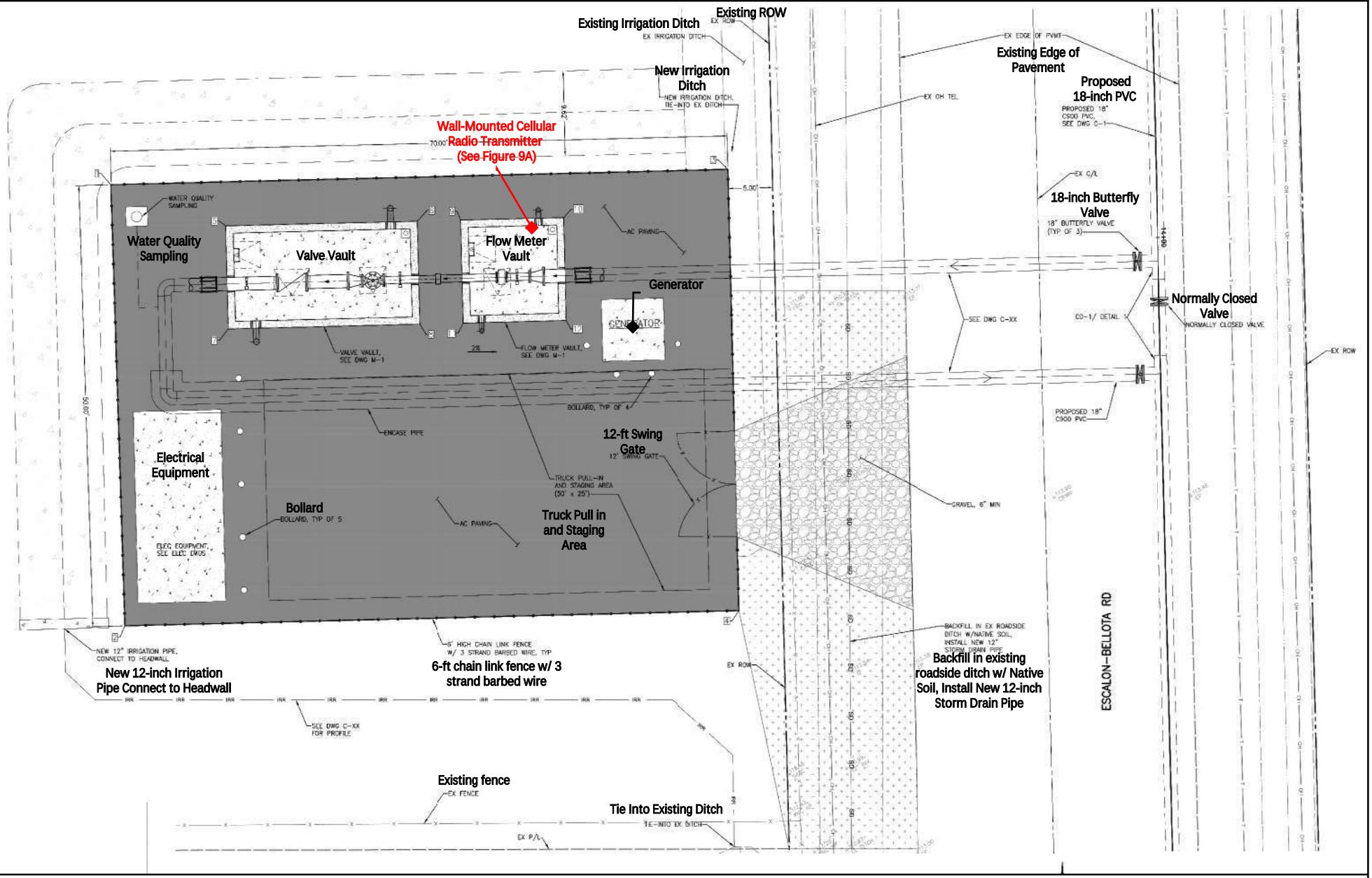


Source: Ardurra Group Engineering

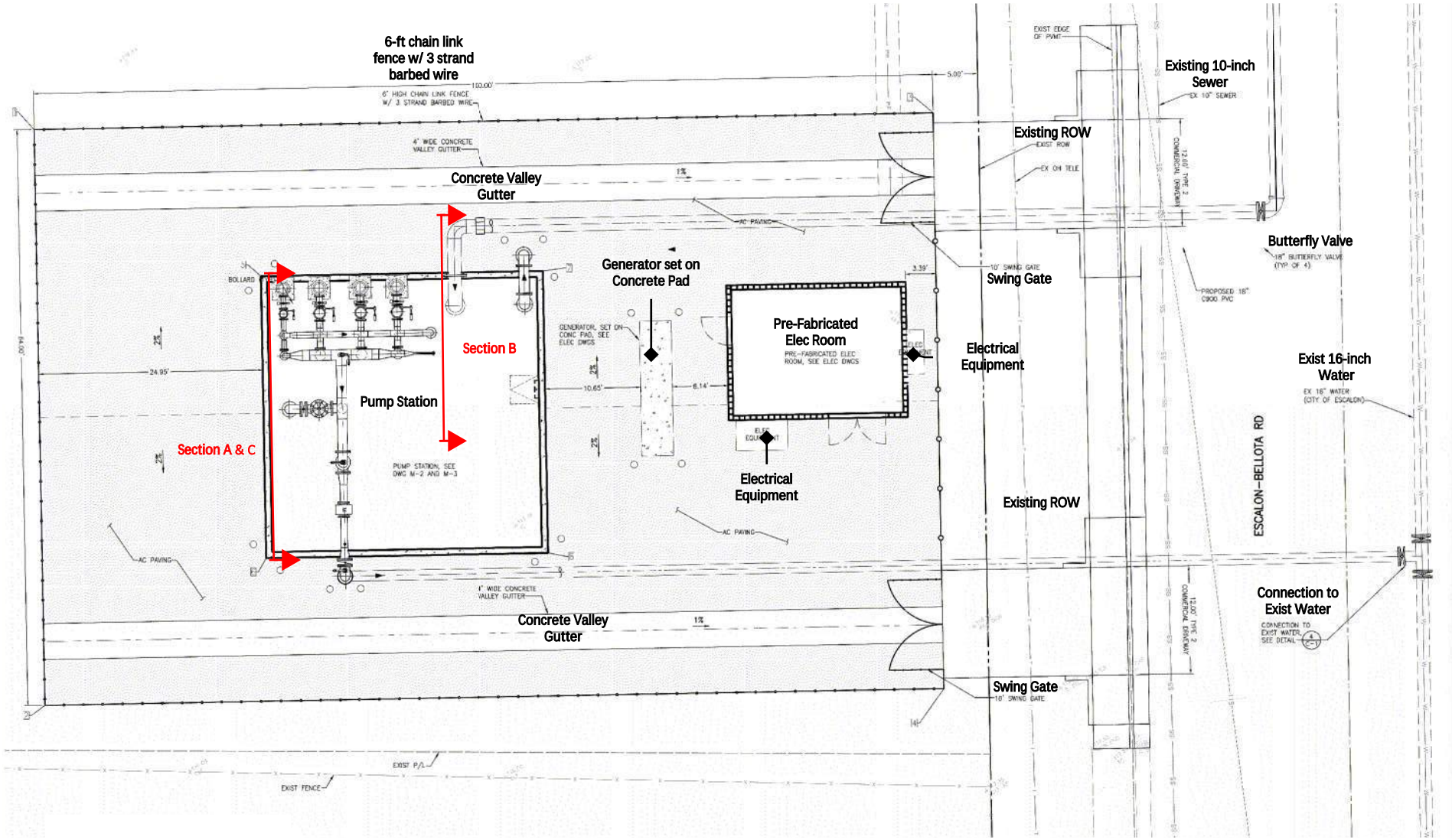
City of Escalon
City of Escalon Connection to Nick DeGroot Water Treatment Plant

Figure 9. Flow Control Facility Site Plan

N

Not to Scale

ARDURRA



Note: Section C is directly below Section A & B, and extends approximately 15-ft bgs.

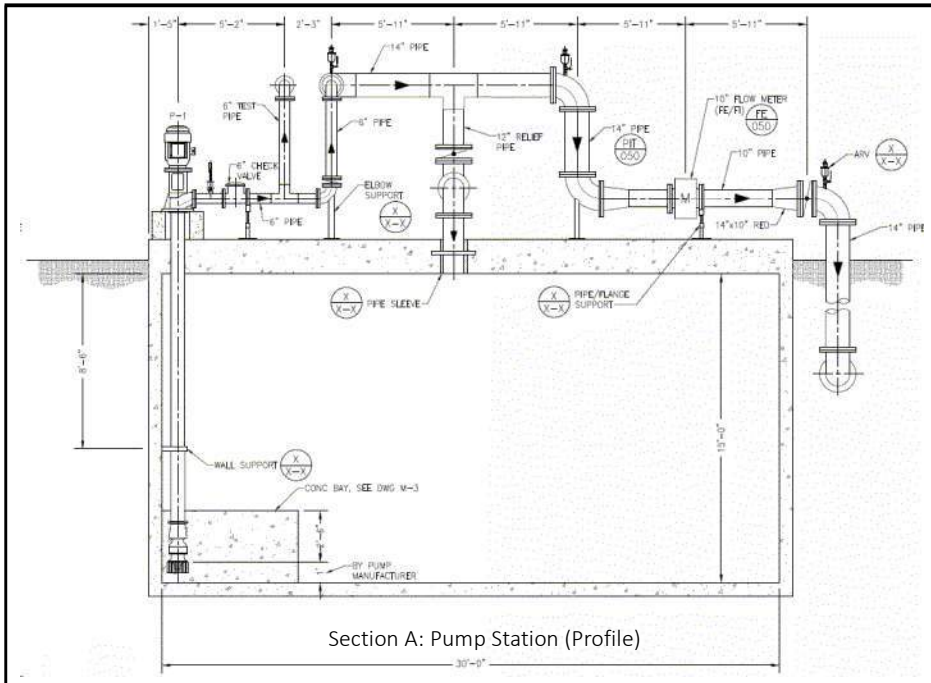
Source: Ardurra Group Engineering

City of Escalon
City of Escalon Connection to Nick DeGroot Water Treatment Plant

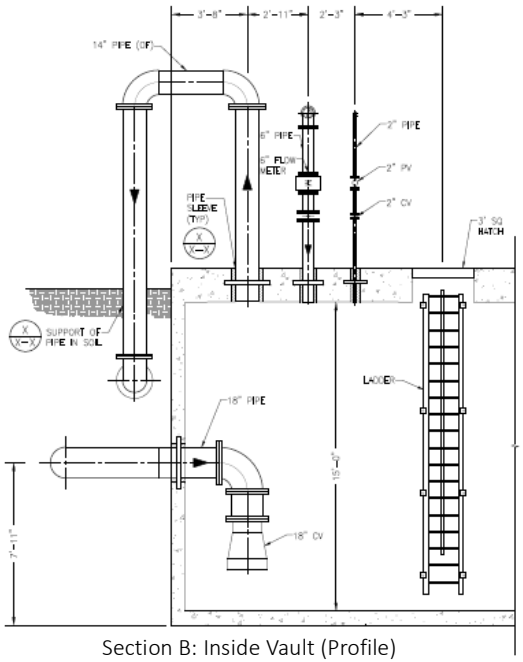
Not to Scale

ARDURRA

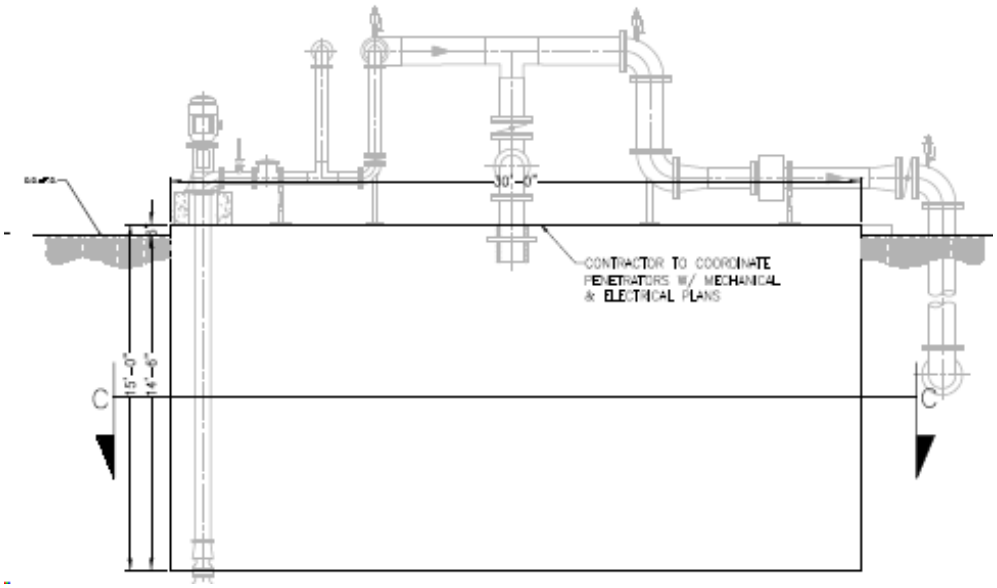
Figure 9A. Proposed Booster Pump Station Site Plan



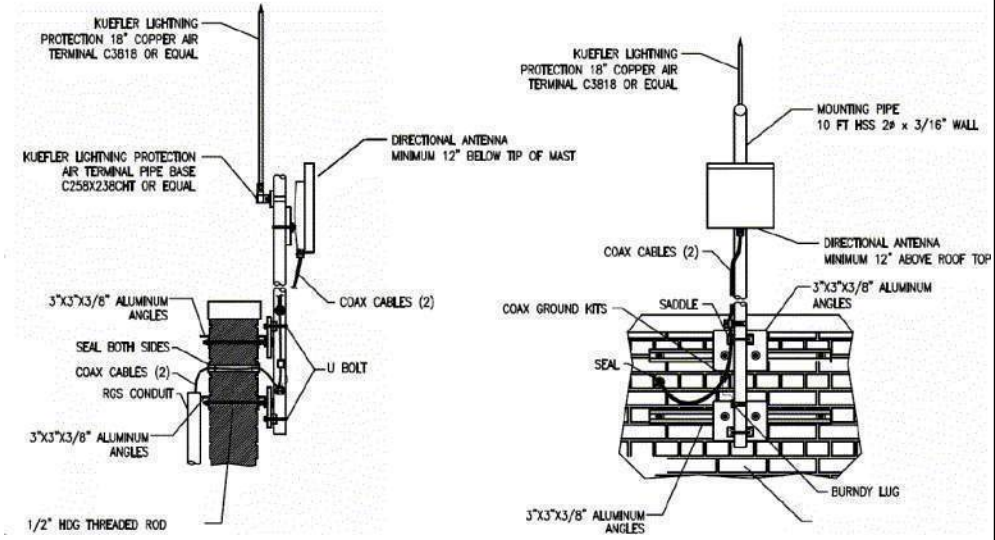
Section A: Pump Station (Profile)



Section B: Inside Vault (Profile)



Section C: Subterranean Tank (Profile)



Wall-Mounted Cellular Radio Transmitter (Profile)
(See Figure 8. Flow Control Facility Site Plan)

Note: This figure corresponds with Sections labelled on Figure 8. Flow Control Facility Site Plan & Figure 8A. Proposed Booster Pump Station Site Plan.

Source: Ardurra Group Engineering, 2023

City of Escalon
City of Escalon Connection to Nick DeGroot Water Treatment Plant

Figure 10. Project Component Elevations

Not to Scale

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3.1 PERMITS AND APPROVALS

This IS/MND is intended to assist state and local agencies carry out their responsibilities for permit review or approval authority over various aspects of the Project. *Table 5: Summary of Agency Approvals*, outlines the following permits and approvals that are required for the proposed Project (see below):

TABLE 5: SUMMARY OF AGENCY APPROVALS

Agency	Permit/ Review Required
State Water Resources Control Board, Division of Drinking Water (DDW)	Amendment to Drinking water permit
San Joaquin County	Encroachment Permit
PG&E	Will serve letter for proposed BPS
City of Escalon	Plan Check, Construction Documents, Inspections Encroachment Permit Approved Traffic Control Plan

3.2 SCSWSP EIR MITIGATION MEASURES

As mentioned above, the proposed Project was included in the SCSWSP EIR (SCH #98022018). Therefore, Mitigation Measures within *Table 6: SSJID SCSWSP EIR Previously Approved Mitigation Measures* will be implemented along with the proposed Project since the previously approved SSJID DEIR components are consistent with the current Project.

TABLE 6: SSJID SCSWSP EIR PREVIOUSLY APPROVED MITIGATION MEASURES

Impact	Previously Approved Mitigation Measure from SSJID SCSWSP EIR (SCH# 98022018)	Description Of Changes and Applicability with proposed Project IS/MND
Aesthetics Previously Approved Mitigation Measures		
EIR Section 4.10.1: The proposed project would affect the visual quality of the project area.	**MM AES-01: Lighting**- Lighting at the WTP and Tracy Pump Station shall be positioned downward and shielded in order to prevent glare, reduce offsite lighting, and disruption of adjacent neighbors. **MM AES-02: Landscaping-** Natural landscaping, which blends with the surrounding aesthetic features, shall be placed along the perimeter of the Tracy Pump Station.	**Description of Changes**: Responsible party, timing, and references to "WTP" and "Tracy Pump Station." See changes within Section 5.1.4 Mitigation Measures. **Applicability**: The proposed mitigation measures are still applicable to the Project since a BPS will be implemented; however, it is part of the City of Escalon's water distribution network, not the City of Tracy.
Air Quality Previously Approved Mitigation Measures		
EIR Section 4.5.1: Project construction activities would result in a temporary increase in air pollution emissions.	**MM AQ-01: Fugitive Dust Control**- For construction activities associated with all project facilities, SSJID shall require contractor(s) to implement the following measures: - Water, chemical soil stabilizers/ suppressants, or vegetative ground cover shall be used to control fugitive dust from all disturbed areas, including storage piles, which are not being used at construction site. - Water or chemical soil stabilizers shall be used to control fugitive dust from all unpaved roads on-site and all off-site unpaved access roads to the construction site. - Applications of water or presoaking shall be performed to control fugitive dust from all land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities. - Cover and wet all materials transported off-site or require all trucks to maintain at least six feet of freeboard from the top of the container. - Remove accumulated mud or dirt from adjacent public streets at least every 24 hours during construction periods. (The use of dry rotary brushes is expressly prohibited, except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. The use of blower devices is also expressly forbidden.)	**Description of Changes**: Responsible party and timing. Section 5.3.4 Mitigation Measures. **Applicability**: The previously approved mitigation measures are still applicable to the Project since construction activities will result in temporary and intermittent increases in air pollution from equipment usage.

Impact	Previously Approved Mitigation Measure from SSJID SCSWSP EIR (SCH# 98022018)	Description Of Changes and Applicability with proposed Project IS/MND
	- Water or chemical soil stabilizers/ suppressants shall be used to control fugitive dust after each addition of materials to or removal of materials from all storage piles. - Limit the speed of all construction vehicles to 15 miles per hour on unpaved roads. - Re plant vegetation in disturbed areas as quickly as possible.	
EIR Section 4.5.2: Operation of proposed project facilities would result in operational air emissions from powering of pumps, the testing and potential use of emergency and standby generators at the two pump stations, various processes and equipment emissions at the WTP and from vehicle trips.	**MM AQ-02: Compliance with SJUAPCD**- Proposed facilities shall be designated to operate in compliance with applicable SJVUAPCD permit requirements and regulations.	**Description of Changes**: Responsible party and timing. Section 5.3.4 Mitigation Measures. **Applicability**: Project components including the FCF and BPS will result in operational air emissions. See Section 5.3.3 for more information.
Biological Resources		
EIR Section 4.7.3: Implementation of the proposed project could result in the removal of annual grassland and cause permanent or temporary impacts to special-status plans and animals supported by annual grassland.	**MM BIO-02: Ground Nesting Raptors Pre-construction Survey**- SSJID shall retain a qualified biologist to conduct a survey for ground nesting raptors (in March or April) prior to construction activities (i.e., grading) in areas containing suitable nesting habitat. Active raptor nests located within 500 feet of construction activity shall be mapped. **MM BIO-03: Raptor Nests**- If active raptor nests are located on or within 500 feet of a construction site, a minimum of a 500 feet buffer area shall be established in consultation with CDFG, and construction activities shall be prohibited within this buffer zone until the end of the nesting season (April through August) or until the young have fledged. A qualified wildlife biologist shall monitor the nest to determine when the young have fledged and submit weekly reports to CDFG throughout the nesting season.	**Description of Changes**: Responsible party and timing. See Section 5.4.3 Mitigation Measures. **Applicability:** During Project construction, impacts to special-status species may occur, especially at sites of the proposed FCF and Lone Tree Creek crossing (site of jack and bore construction). See Section 5.4.3.
EIR Section 4.7-4: Construction of the Water Transmission Lines and Tracy Pump Station could result in the removal of sensitive tree resources.	**MM BIO-04: Active Nests-** Identified trees with active nests shall only be removed prior to the onset of the nesting season (March) or after young have fledged (late August).	**Description of Changes**: Responsible party and timing. See Section 5.4.3 Mitigation Measures. **Applicability:** During Project construction, impacts to trees, riparian habitats, and special

Impact	Previously Approved Mitigation Measure from SSJID SCSWSP EIR (SCH# 98022018)	Description Of Changes and Applicability with proposed Project IS/MND
EIR Section 4.7.5: Construction of the Water Transmission Lines could result in temporary impacts to riparian habitats and to the special-status plants and animals that they support.	**MM BIO-05: Jack and Bore Construction**- At jack and bore locations, bore pits shall be excavated at least 50 feet outside the edge of riparian vegetation to avoid impacts. A biological monitor shall be present during jack and bore construction to alert construction crew to the possible presence of any special-status amphibian or reptile at risk during the crossing. With specific regards to giant garter snake, the following measures shall be implemented: - Construction at stream crossings with riparian and/or emergent vegetation shall be limited to the active period for giant garter snake to facilitate detection and reduce the potential of direct mortality. The USFWS Sacramento Field office shall be contacted in the event that construction needs to occur between October 2 and April 30 to determine if additional measures are necessary to minimize and avoid take. - Two weeks prior to any ground-disturbing activity at stream crossings with riparian and/or emergent vegetation, the bore pit, staging area, and access routes shall be fenced with snake-proof fencing. Two days prior to construction, a biological monitor with appropriate state and federal permits shall survey the fenced-in areas to determine if any giant garter snakes are present. If present, the monitor shall relocate snakes a minimum of 500 feet from construction activities. During construction, the monitor shall be present on-site to ensure that no snakes are in the disturbance area, that all excavated areas are backfilled or covered, and to educate the construction personnel as appropriate.	status plants and animals may occur as a result of jack and bore construction at the Lone Tree Creek crossing and 12 locations along the Project alignment within the City and County ROW.
Cultural Resources		
EIR Section 4.13.1: Construction of the proposed project could result in damage to known and/or unknown prehistoric archeological, historical, or paleontological resources within the project area.	**MM CUL-01: Ground Inspection**- A cultural resource specialist shall be retained to conduct an on-the-ground inspection of the final pipeline alignment for cultural resources. **MM CUL-02: Cultural Resources Discovery**- In the event that any prehistoric or historic subsurface cultural resources are discovered during construction-related earth-moving activities, all work within 50 feet of the resources shall be halted and the District shall consult with a qualified archeologist (or paleontologist) to assess the significance of the find, If any find is determined to be significance by the archeologist, representatives of the District and the archeologist shall determine the appropriate course for action. If the discovery includes human remains of Native American origin, the District shall coordinate activities with the Native American Heritage Commission. All significant cultural materials recovered shall be subject to scientific analysis, professional museum curation, and a report prepared by the archeologist to current professional standards.	**Description of Changes**: Responsible party and timing. See Section 5.5.3 Mitigation Measures. **Applicability:** Project components are located within areas that will be disrupted beyond depths of previous disturbance. Therefore, the Project is susceptible to discovery of cultural, archeological, and paleontological resources. As a result, the previously approved mitigation measures were modified and utilized during the creation of Mitigation Measures within Section 5.5.3.
Geology and Soils		
EIR Section 4.6.1: Seismic activity within San Francisco Bat region, the Coast Range-San Joaquin/ Sacramento	**MM GEO-01: Seismic Design Criteria**- Facility design shall comply with the site-specific seismic design criteria recommendations of a geotechnical engineer. Facility design shall also comply with the seismic design requirements of the UBC and with applicable provisions and policies of the San Joaquin County and Stanislaus County General Plan.	**Description of Changes**: Responsible party and timing. See Section 5.7.3 Mitigation Measures.

Impact	Previously Approved Mitigation Measure from SSJID SCSWSP EIR (SCH# 98022018)	Description Of Changes and Applicability with proposed Project IS/MND
Valleys boundary, and the Sierra Nevada foothills region present the potential for moderate to strong groundshaking within the project area		**Applicability:** The potential for seismic groundshaking at the Project site is moderate. See Section 5.7.3.
EIR Section 4.6.3: Proposed facilities could incur damage as a result of underlying soil properties (subsidence, high shrink-swell potential, and corrosivity).	**MM GEO-02: Geotechnical Design Criteria**- Facility design shall comply with the site-specific geotechnical design criteria recommendations of a geotechnical engineer, applicable requirements of the UBC, and applicable provisions and policies of the San Joaquin County and Stanislaus County and General Plan.	**Description of Changes**: Responsible party and timing. See Section 5.7.3 Mitigation Measures. **Applicability:** Project Components have the potential to be damaged as a result of underlying soil properties at the Project site. See Section 5.7.3.
Hydrology and Water Quality		
EIR Section 4.4.2: Pipeline installation at channel crossings could cause the creek bed to erode away from the pipeline and/or construction zone, exposing the stream channel to increased sedimentation.	**MM HYDRO-01: Stream Crossings**- Standard design criteria for pipeline installation at stream crossings using the jack and bore method prevents destabilization of the streambed and banks. Project design shall locate pipe far enough below streambeds and site the boring entry location and boring slope at a significant distance from the streambank to avoid a future encounter between the pipeline and surface water due to stream downcutting or lateral migration.	**Description of Changes**: Responsible party and timing. See Section 5.10.3 Mitigation Measures. **Applicability:** During Project construction, impacts to trees, riparian habitats, and special status plants and animals may occur as a result of jack and bore construction at the Lone Tree Creek crossing.
EIR Section 4.4.4: Construction of proposed facilities could result in increased sedimentation, with subsequent impacts to water quality and/or storm drain capacity. Additionally, release of fuels or other hazardous materials associated with construction equipment could reduce water quality.	**MM HYDRO-02: SWPPP Specifications**- SSJID shall develop and implement a SWPPP, as required by the SWRCB and enforced by the CVRWQCB, for areas to be disturbed by construction activities. The District shall incorporate into contract specification the requirement that the contractor comply with, and implement the provisions of, the SWPPP and the RWQCB requirements for the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity. The objectives of the SWPPP are to identify pollutant sources that may affect the quality of stormwater discharge, to implement control practices to reduce pollutants in stormwater discharges, and to protect receiving water quality. The SWPPP may include, but is not limited to, the following elements: - Preparation of a site map; - Description of construction materials, practices, and equipment storage and maintenance; - List of pollutants likely to contact stormwater; - Estimate of the construction site area and percentage impervious area;	**Description of Changes**: Responsible party and timing. See Section 5.10.4 Mitigation Measures. **Applicability:** Project construction has the potential to result in increased sedimentation during earthworks and ground disturbing activities. See 5.10.3 for more information.

Impact	Previously Approved Mitigation Measure from SSJID SCSWSP EIR (SCH# 98022018)	Description Of Changes and Applicability with proposed Project IS/MND
	- Site specific erosion and sedimentation control measures including: soils stabilization, revegetation, and runoff control to limit increases in sediment in stormwater runoff, such as detention basins, straw bales, silt fences, geofabrics, drainage swales, and sand bag dikes; - List of provisions to eliminate or reduce discharge of materials to stormwater including practices to minimize the contact of construction materials with stormwater; - Stockpiling of soils along the trench may be on the side of the trench farthest from the nearest creek or drainage where possible; - BMPs for fuel and equipment storage, refueling activities and equipment inspections to prevent chemicals from contacting stormwater; - Description of waste management practices; and - Maintenance and training practices. **MM HYDRO-03: Erosion Control**- SSJID shall incorporate into contract specifications requirements that the contractor(s) implement erosion control measures as well as RWQCB requirements for stormwater pollution prevention for construction activities. The contractor shall be required to exercise special care to prevent erosion in disturbed earth areas, and silt or eroded materials may not be introduced into any storm drain system or watercourse during and following construction. The contractor shall also apply erosion control measures where indicated on contract drawings and where the contractor has disturbed natural vegetation. For construction adjacent to, or crossing any waterways, SSJID shall obtain and comply with any necessary permits from state and local jurisdictions.	
Land Use and Planning		
SSJID EIR Section 4.2.1: Siting and operation of project facilities could impact farmland or adjacent agricultural activities.	**MM LAND-01: Landowner Consultation**- SSJID shall consult with all potentially affected landowners associated with the segments of the selected alignment that crosses farmland as part of the land acquisition process. As part of this acquisition process SSJID and the landowners shall negotiate an agreed-upon compensation for the loss of any existing orchard trees and/ or vines currently in production. During these consultations Escalon shall also, in conjunction with landowners' input, access gates. Access gate locations shall be included in the final design plans for the proposed project. Mitigation Measure PREV MM TRAF-16: Routing Traffic Adjacent to Active Agriculture Operations provides for controlled access for vehicle traffic associated with active agricultural operations in farmland areas.	**Description of Changes:** Responsible party and timing. **Applicability:** The proposed FCF will be located on agricultural land acquired by the City of Escalon.
EIR Section 4.2.3: Construction of proposed project facilities would result in short-term disturbance of sensitive land uses, primarily	**MM LAND-02: Advance Notice**- SSJID shall provide minimum 2-week advance notice of the construction activities schedule to the affected community members adjacent to construction areas (e.g., residences, property owners, business owners, and public facility operators), including the posting of signs.	**Description of Changes:** Responsible party and timing. **Applicability:** Project components will be implemented along a major road, Escalon-Bellota Road. Short-term disturbances are

Impact	Previously Approved Mitigation Measure from SSJID SCSWSP EIR (SCH# 98022018)	Description Of Changes and Applicability with proposed Project IS/MND
residence, due to dust, noise traffic and assess disruption.	**MM LAND-03: Construction Contract Documents-** SSJID shall incorporate mitigation measures in construction contract documents (e.g., terms of schedule or access conditions or technical requirements). SSJID and its contractor(s) shall coordinate with local jurisdictions and obtain all necessary permits (e.g., encroachment permit, utility excavation permit), shall comply with permit conditions established to minimize construction impacts, and shall assign an inspector to the project to oversee construction activities.	anticipated along this road, ultimately impacting adjacent residences and land uses. See Section 5.11.3.
EIR Section 4.2.4: Operation of Water Treatment Plant and Tracy Pump Station would result in impacts to sensitive adjacent land uses.	**MM LAND-04: Operation of Project Components** – SSJID shall implement mitigation measures described in the Air Quality and Noise Section.	**Description of Changes:** Responsible party and timing. **Applicability:** See Section 5.3 Air Quality and 5.13 Noise.
	Noise	
EIR Section 4.8.1: Construction of the proposed project would temporarily increase noise levels in nearby areas.	**MM NOI-01: Noise in Residential Areas**- Construction activities within residential areas shall be limited to the hours and days specified by each jurisdiction as follows: - Construction activity is limited to hours and days when noise standard exemptions apply, per encroachment permit. - If construction outside those exempt time periods is proposed, SSJID shall obtain a variance from the appropriate jurisdiction. - Where no construction exemption is granted, construction shall be scheduled between 7:00 A.M. to 7:00 P.M. Monday to Sunday, or other hours and days as established by the appropriate local jurisdiction on applicable encroachment permits. **MM NOI-02: Staging Areas**- SSJID shall require in construction specifications that the contractor select stating areas far as feasibility possible from existing residences. Activities within these staging areas shall conform to the time limitations established in **MM NOI-01: Noise in Residential Areas**. **MM NOI-03: Noise Muffling Devices**- SSJID shall require in construction specification that the contractor maintain all construction equipment with manufacturers specified noise muffling devices. **MM NOI-04: Stationary Noise Sources**- SSJID shall require in construction specifications that the contractor place all stationary noise generating construction equipment as far away as feasibly possible from sensitive receptors or in an orientation minimizing noise impacts (i.e., behind existing barriers to storage piles, etc.)	**Description of Changes:** Responsible party and timing. **Applicability:** Project construction at each Project Component will temporarily and intermittently increase noise levels in nearby areas.

Impact	Previously Approved Mitigation Measure from SSJID SCSWSP EIR (SCH# 98022018)	Description Of Changes and Applicability with proposed Project IS/MND
	MM NOI-05: Haul Route Plan- As part of the Traffic Control Plan (see Traffic Mitigation Measures) shall develop the haul route plan to route construction traffic away from residential areas when feasible routing alternatives exit.	
EIR Section 4.8.3: Operation of the Tracy Pump Station would result in the generation of noise from pump machinery.	**MM NOI-06: Acoustic Dampening Features**- Based on a final site location determination, SSJID's design engineer shall incorporate acoustical dampening features capable of complying with the noise performance standards of San Joaquin County's General Plan Noise Element and County Noise Control Ordinance (residential Ldn of 65 dBA). Design features may include, but not be limited to: - Incorporation of equipment enclosures fan silences, mufflers, acoustical louvers, noise barriers, acoustical panels, etc. - Orientation of acoustical exists (i.e., features allowing the escape of noise) toward less sensitive land uses; and - Incorporation of landscaping (hard and soft), where possible, to absorb and/or redirect noise.	**Description of Changes:** Responsible party and timing. **Applicability:** The proposed BPS and FCF will have emergency generators which will be operation at various points throughout the Project lifetime.
Transportation		
EIR Section 4.11.1: Construction of the Water Transmission Lines would reduce the number of, or the available width of, travel lanes on public roads, resulting in short-term traffic delays for vehicle traveling past the construction zone on the affected roadways.	**MM TRAF-01: Traffic Control Plan**- Once a final detailed pipeline alignment design is prepared, SSJID shall arrange for a Traffic Control Plan to be prepared by a licensed traffic engineer, for all project-affected roadways and intersections. The Traffic Control Plan shall comply with requirements in encroachment permits issued by San Joaquin County, Stanislaus County, the City of Manteca, and the City of Lathrop. The Traffic Control Plan to be prepared by the construction contractors shall include, but not be limited to, the following measures: - Maintain the maximum amount of travel lane capacity during non-construction periods, with all trenches covered with steel plates and provide flagger-control at all construction sites to manage traffic control. - Limit the construction work zone in each block to a width that, at a minimum maintenance alternate one-way traffic flow past the construction zone. Alternatively, use detour signing on alternate access streets when temporary full streets closure is required. - Restrict construction to non-peak traffic periods as required for specific work sites in encroachment permits. Weekend and night work shifts may be considered in non-residential areas only. - Coordinate construction activities (time of year and duration) to minimize traffic disturbances adjacent to commercial areas (e.g., avoid peak of Christmas, holiday shopping period), dairies, and the Atlanta Cemetery.	**Description of Changes:** Responsible party and timing. **Applicability:** The proposed 19,500 LF of potable water pipeline will be constructed within the public right-of-way.

Impact	Previously Approved Mitigation Measure from SSJID SCSWSP EIR (SCH# 98022018)	Description Of Changes and Applicability with proposed Project IS/MND
	- Post advanced warning of construction activities (e.g., signs, articles in newspapers, notices on radio/TV, etc.) to allow motorists to select alternative routes in advance. **MM TRAF-02: Nighttime Construction**- In consultation with the appropriate local agencies (i.e., San Joaquin County and City of Escalon), SSJID shall identify areas where night construction may be appropriate. Candidate locations are non-residential zones where there are no or few sensitive noise receptors. **MM TRAF-03: Multiple Work Crews**- SSJID shall expedite construction by using multiple work crews so that disturbances are kept as short in duration as possible. **MM TRAF-04: Telephone Hotline Resource**- SSJID shall arrange for a 24-hour telephone hotline resources to address public questions and complaints during Project construction and to offer information about detours, carpooling opportunities, etc. **MM TRAF-10: Off-Street Construction Parking**- SSJID may require the contractor(s) to provide off-street parking for construction worker's vehicles in the vicinity of the work zone, or, workers may be shuttled to the work from an off-site location.	
EIR Section 4.11.2: Construction of the proposed project would generate short-term increase in vehicle trips by construction workers and construction vehicles.	**MM TRAF-05: Consultation with Local Roadway Agencies**- As part of the Traffic Control Plan for roadway segments and intersections, SSJID (and the construction contractor) shall specify designated haul routes from the Project after consultation with CalTrans and other agencies with local roadway jurisdiction. **MM TRAF-06: Disperse Truck Trips**- To the extent possible SSJD, shall schedule the daily work sites such that their relative locations shall disperse truck trips over a number of different trips on any one road. In addition, avoid construction workers and truck trips during peak traffic periods, to the extent possible.	**Description of Changes:** Responsible party and timing. **Applicability:** The proposed 19,500 LF of potable water pipeline will be constructed within the public right-of-way and require crew member to arrive to and from the Project.
EIR Section 4.11.3: Construction of the proposed project would affect access to adjacent land uses and streets for both general and emergency traffic, and for bicycle/pedestrian access.	**MM TRAF-07: Traffic Control Plan Strategies**- As part of the Traffic Control Plan for roadway segments and intersections, SSJID shall develop comprehensive strategies for maintaining emergency access for sensitive land uses such as police and fire stations, and schools in consultation with the facility owner or administer. Strategies shall include, but not limited to, maintaining steel trench plates at the construction sites to restore access across open trenches, parking of fire trucks outside the firehouse on the side of the street opposite the construction during affected work hours, and identification of alternate routing around construction zones. Also, police, fire, and other emergency service providers shall be notified of the timing location, and duration of construction activities throughout the Project, and the location of detours and lane closures.	**Description of Changes:** Responsible party and timing. **Applicability:** The proposed 19,500 LF of potable water pipeline will be constructed within the public right-of-way.

Impact	Previously Approved Mitigation Measure from SSJID SCSWSP EIR (SCH# 98022018)	Description Of Changes and Applicability with proposed Project IS/MND
	MM TRAF-08: Detour Signing- SSJID shall use detour signing on alternate access streets established when temporary full street closure is required. **MM TRAF-09: Advanced Notice**- SSJID shall require a minimum 72-hour advance notice of access restrictions for residents and businesses. Affected residents and businesses shall be advised of requirements for moving motor vehicles out of the area to be closed.	
EIR Section 4.11.6: Construction of the proposed project would increase potential traffic safety hazards for vehicles, bicyclists, and pedestrians on public roadways.	**MM TRAF-11: Warning Signs-** As part of the Traffic Control Plan(s) for roadway segments and intersections, SSJID shall ensure that such plans stress advance "Road Work Ahead" warning signs and speed control (including signs informing drivers of State-legislation double fines for speed infractions in a construction zone) to achieve required speed reductions for safe traffic flow through the work zone. **MM TRAF-12: Bicyclists and Pedestrians**- SSJID shall incorporate into contract specifications for all Project components that requirement that traffic control plans include detours for bicyclists and pedestrians in all areas potentially affected by Project construction.	
EIR Section 4.11.7: Construction of the proposed project would increase wear-and-tear on the designated haul routes used by construction vehicles to assess the project work site(s).	**MM TRAF-13: Encroachment Permit**- SSJID shall obtain encroachment permits from affected jurisdictions prior to construction of the Project, and comply with haul route designations, and roadway wear monitoring and repairs conditions. **MM TRAF-14: Video Tape of Road Conditions**- Prior to start-up of Project construction, SSJID shall prepare a videotape of road conditions of all routes that shall be used by Project-related vehicles. SSJID shall prepare a similar videotape of road conditions after Project construction is completed. The pre- and post-construction conditions of the haul routes shall be reviewed by the staff of the County and local Public Works Departments. An agreement shall be entered into prior to construction that shall detail the pre-construction conditions and post-construction requirements of the rehabilitation program.	**Description of Changes:** Responsible party and timing. **Applicability:** The proposed 19,500 LF of potable water pipeline will be constructed within the public right-of-way and require crew member to arrive to and from the Project.
EIR Section 4.11.8: Construction of the proposed project could disrupt newly repaved streets.	**MM TRAF-15: Rehabilitation of Roadways**- SSJID shall comply with encroachment permit standards negotiated with by San Joaquin County, Stanislaus County, the City of Manteca, and the City of Escalon with respect to rehabilitation of roadways.	**Description of Changes:** Responsible party and timing. **Applicability:** The proposed 19,500 LF of potable water pipeline will be constructed within the public right-of-way and require repaving of Escalon-Bellota Road.
EIR Section 4.11.9: Construction and operation of pipeline alignments could prohibit or limit use of	**MM TRAF-16: Routing Traffic Adjacent to Active Agriculture Operations**- SSJID shall establish a procedure for routing vehicle traffic associated with active agricultural operations in the pipeline easement area, including adequate access points and maintenance of controlled access.	**Description of Changes:** Responsible party and timing.

Impact	Previously Approved Mitigation Measure from SSJID SCSWSP EIR (SCH# 98022018)	Description Of Changes and Applicability with proposed Project IS/MND
internal dirt roads by vehicles associated with agricultural operations.		**Applicability:** The proposed FCF will be located on agricultural land acquired by the City of Escalon and along 3.4 miles of a public right-of-way.
	Utilities and Services	
EIR Section 4.12.1: Pipeline construction could result in temporary planned, or accidental disruption to utility services.	**MM UTL-01- Existing Utilities**- A detailed study identifying utilities in the Project area shall be conducted during the pre-design stages of the Project. For Project components with adverse impacts, the following mitigations are identified: - Utility excavation or encroachment permits shall be required from the appropriate agencies. These permits include measures to minimize utility disruption. SSJID and its contractors shall comply with permit conditions, and such conditions shall be included in construction contract specifications. - Utility locations shall be verified through field survey (potholing) and use of the Underground Service Alert (USA) services. - Detailed specifications shall be prepared as part of the design plans to include procedures for the excavation, support, and fill of areas around utility cables and pipes. All affected utility services shall be notified of SSJID construction plans and schedule. Arrangements may be made with these entities regarding protection, relocation, or temporary disconnection of services. - SSJID shall employ special construction techniques in areas where the water transmission pipeline is located parallel to wastewater pipelines. These special measures, which shall be included in the engineering specifications, may include trench wall-support measures to guard against trench wall failure and possible resulting loss of structural support for the water pipeline. - Residents and businesses in the Project area shall be notified of planned utility service disruption two to four days in advance, in conformance with county and state standards.	**Description of Changes:** Responsible party and timing. **Applicability:** The proposed 19,500 LF of potable water pipeline will be constructed within the public right-of-way with existing utility lines adjacent to the proposed location.
EIR Section 4.12.2: Construction in specific segments of the proposed Water Transmission Lines may result in utility conflicts.	**MM UTL-02: Utility Conflicts**- In order to reduce potential impacts associated with utility conflicts, the following measures shall be implemented in conjunction with **MM UTL-01- Existing Utilities**: - Disconnected cables and lines shall be reconnected promptly.	**Description of Changes:** Responsible party and timing. **Applicability:** The proposed 19,500 LF of potable water pipeline will be constructed within the public right-of-way with existing utility lines adjacent to the proposed location.

Impact	Previously Approved Mitigation Measure from SSJID SCSWSP EIR (SCH# 98022018)	Description Of Changes and Applicability with proposed Project IS/MND
	- Based on the utilities investigation to be conducted under Measure 4.12.1 a, SSJID shall consult with any entities having utility conflicts with the proposed project to negotiate relocation efforts or other plans to resolve the conflict. - SSJID shall observe DHS standards which require: 1) a 10-foot horizontal separation between parallel sewer and water pipelines (gravity or force pipelines); 2) 1-foot vertical separation between perpendicular water and sewer line crossings (in the event that separation requirements may not be maintained, SSJID shall obtain DHS variance through provisions of sewer encasement, or other means deemed suitable by DHS); and 3) encasing water pipelines in protective sleeves where the pipeline crosses under or over an existing wastewater pipeline.	
EIR Section 4.12.3: Pipeline construction could temporarily block access routes from city police departments, San Joaquin and Stanislaus County Sheriff's Department, fire departments, and emergency services.	**MM UTL-03: Street Trench Plates**- SSJID shall include, as part of construction contract specification provisions, steel trench plates at the construction site to maintain emergency access. Steel trench plates shall be used to cover trenches at night.	**Description of Changes:** Responsible party and timing. **Applicability:** The proposed 19,500 LF of potable water pipeline will be constructed within the public right-of-way. Temporary disruption to emergency routes and service connections may occur.

