DRAFT

INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION

SAN JOAQUIN BEWELL BEHAVIORAL HEALTH CAMPUS PROJECT

SAN JOAQUIN COUNTY, CALIFORNIA

LSA

June 2025

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DRAFT

INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

SAN JOAQUIN BEWELL PROJECT SPECIFIC PLAN

SAN JOAQUIN COUNTY, CALIFORNIA

Submitted to:

San Joaquin County
Community Development Department
1810 East Hazelton Avenue
Stockton, California 95205

Prepared by:

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Project No. 20242005.01

LSA

June 2025

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LIST OF ABBREVIATIONS AND ACRONYMS

AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ADT	average daily traffic
af	acre-feet
AIA	Airport Influence Area
Airport	Stockton Metropolitan Airport
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AU-20	Agriculture Urban Reserve, 20-acre minimum
A/UR	Agricultural-Urban Reserve
APN	Assessor's Parcel Number
ASTM	American Society for Testing and Materials
BAAQMD	Bay Area Air Quality Management District
Basin	San Joaquin Valley Basin
Basin Plan	Water Quality Control Plan
BERD	Built Environment Resources Directory
BGEPA	Bald and Golden Eagle Protection Act
bgs	below ground surface
BHCIP	Behavioral Health Continuum Infrastructure Program
bldg	Building
BMP	Best Management Practice
BRA	Biological Resources Assessment
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
C/FS	Commercial/Freeway Service

C/G	Commercial General
CalEEMod	California Emissions Estimator Model
CALGreen Code	California Green Building Standards Code
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCIC	Central California Information Center
CCR	California Code of Regulations
C&D	construction and demolition
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERS	California Environmental Reporting System
CESA	California Endangered Species Act
CFC	California Fire Code
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH_4	Methane
CMP	Congestion Management Plan
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
County	San Joaquin County
CRU	Community Revitalization Unit
CSA	County Service Area
CWA	Clean Water Act

dB	Decibel
dBA	A-weighted decibel
DHCS	California Department of Health Care Services
DJW WTP	Dr. Joe Waidhofer Water Treatment Plant
DOC	California Department of Conservation
DTSC	California Department of Toxic Substances Control
du	Dwelling unit
EHD	San Joaquin County Environmental Health Department
EI	Expansion Index
EIR	Environmental Impact Report
EMFAC2021	California Air Resources Board Emissions Factor 2021 Model
empl	employees
EMS	Emergency Medical Service
EOP	Emergency Operations Plan
ESA	Environmental Site Assessment
EV	electric vehicle
FIRM	Flood Insurance Rate Map
FEMA	Federal Emergency Management Agency
FESA	federal Endangered Species Act
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FMMP	Farmland Mapping & Monitoring Program
FRAP	Fire and Resources Assessment Program
FTA	Federal Transit Administration
GHG	greenhouse gas
gpm	gallons per minute
GWh	gigawatt-hours

GWP	Global Warming Potential
HCM	Highway Capacity Manual
HRA	health risk assessment
HREC	historical recognized environmental condition
HVAC	heating, ventilation, and air conditioning
I-5	Interstate 5
ICP	Incident Command Post
ICU	intersection capacity utilization
I/L	Industrial Limited
IOP	Intensive Outpatient Program
in/sec	inches per second
IS	Initial Study
IS/MND	Initial Study/Mitigated Negative Declaration
ISR	Indirect Source Review
ITE	Institute of Transportation Engineers
ITMM	Incidental Take Minimization Measure
kBTU	thousand British thermal units
kWh	kilowatt hours
L_{dn}	day-night average noise level
L_{eq}	equivalent continuous sound level
LID	Low Impact Development
L_{max}	maximum instantaneous noise level
L_{min}	minimum measured sound level
L_v	vibration velocity
LMAs	local maintaining agencies
LOS	level(s) of service
LRAs	Local Responsibility Areas

MBTA	Migratory Bird Treaty Act
MCM	minimum control measures
MEI	maximally exposed individual
MEP	maximum extent practicable
mgd	million gallons per day
MLD	Most Likely Descendant
MM	Mitigation Measure
MND	Mitigated Negative Declaration
MRZs	Mineral Resource Zones
MS4	Municipal Separate Storm Sewer System
MUSD	Manteca Unified School District
M/X	Mixed-Use
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
ND	Negative Declaration
NIMS	National Incident Management System
NRF	National Response Framework
NO_2	nitrogen dioxide
NOI	Notice of Intent
NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
O_3	Ozone
Pb	lead
PCC	Portland Cement Concrete
PCE	Passenger Car Equivalent
P-F	Public Facilities

PG&E	Pacific Gas & Electric Company
PHP	Partial Hospitalization Program
PI	Plasticity Index
PM_{10}	particulate matter less than 10 microns in size
$PM_{2.5}$	particulate matter less than 2.5 microns in size
Ppb	parts per billion
PPV	peak particle velocity
PRC	Public Resources Code
project/proposed project	San Joaquin BeWell Behavioral Health Campus Project
RCM	Regulatory Compliance Measure
REC	recognized environmental condition
RMS	root-mean-square
ROG	reactive organic gas
RTD	San Joaquin Regional Transit District
RTIF	Regional Transportation Impact Fee
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWCF	Regional Wastewater Control Facility
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCK	Stockton Metropolitan Airport
SEWD	Stockton East Water District
SF	square foot
SF_6	sulfur hexafluoride
SHPO	State Office of Historic Preservation
SIPs	State Implementation Plans
SJ BeWell Campus	San Joaquin BeWell Behavioral Health Campus