3.4 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

3.5 DETERMINATION (To be completed by the Lead Agency):

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 have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

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

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature — 9/6/24 Date

JAYLEN FRENCH Printed Name — City of Escalon For

4.0 INITIAL STUDY

4.1 EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a Lead Agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (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).
2) All answers must take account of 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.
3) Once the Lead Agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4) Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from a "Potentially Significant Impact" to a "Less than Significant Impact." The Lead Agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).
5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or another CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analyses Used. Identify and state where they are available for review.
    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7) Supporting Information Sources. A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
8) 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.
9) The explanation of each issue should identify:

    a) the significance criteria or threshold, if any, used to evaluate each question; and
    b) the mitigation measure identified, if any, to reduce the impact to less than significance.

5.0 ISSUES AND SUPPORTING INFORMATION SOURCES

5.1 AESTHETICS

Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
I. **AESTHETICS**. Except as provided in Public Resources Code Section 21099, would the Project:				
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) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?	☐	☒	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☒	☐	☐

5.1.1 Regulatory Compliance

California Scenic Highway Program

In 1963, the State Legislature passed California's Scenic Highway Program to protect scenic highway corridors from changes that would impact the visual aesthetics of lands surrounding highways. The program is managed by California's Department of Transportation (CalTrans), which has taken "responsibility for the protection and enhancement of California's natural scenic beauty by identifying those portions of the State highway system which, together with adjacent scenic corridors, require special conservation treatment" (CA DOT 2022). CalTrans coordinates with local government agencies, communities, and citizens to comply with the California Scenic Highway Program and preserve the State's scenic resources.

San Joaquin County

San Joaquin County's General Plan defines a Scenic Vista as open public views from regional roadways Interstate 5 (I-5) and I-80 as well as views associated with the Stanislaus River, views at city gateways, rural roads toward agriculture, water features, and open space (San Joaquin County GP EIR). The County protects aesthetic resources through policies that address the preservation of open space and natural areas.

5.1.2 Existing Conditions

According to the San Joaquin County 2035 General Plan EIR, *Figure 4.L-1: Scenic Routes*, the Project is not close to an officially designated scenic highway or scenic route. The closest Local Scenic Route to the Project is River Road, a two-lane rural road running east to west from Ripon Road to Santa Fe Road, which is located approximately 2.8 miles south of the proposed BPS. River Road passes through local scenic resources including croplands, riparian vegetation, and the Stanislaus River. Stanislaus River is approximately 3 miles south of the planned location for the BPS, storage tank, and wet well. This river is considered an important visual resource; however, there are no view corridors between the proposed Project and the Stanislaus River. Therefore, general views between the proposed Project and the river are substantially obscured by existing land use and distance.

5.1.3 Project Impacts

Guidelines provided in Public Resource Code (PRC) Section 21099 make aesthetic impacts from residential, mixed-use residential, or employment center projects on an infill site within a transit priority area less than significant pursuant to CEQA. Section 21099 refers to Transit-Oriented Infill Projects located within a Transit Priority Area (TPA). The proposed Project is a utility within a rural agricultural setting and is not located in a TPA, the closest transportation center to the Project is an Amtrak Station located in Modesto, Stanislaus County, California, approximately 12 miles from the Project. Therefore, PRC Section 21099 does not apply to the proposed Project.

a) Have a substantial adverse effect on a scenic vista?

RESPONSE:

Less than Significant Impact. The Project is 2.8 miles north of an officially designated scenic highway or scenic route and consists of ground-mounted equipment, fencing, and below-grade components at the closest locations to designated scenic resources. The FCF and tank will be located at the southerly end of the Project on City-owned parcels. and the potable water pipeline will be below ground surface (bgs), within the paved street right-of-way for Escalon Bellota Road. Low-profile enclosures and ground-mounted equipment are proposed at the FCF and the reservoir site and will not result in substantive permanent changes above ground, resulting in changes to scenic resources. Due to the proposed fencing that would be allowed by right under applicable codes and ordinances and existing low-profile development patterns, views of above-ground Project improvements from public vantage points would remain localized and not highly visible from vantage points that are not immediately adjacent. Low-profile development adjacent to the south of the Project and proposed street setbacks shown on plans for the Project effectively block views from southerly vantage points. Temporary, and permanent changes expected with the Project would not be discernable from the closest scenic vista due to distance and the scale of above-ground equipment and structures. Below ground components of the Project would have no permanent visual impact upon completion, because plans indicate these areas will be restored to pre-project conditions. The proposed above-ground components of the Project are described in the following paragraphs and would be visible from adjacent roadways and properties within the surrounding agricultural areas. These components of the Project are anticipated to blend in with the existing rural agriculture setting, which consists of similar open setbacks, perimeter fences, and equipment interspersed with low-profile structures.

Proposed underground improvements include the reservoir, potable water transmission pipeline, underground drainage inlet systems, intake and outflow piping, equipment vaults, and wet well, which will involve temporary trenching and excavation up to approximately 6 feet bgs. These below-ground improvements will result in temporary disturbances from excavations and trenching, temporary staging and stockpiles, construction activities, and equipment for foundation preparation and jack and bore construction beneath Lone Tree Creek. Construction would be visible from adjacent streets and parcels over a period of approximately four months. During this time, temporary construction trenches will be backfilled or covered at the end of each day. Once construction is complete, trenches and excavations will be permanently backfilled, and the surfaces returned to pre-Project conditions except for permanent ground-mounted appurtenances. The potable water pipeline will have a minimum of 4 feet of permanent cover once construction is complete. No substantive permanent visual impacts from below-grade structures would occur because these areas will be returned to pre-Project conditions including replanting perimeter vegetation and replacement trees pursuant to the applicable tree ordinance.

Permanent above-ground appurtenances of the Project at the FCF include perimeter fencing, which will block views of the ancillary ground-mounted appurtenances including enclosures for electrical, and site security systems from street views. The only above-ground components are the gate and perimeter fence, electrical enclosure, irrigation ditch, and a wall-mounted radio transmitter.

The Project will recontour surface grades for drainage to direct surface runoff in a manner that is consistent with existing topography, resulting in a less than significant impact. Permanent above-ground components of the Project at the BPS include a gate and security fence, culverts, overflow pipe and standpipe, pumps, and electrical building and would be visible from adjacent vantage points. Due to street setbacks, these are not anticipated to result in significantly modified public views.

Plans indicate perimeter fencing consisting of chain link and barbed wire which will have a three-foot setback from Escalon- Ballota Road right-of-way at the FCF. The proposed electrical enclosure at this location will be setback approximately 35 feet from Escalon-Ballota Road. The electrical enclosure at the BPS will be set back 8 feet from Escalon-Ballota Road with the pumps and generator mounted at finished grade on top of the subterranean reservoir. Upon the completion of construction along the Project alignment, disturbed areas will be backfilled, and surfaces will be returned to existing conditions. Permanent visual changes from the implementation of the Project are associated with the installation of electrical enclosures, fences, pumps, and generators. Views of these components will be localized and will not substantially change the rural character of the surrounding area or views from adjacent roadways due to the scale and setbacks from the streets. Above ground Project components are similar to what is currently found within the existing rural agricultural setting. Likewise, the Project will not significantly impact designated scenic highways or scenic resources associated with agricultural lands due to proposed street setbacks and the scale of the above-grade Project Components. See **Figure 9: Flow Control Facility Site Plan**, **Figure 9A: Booster Pump Station Site Plan,** and **Figure 10: Project Component Elevations**.

The location for the subterranean reservoir is adjacent to an almond orchard; likewise, the location of jack and bore construction; however, impacts to trees and vegetation currently found near Lone Tree Creek are not anticipated to occur. In the unlikely event, that tree removal is necessary, anticipated impacts from the installation of the potable water pipeline will result in localized impact to the edge of the orchard or creek. Tree removals are not expected to occur with the proposed Project.

As a result, the Project will not have substantially adverse effects on a scenic vista; therefore, Mitigation Measures are not needed.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

RESPONSE:

Less than Significant Impact. See Section 5.1.3, Response a). The Project footprint does not contain rock outcroppings or historically significant structures and does not relate to a state scenic highway. The closest scenic resource is over 2 miles south of the location for the proposed BPS (*Figure 4.L-1: Scenic Routes*, San Joaquin County 2035 GP EIR). Due to the Project's proximity to designated scenic resources and no proposed substantive land use changes above ground near applicable scenic highways, significant impacts from Project implementation are not anticipated.

Trees line the Project along Escalon-Bellota Road and the almond orchard directly north of the existing parking lot where the BPS/reservoir site will be constructed. Tree removal will be limited along Escalon-Bellota Road to areas where bore and jack construction will be used at Lone Tree Creek. Tree removal along other portions of Escalon-Bellota Road is not proposed because the conveyance pipeline will be installed within the paved street. Tree removals at Lone Tree Creek and along the southerly edge of the existing orchard north of the reservoir, if necessary, would be implemented with landowner approval and would comply with the City of Escalon and San Joaquin County applicable tree removal permits before the start of construction. According to the permit's conditions of approval, the applicant must defray the cost of replacing a removed tree with an approved conformance with the street plan. Therefore, the Project will result in less than significant impacts on trees.

c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?

RESPONSE:

Less than Significant with Mitigation Incorporated. See Section 5.1.3, Responses a) and b). The Project alignment is located within the developed County and City right-of-way adjacent to primarily agricultural land. Temporary impacts are anticipated during Project construction due to earthwork and delivery/installation of equipment and construction materials. Upon completion of construction, materials and equipment will be removed, and trenches

will be backfilled with a 4-foot cover; resulting in the right-of-way being restored to its original state. Appurtenant ground-mounted equipment, enclosures, fences, and piping, which are permanent, may be visible from the adjacent public streets and properties; however, these appurtenances will be set back from the streets and screened with privacy slats woven into the chain link fences. Due to the scale and types of these structures and the setbacks shown on plans for the Project, above-ground changes proposed with the Project would likely blend in with the existing agricultural setting of the area and would not result in significant impacts or conflicts with the development code. Other areas that will be disturbed during construction will be returned to pre-project conditions to the satisfaction of the landowner and the City of Escalon's standards. Tree replacements, if needed, will be planted pursuant to landowner requirements for private property and city or county standards outlined in the agencies' municipal codes for tree removal permits. The implementation of mitigation measures MM AES-01: Coordination with Private Landowners and Modified MM AES-04: Landscaping will guide the restoration of street-level views and maintain Project continuity with its surroundings. The City of Escalon shall verify landscaping replacement plans meet landowner and City requirements during the standard process of plan check and inspections and final certifications.

For the reasons above, the Project will result in less than significant impact on the existing visual character of public view from the Project and its surroundings with mitigation incorporated.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

RESPONSE:

Less than Significant with Mitigation Incorporated. See Response 5.1.3, a) through c). Construction will occur during daytime hours (7:30 AM- 4:30 AM) on weekdays and may include weekend or night work to avoid traffic. During Project construction, equipment and vehicles with reflective surfaces resulting in new temporary sources of light and glare will be utilized. These impacts are intermittent and will cease once the Project is complete. Project implementation within the public right-of-way is subject to an approved encroachment permit, which will be used to enforce the City of Escalon and County standards for safety within these areas related to light and glare, signage, detours, barriers, etc. Enforcement of these standards will result in less than significant impacts from light and glare during construction.

The Project may implement nighttime construction, requiring additional sources of temporary lighting. Therefore, Mitigation Measure MM AES-02: Construction Lighting Plan and Modified MM AES-03: Lighting is proposed to require that the City Engineer verify that plans and specifications for the Project show temporary construction lighting that is focused on active areas of construction and downlit/shielded to reduce spillover onto the active right-of-way and adjacent properties. The contractor is responsible for the implementation and proper use of approved lighting throughout construction. Project impacts from temporary lighting are therefore less than significant with mitigation.

Based on conceptual Project plans, the installation of permanent exterior lighting is proposed for the Project's BPS structure. Exterior lighting includes building illumination, security lighting, etc. However, all lighting as a result of temporary Project construction and long-term operational uses will comply with City Ordinance *17.41.065-Lighting*. The building will not require substantial lighting around the BPS exterior due to the proposed scale. Reference *Table 4: Temporary and Permanent Project Components* for BPS scale.

Due to the long-term operational use of the BPS, the Project design will remain consistent with *CalTrans Appendix B-1 Lighting Standards* and County Policy NCR-7.7 below.

NCR-7.7: Reducing Glare and Light Pollution. The County of San Joaquin and the City of Escalon shall encourage the Project designs, lighting configurations, complementary land uses, and operational practices that reduce the potential for glare during daytime hours and reduce the nighttime light pollution to protect the adjacent land uses from light glare and preserve views of the night sky.

As a result of the Project's scale, compliance with County Policies, CalTrans Lighting Standards, and implementation of Mitigation Measure **MM AES-02: Construction Lighting Plan** and **Modified MM AES-03: Lighting**, the Project will not create a new source of substantial light or glare which would adversely affect day or nighttime view in the area. Less than significant impacts with mitigation incorporated are anticipated. See **MM AES-02: Construction Lighting Plan** and **Modified MM AES-03: Lighting**.

5.1.4 Mitigation Measures

MM AES-01: Coordination with Private Landowners- Prior to the start of construction, the City and the contractor shall coordinate with private owners and obtain written landowner approval for construction activities on private property in the form of a signature on the plan sheet showing the proposed work. Restoration work on private property shall be agreed upon and approved by the landowner and the City in advance of construction. Restoration shall be certified by the landowner and the City upon completion as adequately meeting the City's private landowner's requirements.

MM AES-02: Construction Lighting Plan- If nighttime construction is planned to occur, the Project contractor must deploy the measures prior to and throughout nighttime construction activities (dusk to dawn). Measures include directing light sources away from residential property or regularly occupied spaces. Elimination of uplighting will occur by angling light sources down and fitting light sources with covered bulbs, shields, and dimmers. Ensure that a 300-foot buffer from residential property lines is maintained throughout nighttime construction.

Modified MM AES-03: Lighting- Lighting at the FCF and BPS shall be positioned downward and shielded in order to prevent glare, and reduce offsite lighting, and disruption of adjacent neighbors.

Modified MM AES-04: Landscaping- Natural landscaping, which blends with the surrounding aesthetic features, shall be placed along the perimeter of the FCF and BPS.

5.2 AGRICULTURE AND FORESTRY RESOURCES

Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
II. **AGRICULTURE AND FORESTRY RESOURCES**. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the Project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☒	☐
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?	☐	☐	☐	☒

5.2.1 Regulatory Compliance

The City of Escalon's approved General Plan (Escalon, 2005) along with the SSJID's Water Master Plan (SSJID, 2022) establish a program and framework for the planned extension of infrastructure and services for managed growth and the planned conversion of land, from agricultural to urban uses, according to the City of Escalon's approved land use map and General Plan Area. The Plan Area includes acreage within existing City Limits and "growth rings" illustrating an approved program to annex property from county unincorporated into governance under the City's Municipal Code. Accepted population projections published by the San Joaquin Council of Governments (SJCOG), as referenced in the current SSJID Water Master Plan for the City of Escalon, indicate future growth within the City is expected to be 20 percent between 2015 and 2040. In support of this, the City's General Plan and the Water Master Plan identify infrastructure requirements, including the Project, and provide guidance for managed conversion of agricultural land to designated recreational open space and residential land use within the Local Vicinity. These approved plans also address other types of urban land use within the City that will be served by the Project, as indicated in the City's approved General Plan Land Use Map and Zoning Map.

The Project is currently located within unincorporated San Joaquin County, north of the Escalon City Limits. The proposed BPS site within the approved City of Escalon SOI, shown on the City of Escalon General Plan Boundaries Map as the 2035 General Plan Growth Boundary. According to these plans, the BPS site and adjacent parcels will be annexed into the City Limits by the year 2035. The Project and adjacent properties are currently subject to state and county regulation regarding regulation of agriculture and forestry resources. Project conformance with approved city

plans is also referenced in this section, and the goals and objectives are outlined in the Eastern San Joaquin IRWMP (2020).

The California Land Conservation Act or Williamson Act

The California Land Conservation Act or Williamson Act was established after World War II in response to increasing conservation pressures on agricultural lands. The Act allows local agencies to contract with private landowners, allowing reduced property tax in exchange for restricting the use of land for agriculture or open space only. In 1965, AB 1227 was enacted to establish a contract process to manage the rate of conservation of agricultural lands for urban uses. In determining whether impacts on agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation (CA DOC) as an optional model to use in assessing the quality of agricultural land and level of impacts on agriculture and environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project; and the forest carbon measurement methodology providing in Forest Protocols adopted by the California Air Resources Board (CARB).

San Joaquin County General Plan

San Joaquin County's 2035 General Plan has adopted policies and goals pertaining to agricultural resources, to achieve compact growth and limit the conversion of farmland to urban uses. When considering the conversion of farmland to non-agricultural uses, the County considers the following:

- Potential for the project to create development pressure on surrounding agricultural lands;
- Potential for the premature conversion of prime farmland of statewide importance, unique farmland, farmland of local importance, and confined animal agriculture;
- Potential for impacts on surrounding farmland operations and practices; and
- Provision of infrastructure and services to the new use and the potential impact of service demands or on the surrounding area (PSP) (Source: Existing GP, CODP, Growth Accommodation, Implementation 13, Implementation 14, modified)

(Source: San Joaquin County GP, LU-2.15: Agricultural Conversion)

City of Escalon Growth Management Ordinance

The City of Escalon's Growth Management Ordinance was adopted to achieve the following objectives:

1. To maintain and promote the distribution of residential densities as prescribed by the General Plan Land Use Map;
2. To maintain and promote economically, physically, and socially viable residential neighborhoods;
3. **To preserve viable agricultural land to the maximum extent possible in the development and expansion of residential areas**;
4. To promote the development of educational, recreational, and other necessary public facilities contributing to desirable residential areas.

The City's General Plan Land Use Map depicts planned urbanization that has been previously certified for compliance with the CEQA regarding the conversion of agricultural land to nonagricultural use. The City achieves the previously listed growth management objectives through the continued review and improvement of zoning and subdivision ordinances for residential purposes and site review via the building permit process for residential units and verification of project consistency with approved plans (City of Escalon Growth Management Procedures Chapter 15.04). Future growth of residential buildings and the City's public utilities shall conform to the Growth Management Ordinance which looks to protect prime agricultural lands from premature urbanization.

5.2.2 Existing Conditions

According to historic aerials of the Project and Local Vicinity, the earliest recorded aerial was shot in 1957, when the Local Vicinity was in use for Agricultural purposes (See https://www.historicaerials.com/viewer). Since 1957, this area has remained designated for agricultural uses. As mentioned in the Project Description (Section 3.0), San Joaquin County is composed of primarily agricultural land (approximately 75 percent), due to its rich soil. Agriculture has

become an essential part of local economies within the County. The County's leading crops are almonds, walnuts, apples, and grapes (SJMSHCP 2000). The City of Escalon is a community dependent on the prosperity of these agricultural lands. For this reason, the City's regulations and Growth Management Ordinance protect farmlands not typically found in other communities.

The proposed water main is located within the County's right-of-way and paved public streets. The FCF will be located on undeveloped City right-of-way and the tank and BPS are proposed within the City right-of-way that is currently developed as a gravel top sports field over-flow parking lot and planned for future park expansion of Hogan-Ennis Park. The Project is proposed to improve the City's water services to its consumer base reflected in existing connections within City Limits and planned growth identified on the City's General Plan Land Use and boundary maps. The Project will reduce reliance on groundwater within the City of Escalon and is also proposed to fulfill regional objectives for groundwater sustainability outlined in the Eastern San Joaquin IRWMP 2020 Addendum (Greater San Joaquin Regional Water Coordination Committee, 2021).

5.2.3 Project Impacts

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?

RESPONSE:

Less than Significant Impact. Based on the CA DOC Farmland Mapping and Monitoring Program's California Important Farmland Finder Website (See https://maps.conservation.ca.gov/DLRP/CIFF/), the Project will not directly convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to alternative uses. The Project will be implemented within the existing paved right-of-way, on a portion of APN 207-190-06 designated as Farmland of Local Importance, and on a gravel parking lot designated as Unique Farmland (CA DOC Important Farmland Finder). The location of the proposed FCF on APN 207-190-06, south of Dodds Road and Escalon- Bellota Intersection, is currently utilized as an open grass field that is immediately adjacent to a paved street. The FCF site is proposed on existing agricultural land; however, this site is not Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland). The FCF will be positioned on approximately 900 sq. ft. (0.02 acres) of Farmland of Local Importance. For the reasons above, no significant Project impacts related to direct conversion of Farmland to non -agricultural use would occur regarding the FCF or the water main.

Approximately 3.2 miles south of the proposed FCF, the Project will develop a portion of an existing parking lot with the Project's BPS, wet well, and subterranean storage tank facility. This parcel is designated as Unique Farmland and Prime Farmland by the County and City of Escalon in the DOC Farmland Mapping and Monitoring Program (CA DOC FMMP). The County has retained this parcel for future urban development under the land use designation agricultural reserve (AU Zone). AU Zones allow neighboring Cities, like Escalon, to facilitate orderly and compact growth at appropriate times. This site is adjacent to existing urban uses and the City of Escalon has approved a plan to develop this site as part of the future expansion of Hogan-Ennis Community Park to serve the community pursuant to the approved Land Use Map and the General Plan. Due to the proposed size of the BPS on the existing overflow parking lot, the Project would not conflict with existing sports overflow parking or the intended future park use. The site is within the approved SOI and the City's plans for development will supersede existing agricultural designations. Significant impacts are not anticipated.

The Project will not result in direct or indirect impacts on Farmland; it is a planned extension of water services aligned with regional groundwater sustainability goals for the San Joaquin Valley that are intended to replace groundwater use with other sources of water to fulfill existing and future demand that has been considered with approved land use programs, such as the City of Escalon and County General Plan Land Use Maps. In this regard, the Project has been on the City's CIP since 2019 and the implementation of the Project is an assumption considered in approved local and regional plans for urbanization. Therefore, the Project would not result in additional conversion of land. Historically, the City's water supply has been provided from groundwater wells, however, Escalon's planned future water supply will incorporate surface water from the SSJID SCSWSP supporting regional groundwater sustainability and reduced groundwater extractions in alignment with groundwater

management objectives of the Eastern San Joaquin IRWMP, 2020 Addendum (GSJRWCC, 2021). The Project is a planned infrastructure improvement that conjoins two water suppliers to promote groundwater sustainability as well as "provide system reliability and redundancy to the City's long-term water supply" pursuant to the objectives of the City's Water Master Plan (Escalon Water Master Plan 2007). Growth-inducing impacts from the Project have been previously analyzed in the environmental documents and technical studies for the SCSWSP (SCH SCH#98022018) EIR. No additional impacts beyond what have been previously identified will result from Project implementation.

For these reasons, the Project will not result in Farmland conversion beyond what has already been approved in local plans for the City of Escalon's General Plan and County and regional plans as well as regional plans regarding groundwater and water infrastructure in San Joaquin Valley. The Project will not conflict with the County and City's General Plan goals and policies regarding the preservation of farmland and natural resources. *Table 7: Project Consistency with County and City Agriculture-Related General Plan Policies and Goals* outlines Project consistency with policies and goals pertaining to agricultural land uses.

TABLE 7: PROJECT CONSISTENCY WITH COUNTY AND CITY AGRICULTURE-RELATED GENERAL PLAN POLICIES AND GOALS

County General Plan (Land Use Element)	City General Plan (Open Space, Conservation, and Recreation Element)	Project Consistency
Policy LU-1.1: Compact Growth and Development. The County shall discourage urban sprawl and promote compact development patterns, mixed-use development, and higher development intensities that conserve agricultural land resources, protect habitat, support transit, reduce vehicle trips, improve air quality, make efficient use of existing infrastructure, encourage healthful, active living, conserve energy and water, and diversify San Joaquin County's housing stock. *Policy LU-1.4: Encourage Infill Development. The County shall encourage infill development to occur in Urban and Rural Communities and City Fringe Areas within or adjacent to existing development in order to maximize the efficient use of land and use existing infrastructure with the capacity to serve new development. The County shall balance infill development within outward expansion of communities and new development in other unincorporated areas. (RDR) (Source: New Policy)*		The Project proposes to install a BPS, wet well, and subterranean storage tank within the southeastern corner of an existing parking lot that is planned for future park development. The proposed Project will be on a shared parcel. Therefore, the Project will promote efficient and compact development by diversifying the use of open spaces within the City's SOI. In addition, the FCF is located on parcels designated to agricultural use within unincorporated areas of San Joaquin County that is currently in use for Agriculture and residential. The FCF is anticipated to have a footprint of approximately 900 sq. ft. (0.02 acres), which is consistent with compact development patterns intended to be achieved by San Joaquin County's General Plan Land Use Policy LU-1.1. Proposed Project Components will ultimately conserve the surrounding agricultural land resources the City and County strive to preserve.
	Policy 3.1.8 Maximize farmland, open space, and wildlife habitat preservation on lands outside of the City by	See Section 5.2.3, Response a). The Project is not intended to facilitate conversion of agriculture to urban use and does not propose to convert farmland outside of city limits. The Project will be located on

	establishing a greenbelt including all lands not designated for future annexation on the General Plan Land Use Diagram. The City shall use natural or manmade features to transition from urban to non-urban uses.	land designated as public right-of-way. The BPS will be installed on a parcel that is currently developed and planned for future development with urban uses. The FCF will install infrastructure within a corner of a parcel that is in use for agriculture. The proposed footprint of development for the FCF and BPS are small and would not preclude planned expansion of the park use or ongoing agricultural use at either location. The FCF will be placed on Farmland of Local Importance; however, due to the scale and nature of the FCF, land conversion is not anticipated to be significant. Therefore, with the installation of the FCF, adjacent agricultural uses to remain during the facility's long-term operation.
Policy LU-1.7: Farmland Preservation. The County shall consider information from the State Farmland Mapping and Monitoring Program when designating future growth areas in order to preserve prime farmland and limit the premature conversion of agricultural lands. (RDR) (Source: New Policy)		See Section 5.2.3, Response a). The farmland finder map indicates that the Project will install infrastructure on land that contains "lesser quality soils" typically "used for the production of the state's leading agricultural crops" (Farmland Mapping Website). The FCF is located on Farmland of Local Importance. This designation is determined by each county's board of supervisors and a local advisory committee; however, this designation is distinctly different than Prime Farmland, Unique Farmland, and Farmland of Statewide Importance (Farmland Mapping Website). The proposed location for the FCF does not contain crops and the installation and long-term operation of the FCF will not limit the use of this parcel for on-going agricultural use; therefore, disruptions to agricultural production are not anticipated by the alternative in land use for a public utility. Project Components including the BPS, subterranean storage tank, and wet well are within the AU Zone and have been considered and approved for development, the parcels designated land use is consistent with County and City plans. The parcel designated as Unique Farmland will not be converted to land uses that have not already been utilized for urban development.
Policy LU-2.15: Agricultural Conversions. When reviewing proposed General Plan amendments to change a land use diagram or zoning reclassification to change from an agricultural use to non-agricultural use, the County shall consider the following: - *potential for the project to create development pressure on surrounding agricultural lands;* - *potential for the premature conversion of prime farmland, farmland of statewide*		The proposed Project will improve water infrastructure in a manner that is consistent with regional plans for sustainable water use and groundwater management. The proposed infrastructure is an allowed use pursuant to local municipal codes and would not require amendments to the General Plan or Zoning Code.

importance, unique farmland, farmland of local importance, and confined animal agriculture; - *potential for impacts on surrounding farming operations and practices; and* - *provision of infrastructure and services to the new use and the potential impact of service demands or on the surrounding area (PSP) (Source: Existing GP, CODP, Growth Accommodation, Implementation 13, Implementation 14, modified)*		
Policy LU-7.9 Agricultural-Urban Reserve The County shall preserve areas designated Agricultural-Urban Reserve (A/UR) for future urban development by ensuring that the operational characteristics of the existing uses does not have a detrimental impact on future urban development or the management of surrounding properties, and by generally not allowing capital-intensive facility improvements or permanent structures that are not compatible with future urban development. (RDR/PSP)		The planned location of the BPS, wet well, and subterranean storage tank is within an AU Zone. The proposed Project is consistent with development standards set forth by the County and City within these parcels. The development standards allow "compatible public, quasi-public, and special uses" including parks and proposed infrastructure to support public water systems. The size and location of the BPS will not preclude the future park expansion or existing use of the park. The FCF is within agricultural land use designations. The size and location of the FCF will not preclude the existing and future use of this parcel for agriculture or development due to size and location within the southwest corner of the parcel, adjacent to Escalon-Bellota Road. Plans for the Project indicate the most of the infrastructure that will be installed with the Project will be subterranean and would not affect existing or future land use.
	Policy 3.3.3: The City will preserve and protect agricultural use on lands in and surrounding the Escalon planning area for open space purposes and for the managed production of resources.	See Section 5.2.3, Response a). The Project design id compact and will. install mostly subterranean features that will not affect agricultural use on lands. Most of the Project is proposed on land that is developed and in use for public right-of-way. Therefore, the Project is consistent with Policy 3.3.3.

Source: (1) City of Escalon General Plan Update, DEIR adopted February 2005;
(2) San Joaquin County 2035 General Plan EIR, adopted October 2014

The Project would not significantly impact agricultural resources during construction or long-term operation due to the reasons stated above. Overall, the Project will function in substantial conformance with the assumptions and conclusions associated with the approved project analyzed in the previously certified SCSWSP EIR which incorporated the City of Escalon's surface water connection. Less than Significant impacts are anticipated.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

RESPONSE:

Less than Significant Impact. The Project is located on parcels within the County public right-of-way adjacent to land zoned under the Williamson Act as "Nonprime Agriculture Land". The 19,500 LF of potable water pipeline proposes to stay within the bounds of the public right-of-way; the FCF will be located on land designated for Agricultural Urban Reserve and the BPS will be on land designated for General Agriculture. These parcels are not on land under a Williamson Act contract. The implementation of the FCF will be on land that is currently in agricultural use. However, due to the size, parcel corner location, and mostly subterranean nature of the FCF design, this component of the Project will not conflict with the existing agricultural use. San Joaquin County anticipates the conversion of farmland for infrastructure and services under County *Policy LU-2.15: Agricultural Conversion.* This parcel is not under a Williamson Act contract and the development of the FCF will not impact adjacent land uses east, north, and south of the proposed FCF location, which are under the Williamson Act contract. The proposed infrastructure use on the FCF site is consistent and will allow uses identified in the existing Zoning Code.

Staging areas are expected to be located along various points of the Project alignment and will not occur outside of the County and City right-of-way. Access to APN 207-190-06 will likely occur via Escalon-Bellota Road; therefore, disruptions to adjacent agricultural production are not anticipated to occur. The Project proposes a structure containing the BPS, subterranean storage tank, and wet well within the southeastern corner of an existing overflow sports parking lot. The footprint of the structure is approximately 40-feet-8-inch x 26-feet-8-inch (1,040 sq. ft./0.024 acres) and does not propose to take up the entire gravel-lined parking lot. Due to the proposed scale of the Project Component, the Project represents compact growth pursuant to County policy *LU-1.1: Compact Growth and Development* and *LU-2.15: Agricultural Conversions* (see *Table 7: Project Consistency with County and City Agriculture-Related General Plan Policies and Goals* for more detail) and will not impact future park use or expansion.

As a result, the proposed Project will not conflict with existing zoning for agricultural use, or a Williamson Act contract beyond what has already been approved and considered by the County of San Joaquin, SSJID, and applicable landowners. Impacts are anticipated to be less than significant; therefore, no Mitigation Measures are necessary.

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))?

RESPONSE:

No Impact. The Project will not result in any temporary, permanent direct or indirect change in areas labeled as Forest Land in the General Plan of both the County and City. Zones have not been labeled as forest land within the City or County and as such, no impact is foreseen due to the location of the Project. Therefore, no Mitigation Measures are necessary.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

RESPONSE:

No Impact. See Response 5.2.3, c). The Project is not located near nor does the Project result in changes to areas labeled as Forest land within the County or City of Escalon General Plans. Therefore, no impact is foreseen. No Mitigation Measures are needed.

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

RESPONSE:

No Impact. The Project is located within a County and City right-of-way consisting of an existing paved roadway, vacant agricultural land, and a gravel-surface parking lot for the purpose of replacing groundwater use with surface water allocations approved in existing agreements. The Project will implement City and regional plans that reflect approved local land use programs, General Plans, the SSJID Water Master Plan, the SCSWSP, and the

Eastern San Joaquin IRWMP, 2020 Addendum. Changes associated with the Project would be derived from temporary construction activities occurring entirely within the Project footprint and will not result in Farmland or forest land conversion to non-agricultural or non-forest use. Likewise, there will be no indirect impacts in this regard due to Project consistency with the applicable local and regional plans. Implementation of the Project has been considered in regional plans and has been conceptually certified for compliance with CEQA within the SCSWSP EIR; therefore, no impact is anticipated, and no additional Mitigation Measures are needed.

5.2.4 Mitigation Measures

No Mitigation Measures are needed.

5.3 AIR QUALITY

Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the Project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☒	☐	☐

5.3.1 Regulatory Compliance

Federal and State Ambient Air Quality Standards

The Federal Clean Air Act was first implemented by the U.S. Environmental Protection Agency (U.S. EPA) in 1970 to enforce federal ambient air quality standards (NAAQS) for six criteria air pollutants, which include particular matter of aerodynamic radius of 10 micrometers or less (PM 10), particulate matter of aerodynamic radius of 2.5 micrometers of less (PM 2.5), carbon monoxide (CO), nitrogen dioxide (NO2), ground-level ozone, and lead. Federal standards are designed to protect public health and the environment with a reasonable margin of safety (Reference *Table 8: Federal and State Pollutant Standards*).

TABLE 8: FEDERAL AND STATE POLLUTANT STANDARDS

Air Pollutant	Concentration/ Averaging Time		Most Relevant Effect
	California Standards	Federal Primary Standards	
Ozone (O3)	0.09 ppm/1-hour 0.07 ppm/8-hour	0.070 ppm/8-hour	(a) Decline in pulmonary function and localized lung edema in humans and animals; (b) Risk to public health implied by alterations in pulmonary morphology and host defense in animals; (c) Increased mortality risk; (d) Risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (e) Vegetation damage; and (f) Property damage.
Carbon Monoxide (CO)	20.0 ppm/1-hour 9.0 ppm/8-hour	35.0 ppm/1-hour 9.0 ppm/8-hour	(a) Aggravation of angina pectoris and other aspects of coronary heart disease; (b) Decreased exercise tolerance in persons with peripheral vascular disease and lung disease; (c) Impairment of central nervous system functions; and (d) Possible increased risk to fetuses.
Nitrogen Dioxide (NO2)	0.18 ppm/1-hour 0.03 ppm/annual	100 ppb/1-hour 0.053 ppm/annual	(a) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; (b) Risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes; and

			(c) Contribution to atmospheric discoloration.
Sulfur Dioxide (SO_2)	0.25 ppm/1-hour 0.04 ppm/24-hour	75 ppb/1-hour 0.14 ppm/annual	(a) Bronchoconstriction accompanied by symptoms which may include wheezing, shortness of breath, and chest tightness, during exercise or physical activity in persons with asthma.
Suspended Particulate Matter (PM10)	50 µg/m^3/24-hour 20 µg/m^3/annual	150 µg/m^3/24-hour	(a) Exacerbation of symptoms in sensitive patients with respiratory or cardiovascular disease; (b) Declines in pulmonary function growth in children; (c) Increased risk of premature death from heart or lung diseases in elderly.
Suspended Particulate Matter (PM2.5)	12 µg/m^3 / annual	35 µg/m^3/24-hour 12 µg/m^3/annual	
Sulfates	25 µg/m^3/24-hour	No Federal Standards	(a) Decrease in ventilatory function; (b) Aggravation of asthmatic symptoms; (c) Aggravation of cardio-pulmonary disease; (d) Vegetation damage; (e) Degradation of visibility; (f) property damage.
Lead	1.5 µg/m^3/30-day	0.15 µg/m^3/3-monthrolling	(a) Learning disabilities; (b) Impairment of blood formation and nerve conduction.
Visibility Reducing Particles	Extinction coefficient of 0.23 per kilometer-visibility of 10 miles or more due to particles when humidity is less than 70 percent.	No Federal Standards	Visibility impairment on days when relative humidity is less than 70 percent.

Source: https://ww2.arb.ca.gov/sites/default/files/2020-07/aaqs2.pdf

The CARB and the EPA designate air basin boundaries across the state to regulate air quality under the Clean Air Act through monitoring, permitting, and establishing standards for criteria pollutants. Air basins exceeding established standards are designated as "nonattainment" areas. If there is inadequate or inconclusive data to make a definitive attainment designation, they are considered "unclassified." National nonattainment areas are further designated as marginal, moderate, serious, severe, or extreme according to the extent of deviation from standards. Each standard has unique criteria for attainment, based on specific air quality statistics related to levels of probable health risk and potential environmental damage (CARB). *Table 10: SJVAPCD Attainment Status* displays the current attainment standards of San Joaquin Valley Air Pollution Control District (SJVAPCD).

SJVAPCD

The Project is within the SJVAPCD's District boundaries, which extend over eight counties within California's Central Valley region (approximately 250 miles long). SJVAPCD's responsibilities as an Air Pollution Control District are to protect public health while developing effective, active air pollution controls for economic prosperity and growth opportunities. SJVAPCD regulates air quality in the basin by monitoring and reporting levels of ten criteria air pollutants within its jurisdiction and by setting standards for achieving compliance with state and federal air quality regulations for each criteria pollutant in addition to their significance thresholds (See *Table 9: SJVAPCD Air Quality Significance Thresholds* and *Table 8: Federal and State Pollutant Standards*). SJVAPCD operates a total of 38 air monitoring stations throughout San Joaquin Valley. Air monitoring sites are operated in collaboration with CARB, the National Park Services, and tribal nations (Valley Air District 2022).

TABLE 9 : SJVAPCD AIR QUALITY SIGNIFICANCE THRESHOLDS

Air Quality Thresholds of Significance			
Pollutant/ Precursor	Construction Emissions	Operational Emissions	
		Permitted Equipment and Activities	Non-Permitted Equipment and Activities
	Emissions (tons/ year)	Emissions (tons/year)	Emissions (tons/ year)
CO	100	100	100
NOx	10	10	10
ROG	10	10	10
SOx	27	27	27
PM10	15	15	15
PM2.5	15	15	15
Air Quality Thresholds of Significance – Toxic Air Containments			
Carcinogens	Maximally Exposed Individual risk equals or exceeds 20 in one million		
Non-Carcinogens	Acute: Hazard index equals or exceeds 1 for the Maximally Exposed Individual		
	Chronic: Hazard Index equals or exceeds 1 for the Maximally Exposed Individual		

Source: http://www.valleyair.org/transportation/ceqa_idx.htm

SJVAPCD regulations target activities known to contribute to high levels of criteria emissions. Source pollutants are grouped into two categories, either point source or non-point source, and are regulated through discretionary review and approvals. The SJVAPCD process allows for review of proposed activities and conditional approval incorporating emissions reduction measures to achieve pollutant attainment and maintenance of air quality standards adopted by CARB and U.S. EPA. Projects that propose to construct, modify, or operate a facility that may emit pollutants from a stationary source into the atmosphere, must obtain an Authority to Construct, and thereafter a Permit to Operate from the District, which may require implementation of BMPs or conditions of approval with projects to target specific criteria pollutants and reduce emissions. Likewise, local agencies work cooperatively with SJVAPCD through the discretionary entitlement process to incorporate BMPs and conditions of approval for construction activities and long-term operations.

Pursuant to U.S EPA health-based NAAQS established by the Clean Air Act for criteria pollutants, the District has adopted 650 rules that have significantly reduced emission levels to comply with EPA's NAAQS standards. The following rules apply to the proposed Project:

District Regulation VIII (Fugitive PM10 Prohibitions) – Regulation VIII (Rules 8011- 8081) is a series of rules designed to reduce PM10 emissions (predominantly dust/dirt) generated by human activity, including construction, road construction, bulk materials storage, landfill operations, etc. A Dust Control Plan must be submitted for the District's approval at least 30 days before construction activities begin if the Project cumulatively encompasses 40 acres or more or will move more than 2,500 CY per day of material on at least three days of the Project.

District Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations). If asphalt paving will be used, then paving operations of the Project will be subject to Rule 4641. This rule applies to the manufacture and use of cutback asphalt, slow-cure asphalt, and emulsified asphalt for paving and maintenance operations.

District Rule 4102 (Nuisance) applies to any source operation that emits or may emit air contaminants or other materials. If the Project creates a public nuisance, it could be in violation and be subject to District enforcement action.

5.3.2 Existing Conditions

The closest air monitoring stations to the Project are the Modesto-14th Street station (Stanislaus County, California) and the Manteca (San Joaquin County, California) monitoring station. Modesto- 14th Street monitoring site is approximately 11.4 miles southwest of the proposed BPS, storage tank, and wet well site. The Manteca monitoring site is approximately 12.4 miles west of the proposed BPS, storage tank, and wet well site.

Within the central valley, prevailing winds are from west to east up to 15 mph and annual rainfall averages 12.2 inches during the wet season (SSJID UWQMP 2020). Air quality data from these two monitoring stations reflects areawide topography, meteorology, and climate, in addition to the quantity of emissions released by existing air pollutant sources. As shown in *Table 10: SJVAPCD Attainment Status*, the Project is within an area that is not in attainment for ozone, PM10, and PM2.5 standards. The pollutants that are in attainment status at this time include CO, NO, Sulfur Dioxide (SO2), Lead, Sulfates, and Vinyl Chloride. Carbon Monoxide tends to be higher and a greater cause for concern due to its primary source from automobile emissions; therefore, CO is regulated with specific standards and analysis methodology tailored to each specific location.

TABLE 10 : SJVAPCD ATTAINMENT STATUS

Pollutant	State Status	Federal Attainment Status
Ozone- One hour	No Federal Standard	Nonattainment/ Sever
Ozone- Eight-hour	Nonattainment/ Extreme	Nonattainment
PM10	Attainment	Nonattainment
PM2.5	Nonattainment	Nonattainment
Carbon Monoxide (CO)	Attainment/ Unclassified	Attainment/ Unclassified
Nitrogen Monoxide (NO)	Attainment/ Unclassified	Attainment
Sulfur Dioxide (SO2)	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

Source: SJVAPCD 2020.

In addition to source emissions like automobiles, the attainment status of the pollutants listed within *Table 10: SJVAPCD Attainment Status* is heavily influenced by topographic features, climate, and weather patterns that affect air moment. Due to San Joaquin Valley's weather and unique terrain consisting of elevated mountain ranges in the east and west in conjunction with temperature inversions, dilution of air pollutants is restricted; therefore, air pollution remains concentrated within the basin (Escalon GP DEIR, 2005). *Table 11: San Joaquin County Ambient Air Quality* outlines the number of days that air quality within the County exceeded Federal and State standards for PM 10 and Ozone. The following table is based on various monitoring sites throughout the County during a monitoring period between 1992 and 2002. State PM 10 exceeded Federal and State standards frequently at the Stockton Hazelton Street and Modesto 14th Street Monitoring Sites.

TABLE 11 : SAN JOAQUIN VALLEY COUNTY AMBIENT AIR QUALITY

Days Exceeding Standards								
Year	*Stockton- E. Mariposa*		*Stockton- Hazleton Street*			*Modesto 14th Street*		
	State Ozone	Federal Ozone	State PM10	Federal PM 10	State Ozone	Federal Ozone	State PM10	Federal PM10
1992	18	0	108	0	10	0	--	--
1993	11	1	77	0	13	0	--	--
1994	15	0	58	0	24	0	--	--
1995	13	2	18	0	19	2	--	--
1996	4	0	18	0	24	2	12	--
1997	3	0	26	0	5	0	--	--
1998	9	0	43	0	24	3	18	--
1999	4	1	60	0	13	0	12	0
2000	4	0	36	0	7	1	15	0
2001	5	0	60	0	12	0	57	3
2002	5	0	60	0	14	0	78	0

Source: (1) City of Escalon General Plan Update DEIR 2005
(2) Air Resources Board Aerometric Data Analysis and Management System (ADAM)
(3) Measurements of PM 10 are made every sixth day. Data is the estimated number of days that the standard would have been exceeded had measurements been collected every day.

5.3.3 Project Impacts

The following responses are based on the Air Quality, Greenhouse Gas, and Energy Technical Memorandum (**Appendix A**) by the Ganddini Group dated July 25, 2023. The following analysis is focused on construction-related emissions and long-term operational emissions.

a) Conflict with or obstruct implementation of the applicable air quality plan?

RESPONSE:

Less than Significant Impact.

Short-term Impacts

The proposed Project is anticipated to result in approximately 99,600 sq. ft.[2] of temporary disturbances during Project construction and will include approximately 3,348 CY of export and 4,680 CY of import[3]. Project construction is anticipated to take approximately one year and four months to complete. **Appendix A** anticipated one (1) more jack and bore location than proposed for the Project; however, temporary disturbances from the additional estimate are negligible.

As shown within *Table 12: Construction-Related Regional Pollutant Emissions*, pollutant emissions modeled using CalEEMod based on these assumptions, indicate construction-related criteria pollutant emissions for the construction of the proposed Project will not exceed the regional emission thresholds. As a result, impacts to applicable air quality plans are not anticipated to occur. Less than significant impacts are anticipated. No Mitigation Measures are needed.

TABLE 12 : CONSTRUCTION-RELATED REGIONAL POLLUTANT EMISSIONS

Activity	Pollutant Emissions (pounds/day)					
	ROG	NOx	CO	SO_2	PM10	PM2.5
Maximum Daily Emissions[1]	0.46	4.11	5.15	0.01	0.17	0.15
SCAQMD Thresholds	10	10	100	27	15	15
Exceeds Thresholds?	No	No	No	No	No	No

Source: CalEEMod Version 2022.1.1.13

Notes: See **Appendix A** (Air Quality, Greenhouse Gas Emissions, & Energy Technical Memorandum, Ganddini, 2023)

(1) On-site PM 2.5 and PM 10 emissions show compliance with SJVAPCD Regulation VIII of fugitive dust.

Long-term Impacts

Operational emissions were analyzed using CalEEMod and based on the year 2026, the anticipated opening year for the proposed Project, which has been delayed by two years; it is assumed that air quality conditions in 2028 will be substantially similar to 2026 conditions. Long-term operation will not require additional staffing needs for maintenance and operations, in addition, a minimal number of daily worker trips are anticipated to conduct routine inspections and ensure proper long-term maintenance. Therefore, the additional vehicle trips from the existing operations associated with the operation of the proposed Project are minimal.

The worst-case summer or winter VOC, NOx, CO, SO2, PM 10, and PM 2.5 emissions generated by the proposed Project's long-term operations are shown in *Table 13: Regional Operational Pollutant Emissions*. As noted within the table below, none of the analyzed criteria pollutants would exceed the SJVAPCD emissions thresholds. Therefore, less than significant impacts are anticipated.

[2] Total disturbance area estimated based on 19,500 LF of pipeline with trench 6 ft deep x 4 ft wide (19,500 x 4 ft = ~78,000 sf disturbance area); 13 jacking pits at 20x35x13ft = 700sf x 13 = ~9,100 sf and 13 receiving pits at 20x10x13ft = 200sf x 13 = ~2,600 sf for jack and bore; FCF is ~50x70 ft (~3,500 sf disturbance area); and BPS is ~64x100 ft (~6,400 sf disturbance area). Therefore, total disturbance area of ~99,600 sf.

[3] Assumed ~3,348 CY export and ~2,359 CY fill based on the calculated numbers provided in the 30% OPCC provided by the Ardurra Group Project Engineers (includes excavation, backfill, aggregate base, and subgrade numbers for pipeline, FCF, BPS, etc.).

TABLE13 : REGIONAL OPERATIONAL POLLUTANT EMISSIONS

Activity	Pollutant Emissions (tons/year)					
	ROG	NOx	CO	SO2	PM10	PM2.5
Maximum Daily Emissions	0.16	0.45	0.57	0.01	0.03	0.03
SJVAPCD Thresholds	10	10	100	27	15	15
Exceeds Threshold?	No	No	No	No	No	No

Source: **Appendix A** (Air Quality, Greenhouse Gas & Energy Technical Memorandum, Ganddini 2023).
Notes: (1) CalEEMod Version 2022.1.1.14; the higher of either summer or winter emissions.

Since short-term, construction-related emissions and long-term operational emissions are not anticipated to exceed SJVAPCD thresholds, Project impacts are considered less than significant.

b) **Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?**

RESPONSE:

Less than Significant Impact. See Section 5.3.3, Response a). As mentioned above, the Project does not anticipate exceeding thresholds for criteria pollutants set by SJVAPCD for construction-related and operational emissions. See *Table 12: Construction-Related Regional Pollutant Emissions* and *Table 13: Regional Operational Pollutant Emissions* above. In addition, due to the scale of the proposed Project and projected use, long-term pollutant emissions during operation are not anticipated to exceed regional pollutant thresholds beyond what has been approved and considered by the City of Escalon's General Plan, Water Master Plan, and SSJID's SCSWSP EIR.

As a result of the following, impacts are anticipated to be less than significant. Therefore, no Mitigation Measures are needed.

c) **Expose sensitive receptors to substantial pollutant concentrations?**

RESPONSE:

Less than Significant with Mitigation Incorporated. See Section 5.3.3 Response a) and b). The closest sensitive receptors to the Project are existing residential uses located adjacent to Escalon-Bellota Road between Dodds Road to Miller Avenue. Approximately 150 feet south of the proposed location of the FCF is a single-family residential development with agricultural support structures. In addition, Escalon High School is located approximately 887 feet (~270 meters) to the southeast of the proposed BPS site. Other air quality-sensitive land uses are located further from the Project area and would experience significantly lower impact. However, according to *Table 12: Construction-Related Regional Pollutant Emissions* and *Table 13: Regional Operational Pollutant Emissions*, Project construction, and operations do not anticipate exceeding the SJVAPD significance thresholds.

According to historic aerials, the Project and Local Vicinity have been in use as agricultural land since approximately 1957. As a result, the possibility that pesticides and arsenic from these agricultural practices can be found in surface soils which may become airborne during excavation and earthwork for the Project could exceed levels of significance for environmental health. For this reason, the Project will implement SJVAPCD Rule 8081 regarding fugitive dust emissions from agricultural sources (**MM AQ-01: Fugitive Dust Control** and **MM AQ-02: (Compliance with SJVAPCD) Verify SJVAPCD's Control Measures**) during construction activities to reduce impacts to adjacent residential properties under standard condition **SC AQ-01: Regular Cleaning of Track-out Areas**. These measures require implementation and recordkeeping on fugitive dust emissions controls, testing, and temporary barriers between active construction and the closest sensitive receptors and will result in less than significant impacts on emissions downwind to the Project and Local Vicinity. For these reasons, Project implementation would not expose sensitive receptors to substantial pollutant concentrations and impacts are anticipated to be less than significant with mitigation and standard conditions incorporated.

d) **Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

RESPONSE:

Less than Significant with Mitigation Incorporated. The Project proposed to install 19,500 LF of potable water pipeline; FCF; BPS, and a storage tank. Adhesives and other chemicals may be utilized during Project construction, which any result in exposure to odors during construction with the closest receptors being construction crew members. However, this is not expected to result in significant impacts to the surrounding community because Cal-OSHA standards will be implemented for the crew during construction activities to fully reduce emissions to acceptable levels and dispersion will occur with distance from construction.

Emissions relating to earthwork and equipment use will occur during construction, however, the Project contractor will deploy BMPs during construction activities including compliance with California Code of Regulation Title 13, Motor Vehicles, section 2449(d)(3) Idling, which limits idling of construction vehicles and emission potentially of odorous exhaust; and SJVAPCD Control Measures and Fugitive Dust Control under **MM AQ-01: Fugitive Dust Control** and **MM AQ-02: (Compliance with SJVAPCD) Verify SJVAPCD's Control Measures.**

As a result, Project impacts are anticipated to be less than significant with the incorporation of mitigation.

5.3.4 Mitigation Measures

MM AQ-01: Fugitive Dust Control- For construction activities associated with all project components: the City of Escalon shall require contractor(s) to implement the following measures throughout construction activities. These measures shall be incorporated in bid documents prior to City approval. The implementation of these measures shall be verified on an ongoing basis through construction inspections:

- Water, chemical soil stabilizers/ suppressants, or vegetative ground cover shall be used to control fugitive dust from all disturbed areas, including storage piles, which are not in active use at the construction site.
- Water or chemical soil stabilizers shall be used to control fugitive dust from all unpaved roads utilized for construction access.
- Applications of water or presoaking shall be performed to control fugitive dust from all land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities.
- Cover and wet all materials transported off-site or require all trucks to maintain at least size feet of freeboard from the top of the container.
- Remove accumulated mud directly from adjacent public streets at least every 24 hours during construction periods. (The use of dry rotary brushes is expressly prohibited, except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. The use of blower devices is also expressly forbidden.)
- Water or chemical soil stabilizers/ suppressants shall be used to control fugitive dust after each addition of materials to or removal of materials from all storage piles.
- Limit the speed of all construction vehicles to 15 miles per hour on unpaved roads.
- Re-plant vegetation in disturbed areas as quickly as possible.

MM AQ-02: (Compliance with SJVAPCD) Verify SJAPCD's Control Measures. The contractor, City Engineer, and Inspectors shall verify that the SJVAPCD's control measure is implemented as outlined below or equivalent to reduce fugitive dust emissions throughout all phases of construction. These measures shall be incorporated in bid documents prior to City approval. The implementation of these measures shall be verified on an ongoing basis through construction inspections:

1. Require construction equipment used at the site to be equipped with catalysts/particulate traps to reduce particulate and NOx emissions. These catalysts/traps require the use of ultra-low sulfur diesel fuel (15 ppm). At the time bids are made, contractors shall show that the construction equipment used is equipped with particulate filters and/or catalysts or prove why it is infeasible.
2. Use alternative fuels and construction equipment.
3. Replace fossil-fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set).
4. Install windbreaks on windward sides of construction areas.

5. Curtail construction during periods of high ambient pollutant concentrations. This may include ceasing construction activity during peak-hour vehicular traffic on adjacent roadways, and "Spare the Air Days" declared by the District.

5.3.5 Standard Conditions

SC AQ-01: Regular Cleaning of Track-out Areas. Before Project approval, the City Engineer shall confirm that the plans and specifications for the Project include a note requiring regular cleaning of track-out areas throughout each workday and at the end of each workday to clean dirt deposited on any public highway or street (SJVAPCD Rule 8041: Carryout and Trackout).

5.4 BIOLOGICAL RESOURCES

Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
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 U.S. Fish and Wildlife Service?	☐	☒	☐	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
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 Community Conservation Plan, or other approved local, regional, or state habitat conservation plan	☐	☐	☒	☐

This section is based on the Biological Resources Assessment (BRA) for the City of Escalon's Connection to Nick DeGroot Water Treatment Plant Project in the City of Escalon, San Joaquin County California, dated August 30, 2024 (**Appendix B**). The BRA was performed by ELMT Consulting and is based on a field survey, conducted on March 1, 2023, by biologist Rachel A. Lyons, which evaluated the habitat within a 200-ft buffer around the Project; and literature review and records search of special-status biological resources using a query of the CDFW's QuickView Tool in the Biogeographic Information and Observation System (BIOS), CNDDB Rarefind 5, the California Native Plant Society's (CNPS) Electronic Inventory of Rare and Endangered Vascular Plants of California, Calflora Database, compendia of special-status species published by CDFW, and the United States Fish and Wildlife Service (USFWS) species listings. As well as the following resources:

- Google Earth Pro historic aerial imagery (1985-2024);
- United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS), Soil Survey[4];
- USFWS Critical Habitat designations for Threatened and Endangered Species; and
- USFWS Endangered Species Profiles.

[4] A soil series is defined as a group of soils with similar profiles developed from similar parent materials under comparable climatic and vegetation conditions. These profiles include major horizons with similar thickness, arrangement, and other important characteristics, which may promote favorable conditions for certain biological resources.

5.4.1 Regulatory Compliance

Federal Endangered Species Act (ESA)

The ESA was enacted in 1973 and establishes protections for fish, wildlife, and plants that are listed as threatened or endangered along with the ecosystems these species depend on (16 U.S.C. 1531-1544) (USFWS 2023). The U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Services (NMFS) share the responsibility for implementing the ESA. Generally, the USFWS oversees terrestrial and freshwater species, while the NMFS manages marine and anadromous species.

Migratory Bird Treaty Act (MBTA)

The MBTA of 1918 established a conservation treaty intended to promote the sustainability of populations of protected migratory bird species. The MBTA prohibits the killing, capture, selling, trading, and transport of protected migratory bird species without prior authorization by the USFW (USFWS 2023). In addition, the MBTA makes it unlawful to remove nests, eggs, and feathers from any of the species protected under the act.

Migratory bird species that are protected by law depend on the bird family and species included in the four international treaties (Canada in 1916; Mexico in 1936; Japan in 1972; Russia in 1976). This list can be found under Title 50 Part 10.13 (10.13 list), which was last updated in 2020 to incorporate current scientific information on taxonomy and natural distribution. The MBTA applies to almost all avian species that are native to California.

A migratory bird species is included on the list if it meets one or more of the following criteria:

1. It occurs in the United States or U.S. territories as the result of natural biological or ecological processes and is currently, or was previously listed as, a species or part of a family protected by one of the four international treaties or their amendments.
2. Revised taxonomy results in it being newly split from a species that was previously on the list, and the new species occurs in the United States or U.S. territories as the result of natural biological or ecological processes.
3. New evidence exists for its natural occurrence in the United States or U.S. territories resulting from natural distributional changes and the species occurs in a protected family.

The Migratory Bird Treaty Reform Act amends the MBTA so that nonnative birds or birds that have been introduced by humans to the United States or its territories are excluded from protection under the MBTA.

California Fish and Game Code

The California Fish and Game Code is composed of various statutes that aid in the protection of biological resources, including the Native Plant Protection Act (NPPA) of 1977 and the California Endangered Species Act (CESA) (California Fish and Game Code Sections 2050-2098). The NPPA designated plants as rare or endangered and prohibits the take of any such plants unless authorized in limited circumstances by the Fish and Game Commission. CESA prohibits public agencies from approving projects that could jeopardize species listed under CESA as endangered or threatened.

In addition, the California Fish and Game Code protects native and migratory birds including nests and eggs in addition to protecting various mammals (Section 4700), amphibians (Section 5050), and fish species (Section 5515). For this reason, the California Fish and Game Code requires that California Department of Fish and Wildlife be notified of lake or streambed alteration activities. If activities are determined to adversely affect existing fish and wildlife resources by CDFW, a streambed alteration agreement must be authorized to ensure the protection of biological resources and water quality.

San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP)

The SJMSCP was adopted on November 14th, 2000, to provide a framework for communities within the San Joaquin County to ensure development remains consistent with the following objectives:

- Balance the need to conserve Open Space and the need to Convert Open Space to non-Open Space uses while protecting the region's agricultural economy;
- Preserve landowner property rights;
- Provide for the long-term management of plant, fish, and wildlife species, especially those that are currently listed, or may be listed in the future, under the ESA or the CESA;
- Provide and maintain multiple-use Open Spaces that contribute to the quality of life of the residents of San Joaquin County and;
- Accommodate a growing population while minimizing costs of Project proponents and society at large.

The MSHCP is a voluntary plan that provides a framework for compensation for the Conservation of Open Space to non-Open Space uses that will impact fish, plants, and other wildlife species and compensation for some impacts to recreational, agricultural, scenic enjoyment, and other beneficial Open Space uses covered by the planning document (SJMSHCP 2000). The SJMSHCP covers all of San Joaquin County except federally owned lands. Overall, the SJMSCP intends to provide "100,841 acres of Preserves based on estimated Conservation acreage of 109,302 acres" (SJMSHCP 2000).

5.4.2 Existing Conditions

The Project is located within the SJMSCP Central Zone, composed primarily of agricultural habitat lands on the floor of the Central Valley including, primarily row and field crops both ditched and unditched. These croplands are bisected by riparian corridors and include, where vegetated, Great Valley riparian forest and Great Valley Oak riparian forest, with patches of Great Valley riparian scrub. Additionally, freshwater emergent wetlands and vernal or seasonal wetlands occur in association with several creeks in the Central Zone. Other wetlands found within the Central Zone include numerous ditches and scattered lakes and ponds. Isolated patches of valley grasslands are scattered throughout the Central Zone, but the bulk of the SJMSCP Lands in the form of orchards and vineyards, are located within the Central Zone. The majority of existing urban development, and proposed new development in the County, exists or will exist within the Central Zone.

The proposed Project area is primarily used for agricultural purposes in unincorporated San Joaquin County. Adjacent developments include those associated with private residences, commercial businesses, and farming along Escalon-Bellota Road. This is a main thoroughfare connecting to SR 120, south of the Project. The proposed Project will be limited to existing developed roads and thoroughfares in the public right-of-way.

<u>Vegetation</u>

Due to historic anthropogenic activities on-site and immediately adjacent to the Project, plant communities supported on land proposed for the Project Components vary in diversity. The Project supports three (3) land cover types that would be classified as disturbed, developed, and agricultural.

Disturbed

Disturbed areas of the proposed Project include stretches of land along Escalon-Bellota Road, consisting of roadside shoulders and ditches. These areas range in vegetative density from barren to full coverage of monocultures, primarily fescue. Common plant species observed in the disturbed portions of the proposed Project include those listed in the nonnative grassland community.

Developed

The Project supports developed land in the form of existing flood control infrastructure and paved driveways associated with adjacent residential and commercial development. These areas are maintained to be free of vegetation, except where perennial flows within channels coincide with an existing plant community. Within this report, areas, where developed land supports overlapping vegetation, are considered to be part of the adjacent plant community.

Agricultural

An active agricultural area lies within and surrounding the FCF and BPS sites. This land cover type supports uniform vegetative coverage in the form of row crops of apple trees (*Malus domestica*). Routine disturbance occurs throughout this area in association with vehicular access on unpaved roads and areas adjacent to the apple orchard, as well as foot traffic throughout the orchard itself. Other plant species observed within the agricultural areas include some aforementioned species present within the disturbed portions of the proposed Project.

Wildlife

The Project provides moderate habitat for wildlife species, especially those adapted to a high degree of anthropogenic disturbances and development.

Fish

No fish were observed at the Project or within the Local Vicinity during the field investigation. Lone Tree Creek, located centrally to the proposed scope of the Project, is known to support several fish species such as coastal rainbow trout (*Oncorhynchus mykiss irideus*), Owens speckled dace (*Rhinichthys osculus*), and Owens sucker (*Catostomus fumeiventris*). However, these species occur in areas that are less channelized and have not been manipulated or reinforced by dams or culverts, such as the portion of Lone Tree Creek within the boundaries of the proposed Project. Further, these species have not been observed in the Project's Local Vicinity. Fish species that have the potential to occur within Local Vicinity include western mosquitofish (*Gambusia affinis*), and largemouth bass (*Micropterus salmoides*).

Amphibians

The roadside ditches, flood control channels, and Lone Tree Creek have the potential to support local amphibian species adapted to a high degree of human disturbance and conditions within the Central Valley. These areas vary in water content from the perennial flow within Lone Tree Creek to ephemeral flooding following storm events within the roadside drainages. Additionally, most of these areas receive regular flows from urban runoff and irrigation from adjacent agricultural and residential development. No amphibian species were observed in or within the Local Vicinity. However, common amphibian species that may occur adjacent to the Project include the American bullfrog (*Lithobates catesbeianus*) and Sierran tree frog (*Pseudacris sierra*).

Reptiles

No reptilian species were observed on-site during the field investigation. The Project provides suitable habitat for local reptile species adapted to routine disturbance and development. Common reptilian species that may occur on-site include western fence lizard (*Sceloporus occidentalis*), pond slider (*Trachymys scripta*), California king snake (*Lampropeltis californiae*), and southern alligator lizard (*Elgaria multicarinata webbii*).

Birds

The Project and Local Vicinity provide suitable foraging and nesting habitat for resident and migratory bird species adapted to routine disturbance and development. Bird species detected during the field investigation include house finch (*Haemorhous mexicanus*), white-crowned sparrow (*Zonotrichia leucophrys*), northern mockingbird (*Mimus polyglottos*), mourning dove (*Zenaida macroura*), great egret (*Ardea alba*), snowy egret (*Egretta thula*), pine siskin (*Spinus pinus*), European starling (*Sturnus vulgaris*), house sparrow (*Passer domesticus*), and savannah sparrow (*Passerculus sandwichensis*). Other common bird species that may occur within or adjacent to the Project include Canada goose (*Branta canadensis*), snow goose (*Anser caerulescens*), and ruby-crowned kinglet (*Regulus calendula*).

Mammals

The Project and Local Vicinity provide suitable foraging and cover habitat for mammalian species adapted to routine disturbance and development. Mammalian species detected during the field investigation include American badger (*Taxidea taxus*), domestic cat (*Felis catus*), western gray squirrel (*Sciurus griseus*), and California ground squirrel (*Otospermophilus beecheyi*). Additionally, domestic dogs (*Canis familiarus*) and livestock such as cattle (*Bos taurus*), horses (*Equus caballus*), and goats (*Capra aegagrus hircus*) occur commonly adjacent or in the Local Vicinity. Other common mammal species that may occur within or adjacent to the Project include coyote (*Canis latrans*), striped

skunk (*Mephitis mephitis*), and desert cottontail (*Sylvilagus audubonii*). Further, local bat species adapted to routine disturbance have the potential to roost in the eucalyptus trees present adjacent to the Project.

The following table is a list of potentially occurring sensitive biological resources at the Project and within the Local Vicinity.

TABLE 14: SPECIAL-STATUS ANIMAL & PLANT SPECIES DOCUMENTED WITHIN THE LOCAL VICINITY

Species	Status	Description of Habitat Requirements	Observed On-Site	Potential to Occur in Study Area
WILDLIFE SPECIES				
Acipenser medirostris pop. 1 green sturgeon-southern DPS	Fed: THR CA: None	Generally found in the San Joaquin and Delta River systems. Spawn primarily in the upper mainstem of the Sacramento River but can also be found spawning in the Yuba and Feather Rivers. Remain in freshwater for a few years, then migrate to saltwater to feed, grow, and mature. Adults enter San Francisco Bay between mid-February and early May and migrate upstream to spawn. Congregate in bays and estuaries in Washington, Oregon, and California in the summer and fall, and northern Vancouver Island, B.C. in the winter and spring.	No	**Presumed Absent.** There is no suitable habitat present within or adjacent to the Project.
Ambystoma californiense pop. 1 California tiger salamander-central California DPS	Fed: THR CA: THR; WL	Can be found in annual grasslands and oak woodlands with hot, dry summers and cool, rainy winters. Reside underground throughout most of the year in abandoned small mammal burrows. Require ephemeral pools for breeding.	No	**Presumed Absent.** There is no suitable habitat present within or adjacent to the Project.
Anniella pulchra northern California legless lizard	Fed: None CA: SSC	Occurs in moist, warm, loose soils with plant cover, or sparsely vegetated areas of beach dunes, chaparral, pine-oak woodlands, desert scrub, sandy washes, and stream terraces. Found in leaf litter under trees and bushes, sunny areas, dunes with stabilized soil, under rocks and logs, and within suburban gardens.	No	**Low.** Suitable foraging and nesting habitat present within and adjacent to the Project. However, species have not been observed in the general area.
Ardea herodias great blue heron	Fed: None CA: None	Fairly common all year throughout most of California, in shallow estuaries and fresh and saline emergent wetlands. Less common along riverine and rocky marine shores, in croplands, pastures, and in mountains about foothills.	No	**High.** Suitable foraging and nesting habitat is present within and surrounding the Project.
Athene cunicularia burrowing owl	Fed: None CA: SSC	Occurs in open, annual, or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. Dependent upon fossorial mammals for burrows, most notably ground squirrels.	No	**Presumed Absent.** There is no suitable habitat present within or adjacent to the Project.
Bombus occidentalis western bumble bee	Fed: None CA: CE	Occurs along the Pacific coast and western interior of North America. Dependent on habitat with rich, floral resources throughout nesting season. Require above and below-ground microsites for overwintering and nesting including logs, stumps, and abandoned rodent and ground nests and dens.	No	**Presumed Absent.** There is no suitable habitat present within or adjacent to the Project.
Buteo swainsoni Swainson's hawk	Fed: None CA: THR	Typical habitat is open desert, grassland, or cropland containing scattered, large trees or small groves. Breeds in stands with few trees in juniper-sage flats, riparian areas, and in oak savannah in the Central Valley. Forages in adjacent grassland or suitable grain or alfalfa fields or livestock pastures.	No	**Presumed Absent.** There is no suitable habitat present within or adjacent to the Project.
Desmocerus californicus dimorphus valley elderberry longhorn beetle	Fed: THR CA: None	Found only within the valley floor and lower foothill region within riparian and foothill oak communities in the Central Valley, of California. Dependent on elderberry as a host plant.	No	**Presumed Absent.** There is no suitable habitat present within or adjacent to the Project.
Entosphenus tridentatus pacific lamprey	Fed: None CA: SSC	Spend most of their lives in freshwater streams before entering the ocean as adults. Young lamprey burrow in muddy bottoms of	No	**Presumed Absent.** There is no suitable habitat

		backwater pools and eddies. Spawn in medium and large-sized, low-gradient rivers and streams.		present within or adjacent to the Project.
Eumops perotis californicus western mastiff bat	Fed: None CA: SSC	Found in a variety of habitats from dry desert washes, flood plains, chaparral, oak woodland, open ponderosa pine forest, grassland, montane meadow, and agricultural areas. Requires rock outcroppings, cliff faces, tunnels, or tall buildings for roosting.	No	**Presumed Absent.** There is no suitable habitat present within or adjacent to the Project.
Hysterocarpus traskii traskii Sacramento-San Joaquin tule perch	Fed: None CA: None	Found in deep waters of low-elevation lakes, streams, and estuarine environments. Require cool, well-oxygenated water. Occupy deep pools with complex vegetative cover.	No	**Presumed Absent.** There is no suitable habitat present within or adjacent to the Project.
Lavinia exilicauda exilicauda Sacramento hitch	Fed: None CA: SSC	Inhabits warm, lowland waters, including clear streams, turbid sloughs, lakes, and reservoirs. Generally found in pools or runs among aquatic vegetation associated with streams.	No	**Presumed Absent.** There is no suitable habitat present within or adjacent to the Project.
Mustela frenata xanthogenys San Joaquin long-tailed weasel	Fed: None CA: None	Occurs in woodlands, thickets, and open areas such as farmland, usually near a water source. Uses abandoned mammal burrows to den, preferably under stumps or beneath rock piles.	No	**Presumed Absent.** There is no suitable habitat present within or adjacent to the Project.
Mylopharodon conocephalus hardhead	Fed: None CA: SSC	stream habitat with high water clarity. Limited to well-oxygenated streams and reservoir surface waters. Common in small aggregations in pools and runs during the day. Primarily bottom-feed but can feed on drifting material and insects at the water's surface.	No	**Presumed Absent.** There is no suitable habitat present within or adjacent to the Project.
Oncorhynchus mykiss irideus pop. 11 steelhead – central valley DPS	Fed: THR CA: None	Occurs primarily in tailwaters of dammed rivers, undammed creeks, and four hatchery-supported systems of Battle Creek, and the Feather, American, and Mokelumne Rivers.	No	**Presumed Absent.** There is no suitable habitat present within or adjacent to the Project.
Oncorhynchus tshawtyscha pop. 13 Chinook salmon-central valley fall/late fall-run ESU	Fed: None CA: SSC	Spend early life growing and feeding in freshwater streams, estuaries, and associated wetlands. Adults live in coastal oceanic areas. This population includes naturally spawned spring-run individuals, originating from the Sacramento River and its tributaries, as well as the Feather River Hatchery program.	No	**Presumed Absent.** There is no suitable habitat present within or adjacent to the Project.
PLANT SPECIES				
Legenere limosa legenere	Fed: None CA: None CNPS: 1B.1	Found mainly in vernal pools in Sacramento and Solano counties but has also been recorded in several other north-central, and baydelta areas. Restricted to seasonal wetland environments below 2,000 feet. Blooms from May to June.	No	**Presumed Absent.** There is no suitable habitat present within or adjacent to the Project.
Tuctoria greenei Greene's tuctoria	Fed: END CA: Rare CNPS: 1B.1	Grows in vernal pools or grasslands with vernal swale complex land cover. Occurs in open grassland communities, on the eastern side of the Sacramento and San Joaquin Valleys.	No	**Presumed Absent.** There is no suitable habitat present within or adjacent to the Project.

Source: ELMT Consulting, 2024
Notes:

USFWS
(Fed) - Federal
END- Federal Endangered
THR- Federal Threatened
CE- Candidate for listing under the Federal ESA

California Department of Fish and Wildlife
END- California Endangered
THR- California Threatened
CE- Candidate for listing under the California ESA
FP- California Fully Protected
SSC- Species of Special Concern
WL- Watch List

CNPS
California Rare Plant Rank
1B Plants Rare, Threatened, or Endangered in California and Elsewhere
2B Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere
3 Plants About Which More Information is Needed – A Review List
4 Plants of Limited Distribution – A Watch List

CNPS Threat Ranks
0.1- Seriously threatened in California
0.2- Moderately threatened in California
0.3- Not very threatened in California

5.4.3 Project Impacts

a) **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

RESPONSE:

Less than Significant with Mitigation Incorporated. According to the CNDDB and CNPS, two (2) special-status plant species; and sixteen (16) special-status wildlife species have been recorded in the Escalon and Avena quadrangles. No special-status plant or animal species were observed on-site during the habitat assessment. The Project and Local Vicinity have been subject to anthropogenic disturbances, including grading, and vegetation removal in recent decades in association with flood control measures, and on-site and adjacent development. These disturbances have reduced the suitability of the habitat to support special-status plants and reduced potential foraging and nesting/denning opportunities for wildlife species known to occur in the Project's Local Vicinity. Based on habitat requirements for specific special-status plant species and the availability and quality of habitats needed by each species, it was determined that the Project does not provide suitable habitat for any of the special-status plant species known to occur in the area and all are presumed to be absent from the Project. No focused surveys are recommended.

However, natural revegetation and the installation of ornamental landscaping continue to provide suitable habitats for some local wildlife species. Based on habitat requirements for specific species and the availability and quality of on-site habitats, it was determined that the proposed Project and Local Vicinity has a high potential to support great blue heron (*Ardea alba*) and a low potential to support northern California legless lizard (*Anniela pulchra*). The Project does not provide suitable habitat for the remaining special-status species known to occur in the Local Vicinity and all are presumed to be absent. Of these species, the California tiger salamander is both federally and state-listed as threatened, and Swainson's hawk is state-listed as threatened. None of the other aforementioned species are federally or state-listed.

No active nests or birds displaying nesting behavior were observed during the field survey. However, on-site plant communities have the potential to provide suitable nesting habitat for year-round and seasonal avian residents, as well as migrating songbirds that could occur in the area that are adapted to routine disturbance. In addition, suitable nesting opportunities for raptors are present in the eucalyptus trees that occur throughout adjacent site areas and the disturbed portions of the Project have the potential to provide suitable nesting opportunities for birds that nest on the open ground (e.g., killdeer [*Charadrius vociferus*]). As a result of potential nests at the Project and within the Local Vicinity, a pre-construction nesting bird clearance survey, and ground nesting raptors pre-construction survey shall be conducted prior to Project construction pursuant to Mitigation Measures **MM BIO-01: Pre-construction Nesting Bird Clearance Survey, Modified MM BIO-02: Ground Nesting Raptors Pre-construction Survey, Modified MM BIO-03: Raptor Nests,** and **Modified MM BIO-04: Active Nests.**

As a result, less than significant impacts are anticipated with the incorporation of Mitigation Measures.

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 U.S. Fish and Wildlife Service?**

RESPONSE:

Less than Significant with Mitigation Incorporated. The USFWS NWI and the USGS National Hydrography Dataset were reviewed to determine if any blueline streams or riverine resources have been documented within or immediately surrounding the Project. Based on this review, several riverine resources were identified in the area of the Project by the NWI. The main water feature in the area is Lone Tree Creek, which passes below Escalon-Bellota Road between Magnolia Avenue to the south and Buerer Road to the north. Several agricultural water conveyance features and water storage basins that occur adjacent to the Project alignment were constructed in the uplands for agricultural purposes and are not considered jurisdictional by the Corps, Regional Board, or CDFW.

Lone Tree Creek supports a riparian plant community. Plant species observed within the riparian community include cattail (*Typha* sp.), black poplar (*Populus nigra*), Gooding's willow (*Salix gooddingii*), California black oak (*Quercus kelloggii*), blackberry (*Rubus occidentalis*), rosewood (*Vaquelinia* sp.), red gum eucalyptus (*Eucalyptus camaldulensis*), and Asiatic jasmine (*Trachelospermum asiaticum*). However, no impacts on this plant community will occur. Based on the proposed Project plans and limits of disturbance, Project activities will not result in impacts to Corps, Regional Board, or CDFW jurisdictional areas and regulatory approvals will not be required.

However, since jack and bore construction is proposed underneath Lone Tree Creek, impacts may occur. Therefore, the Project will implement Mitigation Measure **Modified MM BIO-05: Jack and Bore Construction** to ensure that a Project biologist is onsite during jack and bore construction and that stream crossings are fenced with snake-proof fencing prior to construction activities.

As a result, impacts are anticipated to be less than significant with mitigation incorporated.

c) **Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

RESPONSE:

No Impact. As mentioned in Response b) above, several riverine resources were identified in the area of the Project by the NWI. However, no wetland features were identified. No impacts to state or federally-protected wetlands are anticipated as a result of the Project. No Mitigation Measures are needed.

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?**

RESPONSE:

No Impact. The proposed Project has not been mapped as occurring within any recognized wildlife corridor or linkage. Mokelumne Vernal Wildlife Corridor occurs approximately 6.7 miles to the east and Stanislaus Vernal Wildlife Corridor occurs approximately 3.9 miles to the southeast. Additionally, the site occurs in proximity to several open spaces including golf courses, parks, and inactive agricultural areas which provide movement opportunities for local wildlife, especially for avian species.

Due to the nature and scope of the proposed Project and construction activities, which will be confined to existing paved road right-of-way or heavily disturbed areas, short-term impacts to suitable movement habitat within Lone Tree Creek may occur until phase completion of each relevant area. As a result, no long-term impacts are expected to occur as a result of Project implementation. No impacts are anticipated; no Mitigation Measures are needed.

e) **Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

RESPONSE:

No Impact. The Project does not propose to remove trees as a result of Project implementation. Therefore, conflicts with any local policies or ordinances protecting biological resources including tree preservation policies or ordinances are not anticipated as a result of the Project. No impacts are anticipated; no Mitigation Measures are needed.

f) **Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

RESPONSE:

No Impact. The proposed Project occurs within an area primarily allocated to agricultural practices and associated development. Natural vegetation supported on-site is limited to narrow strips of primarily invasive and ruderal species which were re-established following the complete removal of vegetation in recent decades to accommodate surrounding development and associated flood control infrastructure. Native vegetation in Local Vicinity occurs in very limited areas, mostly along the banks of Lone Tree Creek, which passes under Escalon-Bellota Road central to the proposed scope of the Project.

Due to the scope of the Project and the proposed construction activities, impacts to native vegetation within the Project are expected to be limited to existing disturbed areas, and Project activities are not expected to result in long-term or significant impacts to native plant communities. As a result, implementation of the proposed Project will not result in any impacts to any areas protected by the SJMSCP. No impacts are anticipated; therefore, no Mitigation Measures are needed.

5.4.4 Mitigation Measures

MM BIO-01: Pre-construction Nesting Bird Clearance Survey. If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds should be conducted within three (3) days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. The biologist conducting the clearance survey should document a negative survey with a brief letter report indicating that no impacts to active avian nests will occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities should stay outside of a no-disturbance buffer that will be established by the City's biologist. The size of the no-disturbance buffer will be determined by the wildlife biologist and will depend on the level of noise and/or surrounding anthropogenic disturbances, line of sight between the nest and the construction activity, type and duration of construction activity, ambient noise, species habituation, and topographical barriers. These factors will be evaluated on a case-by-case basis when developing buffer distances. Limits of construction to avoid an active nest will be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel will be instructed on the sensitivity of nest areas. A biological monitor should be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur.

Modified MM BIO-02: Ground Nesting Raptors Pre-construction Survey- Prior to Project construction, the City of Escalon shall retain a qualified biologist to conduct a survey for ground nesting raptors (in March or April) 30 days and repeated 3 days prior to construction activities (i.e., grading) in areas containing suitable nesting habitat. Active raptor nests located within 500 feet of construction activity shall be mapped.

Modified MM BIO-03: Raptor Nests- If active raptor nests are located on or within 500 feet of a construction site, a minimum of a 500 feet buffer area shall be established by a qualified biologist and construction activities shall be prohibited within this buffer zone until the end of the nesting season (April through August) or until the young have fledged. A qualified wildlife biologist shall monitor the nest to determine when the young have fledged and submit weekly reports to CDFW throughout the nesting season.

Modified MM BIO-04: Active Nests- Prior to construction activities, the City of Escalon in coordination with the Project contractor and qualified biologist shall identify trees with active nests. Active nests shall only be removed prior to the onset of the nesting season (March) or after the young have fledged (late August).

Modified MM BIO-05: Jack and Bore Construction- At jack and bore locations, bore pits shall be excavated at least 50 feet outside the edge of riparian vegetation to avoid impacts. A biological monitor shall be present during staking for jack and bore and during jack and bore construction to alert the construction crew to the possible presence of any special-status amphibian or reptile at risk during the crossing. The following measures shall be implemented:

- Construction at stream crossings with riparian and/or emergent vegetation shall be limited to facilitate detection and reduce the potential of direct mortality for snakes. The USFWS Sacramento Field office shall be contacted in the event that construction needs to occur between October 2 and April 30 to determine if additional measures are necessary to minimize and avoid take.
- Two weeks prior to any ground-disturbing activity at stream crossings with riparian and/or emergent vegetation, the bore pit, staging area, and access routes shall be fenced with snake-proof fencing that will be installed under supervision of the city's biologist. Two days prior to construction, a biological monitor with appropriate state and federal permits shall survey the fenced-in areas and determine the presence of snakes. If present, the monitor shall relocate snakes a minimum of 500 feet from construction activities. During construction, the monitor shall be present on-site to ensure that no snakes are in the disturbance area, that all excavated areas are backfilled or covered, and to educate the construction personnel as appropriate.

5.5 CULTURAL RESOURCES

Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
V. CULTURAL RESOURCES. Would the Project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

The following responses are based on a Cultural Resources Assessment conducted by BCR Consulting LLC, dated May 12th, 2023 (See **Appendix C**). Conclusions and recommendations are based on research, a cultural resources records search, a SLF search, and intensive-level pedestrian cultural resources field survey performed on April 28th, 2023. David Brunzell M.A., R.P.A, acted as Principal Investigator, provided project oversight, and authorized the technical report with contributions from BCR Consulting Staff Archeologist Doug Kazmier, B.A., and BCR Consulting Archeological Crew Chief Nicholas Sheptuk, B.A. Central Information Center (CCIC) staff completed the cultural resources records search through its archive at California State University, Stanislaus. Mr. Kazimer completed the field survey.

5.5.1 Regulatory Compliance

California Public Resource Code 15064.5

The following regulations are applicable to cultural resources that could be found during construction of the Project: California Code of Regulations Title 14 Subsection 15064.5 generally defines historically significant cultural resources as any object, building, structure, site, area, place, record, or manuscript which is:

- A resource listed or eligible for listing by the State Historical Resources Commission, for listing in the California Register of Historical Resources (CRHR)
- A resource included in a local register of historical resources, as defined in section 5020.1(k) of the PRC, or identified as significant in a historical resource survey meeting the requirements section 5024.1(g), (listed as historical by local ordinance)
- A resource a Lead Agency determines to be historically significant.

California Code of Regulations §15064.5 relating to historical resources pertains to environmental changes impacting any object, building, structure, site, area, place, record, or manuscript associated with:

- Events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- The lives of persons important in our past.
- 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.
- Resources which have yielded, or may be likely yield, information important in prehistory or history.

Properties that are listed in or eligible for listing in the National Register of Historic Places pursuant to Section 106 of the National Historic Preservation Act are considered eligible for listing in the CRHR and thus are significant historical resources for the purpose of CEQA (PRC Section 5024.1(d)(1)).

CEQA Section 21083.2

CEQA Section 21083.2 requires that the CEQA Lead Agency determine whether a project may have a significant effect on unique archaeological resources. A unique archaeological resource is defined in as an archaeological

artifact, object, or site about which it can be clearly demonstrated that there is a high probability that it:

- Contains information needed to answer important scientific research questions, and there is demonstrable public interest in that information;
- Has a special or particular quality, such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

California Health and Safety Code Section 8100

Section 8100 of the California Health and Safety Code defines a cemetery as six or more human burials at one location. Disturbance of Native American cemeteries is a felony (Health and Safety Code Section 7052). Section 7050.5 of the Health and Safety Code requires that if human remains are found during construction or excavation, the activities be stopped until the county coroner can determine if the remains are Native American. If the remains are determined to be Native American, the coroner must then contact the NAHC, which has jurisdiction pursuant to PRC Section 5097.

5.5.2 Existing Conditions

Natural Setting

The elevation of the Project alignment ranges from approximately 110 to 120 feet AMSL and is located within Township 1 South, Range 9 East on the Escalon, CA USGS 7.5-minute quadrangle. Local geologic units include Late Pleistocene to Early Holocene riverbank formation (Wagner et. al 1991). The Project will be constructed in areas that have been subject to previous disturbances for road construction and maintenance, canal construction and maintenance, and agricultural activities to depths not exceeding approximately 10 feet bgs.

Cultural Setting

The Project is located within the traditional boundaries of the Northern Valley Yokuts, whose regional settlement began between 9,000- 11,500 years before the present. This prehistoric population depended heavily on the San Joaquin River and its connecting sloughs and rivers for sustenance and transportation. Due to numerous perennial water sources, the Northern Valley Yokuts were able to pursue a sedentary lifestyle in an otherwise arid climate. The first Europeans to establish contact with the Yokuts were Spanish troops. Prehistorically, such sedentism often coincides with a village-style residential model in which residential bases remain the same or seasonal, while specialized procurement parties are deployed to more remote areas to collect specialized resources (Binford 1980, Thomas 1983). This village model has been locally supported by early ethnographers, who considered Yokuts unique in California for forming "true tribes" and for developing an unparalleled array of dialects (Kroeber 1925:474).

The Mexican era (1821-1848) saw little notable cultural exchange between Mexicans and Yokuts, although an 1833 malaria epidemic devastated the local native population (Wallace 1978:460). The American era, punctuated by California's annexation into the United States in 1848, resulted in overwhelming Anglo settlement which disrupted local Yokut influence. Mining and ranching represented the early historical focus of the San Joaquin Valley, although abundant natural water, a mild climate, and arable land soon led to the successful development of agriculture.

5.5.3 Project Impacts

a) **Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?**

RESPONSE:

Less than Significant with Mitigation Incorporated. During the Project's field survey, notable past disturbances related to the construction and maintenance of roads, canals, and infrastructure, as well as agricultural activities were documented. Surface conditions observed included sediments, sandy silt, and vegetation which was dominated by seasonal grasses affording approximately 30 percent surface visibility within existing unpaved areas where the Project will be implemented. The field survey conducted by Mr. Kazmier, BCR Staff Archaeologist, on May 12th, 2023, consisted of an inspection of the entire Project using 15-meter transect intervals on either side of the proposed water main alignment and the BPS, and FCF sites, for both prehistoric and historic-period cultural resources. There were no cultural resources (including pre-historic or historic archeological or historic architectural resources) identified during the field survey.

During preliminary research, results from the CCIC revealed 16 cultural resources studies have taken place resulting in 16 cultural resources recorded within a one-half-mile radius of the Project, see *Table 15: Cultural Resources Within One-Half Mile of the Project* below.

TABLE 15: CULTURAL RESOURCES WITHIN ONE-HALF MILE OF THE PROJECT

USGS 7.5 Min Quad	Primary No.	Resource Description	Within Project	Studies Within One-Half Mile
Escalon and Avena, California (1968)	P-39-0015	Tidewater Southern Railway	0.5-mile	SJ-1543, 2544, 3358, 3366, 3367, 3380, 3654, 4193*, 4203, 4204, 4565, 5170, 6625, 6975, 9021, 9023
	P-39-0112	Burlington Northern Santa Fe Railroad	0.35-mile	
	P-39-0439	Historic-Period Electrical Distribution Lines	0.2-mile	
	P-39-0441	Calizo's Deli, Escalon Auto Parts	0.5-mile	
	P-39-0442	Bud's Frosty	0.5-mile	
	P-39-0443	Historic-period Building	0.5-mile	
	P-39-0444	Escalon Recreational Vehicle Sales	0.5-mile	
	P-39-0445	Santa Fe Railroad	0.35-mile	
	P-39-0447	No Information Available	--	
	P-39-0452	Farmer Bill's	0.4-mile	
	P-39-4172	Axel Larson Residence	0.4-mile	
	P-39-4173	Escalon Motel	0.4-mile	
	P-39-4174	Historic-period Single-family Residence	0.4-mile	
	P-39-4245	Structure, Other	0.35-mile	
	P-39-5061	Dent School	0.4-mile	
	P-39-5062	Escalon Union High School	0.1-mile	

Source: BCR Consulting, 2023
Notes: * Occurred Within the Project.

Since no cultural resources including historic or prehistoric archaeological sites and historic architectural resources were found during research and the field survey for the Project, no additional cultural resources work, or monitoring is recommended pursuant to CEQA Guidelines § 15064.5. The possibility for substantial adverse changes in the significance of a historical resource pursuant to Section 15064.5 is considered low; however, impacts are not considered less than significant due to proposed depths of excavation and trenching for the water main, and subterranean portions of the BPS, tank and FCF that may disturb native soils below existing levels of disturbance associated with existing development patterns. This was documented as a potentially significant impact of the SCSWSP and in the Cultural Resources Assessment for this Project. Therefore, crew training for Prehistoric or historic cultural materials that may be encountered during ground-disturbing activities is recommended, and mitigation measures **Modified MM CUL-01: (Ground Inspection) Pre-Construction Crew Training** and **Modified MM CUL-02: Discovery of Buried Cultural Resources** have been included to require that a qualified cultural resources professional be hired by the City to conduct crew training prior to start of construction. Implementation of **Modified MM CUL-01: (Ground Inspection) Pre-Construction Crew Training** and **Modified MM CUL-02: Discovery of Buried Cultural Resources** will result in less than significant impacts with mitigation for buried cultural resources.

b) **Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?**

RESPONSE:

Less than Significant with Mitigation Incorporated. See Section 5.5.3, Response a). According to the Cultural Resources Assessment, the Project Components are underlain with Pleistocene and Pliocene loosely consolidated deposits. While the records search and field survey did not identify cultural resources within the location of each Project Component, ground-disturbing activities proposed by the Project have the potential to discover buried deposits not observed on the surface.

Project construction will require ground disturbance below the depths of previous disturbance. Therefore, Mitigation Measures **Modified MM CUL-01: (Ground Inspection) Pre-Construction Crew Training, Modified MM CUL-02: Discovery of Buried Cultural Resources, MM CUL-03: Cultural Resources Treatment and Disposition,** will

be implemented during construction activities. The Mitigation Measures listed in Section 5.5.4 below will ensure that construction crew members are informed of standard procedures expected from the City of Escalon in the event construction results in the discovery of prehistoric or historic cultural deposits.

As a result, the proposed Project will have less than significant direct impacts on archeological resources pursuant to Public Resources Section 15064.5.

c) **Disturb any human remains, including those interred outside of dedicated cemeteries?**

RESPONSE:

Less than Significant with Mitigation Incorporated. See Section 5.5.3, Response a) and b). According to the records search and review of aerial photos, the previous land uses for the Project area were for agriculture, not a cemetery. Therefore, the discovery of human remains during Project construction is unlikely, but not impossible. Construction activities will require ground disturbances beyond depths of previous disturbances. Therefore, the implementation of Project Components including the FCF, BPS, and subterranean storage tank has the potential to unearth human remains that were unknown to occur within the Project and Local Vicinity.

As a result of the potential for discovery, Mitigation Measure **MM CUL-04: Discovery of Human Remains** and **Modified MM CUL-02: Discovery of Buried Cultural Resources** ensures appropriate procedures are taken in the unlikely event that human remains are discovered. The following Mitigation Measure results in Project impacts being less than significant.

5.5.4 Mitigation Measures

Modified MM CUL-01: (Ground Inspection) Pre-Construction Crew Training: Prior to start of construction, the City of Escalon shall hire a qualified archaeologist and tribal monitor to conduct pre-construction tailgate training for the construction crew. The training can be videotaped for crew added later during construction. Training shall be documented with a sign-in sheet and written materials including photos of cultural materials as follows:

- historic artifacts such as glass bottles and fragments, cans, nails, ceramic and pottery fragments, and other metal objects;
- historic structural or building foundations, walkways, cisterns, pipes, privies, and other structural elements;
- prehistoric flaked-stone artifacts and debitage (waste material), consisting of obsidian, basalt, and or cryptocrystalline silicates;
- groundstone artifacts, including mortars, pestles, and grinding slabs;
- dark, greasy soil that may be associated with charcoal, ash, bone, shell, flaked stone, groundstone, and fire-affected rocks.

Modified MM CUL-02: Discovery of Buried Cultural Resources: Throughout Project construction, the contractor shall maintain records of field crew training per **Modified MM CUL-01: (Ground Inspection) Pre-Construction Crew Training** and a cultural resources monitor shall be present at the site to document any cultural resources encountered during construction with photos, georeferencing, and maps. If field personnel encounter buried cultural materials, work in the immediate vicinity of the find should cease within 50 feet of the resources and the City and a qualified archaeologist should be contacted immediately to assess the significance of the find. The qualified archaeologist shall have the authority to stop or divert construction and excavation as necessary. If the qualified archaeologist finds that any cultural resources present meet eligibility requirements for listing on the California Register or the National Register, plans for the treatment, evaluation, and mitigation of impacts to the find will need to be developed.

MM CUL-03: Cultural Resources Treatment and Disposition: Immediately upon discovery of buried resources encountered during construction, the contractor shall cease work in the immediate vicinity of the find pursuant to **Modified MM CUL-02: Discovery of Buried Cultural Resources** and allow the qualified archaeologist to determine: a) if any cultural resources are significant or meet eligibility requirements for listing on the California Register or the National Register; b) to identify appropriate disposition measures for proper treatment through protection in place

or collection and curation to the find; and c) contact Native American tribes from NAHC's SLF Search to determine the important of the find.

MM CUL-04: Discovery of Human Remains: If human remains are encountered during construction, the contractor shall notify the County Coroner of the find immediately. If the remains are determined to be prehistoric, the coroner will notify the NAHC, which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC.

5.6 ENERGY

Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
VI. ENERGY. Would the Project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

5.6.1 Regulatory Compliance

California Energy Commission (CEC)

The CEC is a planning and policy agency responsible for forecasting future energy needs, promoting energy efficiency, maintaining energy data, developing energy technology, promoting renewable energies, and planning for energy emergencies throughout California. The Title 24 Building Energy Efficiency Standards were developed by the CEC and are updated periodically (SJ 2035 GP DEIR).

Green Building Standards Code (CalGreen)

CalGreen was first adopted in 2009 and has been updated every three years since. CalGreen pertains to sustainable practices for residential and commercial construction projects in California. Pursuant to CalGreen, construction projects must meet a mandatory set of minimum requirements and extensive voluntary measures. The Code covers planning and design, energy efficiency, water efficiency and conservation, materials conservation and resource efficiency, and indoor environmental quality.

5.6.2 Existing Conditions

Electricity within San Joaquin County is provided by PG&E, Modesto Irrigation District (MID), Lodi Electric Utility, and Port of Stockton. The City of Escalon receives electrical services primarily from PG&E. Annually, PG&E provides approximately 86,000 GWh of electricity to over 25 million consumers within Northern and Central California (SJ 2035 GP DEIR). Electricity is provided to residential, commercial, and industrial accounts across the County.

SSJID used a total of 4,178,374 kilowatt hours (kWh) of energy during 2020 operations. Efforts have been made to reduce energy consumption within the District's systems, including a solar farm at the Nick C. DeGroot Wastewater Treatment Plant. The solar farm consists of 7,000 photovoltaic panels installed on 14 acres of land to offset operational energy uses and costs.

5.6.3 Project Impacts

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?

RESPONSE:

Less than Significant Impact. The Project is a 19,500 LF water pipeline that will connect to an FCF, BPS, and storage tank with a wet well. The Project anticipates connecting to nearby power poles for energy use at the BPS and proposed FCF, throughout the lifetime of the Project via coordination with PG&E. At the BPS, PG&E will provide service to the proposed pump station site with the implementation of a new meter that will feed into a new 480V distribution panelboard via an automatic transfer switch.

The Project will install infrastructure that will implement regional groundwater sustainability by reducing well water use. The Project does not anticipate significant long-term use of energy or wasteful, inefficient, or unnecessary consumption of energy resources, since the BPS will not be utilized to its full capacity during long-

term operation, pumps were assumed to utilize approximately 1,006,031 kWh per year[5]. In addition, SSJID has proposed to incorporate solar into overall operations; therefore, energy consumption from the proposed Project will be offset with solar power provided by SSJID's system. The Project's proposed scale and nature prevent the Project from substantial energy consumption beyond what has already been approved and considered by the City's General Plan and Water Master Plan.

A diesel backup power generator will be provided to power the pumps at the BPS in the event of power loss from the utility provider. The modeling has been performed to assume the 125-kW generator will provide power to two of the 50 HP pumps, and HVAC system, in addition to instrumentation and lighting loads. The San Joaquin Valley Air Pollution Control District requires that any diesel-fired generator with break horsepower exceeding 37.3 kW (50 HP) be provided to comply with EPA Tier 4 Regulations. Since the generator is capable of providing power for up to 72 hours and will provide diesel-powered electricity exceeding 37.3 kW (50 HP), the 125kW generator will comply with EPA Tier 4 regulations.

Similarly at the FCF, a new 120/ 240V panelboard will be installed in an enclosed electrical building, which will be powered by PG&E throughout the lifetime of the Project. A 10kW propane backup generator will be provided to power the flow control equipment and the PLC. The generator is significantly larger than the load associated with the Project, which is not anticipated to exceed 1 kW (1.34 HP).

During Project construction, substantial uses of energy are not anticipated beyond what was previously identified in the EIR for the SCSWSP. A generator might be utilized intermittently during construction activities; however, Project equipment will primarily be diesel-powered. In addition, Project Components are not located near electrical infrastructure or hookups. As a result, energy resources will not be heavily utilized during Project construction due to the lack of availability.

The Project is included in the planned buildout of the City of Escalon's Water Master Plan and General Plan EIR and will not result in changes to land use or additional GHG emissions. The Project is not anticipated to result in significant energy consumption beyond what has already been identified in the General Plan EIR and less than significant impacts are anticipated. The Project is part of a planned phased construction from the City's Water Master Plan, which is intended to efficiently accommodate approved future growth for the City of Escalon while maintaining consistent and reliable services to their consumer base.

For the reasons above, the proposed Project is anticipated to have less than significant impacts on energy resources during Project construction or operation. No Mitigation Measures are needed.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

RESPONSE:

Less than Significant Impact. See Section 5.6.3, Response a). Long-term operational energy use is required for the proposed Project and is anticipated to total approximately 1,006,031 kWh per year. Project plans indicate electricity, diesel, and propane will be used for the continuous operation of the Project for water delivery via pumps and emergency generators. The Project is part of a planned buildout of the General Plan within the City of Escalon and is required for annexations, future water system extensions, and buildout of future land use shown in the City of Escalon's approved General Plan Land Use Map. The Project has been approved in concept within the SCSWSP to enhance the City's water delivery system to serve growth which has already been approved. The Project will replace groundwater extraction and will promote sustainability plans for water resources. The Project

[5] During the first year of operation, it is assumed that the 25-HP pump will operate 24/7 or ~8,760 hours per year and the 50-HP pumps would not be in operation. During final buildout, it is assumed that the 25-HP pump will operate ¼ of the time or ~1,095 hours per year and each of the 50-HP pumps will operate 1/3 of the time or approximately 2,920 hours per year for each 50-HP pump. Therefore, the operational hours at final buildout are anticipated to be worst-case and were utilized in the analysis. Energy use calculations for the pumps include: 1-HP=0.75 kW. 25-HP pump = 18.75 kW x 1,095 hours/year = 20,531 kWh/year. 3x50-HP pumps = 150-HP = 112.5 kW x (3x2,920 hours/year) = 985,500 kWh/yr. Total of ~1,006,031 kWh/year of electricity used by the proposed pumps. Operation of project is that of the electric pumps and generators only, no natural gas anticipated to be used (Ganddini, 2023).

will facilitate the implementation of the City's water systems pursuant to previously approved plans with increased capabilities to better serve water customers.

For these reasons, implementation of the Project is not anticipated to conflict with or obstruct a state or local plan for renewable energy or energy efficiency. No Mitigation Measures are necessary.

5.6.4 Mitigation Measures

No Mitigation Measures are needed.

5.7 GEOLOGY AND SOILS

Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
VII. GEOLOGY AND SOILS. Would the Project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☐	☒
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
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 a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

5.7.1 Regulatory Compliance

Alquist-Priolo Earthquake Fault Zoning Act

California's Alquist-Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act) (PRC Section 2621 et seq.), originally enacted in 1972 as the Alquist-Priolo Special Studies Zones Act and renamed in 1994, is intended to reduce the risk to life and property from surface fault rupture during earthquakes. The Alquist-Priolo Act prohibits the location of most types of structures intended for human occupancy across the traces of active faults and strictly regulates construction in the corridors along active faults (earthquake fault zones). It also defines criteria for identifying active faults and establishes a process for reviewing building proposals in and adjacent to earthquake fault zones.

Under the Alquist-Priolo Earthquake Fault Zoning Act, special safety requirements apply to faults that are considered active by the State Geologist, because of repeated activity. Faults are mapped according to fault surface trace locations with a surrounding buffer delineating the Earthquake Fault Zone where there is elevated potential for ground rupture and structural damage. Surface traces of active faults could pose a risk to structures and are in regulated areas if they are active. "A fault is considered well defined if its trace can be clearly identified by a trained geologist at the ground surface or in the shallow subsurface, using standard professional techniques, criteria, and judgment.

California Building Code (CBC)

The CBC establishes regulations for building design and safety related to seismicity, materials, and foundations which are implemented through the standard application of plan check and inspections for grading and construction. California is seismically active, and it is likely that the site would experience earthquake ground shaking within the life of the Project. Strong earthquake shaking is a hazard shared throughout the region and the direct risks posed to structures by ground shaking are mitigated through the structural design provisions of the CBC. The seismic design provisions of the 2010 CBC include a methodology by which sites are classified as A through F in order to quantify site-specific ground-shaking effects.

City of Escalon Standard Specifications

The City of Escalon has published Standard Specifications that are compliant with the City's standard review and approval process for various Projects. These specifications outline the City's procedures applicable to the proposed Project including inspections, dust and dirt control, erosion and sedimentation control, trench excavation, stability of pipeline beds, etc.

CEQA: Paleontological Resources

CEQA provides guidance relative to significant impacts on paleontological resources, indicating that a project will have a significant impact on paleontological resources if it disturbs or destroys a unique paleontological resource or site or unique geologic feature. Section 5097.5 of the California Public Resources Code specifies that any unauthorized removal of paleontological remains is a misdemeanor. Further, California Penal Code Section 622.5 sets penalties for damage or removal of paleontological resources. CEQA documentation prepared for projects would be required to analyze paleontological resources as a condition of the CEQA process to disclose potentially significant impacts and mitigation measures. Please note that as of January 2018, paleontological resources are considered a geological rather than cultural category in the CEQA checklist.

5.7.2 Existing Conditions

The Project is within the southeastern corner of San Joaquin County, which extends across the Central Valley. The County is generally flat and since the Project is on the valley floor, elevations at the Project range from 100 to 200 feet ASML. Land within the County is underlain with alluvial deposits that originate from "eroded silica-based volcanic and granitic materials from the Sierra Nevada" and "shale/clay and quartzite marine deposits" from Coastal Ranges (SJ 2035 GP DEIR).

The Project Local Vicinity are not over or adjacent to a mapped fault line; the closest fault lines are east and west of the Project. Approximately 21 miles to the west from the tie-in with SSJID transmission main is the Vernals Fault, which traverses through Stockton City Limits to the base of the San Joaquin River National Wildlife Refuge.

5.7.3 Project Impacts

The responses within this section were based on a previously published IS/MND within the City of Escalon with technical reports outlining the baseline conditions of the soil composition. Specifically, the IS/MND utilized during the preparation of these responses was drawn from the following sources:

- Administrative Review Draft IS/MND for the Irwin Village Senior Residential Project, Escalon, CA, prepared by BaseCamp Environmental Inc., November 2021. **Location**: approximately 1.0 mile southwest of the proposed BPS site.
- Cultural Resources Assessment, City of Escalon Connection to Nick DeGroot Water Treatment Plant, Escalon, San Joaquin County, California, prepared by BCR Consulting LLC, (May 12th, 2023), Project No. ARD2301

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

RESPONSE:

No Impact. As mentioned above, the Project is not in close proximity to known fault lines and therefore, is not within the boundaries of an Earthquake Fault Zone for fault rupture hazard as defined by the Alquist-Priolo Earthquake Zoning Act of 1972. This conclusion was verified utilizing the CA DOC's Geological Survey Website (Reference CGS Earthquake Zones (ca.gov)). The CA DOC defines Alquist-Priolo earthquake fault zones as "regulatory zones surrounding the surface traces of active faults in California" with an increased potential for surface rupture. Since the Act has come into effect, laws prohibit structures meant for human occupancy to be built across traces of active faults. Structures built within these areas should maintain a minimum of 50 feet from the fault line.

Since the Project is not within mapped fault zones or within the confines of active fault traces or their associated Alquist- Priolo Fault Zones, it is unlikely for ground displacement to occur outside of these areas. For these reasons, no impact is anticipated in association with fault rupture. This includes the risk of loss, injury, or death, which is not anticipated to occur at the Project or other properties in the Local Vicinity. Therefore, no Mitigation Measures are needed.

ii. **Strong seismic ground shaking?**

RESPONSE:

Less than Significant with Mitigation Incorporated. All of California is subject to potential seismic activity, and areas within proximity of fault zones are subject to regulations minimizing the risk associated with ground shaking. The Project is subject to ground shaking due to its geographic location and the state's overall susceptibility to earthquakes and there is nothing unique about the location of the Project that would make it more susceptible to strong seismic ground shaking. The severity of shaking is dependent on proximity to active faults and the estimated maximum ground acceleration of the fault. The City of Escalon General Plan EIR states that "according to the California Division of Mines and Geology Bulletin 198, "Urban Geology Master Plan for California," the Escalon area is shown to be in a low severity zone with a probable maximum intensity of VI or VII on the Modified Mercalli Scale of 1931" (City of Escalon GP EIR 2035).

While the potential for seismic ground shaking is low due to the Project proximity to the nearest fault zone being more than 21 miles away, the proposed Project will still implement BMPs during Project construction pursuant to the City's Standard Specifications *3.02 Utilities*, CBC and Cal-OSHA standards for workers safety, which will reduce risks associated with seismic ground shaking at the various Project Components. In addition, the Project will implement previously approved Mitigation Measures from the SCSWSP EIR (**Modified MM GEO-01: Seismic Design Criteria** and **Modified MM GEO-02: Geotechnical Design Criteria**) to ensure that recommendations from the geotechnical engineer as well as City and San Joaquin County's engineering design policies are incorporated for minimal impact associated with strong seismic ground shaking.

The standard application of the local agency plan check and inspection processes will result in, less than significant impacts as a result of strong seismic ground shaking with the implementation of Mitigation Measures.

iii. **Seismic-related ground failure, including liquefaction?**

RESPONSE:

Less than Significant Impact. Reference Response 5.7.3, a) i) and ii). Liquefaction, as defined by the CA DOC, is "the transformation of granular materials from a solid state into a liquefied state as a consequence of increased pore-water pressure" (CA DOC 2023). Additionally, liquefaction is anticipated in areas where the groundwater is less than 30 feet from the surface. Subsurface information within the City's General Plan Update Background Report published in 2004, indicated that subsurface soil types at the Project or in the Local Vicinity are not conducive to liquefaction (Escalon Draft GPU 2004).

The soils identified within this region consist of Honcut sandy loam and Veritis fine sandy loam with 0 to 2 percent slopes (BaseCamp Environmental 2021). Additionally, according to the CA DOC Compilation of Quaternary Surficial Deposits, the Project is underlain with primarily Alluvial Fan Deposits (Qf) (See https://maps.conservation.ca.gov/cgs/QSD/). These deposits consist of gravel, sand, and small pieces of sediment like silt, which result as a product of flowing water interacting with hills or mountains dating back to the Pleistocene-age (National Geographic 2022).

According to the CA Geologic Survey, the City of Escalon is not within areas identified as having high susceptibility to liquefaction or landslide potential (City of Escalon General Plan 2035) and can be verified using the Earthquake Zones of Required Investigation, provided by the CA DOC (See https://maps.conservation.ca.gov/cgs/EQZApp/app/).

For these reasons, the proposed Project is not highly susceptible to seismic-related ground failure, including liquefaction. Impacts are anticipated to be less than significant, and no Mitigation Measures are needed.

iv. **Landslides?**

RESPONSE:

Less than Significant Impact. See Response 5.7.3, a) iii). The Project is on relatively flat land with surrounding land uses primarily designated for agricultural uses. Mountain ranges or hills are not close to the Project. The closest point of elevation to the Project is located east near the Goodwin Dam Recreation Area, approximately 27 miles east from the tie-in pit with the SSJID transmission line.

According to the CA DOC, the City of Escalon, including the Local Vicinity surrounding and including the Project, does not have a high susceptibility for landslides (DOC, CGS Information Warehouse: Landslide Map). During construction, excavation may involve steep trench slopes and deeper excavations for the reservoir, FCF, tank, and water main as well as jack and bore pits. These slopes will be 6 feet or deeper and are required to be temporarily reinforced through means such as shoring pursuant to Cal-OSHA standards and the California Division of Industrial Safety and City of Escalon's *Standard Specifications for 3.04- Trench Excavations, 3.03- Protection, and 1.04 Quality Assurance*. Upon completion of construction, excavated areas will be backfilled, and surfaces will be stabilized pursuant to City of Escalon's Engineering Standards with the standard application of plan check and inspections. Therefore, there will be no long-term impacts related to unstable soils.

Implementation of the City of Escalon Standard Specifications will mitigate construction impacts to less than significant levels. There will be no long-term impacts. No Mitigation Measures are needed.

b) Result in substantial soil erosion or the loss of topsoil?

RESPONSE:

Less than Significant with Mitigation Incorporated. See Response 5.7.3, a) i) through iii). Project construction will require the disturbance of stable ground surfaces for open-cut trenching, jack, and bore, and deeper excavations for the proposed subterranean components of the tank, BPS, and FCF. Therefore, construction will temporarily disturb stable ground surface leaving soils susceptible to erosion during active construction. Jack and bore, will be implemented beneath the Lone Tree Creek crossing, along the Project alignment, which is located approximately 250 feet south of Lone Tree Road, and will also require deeper and more extensive excavation for entry and exit pits making the soils in this area temporarily susceptible to erosion. Additionally, during construction, other processes such as truck traffic, equipment access, and materials hauling may also temporarily disrupt topsoil resulting in dust and erosion. Therefore, soil erosion and potential loss of some topsoil may occur during construction, especially during high winds and rains. The City's Standard Specifications within *Section 01500: Construction Facilities and Temporary Controls,* which will ensure erosion and sedimentation control via storm runoff containment, temporary drainage structures, and prevent windblown dust or dirt; and previously approved Mitigation Measures Modified MM HYDRO-01: Stream Crossings and Modified MM HYDRO-03: Erosion Control will prevent destabilization of the streambed at Lone Tree Creek Crossing and ensure erosion control measures are in place at excavated, graded, and other disturbed areas to prevent soil erosion.

Therefore, substantial erosion or the loss of topsoil will be mitigated to less than significant levels with the incorporation of the City's standard specifications. As a result, less than significant impacts are anticipated with the implementation of Mitigation Measures.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

RESPONSE:

Less Than Significant Impact. See Response 5.7.3, a) through b). At the Project, the geologic composition is comprised of alluvial fan deposits dating back to the Pleistocene-Holocene age, between 2,580,000 to 11,700 years ago. The Project and surrounding areas are flat and level and will be subject to disturbance during earthwork that is consistent with engineering standards for safety. The City Engineer and inspectors will verify, pursuant to City's *Standard Specifications Section 01500: Construction Facilities and Temporary Controls* will be implemented by the Project contractor to the satisfaction of the City Engineer and verified during plan check and field inspections. The City's Engineer has the right to monitor and inspect Project construction regularly throughout the duration of construction to ensure erosion control measures and temporary drainage structures are implemented pursuant to the City's Standard Specifications *Section 01500: Construction Facilities and Temporary Controls.*

For these reasons, less than significant impact is anticipated from geologic units or soils that are unstable resulting in potential on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. Therefore, no Mitigation Measures are needed.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

RESPONSE:

Less Than Significant Impact. See Responses 5.7.3, a) through c). Expansive soils undergo shrinking and swelling with changes in moisture. These characteristics are attributed to higher clay content within the soil. As expansive soils dry, the clay causes soils to shrink; when the moisture is reintroduced, the soils swell up. Developing infrastructure on low expansive potential is preferred since the soil will not change its volume depending on the moisture and will therefore provide a stable foundation that is more static. The Project is underlain with Pleistoncene-aged alluvial deposits from the Modesto Formation and Riverbank Formation (BCR Consulting 2023). However, alluvial soils tend to not be expansive soils and contain granular and less clayey characteristics.

To maintain low expansive potential, the City of Escalon will implement *Standard Specification Section 01400: Quality Control and Testing* during plan check, construction and inspections. This will ensure that the appropriate

methods of trenching, pipe bedding and recommended backfill material with low shrink-swell properties are implemented with the Project. In addition, the plan check and review process with the City of Escalon will result in the proposed Project-related infrastructure being designed and built to comply with the applicable soil expansion index found within the Uniform Building Code.

For these reasons above, the Project will not increase the potential for direct and indirect risks to life and property due to expansive soils, nor will the Project increase exposure to expansive soil hazards. Therefore, less than significant impacts are anticipated, and no Mitigation Measures are needed.

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?**

RESPONSE:

No Impact. Septic tanks or alternative wastewater disposal systems are not proposed with the Project. There are no existing septic tanks or alternative wastewater disposal systems within the public right-of-way where the Project is proposed. The Project proposes to develop underground structures that will store and convey potable water planned to be distributed to Escalon's residents.

Therefore, no impacts are anticipated, and no Mitigation Measures are needed.

f) **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

RESPONSE:

Less than Significant with Mitigation Incorporated. On March 3rd, 2023, a records search was conducted for the proposed Project by the Western Science Center (WSC). The Project and Local Vicinity were evaluated along Escalon-Bellota Road on Section 32 and between Section 29/28, 20/21/ 17/16 of Township 1 South, Range 9 East on the Escalon, CA USGS 7.5-minute quadrangle. There are no previously documented resources at the WSC located within the Local Vicinity or within a 3-mile radius. However, results from the records indicate high paleontological sensitivity due to underlying alluvial deposits.

Existing conditions indicate the Project is underlain with Pleistocene-aged alluvial deposits from the Modesto Formation and the Riverbank Formation (Wagner, Bortungo, McJunkin 1991). Pleistocene geologic units are considered to be highly paleontologically sensitive. Therefore, any fossil specimen from the SSJID Surface Water Connection Project would be scientifically significant. Since Project construction requires ground disturbances beyond depths of previous disturbance, the Project has the potential to result in significant impacts on paleontological resources found within paleontologically sensitive Pleistocene-aged alluvial units.

As a result, it is recommended by the WSC that a paleontological resources mitigation program pursuant to **MM PALEO-01: Paleontological Resource Mitigation Program** be put in place to monitor, salvage, and curate any recovered fossils associated with Project construction. The following Mitigation Measure will ensure the Project does not directly or indirectly destroy a unique paleontological resource or site or unique geological feature. Therefore, Project impacts will be less than significant with mitigation incorporated.

5.7.4 Mitigation Measures

MM PALEO-01- Paleontological Resource Mitigation Program: Prior to the start of Project construction, the City of Escalon shall hire a qualified paleontologist to conduct pre-construction tailgate trailing for the construction crew and monitoring during ground disturbance. The training can be videotaped for crew added later during construction. Training shall be documented with a sign-in sheet and written materials including photos of potentially significant paleontological resources.

In addition, the City's paleontologist shall prepare and implement a Paleontological Resource Mitigation Program to monitor, salvage, and curate any recovered fossils which will be funded by the City. Throughout Project construction, the Project contractor shall maintain records of field crew training and monitoring and shall document any paleontological resources encountered during construction with photos, georeferencing, and maps. If field personnel

encounter buried paleontological resources, work in the immediate vicinity of the find should cease within 50 feet of the resource and the City and a qualified paleontologist should be contacted immediately to assess the significance of the find. A qualified paleontologist shall have the authority to stop or divert construction and excavation as necessary.

Modified MM GEO-01: Seismic Design Criteria- Facility design shall comply with the site-specific seismic design criteria recommendations of a geotechnical engineer. Facility design shall also comply with the seismic design requirements of the UBC and with applicable provisions and policies of the San Joaquin County General Plan.

Modified MM GEO-02: Geotechnical Design Criteria- Facility design shall comply with the site-specific geotechnical design criteria recommendations of a geotechnical engineer, applicable requirements of the UBC, and applicable provisions and policies of the San Joaquin County General Plan.

See Mitigation Measure Modified MM HYDRO-01: Stream Crossings in Section 5.10 Hydrology.

See Mitigation Measure Modified MM HYDRO-03: Erosion Control in Section 5.10 Hydrology.

5.8 GREENHOUSE GAS EMISSIONS

Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS. Would the Project:				
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?	☐	☐	☒	☐

5.8.1 Regulatory Compliance

Greenhouse Gases (GHGs) trap heat in the atmosphere and can occur both naturally and from human activities. Sources of naturally occurring GHG include volcanic activity, respiration, and decomposition of plants. Climate data indicates a relationship between increased industrialization and continuously elevated atmospheric temperatures attributed to GHG. Human activities that are considered as a continuous source of GHG emissions include electricity production, transportation, manufacturing, and agriculture. GHGs are formed via the mixing of chemicals emitted into the atmosphere. Specific chemicals that are known to result in GHG include water vapor, (CO2), methane (CH4), (NOx), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF6) (State Guidelines, Section (State CEQA Guidelines, Section 15364.5 and Health and Safety Code, Section 38505(g)). Levels of GHGs in the atmosphere enhance the GHG Effect, resulting in trapped heat within the Earth's atmosphere leading to the continual warming of the Earth's climate. According to the 2007 Intergovernmental Panel on Climate Change (IPCC) Report, global temperatures are anticipated to increase by approximately 0.2 degrees Celsius per decade (IPCC 2007). Due to the impacts GHG emissions have on the planet, SB97 was signed into legislation in 2007. SB97 required CEQA documents to prepare feasible mitigation of GHG emissions and evaluate potential effects.

U.S. EPA

The federal government administers a range of public-private partnerships to reduce the GHG intensity generated in the United States. The U.S. EPA is responsible for implementing federal policies and programs to address GHGs, which primarily focus on energy efficiency, renewable energy, methane and other non-CO2 gases, agricultural practices, and implementation of technologies to achieve GHG reductions.

San Joaquin County

Since the 2035 San Joaquin General Plan integrates CCAP-related policies and implementation programs, the General Plan is recognized as a "Plan for the Reduction of GHG Emissions." The County plans to achieve reduction targets through "modified County operations, reduced auto trips, emphasis on infill development in urban communities and cities, and reduced energy and water consumption" (San Joaquin GP DEIR 2035).

The County of San Joaquin General Plan Public Facilities and Service Element includes the following goals and policies relating to GHGs that apply to the proposed Project.

- Goal PHS-6. To reduce GHG emissions as part of the Statewide effort to combat climate change.
  PHS-6.2 The County shall reduce community GHG emissions by 15 percent below 2005 levels by 2020 and shall strive to reduce GHG emissions by 40 percent and 80 percent below reduced 2020 levels by 2035 and 2050, respectively.
  PHS-6.7 The County shall require new development to incorporate all feasible mitigation measures to reduce construction and operational GHG emissions.

City of Escalon

The City of Escalon's General Plan Air Quality Element includes goals and policies related to GHG emissions that promote development practices and are compatible with air quality standards and regional effects to improve air quality and encourage energy- efficiency while promoting GHG reduction. See *Table 17: Project Consistency with County and City General Plan Energy and Climate Change Policies and Goals*.

5.8.2 Existing Conditions

Since GHG emissions are attributed to industrial/manufacturing, agriculture, utilities, transportation, and residential land use, city and county plans focus on reducing emissions from these sources. The largest percentage of the State's GHG emissions come from transportation, approximately 41 percent, followed by energy generation. Water and wastewater services only account for 4% of all electricity consumption nationally and 6.9% of all electricity in California (SJVAPCD CCAP 2008).

Construction-phase GHG emissions can be quantified via routine air quality emissions modeling using CalEEMod for CEQA compliance. Pursuant to SJVAPCD protocol, the significance of GHG emissions for a project is determined by adding GHG emissions quantities, which have been amortized over 30 years, to long-term GHG emissions for a project. Since the SJVAPCD has not adopted a metric for the threshold of significance for GHG emissions, analysis of the significance for direct and indirect Project-related GHG emissions is discussed qualitatively in this section.

5.8.3 Project Impacts

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

RESPONSE:

Less than Significant Impact. Based on the size of the Project and the percentage of regional GHG emissions attributed to water and wastewater services, long-term GHG emissions for the Project are considered negligible from the power needed to maintain the pumps. Likewise, the Project implementation has been considered conceptually in approved city and regional plans. The Project would be implemented in response to approved growth considered in the City's General Plan and will not result in appreciable long-term GHG emissions.

Assumptions made within the Project Description were used as input to CalEEMod to quantify construction phase GHG emissions for the Project. Examples include numbers and types of construction equipment, construction activities, duration of construction (16 months), earthworks quantities (approximately 3,348 CY) of export and 4,680 CY of import), and area of temporary disturbance (99,600 sq. ft.; approximately 2.04 acres). The results from modeling temporary Project emissions are shown below in *Table 16: Construction-Related GHG Emissions*, which indicate that Project construction will result in temporary GHG emissions. The extent of these emissions is proportionate to construction activity levels.

TABLE 16: PROJECT-RELATED GHG EMISSIONS

Category	GHG Emissions (Metric Tons/Year)					
	Bio-CO2	NonBio-CO2	CO2	CH4	N2O	CO2e
Maximum Annual Operations	0.06	219	219	0.02	0.005	220
Construction [1]	0.00	25.70	25.70	0.00	0.00	25.80
Total Emissions	0.06	244.70	244.70	0.02	0.01	245.80

Source: **Appendix A**- Air Quality, Greenhouse Gas, Energy Technical Memorandum, Ganddini 2023.
Notes: CalEEMod Version 2022.1.1.14 for Opening year 2026.
(1) Construction GHG emissions CO2e based on a 30-year amortization rate.

As shown within *Table 16: Construction-Related GHG Emissions*, the proposed Project (without credit for any reduction from sustainable design, and/or regulatory requirements) would result in 25.8 MTCO2e (amortized over 30 years) for Project construction and 220 MTCO2e per year for project operation resulting in a total of 245.8 MTCO2e per year. Since the Project will generate GHG during construction from activities, equipment, and the use of electricity, Project-generated GHG emissions would result in both direct impacts from Project activities and indirect impacts from the use of electricity. Project construction is temporary, based on the anticipated

construction schedule of 16 months, and will utilize energy-efficient equipment that will reduce emissions. Construction will not result in substantial earthwork; materials import and export or use of electricity. This is based on the overall Project footprint of 2.4 acres and approximately 3,348 CY of export and 4,680 CY of import requiring approximately 64,310 vehicle miles traveled (VMT) (50,486 VMT from construction workers; and 13,824 VMT from construction vendor/ hauling trips) during the 16-month construction period.

Based on the size of the Project, GHG emissions related to Project construction are not considered significant. Long-term Project operations are anticipated to exceed what has been considered within the City's approved Water Master Plan and CIP. For the reasons above, the Project would result in a less than significant impact on the environment related to GHG, and no mitigation measures are needed.

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

RESPONSE:

Less than Significant Impact. See Section 5.8.3, Response a) above. The Project will be required to comply with all applicable construction-related SJVAPCD regulations, including SJVAPCD Regulation VIII, and Title 24 energy standards. Regulation VIII will ensure ambient concentrations of PM 10 are reduced during Project construction and Title 24 energy standards will ensure long-term operations are energy efficient and sustainable. As a result of the Project's compliance with applicable construction-related SJVAPCD regulations, the Project would comply with the goals of the City of Escalon and County of San Joaquin General Plans and the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions. See *Table 17 Project Consistency with County and City General Plan Energy and Climate Change Policies and Goals*.

TABLE 17: PROJECT CONSISTENCY WITH COUNTY AND CITY GENERAL PLAN ENERGY AND CLIMATE CHANGE POLICIES AND GOALS

San Joaquin County General Plan Energy and Climate Change Policies	City of Escalon General Plan Air Quality Element Policies	Project Consistency
	Policy 5.1-3: Review development and land use projects to ensure that measures are incorporated to reduce air pollutants, including particulate matter emissions, and greenhouse gases associated with project design, site preparation, grading, and construction as conditions of approval for all development projects, subdivision maps, site plans, and grading permits. These measures may include, but are not limited to: ***1. All applicable particulate matter control requirements of SJVAPCD Regulation VIII;***	Reduction measures outlined within Escalon's General Plan will be implemented upon the City's plan check and review process. The following reduction measures consist of: - Encouraging new buildings and development to be energy efficient through passive design concepts through the installation of "cool" roof (e.g., roof materials with a high albedo) and pavement materials. Therefore, alignment with these policies and procedures set forth by the City will result in less than significant impact. Agency coordination will be implemented through the CEQA process.
	Goal: To protect the health and welfare of Escalon residence by promoting development and planning practices that are compatible with air quality standards and regional efforts to improve air quality. ***Policies and Standards-*** ***1. Coordinate with other local and regional jurisdictions, including the SJVAPCD, San Joaquin Council of Governments (SJCOG), and the California Air Resources Board (ARB), in the development and implementation of regional and county plans, programs, and mitigation measures that address cross-jurisdictional and regional air quality impacts, including transportation and climate change impacts, and incorporate the relevant provisions of those plans into City planning and project review procedures. Also cooperate with the SJVAPCD, SJCOG, and ARB in:*** ***Identifying baseline air pollutant and greenhouse gas emission*** ***Developing consistent procedures for evaluating and mitigating project-specific and cumulative air quality impacts of projects***	

	8. Encourage new buildings and development designed to be energy efficient. Reduce energy consumption and greenhouse gas emissions through: *Requiring new development to be energy-efficient through passive design concepts (e.g., siting and location) and construction methods.* *Encouraging and accommodating projects that incorporate alternative energy, enhanced energy conversion measures, and other voluntary methods of reducing energy usage and greenhouse gas emissions.*	
	Implementation Strategy 1-6 Review new development and rehabilitation projects for consistency with policies related to reducing energy consumption and greenhouse gas emissions. Acceptable energy reduction measures include, but are not limited to: - *Construction methods (LEED Certification, exceedance of Title 24 Energy standards, and green building methods)*	
PFS-1.6: Efficient Infrastructure and Facilities. When performing maintenance, upgrading, or expanding infrastructure and facilities, the County shall use technologies that improve energy efficiency and conserve water, when feasible. (RDR/PSP) (Source: New Policy)		The Project proposes a planned improvement to a public utility. As a result, the planned improvement will allow for the public works facility to be utilized more efficiently with current technology incorporated. Therefore, the Project is aligned with the proposed policy within the County's General Plan.
PFS-3.2: Sustainable Plans and Operations. The County shall integrate sustainability concepts, greenhouse gas reduction strategies, and climate change resiliency planning into County facility and service plans and operations. (PSP/SO) (Source: New Policy)		Upon the implementation of the Project Components (BPS, Storage Tank, Wet Well, and FCF, etc.), the Project will incorporate new sustainability concepts (e.g., energy efficiency, water conservation, waste reduction/ recycling, purchasing preferences, etc.) that have been reviewed prior by the City's Planning Department through the standard application and plan check and inspection processes. Therefore, resulting in less than significant impacts.
Goal PSH-6: To reduce Greenhouse Gas Emissions at part of the Statewide effort to combat climate change. *PSH-6.2: The County shall reduce community greenhouse gas emissions by 15 percent below 2005 levels by 2020 and shall strive to reduce GHG emissions by 40 percent and 80 percent below reduced 2020 levels by 2035 and 2050, respectively.* *PSH-6.7 The County shall require new development to incorporate all feasible mitigation measures to reduce construction and operational GHG emissions.*		Reduction measures outlined within Escalon's General Plan will be implemented upon the City's plan check and review process. The following reduction measures consist of: - Encouraging new buildings and development to be energy efficient through passive design concepts including the installation of "cool" roof (e.g., roof materials with a high albedo) and pavement materials. Therefore, compliance with these policies and procedures set forth by the County's Planning Department will result in less than significant impact.

Source: (1) City of Escalon GP Update, DEIR, adopted February 2005; (2) San Joaquin County 2035 GP EIR, adopted October 2014

5.8.4 Mitigation Measures

No Mitigation Measures are needed.

5.9 HAZARDS AND HAZARDOUS MATERIALS

Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the Project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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 § 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 or excessive noise for people residing or working in the Project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐

5.9.1 Regulatory Compliance

Materials are considered hazardous if they are corrosive, ignitable, reactive, or toxic and are on a list maintained by federal, state, or local agencies, for hazardous materials. Regulations are established to reduce exposure to hazardous materials because exposure can result in damage to health, property, and the environment depending on the extent of exposure and individual susceptibility.

Hazardous materials are utilized frequently throughout the County and City of Escalon for residential, commercial, industrial, and agricultural purposes. Examples include fertilizers, pesticides, cleaners, solvents, paints, and automotive products. Regulations that are established and enforced by agencies such as the EPA, California Department of Toxic Substances Control (CA DTSC), and local fire departments promote proper handling, storage, and transport of hazardous materials to protect the public and the environment. These agencies also oversee the remediation of polluted air, water, and soils and have jurisdiction to issue permits for the production and utilization of hazardous materials under the authority of environmental protection laws including the Clean Air Act, Clean Water Act (CWA), Porter-Cologne Water Quality Act, Resource Conservation and Recovery Act (RCRA), Title 22 of the California Code of Regulations, Health and Safety Code, and California Occupational Safety and Health (Cal-OSHA) Act of 1973.

U.S. EPA

The U.S. EPA provides federal regulations regarding adequate hazardous waste management. The EPA was given authority by Congress to develop the RCRA program through the RCRA Act. The Act created the framework for the proper management of hazardous and non-hazardous solid waste. Under RCRA, the EPA regulates hazardous waste from generation to disposal, referred to as “cradle to grave.”

Over the years, the EPA has led several hazardous waste initiatives to meet the growing challenges that come with hazardous waste management. The EPA has created standards, exclusions, and exemptions for certain types of waste including Universal Waste, Household Hazardous Waste, Pharmaceutical hazardous waste, etc.

CA DTSC

CA DTSC has primary responsibility for regulating hazardous materials in California under the authority of RCRA and the California Health and Safety Code and California Hazardous Waste Control Law. Other entities with responsibility for hazardous materials regulation include:

- Regional Water Quality Control Board (RWQCB) – under authority of the Porter-Cologne Water Quality Control Act of 1969
- California Department of Pesticide Regulations, Department of Food and Agriculture, and the Department of Public Health – under authority of California Code of Regulations Title 3 and Title 22
- California Department of Industrial Relations, Division of OSHA – under authority of California Code of Regulations Title 8
- California Air Toxic “Hot Spots” (AB 2588) Program – under the authority of the California Safety Code

In addition to various regulations, the DTSC also provides an Emergency Response Unit (ERU). The ERU is in place to issue a “statewide response to actual and potential release of hazardous substances that pose an acute threat to public health and/ or the environment” (DTSC 2022).

Cal-OSHA

Cal-OSHA enforces worker safety requirements, which contain standards specifically for hazardous waste operations, emergency response, safety, and preparedness. Cal-OSHA standards must be implemented during general industry and construction activities

Central Valley RWQCB (Region# 5)

The Central Valley RWQCB implements programs to meet and exceed water quality standards. This agency establishes regulations to ensure public and environmental health. The RWQCB enforces water quality plans to comply with Water Quality laws and sustain long-term water supplies within the state.

The RWQCB has created a tool called "GeoTracker" to identify sites that impact or have the potential to impact, water quality within California. GeoTracker contains records for unregulated and regulated facilities that include: "Irrigated Lands, Oil and Gas Production, operating Permitted Underground Storage Tanks (USTs) and Land Disposal Sites" (CA Water Boards 2023).

National Pollutant Discharge Elimination System (NPDES)

The NPDES is a permit program led and managed by the U.S. EPA Office of Wastewater Management in coordination with EPA regional offices. The NPDES permit program ensures water quality is not degraded by the discharge of stormwater from construction projects. The NPDES General Construction Permit applies to projects that plan to disturb more than one acre or more of land during construction. Compliance with permitting requirements called for a Storm Water Pollution Prevention Plan (SWPPP).

Certified Unified Program Agency (CUPA)

The CUPA is a program that consolidates the administrative requirements, permits, inspections, and enforcement activities of multiple environmental and emergency response programs. California EPA and other state agencies set the standards for the Program, while local governments enforce their standards via CUPAs. San Joaquin County's CUPA is part of the Environmental Health Department, which was an action approved by the State for San Joaquin in January 1997. This department administers/ oversees the Hazardous Material Business Plan, California Accidental Release Prevention (Cal-ARP), Aboveground Petroleum Storage Act, Hazardous Waste Generator, Hazardous Waste Onsite Treatment (Tiered Permitting) and Underground Storage Tank program.

San Joaquin

Local-Hazard Mitigation Plan (LHMP)

The San Joaquin LHMP provides strategies and mitigation for reducing potential impacts due to natural or human-induced hazards. LHMP became a State and Federal requirement when the Disaster Mitigation Act was passed in 2000 (SC LHMP 2023). San Joaquin County's LHMP incorporates plans, studies, reports, and technical information from the State Hazard Mitigation Plan, General Plan December 2016, Emergency Operations Plan (EOP), Emergency Preparedness Plan, Threat and Hazard Identification and Risk Assessment (THIRA), Flood Plan, and Emergency Action Plan.

The following documents were utilized to curate six separate elements of San Joaquin County's LHMP that address local hazards from the planning phase to remediation. The six separate elements include:

1) Element A: Planning Process - Documents formal governing body planning process for this plan by all participating jurisdictions as well as the County.
2) Element B: Hazard Identification and Risk Assessment - Identifies hazards affecting the Operational Area and profiles each hazard with a list of past occurrences, threat analysis, and map or geographic description of the risk area.
3) Element C: Mitigation Strategy - Documents County mitigation goals, mitigation strategies by hazard type, and a list of projects that would mitigate sites of past damages or potential future damages.
4) Element D: Plan Update, Evaluation, and Implementation - Procedures to maintain this plan on an ongoing basis. This element ensures the County will monitor the mitigation projects for modification, new projects to be added, and completion of mitigation actions.
5) Element E: Plan Adoption: - Documentation of plan adoption including the County and other jurisdictions, level of participation, risk assessment, and mitigation actions.
6) Element F: Additional State Requirements

San Joaquin County

EOP

The County's EOP was published on February 17th, 2022. The EOP is written in accordance with federal and state guidelines to provide a response to potential emergencies throughout San Joaquin County. The plan was written in coordination with various fire departments throughout the County to appropriately define actions and roles necessary for efficient emergency response with San Joaquin County and neighboring communities.

The County's EOP is compliant with "the Standardized Emergency Management System (SEMS), the National Incident Management System (NIMS), the Incident Command System (ICS), the National Response Framework (NRF), and the National Preparedness Guidelines to include Developing and Maintaining Emergency Operation Plans, Comprehensive Preparedness Guide (CPG) 101, version 3.0" (San Joaquin County EOP 2022).

The EOP consists of individualized planning scenarios and response protocols for hazards, incidents, events, and emergencies believed to be important to the operational area. Planning and preparedness efforts within the County's EOP breaks the core capabilities of responsiveness to potential hazards or threats into five categories: (1) prevention, (2) protection, (3) mitigation, (4) response, and (5) recovery (San Joaquin County EOP 2022). The County will utilize these categories to prevent and prepare for potential risks to San Joaquin County communities, including the Project.

5.9.2 Existing Conditions

Response to human-induced and natural hazards within City Limits is the City's primary duty. The City's municipal code is intended to protect the health, safety, and welfare of its population. For these reasons, the City's Safety Element within the General Plan proposes policies and goals specific to hazard-prone areas. Potential natural hazards within City Limits include soil instability, flooding, wildland and urban fires, and evacuation routes. Geologic and soil hazards are discussed in Section 5.7- Geology and Soils. Human-induced hazards including hazardous materials and waste associated with potentially toxic substances are addressed in this section. The presence of all hazards within the City is mitigated by utilizing the procedures detailed in San Joaquin County's EOP; the City's Standard Specifications and Municipal Code including City planning documents such as the General Plan and Escalon's Water Master Plan.

According to GeoTracker, a website maintained by the State Water Quality Control Board (SWRCB) and EnviroStor website, maintained by the DTSC, there are no active or past significant environmental hazards at the Project and Local Vicinity. The closest active Clean Up Site is 5.6 miles south, downgradient, of the Project's proposed BPS Site, and is a LUST Cleanup Site approximately located at 23659 S. Santa Fe Rd Riverbank, CA 95367. The site is former Barrera's Market but contaminates are unknown.

5.9.3 Project Impacts

a) **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

RESPONSE:

Less than Significant Impact. As referenced in Section 5.9.2- Existing conditions, the closest active LUST Cleanup Site is located over 5 miles downgradient from the Project; therefore, no impact is anticipated as a result.

Project construction will involve the use of heavy equipment and chemicals including the transport of diesel fuel for construction equipment to and from the Project. Due to these anticipated practices, the Project will conform to programs and regulations for temporary hazardous materials storage, handling, and transport during construction. The contractor will coordinate construction activities with City and County Fire Departments; this includes the development of a manifest of potentially hazardous materials and an approved plan under San Joaquin County's EOP and LHMP for proper containment of the materials during Project construction. The Project contractor will also implement Cal-OSHA requirements for workers' safety and conduct regular site inspections.

The use of hazardous materials such as diesel fuel and propane for Project equipment including the 125kW diesel generator and the 10kW propane generator are anticipated to be utilized throughout the lifetime of the Project.

However, the proposed equipment is not anticipated to be routinely used, since generators are for backup/ emergency purposes. The generators will be routinely inspected and will be designed with containment to prevent the release of hazardous materials within internal equipment components. The proposed 125kW diesel generator will provide power for two of the 50 HP pumps, exceeding 50 HP. Therefore, the proposed generator will comply with the EPA's Tier 4 Regulations and Guidelines, which require that any diesel-fired generator with break horsepower exceeding 50 HP be provided to comply with EPA Tier 4 Regulations. Compliance with EPA Tier 4 Regulations requires the generator's exhaust to meet emissions standards set for nonroad engines (see *Table 18: Final Emission Standards in grams per horsepower-hour (g/hp-hr*)) and generators must decrease sulfur levels to reduce particulate matter associated with nonroad equipment (EPA 2004). The Project design incorporates additional equipment to adequately treat air exhaust to meet the requirements of EPA Tier 4 Regulations.

TABLE 18: FINAL EMISSION STANDARDS IN GRAMS PER HORSEPOWER-HOUR (G/HP-HR)

Rated Power	First Year that Standards Apply	PM	NOx
hp<25	2008	0.30	--
25 ≤ hp < 75	2013	0.02	3.5*
75 ≤ hp < 175	2012-2013	0.01	0.30
175 ≤ hp < 750	2011-2013	0.01	0.30
hp ≥ 750	2011-2014 2015	0.075 0.02/0.03**	2.6/0.50 0.50

Source: EPA Office of Transportation and Air Quality, 2004

As a result of the reasons above, less than significant impacts are related to a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. No Mitigation Measures are needed.

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?**

RESPONSE:

Less than Significant Impact. See Section 5.9.3, Response a). The handling, use, and disposal of hazardous materials during Project construction is regulated through the standard application and compliance with the City's Municipal Code via plan check and inspection process. As a result, impacts during construction of the Project are considered to be less than significant.

According to San Joaquin County's LHMP 2017, the Project is not located within a high-risk area for wildland fire, flooding, or earthquakes (Reference San Joaquin County Local Hazard Mitigation Plan pgs. 20-28). As shown within the LHMP, higher-risk areas are located outside of City Limits, primarily west of the City of Escalon. The Project is not within a special study area for Alquist-Priolo Earthquake Fault Zones, FEMA Flood Zones, or High-risk Fire Zones. However, the Project is within a Dam Inundation Zone for New Melones Dam. However, this zone is not isolated to the Project since the entire City of Escalon is within the inundation zone as well. Due to the existing urban land use within City Limits and surrounding the Project Site, implementation of the Project proposes changes that have already been anticipated and considered by the City of Escalon. In addition, the City's plan check and review process will ensure that requirements for minimization of damage to public facilities and utilities within the inundation zone are implemented pursuant to Escalon's Municipal Code *Chapter 17.32 Floodplain Management Overlay District*. Therefore, the threat of the Project being in a dam inundation zone for New Melones is considered to be less than significant.

Existing vegetation within the construction area for the Project will be removed as an initial step of site preparation for construction at the FCF. Therefore, Project construction will primarily occur within non-flammable areas, either pavement, dirt, or gravel top within the City right-of-way, and the potential for fire due to construction equipment's internal combustion is not likely to occur but is still a possibility due to adjacent agricultural lands. Over the long-term, the infrastructure installed with the Project will be subject to regular inspection and maintenance to ensure proper functioning. In addition, Project construction will incorporate local

agency emergency response planning (Reference Section 5.9.1- Regulatory Setting) via the plan check and inspection processes. Emergency response planning will be provided by the San Joaquin County EOP and together with regular maintenance and inspections, will reduce long-term risk of significant hazard.

According to the County's EOP, 311 spills/ incidents of hazardous materials occurred within the County between 2017- 18 and have been steadily increasing in past years (San Joaquin EOP 2022). For this reason, San Joaquin County has developed a Joint Hazardous Materials Response Team, which is an extension of the Environmental Health Department that responds to events throughout the City. Project construction may involve use of hazardous materials as well as activities such as welding that may result in accidents. The Project is designed for automated and remote operation and does not involve use or storage of large quantities of hazardous materials; the internal components of the pumps and generators contain small quantities of petroleum materials that are considered hazardous and potentially flammable; however the Project design provides secondary containment and safety features to reduce risk. Therefore, the risk of release of hazardous materials involving significant risk to the public is low. In the unlikely event that emergency response is needed at the Project, the Joint Hazardous Materials Response Team will be the primary responders to incidents involving potential hazardous materials releases and will work in coordination with local Fire Departments throughout the County during short-term construction and long-term maintenance and operations. The County's Emergency Operation Center (EOC) notifies local responders of potentially hazardous events and determines the scope of the emergency and the type of resources needed to effectively support the event.

The closest fire stations to the Project are Escalon Fire Station 1 and Oakdale Rural Fire Department Station 30. Station 1 is located within downtown Escalon approximately 1.0 mile south of the proposed site for the BPS site directly north of City Limits (1749 Coley Avenue, Escalon, CA 95320). Station 30 is located within Oakdale, CA, west of Woodward Reservoir, and approximately 5.5 miles southeast of the Dodds Road and Escalon Bellota intersection, which is the northerly end of the Project alignment. Both fire stations respond to medical emergencies, motor vehicle accidents, rescue calls, and incidents involving hazardous materials. Since the proposed BPS is just north of City Limits, within the SOI, the location is accessible within the existing City layout. Therefore, long-term maintenance and operations of the proposed facilities are consistent with approved plans and programs for future build-out of the City and County. The closest fire stations are equipped with adequate equipment and personnel to respond to emergencies and perform necessary inspections with City and County approval.

For the reasons above, impacts related to 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 are anticipated to be less than significant. No Mitigation Measures are needed.

c) **Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

RESPONSE:

Less than Significant Impact. The closest existing school to the Project is Escalon High School (1520 Yosemite Avenue, Escalon, CA 95320) located approximately 887 feet from the proposed site for the BPS, tank, and wet well. Escalon High School has approximately 814 students enrolled (9-12 grade) and 39 full-time teaching staff (CA Department of Education, 2023-24 Enrollment by Grade). Daily commutes to Escalon High School occur via Escalon-Bellota Road, a designated route for hazardous materials transport to and from City Limits. However, since construction activities will occur more than a quarter mile from an existing or proposed school and the proposed Project will comply with Federal, State, and Local regulations concerning hazardous materials, impacts are anticipated to be less than significant, ensuring the health and safety of students within Escalon will be protected.

As mentioned in Section 5.9.3, Response a) and b) above, Project implementation is not likely to emit hazardous emissions or involve the handling of acutely hazardous waste in a manner resulting in significant risk to the public or release. Long-term operations will involve Chlorine sampling at the BPS. Since surface water from SSJID is treated with Chlorine; however, the use of Chlorine for additional treatment will not occur at the BPS. In addition,

the application of federal, state, and local regulations outlined within Section 5.9.1- Regulatory Setting, will provide worker safety for the closest receptors and ensure hazardous materials, substances, or waste are being handled appropriately through regular inspections by the City during construction and long-term

For these reasons, the proposed Project does not anticipate significant impacts related to the emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter miles of an existing or proposed school. Less than Significant impacts are anticipated; therefore, no Mitigation Measures are needed.

d) **Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

RESPONSE:

No Impact. Government Code section 65962.5 is an updated list of Hazardous Waste Substances, also referred to as the Cortese List. The CA DTSC Publishes the list on the EnviroStor Website (DTSC Cortese List 2022).

Based on a preliminary search on the EnviroStor Website, utilizing the City name, Zip Code, and County, no results were found at the Project or Local Vicinity. None of the results were located at the Project or adjacent land use addresses. Since the Project is not included on the Cortese List of sites that have known or potential contamination and are not located where facilities are permitted to treat, store, or dispose of hazardous waste, no impacts are anticipated with the Project regarding Government Code section 65962.5. For this reason, mitigation measures are not required.

e) **For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?**

RESPONSE:

No Impact. See Section 5.9.3, Response a) through d). The nearest airports to the Project are Modesto City-County Airport, located approximately 14.2 miles south of the Project's proposed BPS Site, and Oakdale Airport, approximately 13.2 miles east of the Project's proposed BPS Site. Since the closest airport to the Project is over two miles away from a public airport or public-use airport, the Project will not result in impacts to a safety hazard or excessive noise for people residing or working in the Project area. No Mitigation Measures are needed.

f) **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

RESPONSE:

Less than Significant Impact. In order for the City to manage disasters such as earthquakes, floods, and other emergencies affecting the City, Escalon follows the County's Local Hazard Mitigation Plan and Emergency Response Plan. The City's General Plan Chapter 2- Safety Element outlines policies and goals that will assist the local community and emergency response departments during disasters. As a result, the Project will abide by applicable policies and goals within these sections of the General Plan as shown in *Table 19: City of Escalon General Plan Safety Element Applicable Policies and Goals* below.

TABLE 19: CITY OF ESCALON GENERAL PLAN SAFETY ELEMENT APPLICABLE POLICIES AND GOALS

Safety Element	
City of Escalon General Plan	Project Consistency
Policy 2.1.1 The City will maintain its emergency preparedness, including evacuation procedures, to address potential natural and man-made hazards. These procedures shall be developed in coordination with San Joaquin County's emergency operations plans.	The Project is consistent with such plans that involve the County's EOPs. Reference Responses within Section 5.9.3, Response f).
Policy 2.1.5 The City shall establish a network of streets that permits emergency vehicle access to any individual property that is no more than one minute from designated Arterial, Collector, or Minor Collector roadways.	With the coordination from the City, the traffic control plan will allow for continuous vehicular access to the Project and surrounding properties. The traffic control plan and Project construction will ensure that emergency routes are undisturbed in the event of an accident or disaster.

Source: City of Escalon General Plan Safety and Circulation Element

According to Escalon's Evacuation Map provided by San Joaquin County's Office of Emergency Services, Escalon-Bellota Road is a major evacuation route traveling away from downtown Escalon and north towards Farmington. Additional emergency services are provided at Hogan-Ennis Community Park, in the event evacuation is not possible for City residents. The proposed Project does not anticipate impairing or physically interfering with the emergency evacuation routes, since the Project will implement traffic control measures and applicable BMPs including detours, signage, flagmen, and maintaining continuous access throughout Project construction.

There are no critical emergency facilities (hospitals, fire departments, police stations, etc.) adjacent to the Project that could be directly impacted during construction. Construction would not change access such that emergency response activities would be disrupted. The long-term operation of the Project will not differ substantively from existing conditions.

Therefore, the impact related to interference with an adopted emergency response plan or emergency evacuation plan during Project construction would be less than significant. No Mitigation Measures are necessary.

g) **Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?**

RESPONSE:

Less than Significant Impact. See Responses 5.9.3 a) through f). According to CalFire's Fire Hazard Severity Zones (FHSZ) Viewer, the Project and City Limits are not located within a zone with high to moderate fire risk. The closest zones for moderate fire risk are to the east and west, surrounding the Central Valley Region. These zones are approximately 13 miles and 22.9 miles from the Project and outside of City Limits. Due to the proximity of fire-prone areas to the Project, existing conditions do not pose a risk to the Project or Local Vicinity.

As a result, direct exposure to wildland fires is not anticipated to significantly impact people or structures and result in loss, injury, or death. Accidental fire as a result of heavy machinery utilized during construction is possible due to the surrounding land uses containing orchards and agricultural land uses. However, potential impacts will be reduced to less than significant levels with the implementation of the City's Standard Specifications. No Mitigation Measures are needed.

5.9.4 Mitigation Measures

No Mitigation Measures are needed.

5.10 HYDROLOGY AND WATER QUALITY

Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY. Would the Project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i. result in a substantial erosion or siltation on- or off-site;	☐	☒	☐	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☒	☐	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☒	☐	☐

5.10.1 Regulatory Compliance

The Clean Water Act (CWA)

CWA implementation is overseen by the U.S. EPA with the intent to "restore and maintain the chemical, physical, and biological integrity of the nation's waters" (SJ County DEIR 2014). EPA has assigned implementation authority for the CWA to other trustees and responsible agencies, such as the United States Army Corps of Engineers, as well as state

and local agencies including the SWQCB, RWQCB, County of San Joaquin, and the City of Escalon. The CWA is an important instrument for Waterboards across California in the management of water quality and is the foundation of various regulatory and non-regulatory programs (education, outreach, voluntary efforts, partnerships with stakeholders, etc.) to monitor water quality and reduce pollutant discharges into waterways. Regulated waterways under the CWA include lakes, streams, creeks, rivers as well as groundwater and recharge basins. The CWA contains several provisions protecting water quality, including Sections 303(c)(2)(B), 303(d), 305(b), 401, 402(p), and 404, and the Toxics Rule:

Section 303(c)(2)(B) establishes water quality standards and designated beneficial uses within various water bodies (e.g., drinking water, recreation, biological preservation, etc.). This Section of the CWA requires the State to review and update standards for designated uses.

Section 303(d) pertains to impaired waters. The State is required to submit a list of waters that do not meet water quality standards and are impaired due to pollutants. The State must develop Total Maximum Daily Loads (TMDLs) for these water bodies, which establishes a maximum threshold of a pollutant allowed within a water body.

Section 401 gives the State the authority to issue water quality certifications to conduct activities including, but not limited to, construction or operation of large facilities by an individual permittee, which may result in any discharge into surface waters. Individual permits can be issued for projects that exceed the approved threshold of the NPDES Permit issued to the local agency. As a result, before the issuance of a permit that might result in a discharge to navigable waters, the State must certify that the activity will comply with State water quality standards, either through an individual permit issued for a specific project or verification by the local agency that a project conforms with the general permit issued to the local agency (city or county) for a specific activity identified via plan check and discretionary approval.

Section 402(p) pertains to the NPDES program. This section focuses on regulating point source stormwater discharges associated with industrial activity, requiring industrial facilities to obtain permits for their stormwater discharges.

Section 404 regulates the discharge of fill materials into "Waters of the United States", including wetlands. The Corps is responsible for the issuance of the Section 404 permit if any project proposes to fill wetlands or "waters of the United States."

Toxic Rules include various regulations related to toxic substances within water bodies. The EPA establishes thresholds for toxic pollutants discharges into navigable waters.

NPDES

The NPDES is a permit program led and managed by the U.S. EPA Office of Wastewater Management in coordination with EPA regional offices. However, while the EPA retains oversight authority, responsibility for implementation is delegated to the State via SWQCB and RWQCB. The State agencies require local agencies (e.g., Cities and Counties) to develop an NPDES for local level by the local agencies via the discretionary permit process. The NPDES stormwater permitting program regulates the discharge of any pollutant into surface waters (San Joaquin County GP EIR 2014).

The SWQCB established the NPDES permit program and issued discretionary permits (individual and municipal) to private entities and local agencies under the authority of the CWA. Additionally, approved Municipal permit programs are implemented by local agencies (e.g., counties, cities, and special districts); local agencies may also be required to apply for individual permits under certain circumstances. The NPDES General Construction Permit applies to projects that plan to disturb more than one acre of land during Project construction. This permit requires Project applicants to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The City of Escalon requires that the SWPPP include erosion control, spill prevention, response procedures, nature and location of chemicals utilized and stored during project construction, and methods to prevent adverse impacts of any discharge of chemicals, substances, or materials (Ord. 542, 2014). The implementation of the SWPPP starts prior to construction with the installation of temporary BMPs for erosion and pollution source control. According to the City of Escalon's Municipal Code *Section 13.15.100 Construction Activities*, a SWPPP developed pursuant to the Construction General Permit may

substitute for the erosion and sediment control plan for projects where a SWPPP has been developed since the SWPPP is implemented throughout construction. (San Joaquin County GP EIR 2014).

Federal Emergency Management Agency (FEMA)

FEMA is a Federal agency that oversees floodplains and the National Flood Insurance Program (NFIP), adopted under the National Flood Insurance Act of 1968. FEMA provides flood management protections set forth by their adopted standards. In addition, FEMA has developed the National Flood Hazard Layer (NFHL) to assist local jurisdictions with flood potential on the identification of land uses at risk. According to the FEMA flood map, various locations along the Project are identified as regulatory floodways and Zone AE, high-risk flood zones.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Act protects the waters of the state for the use and enjoyment of the people. The Act regulates activities that foreseeably degrade water quality within the state, to attain the highest reasonable water quality and to protect beneficial uses of surface water bodies, wetlands and groundwater. The Porter-Cologne Water Quality Act is administered at a regional level, within the framework of the SWQCB and nine RQWCB across the state of California. Under the Act, each RWQCB must formulate and adopt its own water quality control plan that establishes water quality objectives to ensure the reasonable protection of beneficial uses and prevention of nuisance either from point source or non-point source discharges (CA.gov 2023).

Delta Protection Act

The Delta Protection Act was enacted in 1992, “declaring the Delta a natural resource of statewide, national, and international significance, containing irreplaceable resources” (California Delta Protection Commission). The Act recognizes the preservation and protection of this resource for cultural, recreational, and agricultural uses for California residents. Regulations under the California Code of Regulations, Title XIV, Division 9, are enforced by the State of California Delta Protection Commission and ensure potential threats from urban encroachment do not impact agriculture, wildlife habitat, and recreation uses.

Central Valley RWQCB

The Central Valley RWQCB regulates water quality within San Joaquin County and is given water permitting authority by the U.S. EPA. The primary responsibility of the RWQCB is to protect the quality of the waters within the Region for all beneficial uses through the formulation and adoption of water quality plans that are tailored for specific groundwater or surface water basins. In addition, the RWQCB enforces regulations for industrial, domestic, and agricultural water discharges contained within the Porter-Cologne Water Quality Control Act.

The Central Valley RWQCB is the largest and most diverse region in California. The Region spans from northern Los Angeles to the Oregon Border, approximately 60,000 sq. mi., and composes nearly 40 percent of the state.

SSJID

As a result of the San Joaquin Valley region’s focus on agricultural production, irrigation districts are common throughout San Joaquin County and adjacent counties. Irrigation districts including SSJID and OID are primarily focused on agricultural water management; however, irrigation districts have expanded their services to provide water to urban and municipal areas as a result of diversified initiatives and goals (e.g. SCSWSP). The use of “irrigation district” terminology reflects the entity’s prioritization of providing water for agricultural purposes and distinguishes these entities from water agencies that only focus on water needs within urban and municipal areas.

SSJID has adopted goals and policies including the SCSWSP to supply water to various municipalities. As mentioned within Section 3.0 Project Description, this was a collaborative effort that sought to "make full beneficial use of SSJID’s water rights, bolster groundwater sustainability within the local groundwater basin, and supplement fisheries pulse flows for the benefit of the environment and water users” (SSJID 2022 Water Master Plan).

Standard Specifications

SSJID’s Standard Specifications were adopted on July 28th, 1992, and deployed “to protect the District’s interests in the operation, maintenance, construction, and reconstruction of its works and facilities” (SSJID Special Provisions

1992). The Standards Specifications provide a framework for Project contractors, planners, and engineers to conduct work to SSJID facilities according to the District's satisfaction.

Eastern San Joaquin Groundwater Authority (ESJGWA)

ESJGWA is a joint power authority formed by the 16 groundwater sustainability agencies (GSAs) within the Eastern San Joaquin Subbasin. Currently, the Eastern San Joaquin Groundwater Subbasin is critically over-drafted; as a result, the ESJGWA adopted a Groundwater Sustainability Plan (GSP) in 2019 to manage and use groundwater in a manner that does not cause undesirable results during the planning and implementation of future projects (CA DWR, 2018; Eastern San Joaquin GSP, 2019). The GSP seeks to promote long-term sustainability efforts that locally manage groundwater resources. Through ESJGWA's collaboration with GSAs, projects have been identified throughout the Subbasin that help achieve sustainability goals. (Eastern San Joaquin GSP, 2019). The proposed Project is within the South San Joaquin (SSJ) GSA, comprised of 64,000 acres with participating entities including SSJID and the City of Escalon, and has been identified as a project that will reduce Escalon's groundwater demand.

SSJ GSA

Groundwater Sustainability Plan

In September 2014, the Sustainable Groundwater Management Act (SMGA) was enacted into California's regulatory framework for groundwater management. The SMGA requires that local jurisdictions achieve sustainability in groundwater subbasins through the implementation of GSAs. The Eastern San Joquin Groundwater Authority (ESJGWA) is a joint power authority formed by the 16 groundwater sustainability agencies (GSAs) within the Eastern San Joaquin Subbasin. the ESJGWA adopted a Groundwater Sustainability Plan (GSP) in 2019 to manage and use groundwater in a manner that does not cause undesirable results during the planning and implementation of future projects (CA DWR, 2018; Eastern San Joaquin GSP, 2019). The GSP provides a framework for local jurisdictions to reach the subbasin's sustainability goal of recharging the groundwater basin with 78,000 acre-feet of surface water per year (SSJID 2023).

SSJID in conjunction with San Joaquin County communities and cities formed the SSJ GSA and has identified projects throughout the Subbasin that help achieve sustainability goals. The proposed Project is within the SSJ GSA, comprised of 64,000 acres with participating entities including SSJID and the City of Escalon, and has been identified as a project that will reduce Escalon's groundwater demand. According to their measurable objectives on pages 3-10 (T*able 3-3: Interim Milestones for Chronic Lowering of Groundwater Levels*), the SSJ GSA's groundwater levels, on average, are 22.2 feet AMSL (2013-2016). The GSP established an interim milestone, that states groundwater levels should be 23.1 feet AMSL by 2030; and eventually return to 24 feet AMSL, to "allow a reasonable margin of operational flexibility between minimum thresholds to allow for active management of the Subbasin during dry periods without reaching the minimum threshold" (Eastern San Joaquin GSP, 2019).

City of Escalon

The City of Escalon's General Plan Open Space, Conservation, and Recreation Element, outlines policies and goals intended to protect water resources within City Limits and the City's Sphere of Influence. The following policies serve as a guide for the City of Escalon for "planning and maintaining recreational facilities, enhancing the natural amenities of Escalon and minimizing environmental effects of planned development":

- Protect natural resources including groundwater, soils, and air quality, to meet the needs of present and future generations.
- Expand programs that enhance groundwater recharge in order to maintain the groundwater supply, including the installation of retention ponds in new growth areas

5.10.2 Existing Conditions

San Joaquin County's water resources include surface water and groundwater. The Project is located within the San Joaquin Valley Groundwater Basin. Specifically, the Project is within the Eastern San Joaquin County Groundwater Subbasin. According to the San Joaquin County Flood Control and Water Conservation District (FCWCD), groundwater is located approximately 80-90 feet bgs (San Joaquin FCWCD 2018). However, data collected within the Eastern San Joaquin County Groundwater Subbasin indicates, groundwater levels have dropped approximately 100 feet over the

last 40 years approximately 1.5 feet per year (San Joaquin County General Plan EIR 2014). As a result, groundwater overdraft has been a reoccurring issue within San Joaquin County throughout the County's groundwater basins. However, "there have been active attempts by the County irrigation districts to conserve and utilize the recharge basins to facilitate groundwater recharge have been recognized as effective management alternatives" (GBA, 2007).

Surface waters throughout the County consist of numerous creeks, sloughs, and manmade channels, comprising an intricate network of waterways utilized for agricultural irrigation, as well as urban and industrial uses. During the growing season, these surface waters are heavily monitored and maintained for continuous availability, in order to serve adjacent agricultural land uses year-round. However, various factors impact the quality of surface waters within San Joaquin County. Factors include "seasonal hydrologic patterns, mineral composition of watershed soils, topography, land use, and sources of contamination (e.g. agriculture, mining, industrial facilities, etc.)" (San Joaquin County General Plan EIR 2014). *Table 20: Water Resources and Their Beneficial Uses*, outlines the surface waters and groundwaters within the Central Valley pertinent to the Project. The following table illustrates the various uses of water resources adjacent to the Project and Local Vicinity.

TABLE 20: WATER RESOURCES AND THEIR BENEFICIAL USES

Water Resources	Beneficial Uses					Other	Operating Agency	Source of Supply	Users
San Joaquin River	X	X	X	X	X		--	--	Riparian farmers, Shipping industry, Irrigation Districts
Mokelumne River	X	X	X		X	Flood control	--	--	Irrigation Districts
Camanche Reservoir (1963)	X		X				EBMUD[1]	Mokelumne River	Local Residents
Calaveras River	X	X			X		--	--	Water Districts
Stanislaus River	X		X		X		--	--	Irrigation Districts
Delta	X		X	X	X	Scenic	--	Multiple Sources	Recreationists, Wildlife, USBR[2], DWR[3], shipping industry
Delta-Mendota Canal	X	X	X		X		U.S Bureau of Reclamation	Sacramento River	City of Tracy, Irrigation Districts, Commercial, Businesses
California Aqueduct	X	X	X		X		California Department of Water Resources	Sacramento River	Commercial, Businesses, Irrigation Districts
Lodi Lake			X				--	Mokelumne River	Local Residents
Groundwater	X	X					--	San Joaquin Valley Groundwater Basin	Private individuals, cities, towns

Source: 1) RWQCB, 2011; 2) San Joaquin County General Plan EIR, 2014.
Notes: A= Irrigation; B= Municipal/ Industrial; C= Recreation; D= Transportation; E= Estuary/ Wildlife Area

1) East Bay Municipal Utility District
2) U.S. Bureau of Reclamation
3) California Department of Water Resources

Waterways within the Central Valley are impaired due to various sources of pollution. *Table 21: CWA 303(D) Water Quality Limited Segments within San Joaquin County* outlines a list of water bodies with pollutant levels in excess of the standards established to protect the beneficial uses of water in accordance with Section 303 (d) of the Federal Clean Water Act. A variety of ongoing point and non-point industrial, urban, and agricultural activities contribute to the degradation of groundwater and surface waters throughout the Central Valley region.

TABLE 21: CWA 303(D) WATER QUALITY LIMITED SEGMENTS WITHIN SAN JOAQUIN COUNTY

Water Body	Pollutants	Likely Sources of Pollution	Proposed TMDL Completion
Calaveras River, Lower (Stockton Diverting Canal to the San Joaquin River, includes portions of Delta)	Diazinon	Urban runoff/ storm sewers	2021
	Mercury	Resource Extraction	2021
	Organic Enrichment/ Low dissolved oxygen	Urban Runoff/ Storm sewers	2012
	Pathogens	Urban runoff/ storm sewers, recreational and tourism activities (non-boating)	2008[a]
Delta Waterways (eastern portion)	Chlorpyrifos	Agriculture, urban runoff/ storm sewers	2007[a]
	DDT	Agriculture	2011
	Diazinon	Agriculture, urban runoff/storm sewers	2007[a]
	Invasive Species[b]	Unknown	2019
	Group A Pesticides	Agriculture	2011
	Mercury	Resource extraction (abandoned mines)	2009
	Unknown Toxicity	Unknown	2019
Delta Waterways (southern portion)	Chlorpyrifos	Agriculture, urban runoff/ storm sewers	2007[a]
	DDT	Agriculture	2011
	Diazinon	Agriculture, urban runoff/storm sewers	2007[a]
	Electrical conductivity	Agriculture	2019
	Invasive Species	Unknown	2019
	Group A Pesticides	Agriculture	2011
	Mercury	Resource extraction (mining)	2009
	Unknown Toxicity	Unknown	2019
Delta Waterways (Stockton Ship Channel)	Chlorpyrifos	Agriculture, urban runoff/ storm sewers	2006
	DDT	Agriculture	2011
	Diazinon	Agriculture, urban runoff/storm sewers	2006
	Dioxin[c]	Point source	2019
	Exotic Species	Unknown	2019
	Furan compounds	Contaminated sediments	2019
	Group A pesticides	Agriculture	2011
	Mercury	Resource extraction (mining)	2006
	Organic Enrichment/ Low Dissolved Oxygen	Municipal Point Sources, Urban Runoff/ storm sewers	2007[a]
	Pathogens	Urban Runoff/ storm sewers	2008
	Polychlorinated biphenyls	Point source	2019
	Unknown toxicity	Unknown	2019
Middle River	Low dissolved oxygen	Hydromodification/ Source Unknown	2019
	Chlorpyrifos	Agriculture	2021
	Copper	Resource Extraction	2020
	Mercury	Resource Extraction	2021
	Oxygen, Dissolved	Unknown	2021
	Unknown Toxicity	Unknown	2021
	Zinc	Resource extraction	2020
	Chlorpyrifos	Urban runoff/ storm sewers	2007[a]

San Joaquin River (Stanislaus River to Delta boundary)	DDE (Pesticides)	Agriculture	2011
	DDT (Pesticide)	Agriculture	2011
	Diuron	Agriculture	2021
	Electrical Conductivity	Agriculture	2007[a]
	Group A pesticides	Agriculture	2011
	Mercury	Resource extraction	2012
	Temperature	Unknown	2021
	Toxaphene	Source Unknown	2019
	Unknown toxicity	Agriculture	2019

Source: 1) San Joaquin County General Plan EIR, 2014; Table 4.J-2; 2) CVRWQCB, 2010
Notes: a= Date of USEPA approved completion; b= Invasive Species- refers to an organism (considered a pollutant) that is not native to California waters as a result of human activities

Natural stormwater flows generally flow from north to south and are directed towards County and City drainage facilities (e.g. storm drains) within the public right-of-way as well as canals managed by irrigation districts. At the tie-in with the SSJID transmission line along Dodds Road, stormwater flows south into an existing parkway adjacent to grass fields utilized as a grazing field for livestock. Along Escalon-Bellota Road, where the water main will be installed for the 19,500 LF of potable water pipeline, there are irrigation ditches parallel and adjacent to the eastern edge of Escalon-Bellota Road. Since natural stormwater flows generally flow north to south, elevation gradually decreases along Escalon-Bellota Road as it approaches City Limits. Along Escalon Bellota Road, surface flows drain into Lone Tree Creek, irrigation ditches, and adjacent drainage culverts, adjacent to northbound and southbound travel lanes. Properties adjacent on either side of Escalon Bellota Road drain toward the street. The closest City storm drains are located along Escalon-Bellota Road within City Limits, approximately 100 feet south of the proposed BPS; the closest County storm drains are located along various locations of the Project alignment. The closest water retention basins to the proposed BPS site are Hogan Basin, approximately 650 feet southwest, and Sunrise Basin, approximately 0.3 miles west.

A portion of the Project alignment is bordered by FEMA-designated flood zones, Zone A and Zone AE, and a regulatory floodway (FEMA NFHL Viewer). Reference **Figure 11: Riverine Flood Zones**. According to FEMA, Zone A and Zone AE are areas that present a 1% annual chance of flooding and a 26% chance over 30 years, in addition, no depths or base flood elevations are shown within these zones (FEMA n.d.).

The flood zones are adjacent to Lone Tree Creek and are a result of potential inundation at Lone Tree Creek relate to the riverine floodway. Flood zones are approximately 1.16 miles north from the proposed BPS; and according to Project plans, approximately 2,300 LF of potable water pipeline will be within the FEMA-designated Zone A. Project activities anticipated to be within the flood zone include jack and bore construction, trenching, and installation of the water main.

5.10.3 Project Impacts

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

RESPONSE:

Less than Significant Impact. The majority of receiving waters are manmade, irrigation canals or sloughs, relied upon for agricultural uses. Non-point sources of pollution due to agriculture and urban runoff contribute heavily to the accumulation of pollution within these receiving waters that degrade water quality. Trace amounts of contaminants including coliform bacteria, lead, copper, sodium, arsenic, barium, etc. have been known to be found in water sources within San Joaquin County as shown in *Table 21: CWA 303(D) Water Quality Limited Segments within San Joaquin County* (San Joaquin County GP EIR 2005).

Project construction will result in a total of approximately 2.4 acres of temporary disturbance. Since Project construction anticipates more than one acre of disturbance, the Project Applicant is required to apply for coverage under the City's NDPES General Construction Permit from the Central Valley RWQCB prior to the start

of construction. Under the NPDES Permit, a SWPPP will be established and implemented during construction to reduce the potential for pollution from construction entering surface flows and discharging into receiving waters. The Project will remain compliant with the NPDES permit program, by identifying and implementing Project-specific BMPs at the proposed Project (tie-in pit with SSJID transmission main, FCF, BSP, storage tank, wet well, and along 19,500 LF of the proposed potable water pipeline). Erosion control and pollution prevention BMPs will be implemented via plan check, and inspections by the contractor. Examples of these BMPs include the installation of temporary filters and containment surrounding active construction zones, regular sweeping of impervious surfaces and trackout areas, and covering stockpiles and haul trucks. According to Escalon's Municipal Code *Article III. Reduction of Pollutants in Stormwater, 13.15.080- Best Management Practices*, recognizes BMPs as an essential tool in regulating the discharge of pollutants to the City and County's storm drain system, surface waters, and receiving waters. Proposed BMPs are intended to result in no substantial degradation to surface, or groundwater quality during construction activities so that Project construction remains compliant with the CWA and other water quality regulations. The City of Escalon has established General Construction & Site Supervision BMPs, which consist of keeping pollutants off exposed surfaces, limited use of water at the Project Site, immediate cleanup of leaks or other spills, erosion control via planting vegetation, etc. Regulation of discharges into the municipal stormwater system at the Project will be under the jurisdiction of the EPA and RWQCB as enforced by the City through plan checks and inspections.

Impervious surfaces due to the proposed Project are anticipated to increase by 4,900 sq. ft. and will trigger requirements for permanent structural and non-structural BMPs such as filtered storm drain structures that require ongoing maintenance. While impervious surfaces will be increased due to Project implementation and ultimately increase the rate of runoff, surface drainage in addition to structural BMPs are planned to prevent pollutants from entering storm drains. Structural BMPs include the extension of the irrigation ditch and storm water drainage adjacent to the FCF; and gutters along either side of the BPS for surface water drainage into the City's inlets located along Escalon-Bellota Road. Project plans indicate minimal changes to the natural topography and quality of imported soil needed for proposed improvements.

For reasons above, Project impacts related to the violations of any water quality standards or waste discharge requirements or otherwise degraded surface, or groundwater quality are considered to be less than significant. Therefore, no Mitigation Measures are needed.

b) **Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?**

RESPONSE:

Less than Significant Impact. See Section 5.10.3, Response a). Project plans indicate improvements within the City and County right-of-way with existing impervious surfaces, will be removed and replaced to pre-Project conditions for approximately 3.4 miles of the proposed Project alignment along Escalon-Bellota Road. However, due to the addition of the following Project Components: FCF, BPS, storage tank, and wet well, impervious surfaces are anticipated to increase by 4,900 sq. ft. This increase does not anticipate substantial changes to the rate at which infiltrates into the ground; nor will these proposed improvements significantly change the volume of groundwater recharge currently experienced under existing conditions.

Additionally, the Project Components assist the City of Escalon in receiving surface water supplies that will replace losses from groundwater recharge due to the proposed conversion of land uses within the City's General Plan. The Project plans to extend into existing entitled land uses consistent with the General Plan; therefore, the Project does not propose improvements that have not already been considered and approved by the City of Escalon and the County of San Joaquin and is not considered grow-inducing.

As a result, the proposed Project will not substantially decrease supplies or interfering substantially with groundwater recharge such the Project may impede sustainable groundwater management of the basin. The Project is intended to support regional groundwater sustainability.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. result in a substantial erosion or siltation on- or off-site;

RESPONSE:

Less than Significant with Mitigation Incorporated. See Response 5.10.3, a). The Project alignment generally slopes from north to south and drainage flows in the same southerly direction. During construction, the contractor will remove existing surfaces and perform earthwork. The proposed earthwork will temporarily disturb stable surfaces, resulting in loosened soils, and increased potential for erosion and dust; likewise, deeper cuts proposed for the reservoir, pipes, valves, and temporary bore and jack pits will result in temporary stockpiles of the excavated materials. Temporary stockpiling from earthwork, imported materials, and export soils has the potential to increase construction-phase dust emissions that may impact surface waters and beneficial uses in receiving waters. This is a potentially significant temporary impact.

Likewise, Project implementation is anticipated to require the full discharge of any residual water within existing pipes and components prior to equipment removal and replacement and is expected to impact water quality. For these reasons, project construction may result in a temporary increase in erosion and siltation in surface waters and downstream receiving waters, which is a potentially significant temporary impact that will be reduced to less than significance with the implementation of BMPs and mitigation measures identified in the EIR for the SCSWSP (SCH #98022018).

Previously identified mitigation required implementation of temporary erosion control around active areas of construction as well as dust emissions BMPs to prevent debris, pollution, and dust from entering surface waters, downstream receiving waters, and jurisdictional waters such as Lone Tree Creek.

Temporary filters, inlet covers, and surface containment will be placed around active construction to prevent dust and debris from entering surface waters. Construction equipment, temporary structures, or materials that may temporarily modify localized drainage on parcels and in public right-of-way would be placed around active construction areas and removed upon completion of construction. Project plans indicate construction areas will either be restored to pre-Project conditions or will be constructed with onsite drainage features which are designed to retain and control discharge entering the existing municipal storm drain system without significant impacts or requirements for upsizing or other modifications. Post-construction drainage patterns will follow existing drainage patterns to minimize impacts on the current topography and for minimal permanent changes to drainage patterns and volumes, resulting in less than significant impacts. Therefore, the Project would not substantively modify drainage or require additional mitigation for drainage.

The existing paved streets contain impervious surfaces with high runoff potential and the Project does not propose additional impervious surfaces in these areas. Project trenches and jack and bore pits will be backfilled, and the surface of the pavement will be restored to pre-Project conditions pursuant to the San Joaquin County Public Works Standard R-29 and the City's Encroachment Permit Standards, Trench Patch Structural Section Requirements. Construction activities including trenching, excavation, installation of equipment and structures, as well as temporary jack and bore construction adjacent to the creek will remain compliant with the NPDES Construction General Permit issued by the City and County for CWA Compliance pursuant to the city's standard processes for plan check and inspection and the implementation of the municipal code.

The Project contractor will deploy pre-established structural and nonstructural BMPs pursuant to the NPDES MS4 Permit during Project construction, to ensure pollution is reduced and runoff is filtered prior to discharge into the municipal storm drain system. Upon completion of construction, disturbed surfaces from Project construction will be backfilled and stabilized. Construction areas will be restored to pr-Project conditions for each segment of pipeline.

Due to potentially significant temporary impacts related to erosion, it is recommended that previously approved mitigation measures from EIR for the SCSWSP (SCH #98022018) will be tailored to the Project and implemented to protect water quality, **REV MM HYDRO-01: Stream Crossings, MM REV HYDRO-02: SWPPP Specifications,** and **REV MM HYDRO-03: Erosion Control,** and **MM HYDRO-04: Lead Agency Approval** shall be implemented in conjunction with SSJID Special Provisions for water quality to reduce potentially significant impacts to a less than significant levels.

Project construction has the potential to increase erosion or siltation during construction activities including jack and bore construction, excavation, and trenching. As a result, the Project will implement the proposed Mitigation Measures, restore drainage patterns to pre-Project conditions where possible, and install additional storm drainage facilities consistent with applicable engineering standards for storm drainage within the Zone AE of Lone Tree Creek. Approximately 2,300 LF of the Project alignment is located within Zone AE, adjacent to Lone Tree Creek, and will require temporary jack and bore construction to avoid direct impacts on existing underground infrastructure owned and operated by SSJID.

For the above reasons, the Project will result in less than significant impact with Mitigation Measures.

ii. **substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;**

RESPONSE:

Less than Significant Impact. See Section 5.10.3, Response a) through c) i) above. The Project will not substantially change the direction or volume of surface flows discharging into the municipal storm drain system or involve direct modification of the Lone Tree Creek channel. According to Project plans, the Project will follow existing conditions of surface runoff. Since impervious surfaces are anticipated to increase by approximately 4,900 sq. ft., the construction of these Project Components will include drainage plans meeting the City's standards so that a substantial increase in the rate of surface runoff from the proposed Project is not anticipated to occur.

As a result, less than significant impacts to substantial increases in the rate or amount of surface runoff in a manner that would result in flooding on- or off-site are anticipated.

iii. **Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or**

RESPONSE:

Less than Significant Impact. See Section 5.10.3, Response a) through c) ii. The Project has the potential to increase the volume and rate of runoff due to additional impervious surfaces that are proposed at the FCF, reservoir, and pump station. However, the Project will include on-site and off-site drainage facilities to collect, convey, and discharge runoff from the proposed FCF, BPS, and storage tank to the existing municipal storm drain system. The FCF will be constructed to discharge surface water into an existing irrigation ditch along the northern and western perimeter of the facility, which carries flows to a new 12-inch storm drain within Escalon-Bellota Road that will be constructed with the Project (See **Figure 9. FCF Site Plan**). The proposed reservoir will be designed with an overflow pipe to convey excess stored water as the surface flows toward the street and into an existing storm drain. Drainage from the FCF will tie into the County's existing drainage system and will be designed to discharge according to established engineering standards. Drainage that will be constructed with the Project at the BPS site includes two 4-foot-wide concrete valley gutters located on the northern and southern side of the pump station flowing east towards Escalon-Bellota Road at 1 percent grade (See **Figure 9A. BPS Site Plan**). The gutters at the BPS site will flow to an existing storm drain system along Escalon-Bellota Road.

The design of the proposed BPS includes design for additional runoff due to increases in impervious surfaces. As a result, run-off is not anticipated to exceed the existing capacities of existing storm drainage systems or provide substantial additional sources of polluted runoff.

Additionally, the Project will abide by the City of Escalon's Post-Construction Standards Plan to minimize impacts from increases in impervious surfaces that may be detrimental to adjacent bodies of water (rivers, lakes, reservoirs, estuaries, etc.) within the County. As a result, less than significant impacts are anticipated, and no Mitigation Measures are needed.

iv. **impede or redirect flood flows?**

RESPONSE:

Less than Significant with Mitigation Incorporated. See Section 5.10.3, Response a) through c) iii above. Project plans indicate consistency with existing drainage patterns surrounding the Project. During earthwork, trenching, and jack and bore construction, the existing topography of the site will temporarily be modified from localized earthwork and construction activities. Likewise, equipment and materials will be temporarily placed within active construction areas and within the floodplain; however, due to the scale of the Project and proposed mitigation measures, significant impacts are not anticipated. Lone Tree Creek is within a FEMA-designated A Flood Zone and bore and jack construction for the Project will occur in the A Flood Zone. However, the Project will comply with BMPs from the San Joaquin County Flood Management Division **BMP HYDRO-05: Construction within Riverine Floodway** and Mitigation Measures **Modified MM HYDRO-02: SWPPP Specifications** and **Modified MM HYDRO-03: Erosion Control** will be in place during Project construction according to the NPDES Construction General Permit to reduce potential impacts to the floodplain during construction.

The Project will not install permanent structures within the floodway and will facilitate long-term use of the BPS site, storage tank, wet well, and FCF for delivery of potable water with no substantive changes to surface topography that would impede or redirect flows. Although the Project will result in permanent increases in impervious surfaces and would modify the topography and drainage pattern at the FCF and BPS/tank site, changes are not expected to be substantive since a majority of the surfaces impacted by the Project will return to pre-Project conditions and plans for the project indicate adequately sized drainage facilities will be constructed with the Project, both on-site and downstream to reduce potential impacts from flooding to less than significance.

For the reasons above, the Project is not anticipated to impede or redirect flood flows with the implementation of Mitigation Measures.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?

RESPONSE:

No Impact. See Section 5.10.3, Response a) through c) iv above. The Project will perform jack and bore construction underneath Lone Tree Creek, which is located approximately halfway along the proposed Project alignment. Lone Tree Creek is considered jurisdictional, Waters of the United States, under the U.S. Army Corps jurisdiction, and is within a FEMA-designated AE Flood Zone (FEMA NFHL Viewer) at this location. Use of jack and bore will avoid direct impacts on Waters of the U.S. Construction near Lone Tree Creek will involve earthwork that could result in the release of pollutants during construction. Construction will implement containment and erosion control mitigation measures that will reduce potentially significant impacts related to the release of pollutants in surface waters to less than significant. Construction is not proposed during rain events. Upon completion of construction, surfaces near Lone Tree Creek will be restored to pre-project conditions. The Project does not propose new permanent structures within the floodway or floodplain. There will be no permanent impacts from the Project from release of pollutants due to inundation from flooding.

The CA DOC does not place the Project within a zone at risk for a tsunami (See https://www.conservation.ca.gov/cgs/tsunami/maps). The Project Area is located within southeastern San Joaquin Valley, which is not geographically close to the ocean or large bodies of water. This area is not susceptible to a tsunami or within seiche zones that have the potential to release pollutants due to Project inundation, as indicated by the FEMA flood maps. The Project does not propose work during rain events or permanent structures that would dam or divert flowing water from Lone Tree Creek onto other properties or increase flood flows

downstream. In addition, since the Project alignment is only partially located within the flood zone and permanent structures are proposed outside of the flood zone, the Project may be exempt from flood zone construction requirements with the submission of a site plan, showing all Federal and State flood zones and floodways, property lines, and the footprint of all existing and proposed structures pursuant to San Joaquin County FCWCD (SJ Flood Management Division SFHA). Mitigation Measures and BMPs including **Modified MM HYDRO-01: Stream Crossings**, **Modified MM SWPPP Specifications,** and **BMP HYDRO-05: Construction within Riverine Floodway** are proposed to protect water quality in receiving waters including the creek. Erosion control practices will be implemented pursuant to the City's Standard Specifications and County policies and goals, to mitigate the release of pollutants in surface waters such as Lone Tree Creek.

For the reasons above, the proposed Project is anticipated to have less than significant impacts. Therefore, no Mitigation Measures are needed.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

RESPONSE:

Less than Significant with Mitigation Incorporated. See Section 5.10.3, Responses a) through d) above. The Project will follow current requirements for pollution source control and flood control or a sustainable groundwater management plan. A Storm Water Pollution Prevention Plan (SWPPP) pursuant to the NPDES will be incorporated into Project specifications. As mentioned within this section in Response c) i, the Project contractor will implement stormwater pollution prevention measures and erosion control pursuant to **Modified MM HYDRO-02: SWPPP Specifications**.

For the reasons above, Project impacts are less than significant with mitigation incorporated during construction activities.

5.10.4 Mitigation Measures

Modified MM HYDRO-01: Stream Crossings- Prior to final approval of the Project Plans and specifications and the start of Project construction, the City of Escalon Engineering staff shall verify that standard design criteria for pipeline installation at stream crossings using the jack and bore method prevents destabilization of the streambed and banks. The Project design shall locate the pipe far enough below streambeds and site the boring entry location and boring slope at a significant distance from the streambank to avoid a future encounter between the pipeline and surface water due to stream downcutting or lateral migration.

Modified MM HYDRO-02: SWPPP Specifications- Prior to the certification and approval of Project Plans and the start of Project construction, the City of Escalon Engineering staff shall verify that the Project contractor develops and implements a SWPPP, as required by the SWRCB and enforced by the CVRWQCB, for areas to be disturbed by construction activities. SSJID and the City of Escalon shall incorporate into contract specification the requirement that the contractor comply with, and implement the provisions of, the SWPPP and the RWQCB requirements for the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity. The SWPPP should be kept on site during construction and implementation shall be recorded with the SWPPP. The objectives of the SWPPP are to identify pollutant sources that may affect the quality of stormwater discharge, to implement control practices to reduce pollutants in stormwater discharges, and to protect receiving water quality. The SWPPP may include, but is not limited to, the following elements:

- Preparation of a site map;
- Description of construction materials, practices, and equipment storage and maintenance;
- List of pollutants likely to contact stormwater;
- Estimate of the construction site area and percentage impervious area;
- Site-specific erosion and sedimentation control measures including soil stabilization, revegetation, and runoff control to limit increases in sediment in stormwater runoff, such as detention basins, straw bales, silt fences, geo-fabrics, drainage swales, and sandbag dikes;

- List of provisions to eliminate or reduce discharge of materials to stormwater including practices to minimize the contact of construction materials with stormwater;
- Stockpiling of soils along the trench may be on the side of the trench farthest from the nearest creek or drainage where possible;
- BMPs for fuel and equipment storage, refueling activities, and equipment inspections to prevent chemicals from contacting stormwater;
- Description of waste management practices; and
- Maintenance and training practices.

Modified MM HYDRO-03: Erosion Control- Prior to the issuance of permits and Project construction activities, the City of Escalon shall incorporate into contract specifications requirements that the contractor(s) implement erosion control measures as well as RWQCB requirements for stormwater pollution prevention for construction activities. The contractor shall be required to exercise special care to prevent erosion in disturbed earth areas, and silt or eroded materials may not be introduced into any storm drain system or watercourse during and following construction. The contractor shall also apply erosion control measures as outlined within Modified MM HYDRO-02: SWPPP Specifications (revegetation, soil stabilization, stray bales, silt fences, etc.) where indicated on contract drawings and where the contractor has disturbed natural vegetation. For construction adjacent to, or crossing any waterways, the City of Escalon shall obtain and comply with any necessary permits from state and local jurisdictions.

MM HYDRO-04: Lead Agency Approval of Project Plans- Prior to final approval of the Project Plans and start of construction, City of Escalon Engineering staff shall verify that Project Plans implement the following measures to ensure water quality BMPs are maintained:

a) The generator, fuel tank, containment areas, controls, and transfer switches should be mounted and anchored securely above the expected flood level on a concrete platform inside or next to the building in a protective structure and shielded from wind or windborne debris. At a minimum, the generator should be placed above the main electrical service equipment and above the utility company pad mount transformer with containment.

b) The location of the emergency generator's transfer switch(es), and all electrical distribution equipment so that the generator switches are at elevations that are at least as high as the generator.

c) Provide adequate access to the new generator so that related operating measures, chemicals, and processes are above the floodplain and accessible during storms and emergencies.

d) If a fuel tank is provided on-site, provide containment and anchor tank to resist floatation.

e) Flood-proof any chemicals, process, or operations for the generator within the floodplain
f) Provide an approved operational plan for the Project to relocate chemicals above the floodplain in advance of a flood event.

g) Verify that the local code requirements and standards and appropriate regulations of the utility companies are incorporated in Project plans

h) Verify that Construction Plans incorporate all local and national building codes, as well as applicable electrical codes for the safety of site personnel.

i) All fuel supply and electrical lines must be protected from potential flooding and high wind.

j) A consistent and regularly planned maintenance program should be developed, adopted, and enforced.

k) The City Engineer shall verify that construction within the floodway and flood zone will occur outside of the rainy season (October 15 through April 15). Active construction within the floodway and flood zone will not occur during rain events.

5.10.5 Best Management Practices

BMP HYDRO-05: Construction within Riverine Floodway- Prior to Project construction and final approval of Project plans, the City of Escalon's Engineering staff and San Joaquin County Flood Management Division shall verify that Project Plans and Specifications contain the following measures to minimize impacts within FEMA-designated flood Zone A and AE:

1. A minimum of two (2) surveys are required; one before and one after construction. The first survey establishes the elevation of the project site, and is compared to the BFE to determine the height above grade that flood damage reduction measures must be taken. Based on this initial survey, the "Preliminary Elevation Certificate" an FM form series must be completed by a surveyor or engineer and is required prior to clearance from Public Works. If your plans/ application package does not include a completed FM-1 you cannot proceed to the Community Development Building for a plan check *(SJ SFHA Construction Requirements);*

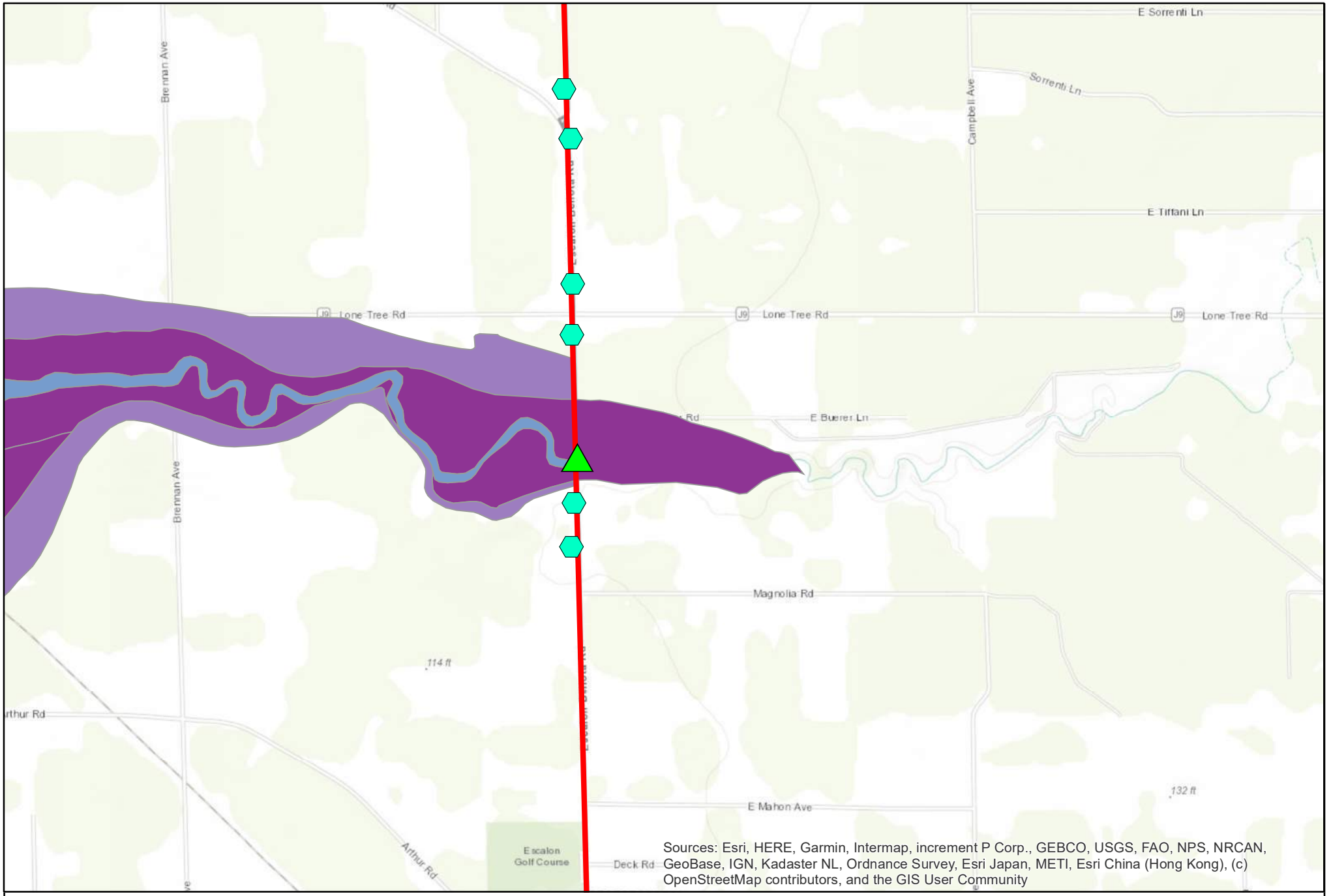
2. All utilities, machinery, equipment, tanks, and wells are required to be elevated above the BFE or be designed, constructed, and installed to prevent floodwaters from entering or accumulating within its components. For additional information, see ASCE 24-05 Chapter 7*(SJ SFHA Construction Requirements);*

3. Upon the competition of daily Project activities within the flood zones, the Project contractor shall ensure that debris, trash, loose branches, and vegetation have been removed from Lone Tree Creek or riverbanks. Vegetation that is actively growing in the stream bank should not be removed without permission. Prior to any removal of streamside vegetation or to report any observations of the clearing of vegetation or trees on stream banks, contact San Joaquin County Channel Maintenance Division at 209.468.9698 *(SJ Hazards in San Joaquin County)*;

4. Utilize methods and practices that minimize flood damage, throughout Project construction (Escalon Municipal Code *Section 17.32.130 Standards of Construction)*;

5. Electrical, heating, ventilation, plumbing, and air conditioning equipment and other service facilities that are designated and/or located so as to prevent water from entering or accumulating within the components during conditions of flooding (Escalon Municipal Code *Section 17.32.130 Standards of Construction*);

6. All new and replacement water supply and sanitary systems shall be designated to minimize or eliminate infiltration of flood waters into the systems; and discharge from the systems into flood waters (Escalon Municipal Code *Section 17.32.150 Standards of Utilities*).



Legend

- Proposed Potable Water Alignment
- 0.2% Annual Chance Flood Hazard
- Area with Reduced Risk Due to Levee
- 1% Annual Chance Flood Hazard
- Special Floodway
- Future Conditions 1% Annual Chance Flood Hazard
- Lone Tree Creek Crossing (Jack and Bore construction)
- Regulatory Floodway
- Jack and Bore Construction

City of Escalon
City of Escalon Connection to Nick DeGroot Water Treatment Plant

Figure 11. Riverine Flood Zones

Not to Scale

ARDURRA

5.11 LAND USE AND PLANNING

Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
XI. LAND USE AND PLANNING. Would the Project:				
a) Physically divide an established community?	☐	☐	☒	☐
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☒	☐	☐

5.11.1 Regulatory Compliance

<u>City of Escalon</u>

The City of Escalon's General Plan consists of 11 elements that provide a framework for achieving long-range goals for the future. The City of Escalon has adopted a Land Use Element as part of the General Plan, which is a required element pursuant to state law, California Gov. Code § 65300, and a tool to achieve managed growth and development. The Land Use Element and the General Plan also establish standards that implement programs for achieving broad legislated goals and stated objectives in regional plans; one example of this is water quality. The Land Use Element consists of text and a Land Use Map describing the general distribution, location, and extent of land uses within city limits. It also defines the location of city limits and the City's SOI. The Land Use Element describes present and planned land uses in the City and incorporates regional and state program goals for resource management, such as water quality and sustainable groundwater use. The Land Use Element is the foundation for many citywide plans and programs as well as other General Plan Elements. Examples of this include the City's CIP and Water Master Plan, for managing adequate provision of utilities and services, to support existing and future land use. The Land Use Element is the foundation for zoning and master plan development. The City's approved plan for Hogan-Ennis Community Park expansion, at the southern end of the Project, is an example of a master plan.

The City's Open Space, Conservation and Recreation Element was developed to implement policies to conserve natural resources as well as regulate open space and provide recreational opportunities to the community over the long term. The City's natural resource objectives and policies that are stated in this Element and related to the Project include the following:

Objectives:

- Protect natural resources including groundwater, soils, and air quality, to meet the needs of present and future generations.
- Ensure that environmental hazards including potential flooding and impacts from agricultural practices are adequately addressed in the development process within the City and the Escalon Planning Area.

Policies And Standards:

- Expand programs that enhance groundwater recharge in order to maintain the groundwater supply, including the installation of retention ponds in new growth areas.

<u>San Joaquin County</u>

The County of San Joaquin General Plan Element stated purpose is to focus on encouraging employment generating development while preserving prime farmland. The County works with the City of Escalon and other local cities on annexations to expand local city SOI. The County is also responsible for coordinating with the San Joaquin Council of Governments regarding State regional housing needs allocations for adequate housing supplies throughout the County. The County's General Plan provides a framework for orderly development, provision of community services,

and regional management of resources. The County is committed to preserving agriculture and the land use element emphasizes the importance of farming in San Joaquin County and encourages protective fencing between farm and urban uses.

ESJGWA IRWMP

As mentioned within Section 3.0 Project Description, the ESJGWA IRWMP is designed to protect and improve water quality and supplies by identifying feasible agricultural and urban water use efficiency strategies, considering the drinking water quality of communities within the plan area, and recognizing significant threats to groundwater resources from over-drafting. These objectives align with the mission of the GSJCRWCC and ESJGWA which aim to achieve long-term sustainability of water resources in the San Joaquin Region.

The Project is consistent with the regional long-term plans since it will provide the City of Escalon surface water to address potential imbalances caused by groundwater extraction for drinking water.

5.11.2 Existing Conditions

Unincorporated San Joaquin County contains approximately 681,21 acres (74.6%) of agricultural land, making agriculture the most abundant land use designation within County Limits. Since the adoption of San Joaquin County's General Plan in 1992, cities have annexed approximately 3 percent of the County's total land (San Joaquin County 2035 EIR With population anticipated to increase within cities over the next few years, annexations are expected to continue pursuant to approved land use patterns from each City's General Plan and the need for regional housing established by the State. Portions of the Project and Local Vicinity are within the approved SOI for the City of Escalon, with pre-annexation land use designations reflecting the approved conversion of land use from agricultural to urban use accommodating anticipated population growth.

All project components will be constructed within the City right-of-way, either within existing paved streets or on parcels that are planned for public use and have been selected for the proposed FCF and the BPS, storage tank, and wet well, due to locations adjacent to the developed Escalon-Bellota Road. The City's established land use designations allow for the development of public utilities on parcels owned by the City of Escalon that will not conflict with existing or proposed land use.

5.11.3 Project Impacts

a) **Physically divide an established community?**

RESPONSE:

Less than Significant with Mitigation Incorporated. The Project involves subsurface installation of a potable water main within the public right-of-way that is not anticipated to permanently divide an established community. In addition, the proposed Project is part of the City's and SSJID's Water Master Plan; therefore, the Project does not propose to develop infrastructure or public utility improvements that have not already been conceptually considered and approved for the region by SSJID, City of Escalon, and County of San Joaquin. Proposed below-grade improvements along Escalon-Bellota Road will connect to existing water infrastructure owned and operated by the SSJID and the City of Escalon. Upon the completion of construction, the public right-of-way will return to pre-construction conditions which involves backfilling trenches and repaving the roadway.

Due to temporary Project construction, the contractor will implement a traffic control plan for work within the paved right-of-way pursuant to the City of Escalon's Standard Specifications. The traffic control plan will ensure that safe and consistent through access is maintained during construction along Escalon-Bellota Road and within surrounding areas. In addition, adjacent land uses will receive a minimum of 2-weeks' notice prior to construction activities and construction activities will be subject to frequent inspections in accordance with SSJID SCSWSP previously approved Mitigation Measures **Modified MM LAND-02: Advance Notice** and **Modified MM LAND-03: Construction Contract Documents.**

Both site plans for the FCF and the Project's BPS, storage tank, and wet well are consistent with County and City land use policies and goals and Local Zoning Codes on adjacent parcels. The proposed tank/wet well will be

located on a parcel that is currently a pervious parking lot utilized for overflow parking that is a portion of the planned expansion of Hogan-Ennis Community Park. This parcel is designated as Agricultural- Urban reserve. Land designated for Agricultural-Urban Reserve is compatible with "public, quasi-public, and special uses" including parks and proposed infrastructure to support public water systems (San Joaquin County GP EIR). Plans indicate compact layout for Project improvements, which are adjacent to the Escalon-Bellota paved street in a manner that will not substantially conflict with the future park use proposed within this area. Other Project Components will be constructed as underground utilities within the County and City right-of-way; therefore, the BPS, tank and wet well components of the Project will not conflict with an established community or designated zoning requirements.

The location of the FCF is proposed on land that will be converted to public right-of-way. This parcel is designated for General Agriculture (AG-40). The FCF has a proposed footprint of approximately 3,500 sq. ft. (0.08 acres) and is currently a vegetated open space, void of crops. The FCF will be located adjacent to Escalon-Bellota Road. Due to the compact nature of the Project improvements at this location and adjacent siting to the existing paved right-of-way, no conflicts with existing or future land use would occur.

Due to the scale, Project impacts are not anticipated to be significant. However, to minimize potential conflicts during construction, the proposed Project will incorporate SSJID SCSWSP previously approved Mitigation Measures Modified MM LAND-01: Landowner Consultation and Modified MM LAND-04: Operation of Project Components. The following measures will ensure that adequate compensation is provided during landowner consultation and that long-term operation does not significantly impact noise and air quality.

In addition, the proposed Project will comply with San Joaquin Valley and the City of Escalon General Plan Policies and Goals. Reference *Table 22: County and City Consistency with Applicable Land Use Policies and Goals*.

TABLE 22: COUNTY AND CITY CONSISTENCY WITH APPLICABLE LAND USE POLICIES AND GOALS

County General Plan Update Land Use Policies and Goals	City General Plan Update Land Use Policies and Goals	Project Consistency
LU- 1.4 Encourage Infill Development. The County shall encourage infill development to occur in Urban and Rural Communities and City Fringe Areas within or adjacent to existing development in order to maximize the efficient use of land and existing infrastructure with the capacity to serve new development. The County shall balance infill development within outward expansion of communities and new development in other unincorporated areas. (Source: New Policy)	*Policy 7.6.1: Provide for orderly outward expansion of new urban development that is contiguous with existing development, allows for the incremental expansion of infrastructure and public services, and minimizes impacts on the environment.*	The Project indirectly supports LU-1.4 by building infrastructure that reduces reliance on groundwater north of the city limits. The development of the BPS will occur on an underutilized parcel directly north of City Limits within Escalon's SOI, adjacent to the existing Escalon-Bellota Road. Currently, the parcel is a City-owned overflow parking lot that serves commercial land uses to the south. The BPS site will maximize the efficient use of County land by implementing compact, mostly subterranean water infrastructure essential to the City of Escalon. Similarly, the FCF is proposed on land designated for agricultural use is currently an open space grass field. The FCF will be connected the SSJID transmission main in Dodd Road to the City of Escalon's potable water system. The Project has been approved and considered by the County through the SCSWSP.

		Therefore, the Project is consistent with County Policy LU- 1.4.
LU- 1.13 Regional Growth Considerations. The County shall consider the San Joaquin Council of Governments' Regional Transportation Plan, including the Sustainable Communities Strategy or Alternative Planning Strategy, and adopted city general plans and those of surrounding counties each time it considers an update to the General Plan or any master plan, strategy, or zoning. (Source: Existing GP, CODP, Growth Accommodation Implementation 1, modified)		Since Project improvements do not propose to increase existing density or population within the surrounding area. Significant impacts to the following plan outlined within the SJCOG RTP/SCS are not anticipated. As a result, the proposed Project is consistent with County Land Use policy LU- 1.7.
LU- 1.7: Farmland Preservation. The County shall consider information from the State Farmland Mapping Monitoring Program when designated future growth areas in order to preserve prime farmland and limit the premature conservation of agricultural lands. (RDR) (Source: New Policy)		See Section 5.2.3, Response a), *Table 7: Project Consistency with County and City Agriculture-Related General Plan Policies and Goals.*
LU-1-14: Review of New Infrastructure. The County shall comment on any plan that would result in new infrastructure (e.g., freeways/roads, transmission lines, rail lines, surface water conveyance facilities) that would physically divide an established community and shall require that any routing be revised to protect existing communities. The County shall work with special districts, community service districts, public utility districts, mutual water companies, private water purveyors, sanitary districts, and sewer maintenance districts to provide adequate public facilities and to plan/coordinate, as appropriate, future aboveground utility corridors in an effort to minimize future land use conflicts.		The Project will undergo a plan check and review process by the City of Escalon. In addition, the CEQA process requires a 30-day public review period for Public Comment. During that time. the County will have the opportunity to review the ISMND. The City of Escalon is open to recommendations and comments from the County. The City, County, Oakdale Water District, and SSJID are working together to implement Phase 2 of the SCSWSP (proposed Project), which connects Escalon to the SSJID's treated surface water system. Their continued coordination is necessary for the implementation of the proposed Project, which will provide adequate public facilities for regional groundwater sustainability and future growth within urbanized areas of the County.
	Goal 7.5.4: Continue to plan and provide efficient public safety and leisure/cultural facilities and services for the community	The Project will provide water services for the community more efficiently, since this is a part of a planned buildout of the water distribution network, as outlined in the City's Water Master plan. The community overall will benefit from the proposed Project because it will

		allow for an enhanced level of service meeting the City's established level of service standards for existing and future land use shown in the approved Land Use Map of the General Plan
	Policy 7.6.1-5: Ensure that land uses proposed in general plan updates and amendments are supported by adequate existing or planned infrastructure and utilities, including water, wastewater, and a multi-modal transportation system.	The Project supports a full buildout of the City's current General Plan Land Use Map. The BPS site is proposed on underutilized land, currently designated for overflow parking. Other Project Components are within the County and City right-of-way; therefore, the installation of a 19,500 LF potable water pipeline and tee connection with an SSJID 48-inch transmission line is compatible with the County and City's General Plan. The proposed Project improvements will reduce the City's reliance on groundwater and provide the City with enhanced levels of service to the water system's consumer base. While the FCF is proposed on a portion of land designated for agricultural use, the Project Component will support the planned buildout of Escalon's General Plan. The FCF along with other Project Components will achieve reliable water services. In addition, the Project is part of the City's Water Master Plan; therefore, the Project does not propose land uses that have not already been approved or considered by the City. For the reasons above, the proposed Project is consistent with City General Plan Policy 7.6.1-5.

Source: (1) City of Escalon General Plan Update, DEIR, adopted February 2005;
(2) San Joaquin County 2035 General Plan EIR, adopted October 2014

The Project will allow the City of Escalon to receive its surface water allotment and to implement approved policies for the region for balanced groundwater management, sustainable groundwater use, and reduced groundwater extractions. Most of the proposed components of the Project, the proposed water main, wet well and the tank and the FCF will be underground. Proposed above-ground improvements will be a fenced utility consisting of perimeter fence, gate and ground-mounted appurtenances. The Project will be located within the approved SOI of the City's General Plan, adjacent to developed public right-of-way and will not conflict with existing and planned land use in the Local Vicinity. The Project has been approved in concept in the SSJID Water Master Plan and EIR (SCH#98022018). Therefore, implementation of the Project is not expected to indirectly or directly change land use, induce growth, or physically divide an established community. Implementation of the Project has been approved conceptually and is included as assumption in regional plans for this area.

The Project will implement water infrastructure that is consistent with the City's Water Master Plan, the SSJID Water Master Plan, and the Eastern San Joaquin IRWMP. The Project will be installed within and adjacent to the

existing paved public right-of-way for Dodds Road and Escalon-Bellota Road and will not physically divide an established community. Therefore, no mitigation measures are needed.

b) **Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

RESPONSE:

Less than Significant with Mitigation Incorporated. See Section 5.11, Response a). Implementation of the approved General Plan for the City of Escalon and the City's Water Master Plan have accounted for the infrastructure improvements that are being proposed with the Project. Project implementation will convert approximately 9,900 square feet of land that is currently in use for overflow parking and open space to public right-of-way; however, these proposed modifications are adjacent to and are a logical extension of existing public right-of-way for Dodd's Road and Escalon Bellota Road, where the tie in and the transmission pipeline will be constructed bgs within the adjacent to the existing streets. Installation of infrastructure is an allowed use under the City and County General Plan and zoning designations for agricultural and commercial land use associated with the FCF and BPS/tank site. Plans for the Project indicate compact project layouts at the FCF and BPS that are intended to reduce conflicts with existing and planned adjacent land use.

Project improvements are proposed to reduce the City's reliance on groundwater wells for its potable water service, improve system reliability and water quality within the City's potable water system, and to facilitate the City of Escalon's use of its surface water allotment that was approved in 1999 to support goals and policies of the City's General Plan for regionally sustainable groundwater use within the City as well as groundwater management within the San Joaquin Valley region. Therefore, the Project is aligned with goals and policies for water quality, groundwater management, capital improvements, land use, and emergency response that have been incorporated into the County's and the City's General Plans as well as approved regional plans supporting reduced use of groundwater by the City of Escalon, through the proposed Project's connection to the SSJID surface water transmission line. The proposed Project is aligned with established land use policies and regulations pertaining to future buildout of the City and the City's potable water system. Since the proposed Project will not exceed what has been anticipated under the City's approved allotment of surface water, the City's Water Master Plan, County and City General Plans, Project implementation is not expected to cause significant environmental impact due to conflicts with a land use plan or policy adopted for the purpose of avoiding or mitigating an environmental effect. The Project is intended to enhance the reliability of the water distribution network to accommodate the City's receipt of surface water for potable use up to the approved allotment.

Project construction may result in temporary and intermittent localized neighborhood impacts to traffic, air quality and noise from construction vehicles, equipment and activities. Mitigation measures are proposed to reduce conflicts with adjacent landowners and nuisance during construction. The Project will install new equipment, such as permanent pumps, generators, and valves that may result in exceedances in municipal standards for noise, which is a potentially significant impact. The Project will implement standard conditions from the City's municipal code, Project- specific mitigation measures, and modified mitigation measures from SCH#98022018 to reduce impacts on traffic, air quality, land use, and noise to less than significant levels. Therefore, less than significant impacts related to County and City regulations are anticipated.

As a result, of required implementation of standard conditions and mitigation measures proposed with the Project, no additional impacts beyond what has already been considered for the City of Escalon and County of San Joaquin within the environmental analysis of the certified General Plan EIRs and SSJID's SCSWSP and certified EIR (SCH#98022018) will occur. Modified mitigation measures from SCH#98022018 including **Modified MM LAND-01: Landowner Consultation**, **Modified MM LAND-02: Advance Notice, Modified MM LAND-03: Construction Contract Documents,** and **Modified MM LAND-04: Operation of Project Components** will be implemented with the Project to reduce land use conflicts from construction and long-term operation to less than significant levels.

5.11.4 Mitigation Measures

Modified MM LAND-01: Landowner Consultation- The City of Escalon shall consult with all potentially affected landowners associated with the segments of the selected alignment that crosses farmland as part of the land acquisition process. As part of this acquisition process Escalon and the landowners shall negotiate an agreed-upon compensation for the loss of any existing orchard trees and/ or vines currently in production. During these consultations Escalon shall also, in conjunction with landowners' input, access gates. Access gate locations shall be included in the final design plans for the proposed Project. **Modified MM TRAF-16: Routing Traffic Adjacent to Active Agriculture Operations** provides for controlled access for vehicle traffic associated with active agricultural operations in farmland areas.

Modified MM LAND-02: Advance Notice- The City of Escalon shall provide a minimum 2-week advance notice of the construction activities schedule to the affected community members adjacent to construction areas (e.g., residences, property owners, business owners, and public facility operators), including the posting of signs.

Modified MM LAND-03: Construction Contract Documents- The City of Escalon shall incorporate mitigation measures in construction contract documents (e.g., terms of schedule or access conditions or technical requirements). The City and its contractor(s) shall coordinate with local jurisdictions and obtain all necessary permits (e.g., encroachment permit, utility excavation permit), shall comply with permit conditions established to minimize construction impacts, and shall assign an inspector to the Project to oversee construction activities.

Modified MM LAND-04: Operation of Project Components – The City of Escalon shall implement mitigation measures described in the Air Quality and Noise Section.

5.12 MINERAL RESOURCES

Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the Project:				
a) Result in the loss of availability of a known mineral resource that would be a 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?	☐	☐	☐	☒

5.12.1 Regulatory Compliance

The California Surface Mining and Reclamation Act of 1975

The County of San Joaquin and the City of Escalon identify potential mineral resources within their General Plan documents under the California Surface Mining and Reclamation Act of 1975 (SMARA). The Act sets requirements for mining and reclamation policy to ensure the following:

- Production and conservation of minerals is encouraged;
- Environmental effects are prevented or minimized;
- Consideration is given to recreational activities, watersheds, wildlife, range and forage, and aesthetic enjoyment;
- Mined lands are reclaimed to a useable condition once mining is completed; and
- Hazards to public safety both now and in the future are eliminated

In addition, the Act requires local jurisdictions, within the State of California, to classify land that has the potential for the discovery of mineral resources called Mineral Resource Zones (MRZs). According to the California State Board's Guidelines for Classification and Designation of Mineral Lands, the following MRZ designations are below:

- MRZ-1: Areas where available geologic information indicates that there is minimal likelihood of significant resources.
- MRZ-2: Areas underlain by mineral deposits where geologic data indicate that significant mineral deposits are located or likely to be located.
- MRZ-3: Areas where mineral deposits are found but the significance of the deposits cannot be evaluated without further exploration.
- MRZ-4: Areas where there is not enough information to assess the zone. These are areas that have unknown mineral resource significance.
- SZ: Areas containing unique or rare occurrences of rocks, minerals, or fossils that are of outstanding scientific significance shall be classified in this zone.

  Due to the ongoing discovery of mineral resources on County lands, policies and goals are enacted by both San Joaquin County and the City of Escalon to conserve the natural resources within the region. The State Office of Mining Reclamation (OMR) and the County Public Works Department monitor all mining activities within San Joaquin County to ensure operations are compliant with applicable laws.

5.12.2 Existing Conditions

San Joaquin County's mineral resources consist of primarily sand and gravel aggregate with limited mining of peat, gold, and silver. A total of 41 mining sites are located within San Joaquin County (13 active mines and 4 newly permitted mines); however, none of the mining sites are within Local Vicinity (San Joaquin GP EIR 2014); therefore, mineral resources will not be impacted by the Project As shown in San Joaquin County's General Plan EIR, *Figure 4.O-*

1: Aggregate Resources, MRZs containing known and potential resources are located in the northeastern and southwestern corners of the County. The Project is not within an MRZ or close to an active mining facility.

5.12.3 Project Impacts

a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?

RESPONSE:

No Impact. The Project is being implemented to support sustainable groundwater use by replacing potable groundwater extraction with surface water from SSJID up to the approved City allotment from 1999. The Project will improve water quality and water system reliability within the City of Escalon to serve existing and approved land use in the City's General Plan and would not induce additional growth and development; therefore, indirect Project impacts on mineral resources would not occur as a result of the Project. Since the areas with known mineral resources of significance are outside the bounds of the Project and Local Vicinity, no direct impacts from the implementation of the Project on mineral resources are anticipated.

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?

RESPONSE:

No Impact. See Response 5.12.3 a). There are no locally important mineral resource recovery sites delineated in the County's General Plan. The Project would not induce additional growth beyond what is approved with the existing zoning and general plan. Therefore, Project implementation will not result in direct or indirect impacts on mineral resources or the loss of availability of a locally important mineral resources recovery site delineated on a local general plan or other land use plan. No impacts are anticipated.

5.12.4 Mitigation Measures

No Mitigation Measures are needed.

5.13 NOISE

Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
XIII. NOISE. Would the Project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a Project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?	☐	☐	☐	☒

The responses within this Section are based on the Noise Impact Analysis for the Project (**Appendix D**) conducted by Ganddini Group, published on July 27th, 2023. The purpose of the Noise Impact Analysis study is to provide an assessment of the noise impacts associated with the construction and long-term operation of the proposed Project and to identify mitigation measures that may be necessary to reduce associated impacts.

5.13.1 Regulatory Compliance

Federal Noise Control Act of 1972

In 1972, the U.S. EPA Office of Noise Ambient and Control issued the Federal Noise Control Act, which established programs and guidelines to identify and address the effects of noise on public health, welfare, and the environment. The EPA established Levels of Environmental Noise and recommended that Ldn should not exceed 55 dBA outdoors or 45 dBA indoors to prevent significant activity interference and annoyance in noise-sensitive areas (e.g. residences, schools, hospitals, etc.). 55 dBA was identified as an "adequate margin of safety" for noise level increase relative to a baseline noise exposure level of 55 dBA Ldn. The standards set by the EPA's Federal Noise Control Act are advisory exposure levels below which there would be no risk to a community from any health or welfare effect of noise.

In 1981, EPA administrators determined that subjective issues such as noise would be better addressed at lower levels of government. Consequently, in 1982 responsibilities for regulating noise control policies were transferred to State and local governments. However, noise control guidelines and regulations contained in EPA rulings in prior years remain in place by designated Federal agencies, allowing more individualized control for specific issues by designated Federal, State, and local government agencies.

San Joaquin County Code

The San Joaquin County Municipal Code establishes noise standards for transportation and stationary noise sources through the implementation of its General Plan Public Health and Safety Element (San Joaquin County GP). The following standards are shown below in *Table 23: Maximum Noise Exposure Criteria for Stationary Noise Sources.*

Noise-sensitive land uses proposed by existing or planned stationary noise sources will require noise exposure mitigation if noise levels exceed County thresholds, to ensure stationary noise sources do not create a constant or periodic noise nuisance in a fixed location.

TABLE 23: MAXIMUM NOISE EXPOSURE CRITERIA FOR STATIONARY NOISE SOURCES

Noise Descriptor	Daytime (7 AM- 10 PM)	Nighttime (10 PM- 7 AM.)
Hourly Leq	50	45
Lmax	70	65

Notes: Standards are applied at the outdoor activity area of the receiving land use. If no outdoor activity area is known, the standard shall be applied at the property line of the receiving land use. Each of the criteria shall be reduced by 5 dBA for impulsive noise, tonal noise, or noise consisting primarily of speech and/or music.
Source: San Joaquin County DEIR 2014, Table 4.H-9.

City of Escalon

The City of Escalon regulates noise impacts within City Limits through its General Plan Noise Element and the City of Escalon Municipal Code.

General Plan Noise Element

The City's Noise Element outlines policies and standards that will accomplish the City's main objectives which include:

A. To protect the citizens of the City from the harmful and annoying effects of exposure to excessive noise.
B. To protect the economic base of the City by preventing incompatible land uses from encroaching upon existing or planned noise-producing uses.
C. To preserve the tranquility of residential areas by preventing noise-producing uses from encroaching upon existing or planned noise-sensitive uses.
D. To educate the citizens of the City concerning the effects of exposure to excessive noise and the methods available for minimizing such exposure.
E. To emphasize the reduction of noise impacts through careful site planning and project design, giving second preference to the use of noise barriers and/or structural features to buildings containing noise-sensitive land uses.

The City of Escalon's Noise standards indicate that noise levels must be maintained at 55 dBA, CNEL in existing residential areas. Allowable exterior noise levels of 65 dBA, CNEL if interior levels can be maintained at 45 dBA, CNEL.

Municipal Code

The City of Escalon Municipal Code addresses noise regulations and standards in Chapter 8.16 Noise Control. The standards applicable to the proposed Project include the following:

- *Section 8.16.020 Prohibited Generally*: It shall be unlawful for any person to willfully or knowingly make, continue, or cause to be made any loud and raucous noise.
- *Section 8.16.030 Enumeration of public nuisances*: The following specific acts, subject to the exemptions provided in EMC 8.16.020, *Noises Prohibited Generally*, are declared to be public nuisances in violation of EMC 8.16.020, namely:
  A. The loud and raucous discharge into the open air of the steam of any steam equipment or exhaust from any stationary internal-combustion engine;
  B. The loud and raucous operation or use of any of the following before 7:00 a.m. or after 9:00 p.m. daily (except Saturday and Sunday and state or federal holidays, when the prohibited time shall be before 8:00 a.m. and after 9:00 p.m.). Any construction, demolition, excavation, erection, alteration, or repair activity

  C. Unless permitted by an approved conditional use permit by the planning commission or otherwise approved by the city planner, outdoor activities that involve the operation of commercial vehicles and diesel-operated equipment, other than for the purposes specifically stated in subsection F of this section, shall be limited to the hours of 7:00 a.m. to 6:00 p.m., Monday through Friday and from 8:00 a.m. to 5:00 p.m. on Saturdays,

Sundays, or holidays. Warm-up and maintenance activities of said vehicles and equipment are specifically prohibited before or after these hours. When considering modification of these hours, the approving body shall consider the factors enumerated in EMC 8.16.020.

Per EMC 8.16.040.E. Activities on or in publicly owned property and facilities, or by public employees while in the authorized discharge of their responsibilities, are exempt; provided, that such activities have been authorized by the owner of such property or facilities or its agent or by the employing authority;

5.13.2 Existing Conditions

Existing sensitive land uses near the Project include single-family residential homes along and near Escalon-Bellota Road as close as 40 feet. Other single-family residences close to the Project Components are approximately 105 feet south and southwest of the FCF and approximately 200 feet from the BPS. In addition, Escalon High School is located approximately 887 feet southeast of the southernmost portion of the Project and proposed BPS; Hogan-Ennis Community Park is located as close as approximately 145 feet southwest of the southernmost portion of the water main and BPS.

Existing ambient noise measurements were taken using the American National Standards Institute (ANSI Section S1.4 2014 Class 1) Larson Davis model LxT sound meter. Noise measurements consisted of five (5) 15-minute daytime noise measurements between 1:10 PM and 4:15 PM on June 14th, 2023; one (1) long-term 24-hour noise measurement taken from June 14th, 2023, to June 15th, 2023. See **Figure 12: Noise Measurement Overview Location Map** for locations of each short-term and long-term noise measurement location. Noise measurements indicate existing short-term ambient noise levels are between 54.4 to 77.2 dBA Leq; long-term hourly noise measurement ambient noise levels range from 58.9 to 72.1 dBA Leq. Prominent noise sources in the Local Vicinity derived from train activity and vehicular traffic along Escalon-Bellota Road, Dodds Road, and Mariposa Road.

5.13.3 Project Impacts

a) **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

RESPONSE:

Less than Significant with Mitigation Incorporated.

Construction Noise

Construction Noise sources are regulated within Section 8.16.030(F)(7) of the City of Escalon's Municipal Code, which prohibits the loud and raucous operation or use of construction equipment outside of the hours between 7:00 AM and 9:00 PM daily except on Saturday, Sunday, and state or federal holidays in which the hours are between 8:00 AM and 9:00 PM. Therefore, the Project impacts will be significant if construction noise sources do not comply with Section 8.16.030(F)(7). However, the Project will comply with City Ordinance 8.16.030(F)(7); therefore, construction impacts are anticipated to be consistent with applicable plans and policies and impacts would technically be less than significant under CEQA.

Noise levels during Project construction were calculated using the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual (2018) in addition to key construction parameters including distance to each sensitive receptor, equipment usage, percent usage factor, and baseline parameters for the location of each Project component. The FTA considers Project impacts to be significant if construction noise levels exceed 80 dBA Leq for an 8-hour period at residential and noise-sensitive outdoor areas. For each construction phase, noise levels were modeled utilizing typical construction equipment and typical usage factors from the Federal Highway Administration (FHWA) Roadway Construction Noise Model User's Guide (2006) based on anticipated construction equipment (see *Section 3.0 Project Description, Project Elements- Construction Equipment*). Modeling results are shown within *Table 24: Construction Noise Levels by Location (dBA Leq)* and indicate various construction phases including excavation, pipeline installation, backfill and resurfacing, striping,

and resurfacing, fencing/restoration, tank construction, and equipped/ pumps/ piping/ values are anticipated to exceed 80 dBA at the nearest sensitive receptor.

TABLE 24: CONSTRUCTION NOISE LEVELS BY LOCATION (dBA Leq)

Location	Construction Phase	Noise Level at 50 feet (Dba Leq)	Distance to Nearest Sensitive Receptor	Total Noise Level at Nearest Sensitive Receptor
Tie-In at Dodds Road	Site Preparation	85.2	284	79.5
	Excavation	86.1	284	80.4
	Existing Pipe Cut-in	83.5	284	77.8
	Backfill and Resurfacing	87.0	284	81.3
	Striping/ Restriping	83.4	284	77.7
Pipeline Installation	Demolition	86.3	30	85.8
	Pipeline Installation	87.4	30	86.9
	Backfill and Resurfacing	87.0	30	86.5
	Striping/ Restriping	83.4	30	82.9
FCF	Clear and Grub	85.5	20	83.9
	Excavation	86.1	20	84.5
	Piping and Valves	86.3	20	84.7
	Backfill and Resurfacing	87.0	20	85.4
	Fencing/ Restoration	85.1	20	83.5
BPS	Demolition	86.3	70	86.1
	Excavation	86.1	70	85.9
	Tank Construction	88.11	70	87.9
	Equipping Pumps/ Pipes/ Valves	86.6	70	86.4
	Backfill	87.0	70	86.8
	Fencing/ Restoration	85.1	70	84.9

Source: Noise Impact Analysis, Ganddini 2023 **(Appendix D)**

Due to anticipated noise levels during Project construction, Mitigation Measure **MM NOI-01: Construction Noise Attenuation** shall be implemented. Mitigation Measure **MM NOI-01: Construction Noise Attenuation** will require construction equipment to be equipped with mufflers, and noise shields, and directed away from sensitive receptors to limit noise levels during construction activities.

Additionally, noise associated with construction-related vehicle trips is anticipated. The Air Quality, Greenhouse Gas, and Energy Technical Memorandum (**Appendix A**) indicated the greatest number of construction-related vehicle trips per day would be a maximum of up to 102 vehicle trips per day (98 worker trips, and 14 hauling trips). Traffic counts along Escalon-Bellota Road, where the water main will be installed, range between 2,769 and 8,457 average daily trips (ADT)[6]. The lower end of the existing counts was used for modeling purposes in order to show the greatest possible increase in noise levels due to Project-generated vehicle traffic. Roadway noise levels were calculated for the following scenarios:

- **Existing (without Project)**: This scenario refers to the existing year traffic noise conditions.
- **Existing Plus Project Construction**: This scenario refers to the existing year plus Project construction traffic noise conditions.

Modeling results show that existing noise levels along Escalon-Bellota Road are 65.5 dBA CNEL and existing plus Project noise levels would be 65.7 dBA CNEL. The proposed Project would result in a noise increase of less than one decibel, which is equivalent to typical rapid transit; according to San Joaquin County a "substantial increase" in noise would be an increase in Leq of 12 dB during peak hours of traffic noise (SJ RTP/SCS Draft EIR 2014). Therefore, impacts would be less than significant. No mitigation measures are required.

[6] San Joaquin County GIS, https://sjc-gis.maps.arcgis.com/apps/webappviewer/index.html?id=b031e6e5a21b4c039643eddcb8a13fc3

Stationary Source Noise

As mentioned above, the City of Escalon's General Plan indicates that operational noise from stationary noise sources is considered significant if exterior noise exceeds 65 dB Ldn (or CNEL) and interior noise exceeds 45 dB Ldn (or CNEL) within the interior living spaces of sensitive receptors. Several noise sources are proposed as a result of the Project; at the FCF, the 10-12 kW propane generator, which was modeled assuming the generator would operate 24 hours a day, and at the BPS, noise sources include a diesel generator, a 25Hp pump, three 50 Hp pumps, and an HVAC condenser[7].

FCF

At the FCF, the 10-12 kW propane generator is anticipated to be located approximately 55 feet from the southern property line shared with the existing residential land use. Therefore, noise levels from the southern property line as a result of the propane generator are anticipated to reach up to 64 CNEL, assuming the generator will be operational 24/7. Noise associated with the propane generator will not exceed the City's established exterior noise standard of 65 dBA CNEL. In addition, the residential property is located approximately 50 feet further south from the shared property line, the residential property is 105 feet from the proposed location of the propane generator. As a result, interior noise levels are anticipated to be approximately 38 CNEL; exterior noise levels at the house would be 58 CNEL, but residential construction provides 20 dB of exterior-to-interior sound reduction with windows closed. Since the Project's operational interior noise levels are below the City's interior goal of 45 CNEL for sensitive receptors, impacts are considered to be less than significant. No Mitigation Measures are anticipated as a result of the FCF operational noise levels.

BPS

Two operational noise scenarios were calculated 1) normal demand and 2) high demand. Normal demand assumes that only one 25 HP pump is utilized, and high demand assumes all four pumps (one 25-HP pump and three 50 HP pumps) are utilized. Modeling indicated exterior noise levels would range from 56 and 74 CNEL at sensitive receptor property lines under normal demand and between 58 and 76 CNEL at sensitive receptor property lines during high demand, see *Table 25: Operational Exterior Noise Levels at Sensitive Receptor Property Lines*. Since the City's exterior noise level criteria of 65 CNEL under both scenarios will be exceeded, mitigation is required. For this reason, the Project design shall incorporate Mitigation Measure **MM NOI-02: Stationary Source Noise**, which provides options for achieving 65 CNEL via equipment with specific sound pressure levels, noise attenuation structures, etc. Impacts on exterior noise levels will be less than significant with the implementation of Mitigation Option 1 (for both normal and high demand) OR with the implementation of either Mitigation Option 2 or 3.

TABLE 25: OPERATIONAL EXTERIOR NOISE LEVELS AT SENSITIVE RECEPTOR PROPERTY LINES

				CNEL					
				Normal Demand[2]		High Demand[4]			
Receptor	Equipment	Quantity	Noise Reference Level Dba, Leq[1]	Total Equipment Sound Levels	Mitigated Total Equipment Sound Levels[3]	Total Equipment Sound Levels	Mitigation Option 1 Total Equipment Sound Levels	Mitigation Option 2 Total Equipment Sound Levels	Mitigation Option 3 Total Equipment Sound Levels
FCF									
Receptor 1	12-kW Kohler Propane Generator (Model #RESV(L))	1	65 at 23 ft	64	n/a	64	n/a	n/a	n/a
BPS									
Receptor 1	Diesel Generator	1	73 at 21 ft	74	65	76	65	65	65
	25 Hp Pump	1	80 at 3 ft						

[7] Combined noise levels were modeled using SoundPLAN Noise Model. The SoundPLAN software allows the user to input specific noise sources spectral content, sound barriers, building placement, topography, and sensitive receptor locations.

	50 Hp Pump	3	85 at 3 ft						
	Heating and Ventilation Unit Condenser	1	62 at 3 ft						
Receptor 2	Diesel Generator	1	73 at 21 ft	61	51	62	52	57	62
	25 Hp Pump	1	80 at 3 ft						
	50 Hp Pump	3	85 at 3 ft						
	Heating and Ventilation Unit Condenser	1	62 at 3 ft						
Receptor 3	Diesel Generator	1	73 at 21 ft	67	56	68	56	65	65
	25 Hp Pump	1	80 at 3 ft						
	50 Hp Pump	3	85 at 3 ft						
	Heating and Ventilation Unit Condenser	1	62 at 3 ft						
Receptor 4	Diesel Generator	1	73 at 21 ft	56	47	58	47	58	58
	25 Hp Pump	1	80 at 3 ft						
	50 Hp Pump	3	85 at 3 ft						
	Heating and Ventilation Unit Condenser	1	62 at 3 ft						

Source: Noise Impact Analysis, Ganddini 2023 (**Appendix D**)
Notes: 1) Provided by equipment manufacturers.
2) Normal Demand includes the 25 HP pump only
3) Diesel generator shall not exceed 90 Lw. 25 Hp pump shall not exceed 88 Lw. The HVAC condenser shall not exceed 70 Lw. 50Hp pumps shall not exceed 72 Lw.
4) High demand includes operations of all the pumps at the same time.

The existing house located on an adjacent residential parcel that would be affected by noise associated with the pump station is located 180 feet northwest of the proposed pumps. The exterior noise level at the house would be 61 CNEL without mitigation during normal demand, and up to 62 CNEL during high demand. However, typical residential construction provides 20 dB of the exterior to interior sound reduction with the windows closed (assuming HVAC is provided). Therefore, interior noise levels would be approximately 42 CNEL, and pump station operational noise would not exceed the City's interior noise standard of 45 dBA CNEL. This impact would be less than significant, and no mitigation is required.

b) **Generation of excessive groundborne vibration or groundborne noise levels?**

RESPONSE:

Less than Significant Impact. The City of Escalon does not have a City-established numerical threshold of significance for groundborne vibration. Therefore, groundborne vibration impacts are based on guidance from the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual (FTA 2018). The FTA threshold indicates potential to cause architectural damage at the nearby buildings will occur if the Project exceeds the following PPV:

- 0.10 in-sec at buildings extremely susceptible to vibration damage
- 0.20 in/sec at non-engineered timber and masonry buildings
- 0.30 in/sec at engineered concrete and masonry (no plaster) buildings
- 0.50 in/sec at reinforced concrete, steel, or timber (no plaster) buildings

The closest structure to the proposed construction is a single-family residential home located approximately 40 feet from the proposed water main, northeast of the Escalon-Bellota Road and Lone Tree Road intersection. Construction equipment with the highest vibratory potential are plate compactors. The peak particle velocity (PPV) per square foot associated with these vibratory plates is 0.21 at a distance of 25 feet (See *Table 26: Construction Equipment Vibration Sources Levels*). Vibratory plates are expected to be utilized within 25 feet of an existing structure. Other equipment anticipated to be used during construction generates lower PPV. Therefore, groundborne vibration generated by Project construction would not exceed the levels necessary to cause architectural damage.

TABLE 26: CONSTRUCTION EQUIPMENT VIBRATION SOURCE LEVELS

Equipment		PPV at 25 ft, in/sec	Approximate Lv* at 25 ft
Pile Driver (impact)	Upper range	1.518	112
	typical	0.644	104
Pile Driver (sonic)	Upper range	0.734	105
	typical	0.170	93
Clam shovel drop (slurry well)		0.202	94
Hydromill (slurry wall)	In soil	0.008	66
	In rock	0.017	75
Vibratory Roller		0.210	94
Hoe Ram		0.089	87
Large Bulldozer		0.089	87
Cassion Drilling		0.089	87
Loaded Trucks		0.076	86
Jackhammer		0.035	79
Small Bulldozer		0.003	58

Source: Noise Impact Analysis, Ganddini 2023 (**Appendix D**)
Notes: Based on Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual, 2018.
*RMS velocity in decibels, VbB re 1 micro-in/sec

The potential for construction equipment to exceed the threshold of annoyance due to vibration is possible. As a result, the closest sensitive receptors to the proposed Project Components may experience temporary annoyances; however, construction vibration is anticipated to be temporary and intermittent throughout construction activities. In addition, annoyances will only occur if equipment is utilized within 21 feet of a structure. Since the closest structures are 40 feet from construction activities, impacts are less than significant. No Mitigation Measures are needed.

Sources of groundborne vibration during long-term Project operations will occur from passenger vehicles and trucks along the paved Escalon-Bellota Road. Loaded trucks have a PPV of 0.076 at a distance of 25 feet (CalTrans 2020), which is substantially lower than most construction equipment including the vibratory roller (0.210 in/sec PPV at 25 feet). As a result, groundborne vibration levels generated by Project operations will not exceed those modeled for Project construction. Impacts are anticipated to be less than significant, and no Mitigation Measures are proposed.

c) **For a Project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?**

RESPONSE:

No Impact. There are no airports within two miles of the project site. Therefore, the proposed Project would not expose people residing or working in the area to excessive noise levels. There is no impact, and no mitigation is required.

5.13.4 Mitigation Measures

MM NOI-01: Construction Noise Attenuation-

1. During all Project Site excavation and grading, construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturer standards.
2. The contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise-sensitive receptors nearest the project site. One-inch plywood or acoustic blankets capable of achieving a reduction level of at least 10 dB shall be used to keep equipment noise from exceeding the 80 dBA noise level standard.
3. Equipment shall be shut off and not left to idle when not in use.

4. Whenever possible, electric power will be used instead of internal combustion engine power.
5. The contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise/vibration sources and sensitive receptors nearest the Project Site during all project construction.
6. Jackhammers, pneumatic equipment, and all other portable stationary noise sources shall be shielded, and noise shall be directed away from sensitive receptors.
7. The Project proponent shall mandate that the construction contractor prohibit the use of music or sound amplification on the Project Site during construction.
8. The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment.

MM NOI-02: Stationary Source Noise-
Option 1
Prior to Project construction, the Project contractor and the City of Escalon shall verify with sound measurements that the 125-kW diesel generator does not exceed 82 dB at 3 feet or a sound power level of 90; along with the proposed 25 Hp with a sound pressure level of 80 dB at 3 feet (sound power level of 88) and the proposed HVAC condenser with a sound pressure level of 62 dB at 3 feet (power level of 70). See Figure 13: BPS Operational Noise Levels.

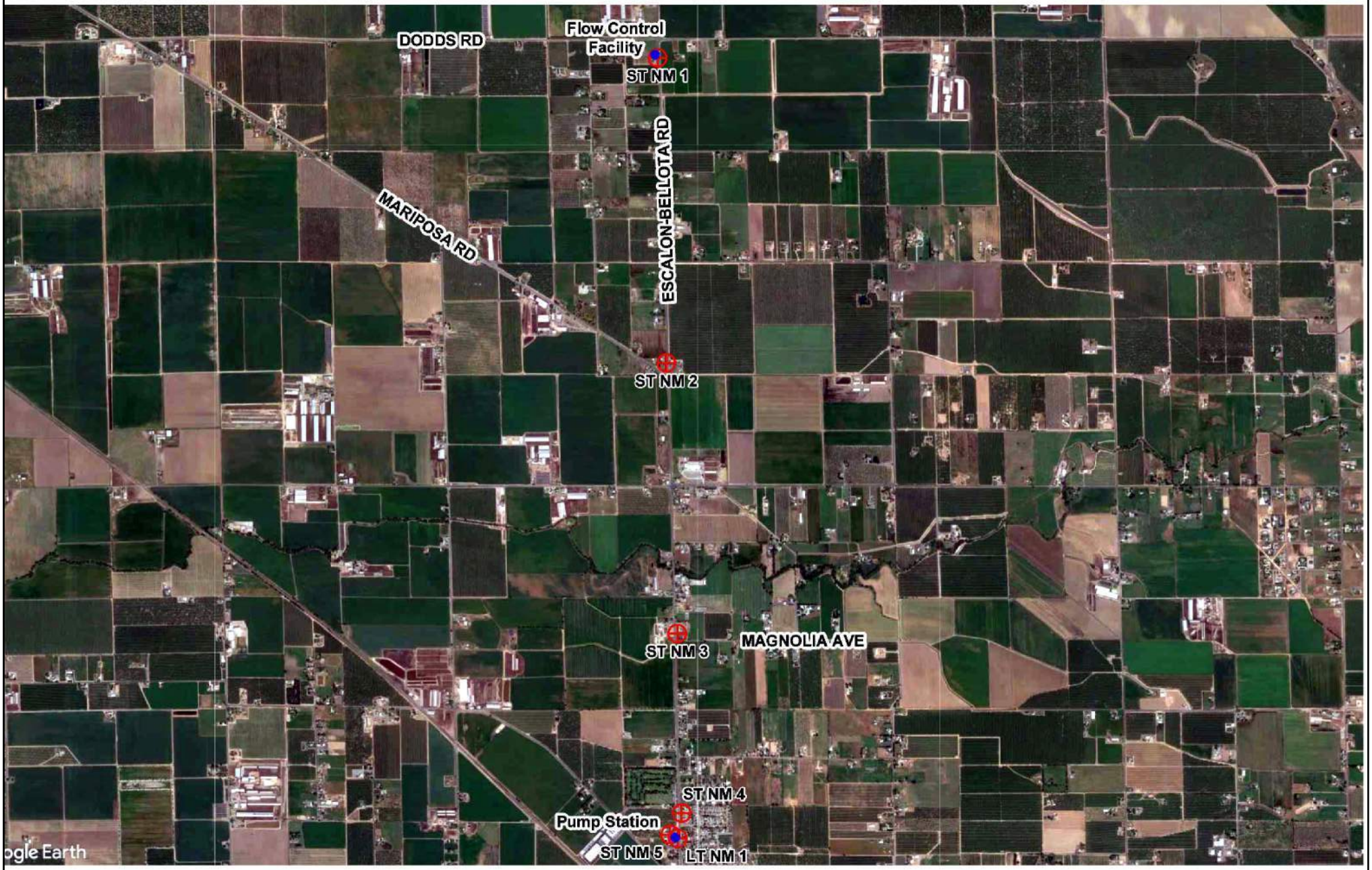
In addition, to ensure that operational noise levels do not exceed 65 CNEL during high demand, the Project contractor and City engineers shall require (measure, confirm, and monitor during site inspections) on an ongoing basis each 50 Hp pump does not have a noise level that exceeds 64 dB at a distance of 3 feet (sound power level of 72). See Figure 13: BPS Operational Noise Levels.

OR

Option 2
Prior to the issuance of building and grading permits, the City of Escalon engineering department shall verify Project plans including the construction of a 10-foot-high concrete barrier along the northern edge of the pad proposed for the pumps and a 7-foot-high barrier along the eastern boundary of the BPS. See Figure 13: BPS Operational Noise Levels.

OR

Option 3
Prior to the issuance of building and grading permits, the City of Escalon engineering department shall verify Project plans including the construction of an 8-foot-high concrete barrier along the northern boundary of the existing parking lot and a 6-foot barrier along the eastern edge of the pump area pad, parallel to Escalon-Bellota Road. Figure 13: BPS Operational Noise Levels.



Legend

Noise Measurement Location

NM 1

ST NM Short-Term Noise Measurement

LT NM Long-Term Noise Measurement

City of Escalon
City of Escalon Connection to Nick DeGroot Water Treatment Plant

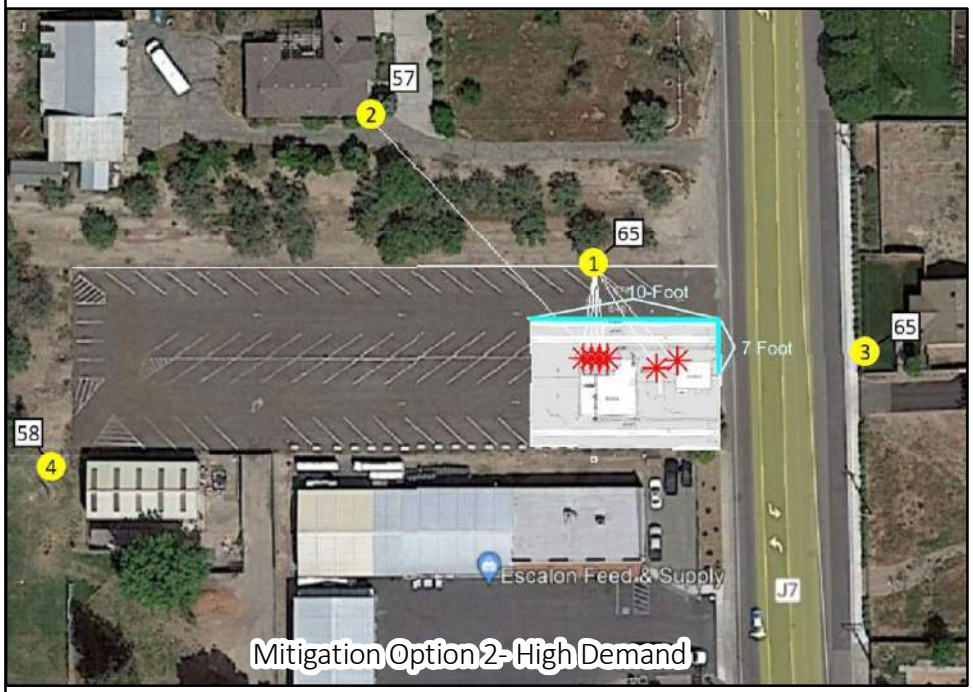
Figure 12. Noise Measurement Overview Location Map

Source: Appendix E- Noise Impact Analysis, Ganddini 2023

N

Not to Scale

ARDURRA



Legend
- Receiver
- Point source
- # Noise Levels (dBA, CNEL)
- 8- 10 ft High CMU wall
- 7- ft High CMU wall
- Line

City of Escalon
City of Escalon Connection to Nick DeGroot Water Treatment Plant

Figure 13. BPS Operational Noise Levels

Source: Noise Impact Analysis, Ganddini 2023 (Appendix E)

N

Not to Scale

ARDURRA

5.14 POPULATION AND HOUSING

Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
XIV. POPULATION AND HOUSING. Would the Project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

5.14.1 Regulatory Compliance

Regional Housing Needs Plan (RHNP)

The 2023-2031 RHNP was adopted by SJCOG and approved by the California Department of Housing and Community Department pursuant to the Housing Element Law of Government Code Section 65580. The RHNP establishes the number of housing units for various income levels that a city or county in California must plan for. The RHNP applies to housing within cities and counties throughout the State. Cities and unincorporated San Joaquin County must plan for housing needs at various income levels identified within the RHNP during the specified planning period. The RHNP establishes methodology and objectives to assist local jurisdictions in meeting regional housing needs.

San Joaquin County

Housing Element

Pursuant to the State Housing Element Law, San Joaquin County created a Housing Element that adequately addresses ways to meet projected housing needs for all socioeconomic segments of the community based on the SJCOG RHNP. San Joaquin County's Housing Element also evaluates the progress made since the housing element was last adopted in 2010.

5.14.2 Existing Conditions

Since the year 1920, San Joaquin County's population has increased by approximately 159% (79,905 residents in 1970; 710,731 residents in 2014). From 2010 to 2014, San Joaquin County's population increased by 0.9%, which is above the State average of 0.7% (SJ Housing Element 2015). Population growth is expected to continue into 2035, with projections showing a 1.5% increase in total population every 5 years (See *Table 7-9 SJCOG Population Projections, SJ Housing Element 2015*). The City of Escalon is amongst the few cities within the County that receive moderate growth (approximately 1.8%) but continues to maintain a population under 50,000 residents.

According to Escalon's Water Master Plan, the estimated population for 2005 through 2025 is anticipated to be approximately 11,950 residents, which will require an additional 382 acres for future built-out (Escalon Water Master Plan 2007). As of 2020, the City of Escalon has a total population of 7,523 residents. Therefore, falling behind on anticipated growth projections.

As mentioned within SJCOG's 2023-2031 RHNP, San Joaquin County needs a total of 52,719 units (21,637 units designated to lower income; 31,082 designated to higher income) to meet future demands. Within Escalon 367 units need to be allocated (146 units designated to lower income; 221 units designated to higher income).

5.14.3 Project Impacts

a) **Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

RESPONSE:

No Impact. Population within the City of Escalon and County of San Joaquin are indicated to increase consistently pursuant to each jurisdiction's approved General Plan. Increases within these local jurisdictions mirror similar growth patterns that are also expected throughout the state into the future. The rate of population growth within the City is less that what was anticipated in the City's General Plan and is less than the rate of growth in the County. The City's population was expected to reach 11,950 residents by 2025; however, the current population of the City of Escalon is 7,523.

The proposed Project will complete the City of Escalon's surface water turnout to deliver treated surface water from the SSJID transmission line on Dodds Road; the Project will supply treated surface water to the City via this new connection between the City of Escalon's water system within City Limits and SSJID's regional water distribution system that is intended to deliver water from the Stanislaus River to local cities within the SSJID service area. The Project is a proposed improvement within the City's Water Master Plan and will be completed pursuant to the SSJID SCSWSP Water Supply Development Agreement of 1999. The Agreement was made with SSJID amongst the Cities of Escalon, Manteca, Lathrop, and Tracy acknowledging the "delivery of treated surface water is needed to supplement the municipal and industrial water supplies of these communities" which rely on groundwater (Escalon Water Master Plan 2007). The Agreement intends to increase the reliability of the water distribution network for the City of Escalon as well as support sustainably managed groundwater resources within the San Joaquin Valley.

As a result of the Project's consistency with the SSJID SCSWSP Water Supply Development Agreement and the City of Escalon's Water Master Plan, the proposed Project is not anticipated to result in unplanned population growth by either implementing new homes or businesses or indirectly extending infrastructure. Therefore, impacts are not anticipated, and no Mitigation Measures are needed.

b) **Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

RESPONSE:

No Impact. The Project will install a connection, turnout, FCF, BPS, storage tank and 19,500 LF of water main within public t right-of-way along Escalon-Bellota Road. The FCF, storage tank, wet well, and BPS will be located on land that does not require the removal of existing buildings. In addition, the Project alignment and Project Components will be located on the City's public right-of-way; therefore, Project implementation does not anticipate displacement of substantial numbers of existing people or housing developments.

The Project will increase the reliability of the water distribution networks and reduce reliance on groundwater in order to accommodate water quality standards and service requirements as well as eventually achieve planned growth projected within the Escalon City Limits that is indicated in the City's approved General Plan. For these reasons, no impacts related to the displacement of substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere is not anticipated to occur. Mitigation Measures are not needed.

5.14.4 Mitigation Measures

No Mitigation Measures are required.

5.15 PUBLIC SERVICES

Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
XV. PUBLIC SERVICES. Would the Project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:	☐	☒	☐	☐
i. Fire Protection?	☐	☒	☐	☐
ii. Police Protection?	☐	☒	☐	☐
iii. Schools?	☐	☒	☐	☐
iv. Parks?	☐	☒	☐	☐
v. Other public facilities?	☐	☐	☐	☒

5.15.1 Regulatory Compliance

Fire Services

Fire protection and emergency services are provided by The Escalon Consolidated Fire Protection District (ECFPD), a combined initiative from both the City of Escalon and the County of San Joaquin to ensure maximum fire protection. The District was founded in 1912 and serves the southeast portion of San Joaquin County, approximately 65 square miles of primarily agricultural land. Escalon Fire provides emergency response services including Emergency Medical Services (EMS), vehicle fires, vegetation fires, motor vehicle accidents, structure fires, fire alarms, and public safety assistance (Escalon Fire 2023).

Police Services

Law enforcement services are provided within the City of Escalon. The Escalon Police Department strives to communicate with community members and visitors through their working partnerships and quality service. The goal of the Department is to preserve and improve the quality of life for the community members that they serve (Escalon Police Department Website 2023).

SSJID

SSJID was established in 1909 to provide a "reliable and economical source of irrigation water for agricultural areas in and around Escalon, Manteca, and Ripon" (SSJID Website 2023). By extending water service within these areas, SSJID gave life to the region, assisting in the delivery of water services to 70,000 acres of productive farmland (SSJID 2023). Today, the District provides water services to approximately 1,943 parcels. The District shares "pre-1914 water rights on the Stanislaus River" with the neighboring District, OID; water is diverted via canals, ditches, and pipelines (SSJID Water Master Plan 2022).

City of Escalon

The City of Escalon evaluates the environmental impact of Public Services and Facilities within their General Plan EIR. The evaluation provided within the EIR ensures that the City has sufficient levels of public services as Escalon anticipates growth. The City is required to provide sufficient public services including parkland pursuant to the Quimby

Act; and school/ school districts pursuant to the California Education Code. The City regularly evaluates the adequacy of services by establishing a land use plan that incorporates institutional public services and facilities through in-lieu fees paid at the time of discretionary permit issuance for implementation and maintenance of public services.

5.15.2 Existing Conditions

Fire Services

The Project is within the bounds of the ECFPD. The ECFPD provides fire protection, emergency medical, hazardous materials, and other services to residents and businesses within its area of service. Within the City of Escalon, there are two stations. Station 1 is located on 1749 Coley Avenue, Escalon, CA 95320, approximately 1 mile from the proposed BPS, storage tank, and wet well and adjacent to the heart of Escalon's downtown. Currently, there are seven full-time active firefighters working in this station with an additional four volunteer firefighters and eight reserve personnel. Station 62 is located northwest of the Project Site, approximately 3.3 miles southwest of the proposed BPS, storage tank, and wet well at 17950 South Van Allen Road. The closest fire hydrant is along the eastern perimeter of Escalon-Bellota Road, approximately 500 feet from the proposed BPS, storage tank, and wet well.

Police Protection

The City of Escalon Police Department will provide police protection to the Project. The closest police station to the Project is located on McHenry Avenue, approximately 1.1 miles from the proposed BPS, storage tank, and wet well facility. Response times to calls within City Limits are on average two minutes for emergency calls and 5 to 10 minutes for non-emergency calls (Escalon General Plan EIR 2005).

Schools

The Project is within the Escalon Unified School District (EUSD). The closest school to the Project is located near Escalon's downtown area, approximately 887 feet north of the Project Site. Escalon High School is located south of the proposed BPS, storage tank, and wet well, along Escalon-Bellota Road. As mentioned within Section 5.9.3, Response c), Escalon High School has approximately 814 students enrolled (9-12 grade) and 39 full-time teaching staff (CA Department of Education, 2023-24 Enrollment by Grade).

Parks

Parks near the Project include Escalon Dinosaur Park (approximately 250 feet west) and Hogan-Ennis Community Park (100 feet east) of the proposed BPS, storage tank, and wet well.

SSJID Facilities

The closest existing facilities owned and operated by SSJID to the Project Alignment are the 48-inch transmission main along Dodds Road that connects from the WTP in the east.

5.15.3 Project Impacts

a) **Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:**

i. **Fire Protection?**

RESPONSE:

Less than Significant with Mitigation Incorporated. During construction an approved traffic control plan will be followed pursuant to the City's Standard Specifications and **Modified MM TRAF-01: Traffic Control Plan**. This will allow services to function as usual and would reduce conflicts and delays from construction within the public right-of-way to the Fire and Police Department response during construction. As a result, less than significant impacts are expected during construction on fire and police services. The closest Fire Station is Station 1, which is approximately 1 mile south of the proposed BPS site. The Project will be constructed and tested prior to the permanent connection at the tie-in at Dodds Road so that

adequate water pressure for potable deliveries and emergency response within the surrounding area will be achieved.

The Project does not propose or indirectly contribute to increased population or density that would require an additional fire station, equipment, or staff over the long term. Likewise, the Project would not to change land use resulting in an increased need for fire response beyond what has already been identified in the City's approved Water Master Plan and General Plan. The standard application of the City's plan check, inspection, and design criteria will verify the implementation of fire protection performance objectives for the Project and facilitate fire protection within the Local Vicinity.

For these reasons, impacts are considered less than significant with Mitigation incorporated.

ii. Police Protection?

RESPONSE:

Less than Significant with Mitigation Incorporated. See Section 5.15.3, Response a) i. Since the Project is a part of the Water Master Plan, intended to benefit the City's public works facilities, the Project will not impact the level of police protection at the Project. The Project does not propose to increase population or change land use.

During construction, an approved traffic control plan will be followed pursuant to the City's Standard Specifications and Modified MM TRAF-01: Traffic Control Plan. This will allow services to function as usual, and access will remain open throughout the areas of disturbance and along the Project Alignment. Implementation of the approved traffic control plan by the contractor is intended to provide adequate and safe access pursuant to city standards, which is expected to be adequate for law enforcement. Upon completion of construction, road and sidewalk surfaces will be returned to pre-Project conditions. Areas where permanent above-ground structures will be implemented will be fenced and gated; onsite security will be installed. The proposed Project will not permanently increase population or change land use resulting in an increased need for police services either directly or indirectly.

Less than significant long-term impacts on police protection are expected. Short-term impacts will be mitigated by a traffic control plan; therefore, impacts are anticipated to be less than significant with Mitigation incorporated.

iii. Schools?

RESPONSE:

Less than Significant with Mitigation Incorporated. Within the downtown region, El Portal Middle School, Dent Elementary School, and Escalon High School are located within blocks of one another. As mentioned in Section 5.15.2 Existing Conditions, the Project is closest to Escalon High School, approximately 887 feet south of the proposed BPS site. Walking and biking during Project construction may be temporarily impacted along Escalon-Bellota Road, therefore the traffic control plan contains provisions for pedestrians and bicyclists to gain access during construction. In addition, Mitigation Measure Modified MM TRAF-02: Coordinate Traffic Plan with EUSD shall be implemented throughout Project construction to ensure that the traffic control plan has been reviewed by the District to avoid construction conflicts along local roadways during pick-ups and drop-offs.

Additionally, the Project will not increase population or density either directly or indirectly within the planning area; therefore, the project will not result in changes to school enrollment. Due to the Project's proximity to the closest educational facilities and the implementation of a traffic control plan under Modified MM TRAF-01: Traffic Control Plan and Modified MM TRAF-02: Coordinate Traffic Plan with EUSD. As a result of the proposed Mitigation Measures, Project construction will not conflict with or directly impact these schools during peak hours for drop-off and pickup.

As a result, less than significant impacts are anticipated with the incorporation of Mitigation Measures **Modified MM TRAF-01: Traffic Control Plan** and **MM PUB-01: Coordination with Local School District for Traffic Control.**

iv. **Parks?**

RESPONSE:

Less than Significant with Mitigation Incorporated. See Section 5.15, Responses a) i through iii. The Project does not propose to change land use resulting, either directly or indirectly, in an increase in density or population that would affect park use. However, the BPS site is proposed within the southeastern corner in a 0.15 (6,400 square feet) acre area that was planned within Phase Two of the Hogan-Ennis Community Park expansion. Project implementation will convert approximately 0.15 acres of parkland to public right-of-way for a utility. However, according to the City's Final GP EIR, the City's suggested ratio of 5 acres per 1,00 population is exceeded and satisfies future growth needs (City of Escalon GP FEIR, 2005). Therefore, the allocation of 0.15 acres of parkland for a public utility is anticipated to have negligible impacts on the City's parkland.

The Project is planned to be constructed within the County and City right-of-way; therefore, an approved traffic control plan will be implemented in compliance with City Standard Specifications pursuant to **Modified MM TRAF-01: Traffic Control Plan**. As a result, access to existing parkland adjacent to Project Components is not anticipated to be impacted by Project construction. Upon completion of construction, the project will be fenced and gated; therefore, the long-term use of recreational facilities will not be changed as a result of Project implementation.

Therefore, less than significant impacts are anticipated with the incorporation of Mitigation Measures.

v. **Other public facilities?**

RESPONSE:

No Impact. Proposed Project Components are located directly north of Escalon City Limits, adjacent to agricultural land uses and away from other public facilities. Therefore, construction is not anticipated to result in the closure of public facilities in the City of Escalon.

Proposed improvements are consistent with the County Water Management Plan and City Water Master Plan as part of the SCSWSP. As a result, no impacts are anticipated to other public facilities within the County or City of Escalon due to Project implementation. Mitigation Measures are not required.

5.15.4 Mitigation Measures

See applicable Mitigation Measures modified from SCSWSP, **Modified MM TRAF-01: Traffic Control Plan** and **Modified MM TRAF-02: Coordinate Traffic Plan with EUSD** within Section 5.17.4- Transportation Mitigation Measures.

5.16 RECREATION

Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
XVI. RECREATION.				
a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
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?	☐	☐	☐	☒

5.16.1 Regulatory Compliance

The Quimby Act

The Quimby Act of 1965, Section 66477 of the California Government Code, enables local governments, cities, or counties to require the dedication of land or impose a requirement of the payment of the in-lieu fees during the subdivision process to mitigate increased demand for parks and use of parks due to population growth associated urbanization. Park-in-lieu fees are collected based on development size and the fees are used to purchase land for recreational use and develop or rehabilitate parks within the community. Quimby Act requirements establish minimum acreage requirements for parks per capita, 3 acres of park area per 1,000 persons unless the park acreage of a municipality exceeds that standard, in which case the maximum dedication is five acres per 1,000 residents (San Joaquin County GP EIR, 2014).

City of Escalon Ordinances

The proposed Project is subject to compliance with the City of Escalon's Municipal Code. Since the Project is an infrastructure improvement that was considered in the City's Water Master Plan and General Plan, the Project would not directly generate increased population or demand for recreation or parks. Current City standards require five acres of parkland per 1,000 residents; one acre per thousand to be developed for mini-parks, 3 acres per 1,000 for neighborhood parks, and 1 acre per thousand for regional parks (Escalon General Plan EIR 2005). There are no deficiencies in parkland per capita within the City.

Plans within the City Limits include the expansion of Hogan-Ennis Community Park. The site of the proposed BPS, subterranean storage tank, and wet well is on land owned by the City of Escalon that has been planned and approved for future development of a portion of the Hogan-Ennis Community Park expansion, Phase Two. Hogan-Ennis Community Park Project is part of the City's CIP. The City of Escalon plans to expand the park into parcels that were previously utilized for agriculture and are currently vacant and located northeast and north of the existing park within unincorporated San Joaquin County. These parcels are designated under the County's General Plan for Agricultural-Urban Reserve (AU).

Future Improvements are planned to be implemented in three phases of park development are listed in *Table 3: Hogan-Ennis Community Park CIP Phases*. The Project is part of Phase Two, located in an area planned for a skatepark. The phases and park improvements are summarized in *Table 3: Hogan-Ennis Community Park CIP Phases* & **Figure 6: Master Plan of Hogan-Ennis Community Park**.

5.16.2 Existing Conditions

San Joaquin County contains over 2,800 acres of regional and local parkland (San Joaquin County GP EIR 2014). Within Escalon's City Limits and SOI, park/ open space accounts for approximately 82 acres. According to the City's Final GP EIR, the City's suggested ratio of 5 acres per 1,000 population is exceeded and satisfies future growth needs (City of Escalon GP FEIR, 2005). The closest parks to the Project within the Escalon City Limits, consist of Escalon Dinosaur Park, approximately 250 feet northwest, and Hogan-Ennis Community Park, approximately 100 feet southeast of the proposed BPS, storage tank, and wet well.

5.16.3 Project Impacts

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?**

RESPONSE:

Less than Significant Impact. Project implementation is considered in the approved General Plan and Water Master Plan for the City of Escalon, as well as regional water plans and programs for groundwater sustainability. The Project would not generate long-term employment, new housing units, or increase the local population. Therefore, Project implementation will not increase the use of existing parks or the demand for new parks.

The Project proposes to implement a compact design for a tank, wet well and BPS within approximately 9,600 square feet; this infrastructure will be installed within the northeastern corner of the planned Hogan-Ennis Community Park expansion, at the northeast corner of the master plan area. Due to the proposed location and size of the Project facilities at this location it is not expected to conflict with the overall use of the existing or future park. The Project will be adjacent to the west of the paved right-of-way for Escalon-Bellota Road. The Hogan-Ennis Park expansion is an approved CIP project within the City of Escalon that was initially planned for 2019-20; however, the CIP project is still part of future planning projects within the CIP. The CIP project will extend existing Hogan Park to the north and east of the developed park boundaries, within the City's SOI to include passive and active park spaces including a baseball field and skate park.

The BPS, tank and wet well that are proposed with Project would not result in a substantial conversion of parkland resulting in noncompliance of the City's park requirements per capita. Likewise, Project implementation will not preclude the park uses that are proposed with the CIP park expansion. The BPS, tank and wet well are essential components of the Project that are needed to achieve the groundwater sustainability goals and policies of approved city and regional plans including the City's General Plan, Safety Element, and Water Master Plan and regional groundwater sustainability plans. The Project will provide reliable potable water deliveries for Escalon's existing and future population. The Project will enable reliable delivery of water services and fire response that will be distributed for required land uses across the City (residential, commercial, park, etc.) and will support ongoing park operations and maintenance within city limits as well as the planned buildout of the General Plan.

As a result, the Project impacts are considered less than significant impacts on existing neighborhood and regional parks or other recreational facilities. Likewise, implementation of the Project would not result in substantial physical deterioration or accelerated deterioration of park facilities. No Mitigation Measures are needed.

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?**

RESPONSE:

No Impact. See Section 5.16, Response a). The Project is proposed to support the buildout of the City's approved land use map and will not cause substantial changes to approved land use patterns, recreational facilities, or the use of these facilities, as mentioned above. The Project will have no impacts related to the construction or expansion of recreational facilities or an adverse physical effect on the environment related to recreation facilities. Therefore, no mitigation is required.

5.16.4 Mitigation Measures

No Mitigation Measures are required.

5.17 TRANSPORTATION

Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
XVII. TRANSPORTATION. Would the Project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	☐	☒	☐	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☒	☐	☐

5.17.1 Regulatory Compliance

CEQA Guidelines

In December 2018, CEQA Guidelines Section 15064.3, subdivision (b) was proposed by the Office of Planning and Research and adopted by the California Natural Resources Agency. The updated guidelines outline the specific considerations for evaluating a project's transportation impacts; identifying "vehicle miles traveled" (VMT) as the most appropriate measure for determining impact levels. The updated guidelines focus primarily on transit priority areas, shifting the focus from driver delay to GHG reductions, the utilization of multimodal networks, and mixed-use land use patterns that may improve walkability and reduce reliance on automobile use.

Section 15064.3 subdivision (b) considers all the following acceptable criteria for analyzing transportation impacts:

(1) Land Use Projects. Project-related VMT exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact based on proximity with mass transit or goods and services. Projects that decrease VMT should be presumed to have a less than significant transportation impact.

(2) Transportation Projects. Transportation projects that reduce, or have no impact on, VMT should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have the discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.

(3) Qualitative Analysis. If existing models or methods are not available to estimate VMT for the particular project being considered, a lead agency may analyze the project's VMT qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.

(4) Methodology. A lead agency has the discretion to choose the most appropriate methodology to evaluate a project's VMT, including whether to express the change in absolute terms, per capita, per household, or in any other measure. A lead agency may use models to estimate a project's VMT and may revise those estimates to

reflect professional judgment based on substantial evidence. Any assumptions used to estimate VMT and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

Source: CEQA Guidelines Section 15064.3- Determining the Significance of Transportation Impacts.

5.17.2 Existing Conditions

According to the San Joaquin County General Plan, *Figure TM-1 Circulation Diagram*, Escalon-Bellota Road is a major arterial street within unincorporated San Joaquin County, that transitions to a minor arterial within Escalon's City Limits. Escalon-Bellota Road right-of-way is where the Project will be implemented and current traffic counts from San Joaquin County indicate Escalon-Bellota operates at acceptable traffic levels. For a two-lane major collector street similar to Escalon-Bellota Road, San Joaquin County's threshold capacity volume to maintain Level of Service C is 12,500 vehicles (San Joaquin County EIR, 2014). According to the San Joaquin County Department of Public Works, recent traffic counts along Escalon-Bellota Road, the Project Alignment, are between 2,769 and 7,777 average daily trips (ADT) (San Joaquin County Dept. Public Works GIS), less than the roads design capacity.

State Route (SR) 120 is approximately 0.5 miles north of the proposed BPS and provides regional access to the Project. State Route 120 traverses east to west across Escalon's Downtown, connecting Escalon to neighboring cities including Oakdale and Manteca, approximately 9 miles east and 10 miles west of the proposed BPS.

5.17.3 Project Impacts

a) **Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?**

RESPONSE:

Less than Significant Impact. The Project plans to install 19,500 LF of potable water pipeline bgs within the paved public right-of-way of Escalon-Bellota Road. Upon completion of construction, the street surface will be returned to pre-project conditions. No permanent impacts on the City of Escalon's or County's circulation system are proposed with the Project. Likewise, the Project will not cause direct changes to existing or planned land use resulting in increased VMT. Project construction is anticipated to cause temporary and intermittent increased traffic during construction and will increase activity within construction zones from the arrivals and departures of the crew, inspectors, contractor trips, truck trips, and equipment use. As anticipated within the Project's Air Quality, Greenhouse Gas, & Energy Technical Memorandum (**Appendix A**), construction worker trips will generate 50,486 vehicle miles traveled (VMT) related to construction worker trips[8]; and 13,824 VMT for vendor and hauling trips[9] during Project construction, totaling 64,310 VMT over 16 months (Ganddini 2023). As a result, modeling in **Appendix A**, shows daily truck trips from construction works and vendor hauling are not anticipated to exceed approximately 112 trips per day (**Appendix A**, Ganddini, *Table 7: Construction Worker Fuel Consumptions Estimate; Table 9: Construction Hauling Fuel Consumption Estimates (HHD Trucks)*) throughout the various phases of Project construction.

Due to the temporary and intermittent activities from Project construction along Escalon-Bellota Road and in the temporary increase of approximately 112 daily trips per day during construction, the increase in daily trip trips from Project construction is not anticipated to have significant impacts on traffic. ADT along Escalon Bellota road is well below the County's capacity threshold of 12,500 vehicles and the temporary increase in trips per day as a result of Project construction does not anticipate resulting in significant transportation deficiencies.

As a result, Project construction will not result in daily trips exceeding County-established capacity thresholds or significantly increased VMT. For the reasons above, the proposed Project is not anticipated to conflict with a

[8] Construction worker trips are based on CalEEMod User's Guide Appendix C (April 2022) states that construction work trips are made by a fleet consisting of 25 percent light-duty auto (or passenger car), 50 percent light-duty truck type 1 (LDT1), and 25 percent light duty truck type 2 (LDT2).
[9] Vendor and hauling trips are based on the following assumptions contained within CalEEMod User's Guide Appendix C (April 2022) states that vendor trips are made by a fleet consisting of 50 percent medium trucks (MHDT) and 50 percent heavy trucks (HHDT) and that hauling and onsite truck trips are made by a fleet consisting of 100 percent HHDT.

program, plan ordinance, or policy addressing the circulation system including transit, roadway, bicycles, and pedestrian facilities. Less than significant impacts are anticipated. No Mitigation Measures are needed.

b) **Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?**

RESPONSE:

Less than Significant with Mitigation Incorporated. CEQA Guidelines Section 15064.3, subdivision (b) pertains to VMT that are expected from a Project. The Project does not propose changes to existing or approved land use and will not facilitate permanently increased traffic trips or permanently increased VMT. As mentioned above, **Appendix A**, Air Quality, Greenhouse, & Energy Technical Memorandum anticipates temporary Project construction will generate 50,486 VMT related to construction worker trips; and 13,824 VMT for vendor and hauling trips, totaling 64,310 VMT over 16 months. Throughout the various phases of Project construction, approximately 112 daily trips are not anticipated to be exceeded. As a result of temporary increases in construction trips along local roadways, the Project will implement previously approved Mitigation Measures from SSJID's SCSWP, which have been modified for the proposed Project. Mitigation Measures **Modified MM TRAF-01: Traffic Control Plan** will ensure a licensed traffic engineer maintains the maximum amount of travel lane capacity and emergency access during Project construction.

Since impacts to VMT are anticipated to be temporary and intermittent during Project construction, the County's ADT thresholds will not be permanently impacted; therefore, less than significant impacts are anticipated with the implementation of proposed Mitigation Measures.

c) **Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

RESPONSE:

No Impact. The Project will be constructed below the ground surface and will not implement above-ground features that could result in permanent hazards from a geometric design feature. During construction, the Project will require transport of heavy equipment to the Project and Local Vicinity and the use of heavy equipment. Work within the public right-of-way requires review and approval of an encroachment permit by the City, which will require an approved traffic control plan with BMPS such as temporary barriers and detours, signage, and flagging. Therefore, no impacts are anticipated.

d) **Result in inadequate emergency access?**

RESPONSE:

Less than Significant with Mitigation Incorporated. Refer to Responses 5.17.3 a) through c). Potential for delay within the Local Vicinity during Project construction is likely since slower-moving equipment and trucks used during construction could create temporary delays. Continuous access will be maintained by the contractor by implementing the approved traffic control plan. The Project will implement the City's Standard Specifications and will comply with City requirements for plan check review and approval and construction inspections. During construction, an approved traffic control plan under modified Mitigation Measures **Modified MM TRAF-01: Traffic Control Plan** through **Modified MM TRAF-07: Encroachment Permit** will be followed to allow services to function as usual, and any required road or driveway access will be available for emergency access by the Fire and Police department through the Project site. As a result of the proposed Mitigation Measures, impacts will be less than significant. In the long term, The Project will return to pre-project conditions and there will be no impact on vehicular access near the Project Alignment or in the Local Vicinity.

5.17.4 Mitigation Measures

Modified MM TRAF-01: Traffic Control Plan- Upon the finalization of a detailed pipeline alignment design, the City of Escalon shall arrange for a Traffic Control Plan to be prepared by a licensed traffic engineer, for all project-affected roadways and intersections. The Traffic Control Plan shall comply with requirements in encroachment permits issued by San Joaquin County. The Traffic Control Plan to be prepared by the construction contractors shall include, but not be limited to, the following measures:

- Maintain the maximum amount of travel lane capacity during non-construction periods, with all trenches covered with steel plates, and provide flagger control at all construction sites to manage traffic control.
- Limit the construction work zone in each block to a width that, at a minimum maintenance alternates one-way traffic flow past the construction zone. Alternatively, use detour signing on alternate access streets when temporary full streets closure is required.
- Restrict construction to non-peak traffic periods as required for specific work sites in encroachment permits. Weekend and night work shifts may be considered in non-residential areas only.
- Coordinate construction activities (time of year and duration) to minimize traffic disturbances adjacent to commercial areas (e.g., avoid the peak of Christmas, and holiday shopping period), dairies, and the Atlanta Cemetery.
- Post advanced warnings of construction activities (e.g., signs, articles in newspapers, notices on radio/TV, etc.) to allow motorists to select alternative routes in advance.

Modified MM TRAF-02: Coordinate Traffic Plan with EUSD - Prior to Project construction, the City of Escalon shall develop comprehensive strategies for maintaining emergency access for sensitive land uses such as Escalon police and fire stations, and Escalon Unified School District in consultation with the facility owner or administer, as part of the Traffic Control Plan for roadway segments and intersections. Strategies shall include but are not limited to, maintaining steel trench plates at the construction sites to restore access across open trenches, parking of fire trucks outside the firehouse on the side of the street opposite the construction during affected work hours, and identification of alternate routing around construction zones. Also, police, fire, and other emergency service providers shall be notified of the timing location, and duration of construction activities throughout the project, and the location of detours and lane closures. In addition, the Project contractor must share the traffic control plan with the Escalon Unified School District to coordinate best management practices during peak operational hours (pickup and drop-offs) at Escalon High School.

Modified MM TRAF-03: Advanced Notice- Prior to construction activities along the Project alignment and at the site of the FCF, and BPS, the City of Escalon shall require a minimum 72-hour advance notice of access restrictions for residents and businesses. Affected residents and businesses shall be advised of the requirements for moving motor vehicles out of the area to be closed.

Modified MM TRAF-04: Off-Street Construction Parking- During construction activities, the City of Escalon may require the contractor(s) to provide off-street parking for construction worker's vehicles in the vicinity of the work zone, or workers may be shuttled to the work from an off-site location.

Modified MM TRAF-05: Warning Signs- As part of the Traffic Control Plan(s) for roadway segments and intersections, the City of Escalon shall ensure that such plans stress advance "Road Work Ahead" warning signs and speed control (including signs informing drivers of State-legislation double fines for speed infractions in a construction zone) to achieve required speed reductions for safe traffic flow through the work zone.

Modified MM TRAF-06: Bicyclists and Pedestrians- Prior to construction activities, the City of Escalon shall incorporate into contract specifications for all project components that require that traffic control plans include detours for bicyclists and pedestrians in all areas potentially affected by project construction.

Modified MM TRAF-07: Encroachment Permit- Before the approval of Project plans, the City of Escalon shall obtain encroachment permits from affected jurisdictions before construction of the project, and comply with haul route designations, and roadway wear monitoring and repairs conditions.

5.18 TRIBAL CULTURAL RESOURCES

Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES.				
a) Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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:	☐	☒	☐	☐
i. 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	☐	☒	☐	☐
ii. 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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

5.18.1 Regulatory Compliance

Assembly Bill (AB) 52

AB 52 became effective on July 1st, 2015, and requires lead agencies to provide notice to any California Native American tribes that have requested notice of projects. Upon the receipt of the notice, the tribe has 30 days to request consultation with the lead agency. AB 52 created a new category of resources formally known as "Tribal Cultural Resources" (TCRs).

Public Resources Code 21074 defines "Tribal cultural resources as any of the following "Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either: (A) Included or determined to be eligible for inclusion in the California Register of Historical Resources and/or (B) Included

in a local register of historical resources as defined in subdivision (k) of Section 5020.1. This may include 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 Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe."

5.18.2 Existing Conditions

As mentioned within Section 5.5.2 Existing Conditions, the Project area is within the traditional boundaries of the Northern Valley Yokuts. The tribe adopted a sedentary lifestyle due to the benefits of the perennial water sources in an otherwise arid climate. A sedentary lifestyle allows the tribe to have a village-style residential model in which residential-based remained the same or seasonal and sanctioned mobility to more remote areas for the collection of specialized resources (Binford 1980, Thomas 1983). The village-style residential model has been locally supported by early ethnographers, who considered Yokuts unique in California for forming "true tribes" and for developing an unparalleled array of dialects (Krober 1925:474).

5.18.3 Project Impacts

a) Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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:

i. **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**

RESPONSE:

Less than Significant with Mitigation Incorporated. On March 13th, 2023, a records search of the NAHC SLF was completed for the proposed Project. The results from the SLF were negative and no resources have been previously identified in the immediate area of the Project. However, the SLF search does not indicate the absence of cultural resources during construction. Therefore, additional sources, including information from Native American Tribes, who have knowledge of cultural resources within the Project area is needed (see Section 5.18.3, Response i) below). The City of Escalon has initiated AB 52 Consultation with tribes listed on the NAHC SLF Search pursuant to Standard Condition **SC TRI-01: AB 52** and proposes Mitigation Measures **MM TRI-01: Agreements, Consulting, and Monitoring with Affiliated Tribes** and **MM TRI-02: Diversity of Buried Tribal Cultural Resources** requiring tribal monitoring and coordination during construction.

Based on the results of the SLF, impacts on cultural resources pursuant to Public Resources Code Section 21074 and 5020.1(k) are considered less than significant with mitigation.

ii. **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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

RESPONSE:

Less than Significant with Mitigation Incorporated. As mentioned within Section 5.18.3, Response i) above, the SLF search results indicate the Project is not located within an area where tribal cultural resources have been previously found. Therefore, The City of Escalon has contacted tribes affiliated with the Local Vicinity to better understand the potential for discovery of tribal cultural resources and Project impacts.

The NAHC provided a list of Native American tribes that may have information on tribal cultural resources that may be present near the Project. The list includes seven tribes (Consulting Tribes) listed as follows: Buena Vista Rancheria of Me-Wuk Indians, California Valley Miwok Tribe, Ione Band of Miwok Indians, North Valley Yokuts Tribe, Tule River Indian Tribe, Wilton Rancheria, and Wuksache Indian Tribe/

Eshom Valley Band. These tribes along with many others are affiliated with the Local Vicinity and were historically present within the region. Therefore, the City of Escalon, the lead agency, has contacted the following tribes inquiring whether or not they will require formal consultation pursuant to Standard Condition **SC TRI-01- Assembly Bill 52**: Buena Vista Rancheria of Me-Wuk Indians, California Valley Miwok Tribe, Chicken Rancho Rancheria of Me-Wuk Indians, Ione Band of Miwok Indians, Nashville Enterprise Miwok-Maidu-Nishinam Tribe, North Valley Yokuts Tribe, The Confederated Villages of Lisjan, Tule River Indian Tribe, Wilton Rancheria, Wuksache Indian Tribe/ Eshom Valley Band, and the United Auburn Indian Community of the Auburn Rancheria. On September 5, 2024, the City received a response from the California Valley Miwok Tribe. The tribe indicated that they understood the nature and purpose of the proposed Project and the tribe did not have any further comments or concerns.

In addition, tribal monitoring will be implemented during earthwork pursuant to TRI-01, **MM TRI-01: Agreements, Consulting, and Monitoring with Affiliated Tribes**. This mitigation measure and standard condition will ensure claims of tribal cultural significance of the areas where earthwork is anticipated for Project implementation are appropriately assessed and that finds during earthwork are not significantly impacted. Less than significant impacts with mitigation measures would result.

Based on preliminary review of the SLF, significant impacts are not likely. However, the proposed depths of excavation have the potential to impact native soils and could uncover previously unknown tribal resources. Therefore, therefore, tribal coordination and monitoring is proposed. Therefore, Mitigation Measures **MM TRI-01: Agreements, Consulting, and Monitoring with Affiliated Tribes** and **MM TRI-02: Diversity of Buried Tribal Cultural Resources** are proposed to ensure that prior to Project construction agreements with consulting tribes are established; field training is conducted on the appropriate procedures in the event a TCR is discovered; and procedures were established for reburial.

As a result, the Project anticipates less than significant impact with mitigation incorporated.

5.18.4 Mitigation Measures

MM TRI-01: Agreements, Consulting, and Monitoring with Affiliated Tribes. Prior to the issuance of grading or building permits, the City of Escalon shall secure agreements with Consulting Tribes for monitoring. The City will be required to provide 30 days' advanced notice to the tribes of all ground-disturbing activities. The Native American Tribal Representatives shall have the authority to temporarily halt and redirect earth moving activities in the affected area if suspected tribal resources are unearthed. The Native American Monitor(s) shall attend the pre-construction crew training with the Project Archaeologist, City, the construction manager and any contractors pursuant to **Modified MM CUL-01: (Ground Inspection) Pre-Construction Crew Training**. The training will include a Tribal Perspective of the mandatory Cultural Resources Worker Sensitivity Training to those in attendance.

MM TRI-02: Diversity of Buried Tribal Cultural Resources. If sub surface cultural resources are discovered during ground disturbing activities (inadvertent discoveries), the following shall be carried out for final disposition of the discoveries:

1. **Preservation-in-Place**: The cultural resource shall be preserved in place by the Project contractor if possible. Preservation-in-Place means avoiding the resources and leaving them in place where they were found with no development affecting the integrity of the resources. All work around the inadvertent discoveries shall be halted until the Project archeologist or representative from a Consulting Tribe is notified and onsite for retrieval.
2. **Notify Consulting Tribes**: Prior to the reburial or resuming construction activities, tribes must be notified immediately by the District regarding treatment and disposition of artifacts.
3. **Reburial**: Onsite reburial of the discovered items shall be reburied; and the reburial area shall be protected from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed. No recordation of sacred items is permitted without the written consent of all Consulting Tribes. The location for the future reburial area shall be identified on a confidential exhibit

on file with the City and concurred to by the Consulting Tribes prior to certification of the environmental document.

5.18.5 Standard Conditions

SC TRI-01: AB 52: Prior to Project construction, the City of Escalon shall complete coordination with the local tribes pursuant to AB 52. If a response has not been received within two weeks of notification, the City of Escalon might follow-up with a telephone call or email to ensure that the Project information has been received and reviewed by each respective tribe.

5.19 UTILITIES AND SERVICES

Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS. Would the Project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☒	☐	☐
b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	☒
c) Result in a determination by the wastewater treatment provider, which serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

5.19.1 Regulatory Compliance

City of Escalon

The City of Escalon Public Works Department provides water and wastewater services within City Limits. Escalon's primary water source is from groundwater wells located throughout City Limits. Wastewater is directed to Escalon's Wastewater Treatment Plant south of City Limits off East River Road.

The City of Escalon provides consumers with a "Consumer Confidence Report" every year evaluating the groundwater contaminants within the City wells (Wells 3A- South, 9-Northeast, 10-East). The reports provided by the City of Escalon ensure that the City's drinking water is safe to drink according to the U.S. EPA and State Board.

Water Master Plan

The City of Escalon's Water Master Plan is a comprehensive water infrastructure strategy for adequate delivery of service to the existing consumer base and planned future growth. The City's Water Master Plan sets service objectives that account for water needed to serve land uses, population projections, and planning horizons that are described in the approved General Plan. This document is used to identify, organize, and phased implementation of CIP projects to achieve master plan objectives (Escalon Water Master Plan 2007). The objectives of the Water Master Plan include the following:

1. Development of a logical expansion plan that can be phased according to growth projections and land use identified in the General Plan as well as the City's Growth Ordinance which limits residential development to a maximum of 75 residential units per year. Revenue generated by connection charges for improvements will be limited accordingly.
2. Projection of future water demands based on historical water use data and approved land use as defined in the General Plan.
3. Identification of water infrastructure needs to meet the goals and objectives of the General Plan including supply, storage, pumping and distribution facilities.
4. Description of improvements including capital costs which will be used to develop the appropriate water connection charge.
5. Development of an implementation plan and recommended water connection charge.

5.19.2 Existing Conditions

Within City Limits, electrical services are provided by both PG&E and MID. Solid waste collection is provided by Gilton Solid Waste Management and is taken to McClure Transfer Station in Modesto, where it is processed and sent to the Fink Landfill in Stanislaus County.

Near City Limits, along Escalon-Bellota Road, a water main and sewer line runs parallel to the City's right-of-way. Water services being provided by the City are distributed from the existing water main to adjacent land uses including residential, commercial, agricultural, and parkland. Pipeline diameters range from three to 16 inches. In addition, the water distribution system is operated by SCADA, which allows Escalon to regulate the system's desired pressure and configure the wells utilizing a lead/lag pumping configuration (Escalon Water Master Plan 2007), with a continuous lead pump assisted by a lag pump to meet flow requirements when the system demands exceed the capability of the lead pump.

According to the Water Master Plan, the distribution system is in excellent condition; however, to meet further demand requirements and provide redundancy and reliability to the City's long-term water supply, the City needs to supplement well water with "surface" water provided by SSJID (Escalon Water Master Plan 2007). As a result, the City is a participant in the SSJID SCSWSP, which agrees to deliver treated surface water to supplement municipal and industrial water supplies to communities' part of the agreement (Escalon, Tracy, Lathrop, Manteca). As proposed in the Water Master Plan, the primary facilities associated with the SSJID project include the conveyance of water from the existing 48-inch SSJID transmission main and turnout facilities (storage tank and BPS).

5.19.3 Project Impacts

a) **Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

RESPONSE:

Less than Significant with Mitigation Incorporated. Relocation of existing utilities will not be required for Project construction. The Project will be implemented using open trench and jack and bore methods for the proposed improvements to the City's water distribution network. Jack and bore will be used to avoid impacts on existing utilities. Project implementation requires the installation of 19,500 LF of potable water from the SSJID transmission line, an FCF, BPS, a storage tank, and wet well. The extension of the potable water line from the

SSJID tie-in, will expand the City's water infrastructure and assist with providing potable water to the City's consumer base. The improvements will help achieve regional groundwater sustainability goals and to meet the demands that are forecasted due to population growth.

Project construction of Project Components is meant to increase water supply and improve performance and reliability. Since the BPS will connect to the City's water distribution network along Escalon-Bellota Road, water services may be temporarily impacted to allow for the connection to the existing water line. Electrical services will be extended to the BPS from nearby power poles owned and operated by PG&E. Electricity demand anticipated at the BPS over the lifetime of the Project and is not anticipated to be significant due to the anticipated scale.

The Project is included in the City's Water Master Plan; therefore, the Project does not propose to develop infrastructure or public utility improvements that have not already been considered and approved by the City of Escalon. As outlined below in *Table 27: Project Consistency with County General Plan Services and Recreation Policies and Goals*, the Project is consistent with the policies and goals outlined in San Joaquin County's General Plan.

For the reasons above, the Project will result in the construction of new expanded wastewater utilities; however, new construction will not result in significant impacts that involve the relocation of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities.

TABLE 27: PROJECT CONSISTENCY WITH COUNTY GENERAL PLAN SERVICES

County General Plan Policies and Goals (Public Services and Recreation)	Project Consistency
IS-1.3: Facilities and Services Deficiencies. The County shall coordinate with other public facility districts and agencies (e.g., special districts, community service districts) to identify and find solutions to key infrastructure deficiencies in the County. (IGC) (Source: New Policy)	The proposed Project will be implemented in coordination with SSJID, OID, the City of Escalon, and San Joaquin County. The proposed Project will be owned and operated by the City of Escalon; however, SSJID and San Joaquin County are involved to ensure that activities proposed within the SCSWSP EIR are carried out to reduce significant impacts.
IS-1.4: Infrastructure Maintenance. The County shall work with agencies to maintain, improve, and replace public facilities as necessary to maintain adequate levels of service for existing and future development and reduce the need for new facilities. Where public facilities and services are provided by other agencies, the County shall encourage similar service-level goals. (PSP/IGC) (Source: Existing GP, CODP, Growth Accommodation, Policy 25, modified)	The Project will carry out Policy IS-1.4 by improving the water distribution network to maintain adequate levels of service for existing and future development. The improvement will allow water services to run as usual and will reduce impacts on groundwater.
IS-1.5: Infrastructure and Service Expansions. The County shall base the expansion of public facilities and services on current needs and planned or projected development patterns. (PSP) (Source: Existing GP, CODP, Growth Accommodation, Policy 26, modified)	The Project is proposed to reduce the City's use of groundwater and will also serve to support projected population growth within City Limits pursuant to the approved General Plan. Project Components will accommodate the increase in growth anticipated within the coming years by connecting Escalon's water infrastructure to SSJID's transmission main that will supply surface waters. The Project will improve and modify water service in the City.

Source: San Joaquin County 2035 General Plan

Since the proposed Project is anticipated to connect to existing water infrastructure including the SSJID 48-inch transmission line and a water main along Escalon-Bellota Road with City Limits, conflicts with existing utilities have the potential to occur. As a result, the Project will implement SSJID's previously approved Mitigation

Measure **Modified MM UTL-01: Existing Utilities** and **Modified MM UTL-02: Utility Conflicts** from the SCSWSP DEIR; therefore, less than significant impacts are anticipated with mitigation incorporated.

b) **Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?**

RESPONSE:

No Impact. The proposed Project will connect to SSJID's transmission line currently located on Dodds Road in unincorporated San Joaquin County and bring surface water to the City of Escalon for long-term use and ensure system reliability and redundancy as well as fulfill groundwater sustainability goals. The Project does not propose to increase population or density. Proposed Improvements will improve the City's water infrastructure and supply additional sources of water (via SSJID transmission main). The Project is part of the SSJID SCSWSP and has been approved and considered within the City's Water Master Plan and SSJID.

As a result, no impacts are foreseen, as the Project is not anticipated to substantially impact water supplies that serve the Project and reasonably foreseeable future development during normal and multiple dry years. No Mitigation Measures are needed.

c) **Result in a determination by the wastewater treatment provider, which serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?**

RESPONSE:

No Impact. Wastewater flows are treated by the Escalon Wastewater Treatment Plan (WWTP) located at 25100 East River Road, Escalon, CA 95320, approximately 3.5 miles south of the proposed BPS site. At the Escalon WWTP, influents from domestic and industrial are received at this plant, then processed separately in different sections of the facility (Escalon WWTP Master Plan Report 2019).

Since the proposed Project does not anticipate the generation of wastewater over the long-term, Escalon WWTP does not need to account for increased capacity due to Project activities. Therefore, changes to the facilities existing commitments are not anticipated. No impacts are anticipated, and Mitigation Measures are not required for the Project.

d) **Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

RESPONSE:

Less than Significant Impact. According to Escalon's Sewer System Map, a sewer main runs north-south along the western perimeter of Escalon-Bellota Road. An existing manhole lid is directly west of the proposed BPS site, on the border of City Limits. Since Project improvements are planned to expand the City's water distribution network for redundancy and reliability, the Project does not propose to increase population density at the location of any Project Components. Therefore, waste management services or submittal of an approved Waste Management and Recycling Plan for the Project is not necessary. Long-term operation of the proposed components including the FCF, BPS, storage tank, and wet well, will be maintained by the City of Escalon's Public Works Department. Operation of the facilities do not anticipate regular disposal of debris or waste, since facilities will be operated on an automatic pump system utilizing lead/lag configuration.

However, Project construction will result in debris from excavation, trenching, and jack and bore construction. As a result, the Project contractor will implement a waste management plan for the Project, which will include temporary lidded bins at on-site staging areas. Lidded bins will be utilized for collection, disposal, recycling, and transport of construction-related waste.

e) **Comply with federal, state, and local management and reduction statutes and regulations related to solid waste**

RESPONSE:

No Impact. The Project will not increase solid waste production over the long-term, since the Project does not propose to increase population or density at the Project or within the Local Vicinity. The Project improvements

to the City's water distribution network to increase the reliability of water services for the City's consumer base. Therefore, no impacts are anticipated, and no Mitigation Measures are required.

5.19.4 Mitigation Measures

Modified MM UTL-01- Existing Utilities- A detailed study identifying utilities within areas subject to earthwork with the Project construction shall be conducted during the pre-design stages of the Project. For project components with utility conflicts, the following mitigations are identified:

- Utility excavation or encroachment permits shall be required from the appropriate agencies. These permits include measures to minimize utility disruption.The City and its contractors shall comply with permit conditions, and such conditions shall be included in construction contract specifications.
- Utility locations shall be verified through field survey (potholing) and use of the Underground Service Alert (USA) services.
- Detailed specifications shall be prepared as part of the design plans to include procedures for the excavation, support, and fill of areas around utility cables and pipes. All affected utility services shall be notified of the City's construction plans and schedule. Arrangements may be made with these entities regarding protection, relocation, or temporary disconnection of services.
- The City shall employ special construction techniques in areas where the water transmission pipeline is located parallel to wastewater pipelines. These special measures, which shall be included in the engineering specifications, may include trench wall-support measures to guard against trench wall failure and possible resulting loss of structural support for the water pipeline.
- Residents and businesses in the project area shall be notified of planned utility service disruption two to four days in advance, in conformance with county and state standards.

Modified MM UTL-02: Utility Conflicts- In order to reduce potential impacts associated with utility conflicts, the following measures shall be implemented in conjunction with **Modified MM UTL-01- Existing Utilities:**

- Disconnected cables and lines shall be reconnected promptly
- Based on the utilities investigation to be conducted by the City of Escalon shall consult with any entities having utility conflicts with the proposed project to negotiate relocation efforts or other plans to resolve the conflict.
- The City of Escalon shall observe DHS standards which require: 1) a 10-foot horizontal separation between parallel sewer and water pipelines (gravity or force pipelines); 2) 1-foot vertical separation between perpendicular water and sewer line crossings (in the event that separation requirements may not be maintained, the City shall obtain DHS variance through provisions of sewer encasement, or other means deemed suitable by DHS); and 3) encasing water pipelines in protective sleeves where the pipeline crosses under or over an existing wastewater pipeline.

5.20 WILDFIRE

Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☒	☐	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

5.20.1 Regulatory Compliance

2019 CEQA Guidelines

In 2019, CEQA Guidelines were amended to address the need to evaluate wildfire impacts since it has worsened in recent history.

While wildfires have been prevalent throughout California's history and more acres of California have burned in the past decade than in the previous 90 years (CALFIRE, Top 20 Largest California Wildfires 2022). Wildfires are typically caused from human activities such as downed powerlines, electrical sources associated with residential development and industrial facilities" (CA Attorney General 2022). As development expands, residential development has the potential to expand into wildland-urban interfaces. Approximately one-third of California's housing units are currently located within these areas (CA Attorney General 2022). As a result, wildfire risks have increased within the state of California. For this reason, each local jurisdiction within the state of California is now required to adopt a Safety Element to incorporate fire safety and response into city plans as well as plan for other types of natural safety concerns. The Safety Element is a required element of each local general plan pursuant to California Government Code §65302(g).

California Fire Code

The County has adopted the 2010 California Fire Code published by the California Building Standards Commission, which is based on the adopted 2009 International Fire Code of the International Code Council. County Fire Code regulations applicable to the proposed Project will be followed. Applicable regulations include the following:

- Section 4-1006. Access Roadways for Fire Apparatus
- Section 4-1009. Fees
- Section 4-1017. Operational Fees
- Section 4-1018. Construction Fee

San Joaquin County

San Joaquin County Safety Element

The County of San Joaquin is in the process of updating its Safety Element. The stated purpose of the County's Safety Element is to create a framework for the protection of people and property from natural and man-made hazards.

General Plan

The proposed Project will remain consistent with the following policies and goals outlined within San Joaquin County's General Plan EIR.

Goal PHS-1: To maintain a level of disaster preparedness necessary for the protection of public and private property, and the health, safety, and welfare of people living and working in San Joaquin County.

- *Policy PHS-1.1 Effective Emergency Response*. The County shall maintain adequate facilities equipment and staffing to respond effectively to emergencies. (PSP/SO)

- *Policy PHS-1.3 Emergency Operations Plan*. The County shall maintain and implement the following emergency and hazard mitigation plans to provide emergency planning, mitigation, response, and recovery activities to the community
    - Emergency Operations Plan,
    - Mountain House Community Emergency Operations Plan,
    - Multi-Hazard Functional Plan,
    - Local Hazard Mitigation Plan, and
    - Flood Safety Plan and Contingency Mapping (PSP/SO)

Goal PHS-4: To minimize the risk of wildland and urban fire hazards.

- *Policy PHS-4.1 Community Wildfire Protection Plan*. The County shall maintain and implement the Community Wildfire Protection Plan as a mechanism for community input and identification of areas with high fire hazard risk. (PSP)

- *Policy PHS-4.2 Residential Densities in High Hazard Areas*. The County shall restrict development to rural residential densities or lower and require on-site fire suppression measures in areas with high or extreme wildfire hazards. (RDR/PSP)

- *Policy PHS-4.3 Fire Prevention Measures*. The County shall implement State recommendations for fire prevention in Fire Hazard Severity Zones and require new and/or existing development to provide clearance around structures, use fire-resistant ground cover, build with fire-resistant roofing materials, participate in fuel load reduction, and take other appropriate measures. (RDR/PSP)

- *Policy PHS-*4.6 Fire Protection Coordination. The County shall encourage well-organized and efficient coordination among fire agencies, CalFire, and the County. (IGC)

City of Escalon

Safety Element

The City of Escalon's Safety Element is dated June 6, 2005, and outlines policies and standards to achieve the stated fire protection objective of maintaining an effective and well-trained Fire Department. Stated policies for fire protection in the City are as follows:

1. The City's fire service response goal shall be five minutes from "tone-out" to arrival on the scene.

2. The City shall maintain a reliable water supply system that meets the fire protection needs of the community.
3. The City shall enforce the municipal code as it pertains to the abatement of fire hazards related to existing buildings, structures, and weed control.
4. The City shall support local, state, and federal programs designed to inform and educate the public concerning fire prevention and suppression.
5. The City will coordinate with San Joaquin County in the provision of fire protection services to ensure the maximum level of protection for all residences, commercial establishments, and industries within the planning area.
6. The City will encourage the installation of fire safety devices in all residences and require such installation at the time of original construction, remodeling, or expansion.
7. The City will establish five minutes, or two miles travel distance as the maximum response time or travel distance from the nearest fire station. Outside of this response range, built-in fire protection systems (i.e. sprinklers) shall be required in all new buildings.
8. The City will encourage the community to become involved in promoting state and federal fire protection programs in school and civic functions.

CALFIRE Fire Hazard Severity Zones

The CALFIRE Fire Hazard Severity Zone (FHSZ) is "a mapped area that designated zones (based on factors such as fuel, slope, and fire weather) with varying degrees of fire hazard" (CALFIRE 2022). CALFIRE released a FHSZ Viewer that identifies areas where wildfires are prone to occur (See https://egis.fire.ca.gov/FHSZ/). The utilization of this tool is meant to limit wildfire damage in preliminary phases of planning to mitigate and prevent activities or land uses that would cause greater risk for a wildfire.

5.20.2 Existing Conditions

Land use surrounding the Project consists of agricultural use and urban development within a rural context. According to CALFIRE's FHSZ Viewer, the Project is not within designated Fire Hazard Severity Zones (CALFIRE FHSZ Viewer). The closest lands that are categorized as such are east and west of the Project, approximately 7.2 and 33.9 miles from the Dodds Road/Escalon-Bellota intersection, on the north end of the Project. However, in the event of a fire, the Project and adjacent areas will be served by Escalon Fire Station (Station 1) and Oakdale Rural Fire Department (Station 30). Station 1 is located within downtown Escalon approximately 1.0 miles from the proposed BPS. Station 30 is located within Oakdale, CA, west of Woodward Reservoir, and approximately 5.5 miles southeast of the Dodds Road and Escalon Bellota intersection, at the north end where the Project ties into the SSJID water distribution system (See **Figure 2: Local Vicinity Map**). Reference *Section 5.9- Hazards and Hazardous Materials: Existing Conditions* for additional information regarding emergency response and Station personnel/ equipment.

5.20.3 Project Impacts

a) **Substantially impair an adopted emergency response plan or emergency evacuation plan?**

RESPONSE:

Less than Significant with Mitigation Incorporated. According to Escalon's Evacuation Map, provided by San Joaquin County's Office of Emergency Services, Escalon-Bellota Road is an evacuation route that will not be permanently affected by the Project. Improvements that are proposed with the Project will be installed bgs and the paved surface of Escalon-Bellota Road will be returned to pre-Project conditions after Project construction is complete.

Project implementation is not anticipated to involve significant impacts to evacuation routes and emergency response plans for vulnerable, fire-prone areas, because the Project is not near a Fire Hazard Severity Zone. Likewise, the Project is not anticipated to require elevated or unique emergency response services, because the scope and nature of the Project will not require handling, storage, and use of materials involving elevated risk; areas of active construction will be monitored during the day and secured at night and the Project is subject to plan check and inspections by the City of Escalon and the Fire Department.

The Project will implement a Traffic Control Plan to facilitate continuous access within and through construction areas. As a result of the Traffic Control Plan, the Project will not significantly affect emergency response. During construction, there may be traffic delays during active construction. To mitigate potential impairments to the local roadways and evacuation routes, the Project will implement a traffic control plan under Mitigation Measure **Modified MM TRAF-01: Traffic Control Plan** and **Modified MM TRAF-02: Coordinate Traffic Plan with EUSD**. The proposed traffic control plan will be reviewed by the City's Fire Department, school district, and additional emergency response personnel.

In the event of an emergency, fire stations closest to the Project will assist in providing access to evacuation routes. See Section 5.20.2-Existing Conditions for more information. As a result of the reasons above, the Project will implement Project Mitigation Measure **Modified MM TRAF-01: Traffic Control Plan** and **Modified MM TRAF-02: Coordinate Traffic Plan with EUSD** during Project construction to reduce impacts to a less than significant level.

b) **Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

RESPONSE:

Less than Significant Impact. See Response 5.20.3, a). Since the Project is not within a CALFIRE Fire Hazard Severity Zone or a zone of higher severity Locally or Regionally, the Project will not be prone to fires and is relatively flat. According to the City's General Plan, "no historic wildfire activity has been identified in or around the [City's planning area]" (Escalon GP, 2005).

However, during Project construction almond orchards and other agricultural land uses surround the Project northern portions of the Project and may be susceptible to fire. For this reason, BMPs for handling machinery should be utilized during Project construction and include the following: ensuring equipment is properly stored in staging areas and regular inspections of the equipment are performed to ensure flammable gasoline is not leaking.

As a result, the impacts due to slope, prevailing winds, and other factors related to wildfires are less than significant.

c) **Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

RESPONSE:

Less than Significant Impact. The Project will not require installation or maintenance of infrastructure that would exacerbate fire risk. Project plans indicate the installation of approximately 19,500 LF of potable water main within the existing developed County and City right-of-way along Escalon-Bellota Road between a proposed tie-in at the northern end, within the intersection of Escalon-Bellota Road at Dodd Road, and the southerly terminus of the Project that will be located on a developed parcel north of Hogan- Ennis Park that is currently developed with an overflow sports parking lot. The Project will provide long-term reliable water services to the City of Escalon as well as fulfill regional goals for sustainable groundwater use. Prior to trenching and jack and bore construction, existing infrastructure within the County and City right-of-way will be mapped and marked on-site utilizing plans obtained by the City and other utility operators, to avoid potential temporary disruptions.

Additionally, Project plans will be consistent with the long-term goals and objectives of the City's General Plan and Water Master Plan, which have already been considered and approved by the City's decision-makers and reviewed by City Engineers to ensure compliance with the Municipal Code and Standard Specifications pertaining to potable water services and fire flow. The Project will not obstruct above-ground infrastructure or exacerbate fire risk because the potable water line will be underground.

For the reasons above, the implementation of the Project will not exceed what has already been considered and approved by the Water Master Plan and other approved City and regional plans regarding water distribution. Therefore, the Project will not result in additional impacts due to Project implementation.

d) **Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

RESPONSE:

No Impact. See Response 5.20.3, a) through c). According to CALFIRE's Fire Hazard Safety Zone Map, the area is designated as Local Responsibility exhibiting no high-moderate fire hazards. Therefore, based on this assessment, the Project is not in an area with unique features or elevated risk from wildfire, slope, flooding, runoff, landslides, and drainage. Project compliance with the City's Municipal Code will be verified during the standard application of the City's plan check and inspection processes and will reduce risk to people and structures from flooding and soil instability.

For these reasons, impacts are less than significant. No Mitigation Measures are needed.

5.20.4 Mitigation Measures

See applicable Mitigation Measures modified from SCSWSP, **Modified MM TRAF-01: Traffic Control Plan** and **Modified MM TRAF-02: Coordinate Traffic Plan with EUSD** within Section 5.17.4- Transportation Mitigation Measures.

5.21 MANDATORY FINDINGS OF SIGNIFICANCE

Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE. Would the Project:				
a) Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
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?	☐	☒	☐	☐

5.21.1 Project Impacts

a) Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

RESPONSE:

Less than Significant with Mitigation Incorporated. The discussion for Environmental Checklist indicates only short-term, temporary impacts during construction will occur with Project implementation. Mitigation measures to reduce all potentially significant impacts to less than significance are provided in the IS/MND. Due to its location within the street right-of-way and proposed improvements on developed land and/or disturbed land use for agricultural production, the Project has limited potential to result in direct significant impacts on wildlife or habitat. The Project will utilize jack and bore construction to avoid direct impacts on Lone Jack Creek. Mitigation Measures will be implemented for biological resources which include **MM BIO-01: Pre-construction Nesting Bird**

Clearance Survey, Modified MM BIO-02: Ground Nesting Raptors Pre-construction Surveys, Modified MM BIO-03: Raptor Nests, Modified MM BIO-04: Active Nests, Modified MM BIO-05: Jack and Bore Construction). These Mitigation Measures will ensure bird species protected under the MBTA are protected through required preconstruction surveys and nest protection if needed, and impacts do not occur to Lone Tree Creek during jack and bore construction. Less than significant impacts with mitigation would occur.

The Project will be implemented within the public right-of-way and adjacent parcels for the installation of the FCF and BPS. Requirements to conduct preconstruction training for cultural resources and treatment protocols for buried resources, should they be encountered; consultation with Native American tribes; requirements for an archeological monitor and tribal monitor throughout construction activities are included within the prescribed Mitigation Measures. The following Mitigation Measures and Standard Conditions will avoid impacts on cultural and tribal cultural resources: Modified MM CUL-01: (Ground Inspection) Pre-Construction Crew Training, Modified MM CUL-02: Discovery of Buried Cultural Resources, MM CUL-03: Cultural Resources Treatment and Disposition, MM CUL-04: Discovery of Human Remains, MM TRI-01: Agreements, Consulting, and Monitoring with Affiliated Tribes, MM TRI-02: Diversity of Buried Tribal Cultural Resources, SC TRI-01: AB 52).

As a result, impacts are anticipated to be less than significant with mitigation incorporated.

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.)

RESPONSE:

Less than Significant with Mitigation Incorporated. The Project intends to carry out long-term regional plans consistent with ESGWJA, SSJID, and the City of Escalon. The Project will reduce the potential for groundwater overdraft since the City of Escalon is solely reliant on groundwater for its drinking water needs; and provide a more reliable source of drinking water to Escalon's residents. The Project proposes to implement permanent structures; however, the maintenance of the proposed structures is not anticipated to change based on the proposed Project components. Therefore, the level of activity at the Project and within the Local Vicinity is not anticipated to change in the long term.

However, during short-term, temporary Project construction potentially significant impacts were identified for the following resources: aesthetics (light and glare), air quality emissions, biological resources (avian), buried cultural and tribal cultural, buried paleontological resources, hydrology and water quality, land use and planning (temporary neighborhood impacts), noise (permanent equipment installations), public services, utilities and services, transportation (encroachment and traffic control). As a result, Project impacts will be reduced to less than significance with the implementation of recommended Mitigation Measures, Standard Conditions, and BMPs identified herein: aesthetics, (Modified MM AES-01: Coordination with Private Landowners, Modified MM AES-02: Construction Lighting, Modified MM AES-03: Lighting, Modified MM AES-04: Landscaping), air quality (MM AQ-01: Fugitive Dust Control, MM AQ-02: (Compliance with SJVAPCD) Verify SJAPCD's Control Measures, and SC AQ-01: Regular Cleaning of Track-out Areas), biological resources MM BIO-01: Pre-construction Nesting Bird Clearance Survey, Modified MM BIO-02: Ground Nesting Raptors Pre-construction Survey, Modified MM BIO-03: Raptor Nests, Modified MM BIO-04: Active Nests, Modified MM BIO-05: Jack and Bore Construction), cultural and tribal resources (Modified MM CUL-01: (Ground Inspection) Pre-Construction Crew Training, Modified MM CUL-02: Discovery of Buried Cultural Resources, MM CUL-03: Cultural Resources Treatment and Disposition, MM CUL-04: Discovery of Human Remains, MM TRI-01: Agreements, Consulting, and Monitoring with Affiliated Tribes, MM TRI-02: Diversity of Buried Tribal Cultural Resources, SC TRI-01: AB 52), geology and soils (Modified MM GEO-01: Seismic Design Criteria, Modified MM GEO-02: Geotechnical Design Criteria, Modified MM HYDRO-01: Stream Crossings, Modified MM HYDRO-03: Erosion Control, MM PALEO-01-Paleontological Resource Mitigation Program), hydrology and water quality (Modified MM HYDRO-01: Stream Crossings, Modified MM HYDRO-02: SWPPP Specifications, Modified MM HYDRO-03: Erosion Control, MM HYDRO-04: Lead Agency Approval of Project Plans, BMP HYDRO-05: Construction within Riverine Floodway), noise (MM NOI-01: Construction Noise Attenuation and MM NOI-02: Stationary Source Noise), land use planning

(Modified MM LAND-01: Landowner Consultation, Modified MM LAND-02: Advance Notice, Modified MM LAND-03: Construction Contract Documents, and Modified MM LAND-04: Operation of Project Components), public services and transportation (Modified MM TRAF-01: Traffic Control Plan, Modified MM TRAF-02: Coordinate Traffic Plan with EUSD, Modified MM TRAF-03: Advanced Notice, Modified MM TRAF-04: Off-Street Construction Parking, Modified MM TRAF-05: Warning Signs, Modified MM TRAF-06: Bicyclists and Pedestrians, Modified MM TRAF-07: Encroachment Permit), utilities and services (Modified MM UTL-01- Existing Utilities, Modified MM UTL-02: Utility Conflicts), and wildfire (Modified MM TRAF-01: Traffic Control Plan, Modified MM TRAF-02: Coordinate Traffic Plan with EUSD).

As a result, impacts are anticipated to be less than significant with mitigation incorporated.

c) Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

RESPONSE:

Less Than Significant with Mitigation Incorporated. The analysis in this report indicates that Project implementation, with the incorporation of Mitigation Measures, will not cause substantial adverse effects on human beings either directly or indirectly. As mentioned above, the Project will implement Mitigation Measures and Standard Conditions for air quality (MM AQ-01: Fugitive Dust Control, MM AQ-02: (Compliance with SJVAPCD) Verify SJAPCD's Control Measures, and SC AQ-01: Regular Cleaning of Track-out Areas), noise (MM NOI-01: Construction Noise Attenuation and MM NOI-02: Stationary Source Noise) throughout Project construction. The Project is proposed to improve water quality and reliability within the City of Escalon's potable water system.

As a result, impacts are anticipated to be less than significant with mitigation incorporated.

6.0 REPORT PREPARATION

This section lists those individuals who contributed to the preparation of this IS/MND.

6.1 CITY OF ESCALON

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6.2 AGENCIES OF PERSONS CONTACTED

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8.0 APPENDICES

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