SJCFCWCD	San Joaquin Flood Control and Water Conservation District
SJCOG	Jan Joaquin Council of Governments
SJMSCP	San Joaquin County Multi-Species Habitat Conservation and Open Space Plan
SJSO	San Joaquin Sheriff's Office
SJVAB	San Joaquin Valley Air Basin
SJVAPCD	San Joaqu7in Valley Air Pollution Control District
SLF	Sacred Lands File
SMARTS	Stormwater Multiple Application and Report Tracking System
SMARA	Surface Mining and Reclamation Act
SO_2	sulfur dioxide
SO_x	sulfur oxides
SOI	Sphere of Influence
SRAs	State Responsibility Areas
State CEQA Guidelines	State of California *Guidelines for Implementation of the California Environmental Quality Act*
SSJCPL	Stockton-San Joaquin County Public Library
SUD	substance abuse disorder
Subbasin	Eastern San Joaquin Subbasin
SWIF	systemwide improvement frameworks
SWQCCP	Stormwater Quality Control Criteria Plan
SMWP	Storm Water Management Plan
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Technical Advisory Committee
TACs	toxic air contaminants
TANF	Temporary Assistance for Needy Families
TCPs	Traditional Cultural Properties

TIS	Transportation Impact Study
TIMF	Traffic Impact Mitigation Fee
USACE	United States Army Corps of Engineers
USDOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
VA	Veterans Affairs
V/C	volume-to-capacity
VdB	vibration velocity decibels
VEC	Vapor Encroachment Condition
VES	Vapor Encroachment Screening
VMT	vehicle miles traveled
WDR	Waste Discharge Requirements
WEAP	Worker Environmental Awareness Program
WDID	Waste Discharge Identification Number
WMS	Waste Management Services
WQMP	Water Quality Management Plan

1.0 PROJECT INFORMATION

1. Project Title:

San Joaquin BeWell Behavioral Health Campus Project

2. Lead Agency Name and Address:

San Joaquin County Community Development Department

3. Contact Person and Phone Number:

Stephanie Stowers, Principal Planner
San Joaquin County | Community Development Department
1810 E. Hazelton Avenue
Stockton, CA 95205
Phone: 209-468-9653

4. Project Location:

French Camp, San Joaquin County, CA

5. Project Sponsor's Name and Address:

Genevieve G. Valentine, LMFT
Behavioral Health Director
San Joaquin County
1212 N. California St.
Stockton, CA 95202
Phone: 209-468-8750
Fax: 209-468-8024

6. General Plan Designation:

Commercial/Freeway Service (C/FS)

7. Zoning:

Agriculture Urban Reserve, 20-acre minimum (AU-20)

8. Description of Project:

Please see Section 2.2, Project Description.

9. Surrounding Land Uses and Setting:

Please see Section 2.1, Setting and Surrounding Land Use.

10. Other Public Agencies Whose Approval is Required (e.g., permits, financial approval, or participation agreements):

Please see Section 2.4, Required Permits and Approvals.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resource 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 County of San Joaquin mailed initial consultation notification letters on January 21, 2025, to the following California Native American Tribes pursuant to Assembly Bill (AB) 52 and Senate Bill (SB) 18:

- Amah Mutsun Tribal Band
- Buena Vista Rancheria of Me-Wuk Indians
- California Tribal Temporary Assistance for Needy Families (TANF) Partnership
- Confederated Villages of Lisjan Nation
- Muwekma Ohlone Tribe of the San Francisco Bay Area
- Northern Valley Yokut / Ohlone Tribe
- Tule River Indian Tribe
- Wilton Rancheria
- United Auburn Indian Community

Tribal consultation was completed on April 21, 2025. Refer to Section 4.18, Tribal Cultural Resources, of this IS/MND for further discussion.

2.0 PROJECT DESCRIPTION

2.1 SETTING AND SURROUNDING LAND USE

The proposed project is the San Joaquin BeWell Behavioral Health Campus (SJ BeWell Campus or proposed project). The SJ BeWell Campus would be operated by San Joaquin County Health Services (County Health) and constructed on land owned by the County of San Joaquin (County). The project site would be developed pursuant to a specific plan as a South Campus and a North Campus. Initial development would begin with the South Campus and continue with the North Campus. The project site is located in the unincorporated community of French Camp, just south of the City of Stockton. The project site is bounded by undeveloped land to the north, South El Dorado Street to the east, West Hospital Road to the south, and Interstate 5 (I-5) to the west. **Figure 2-1: Project Site** depicts the project site's location and regional vicinity. All figures discussed in this chapter are provided at the end of the chapter.

The proposed project is situated on an 18 acre site, a portion of a larger parcel (Assessor's Parcel Number [APN] 193-05-027) that includes the San Joaquin General Hospital, located to the west across I-5. The project site is largely undeveloped, with the exception of a gravel road that generally runs through the project site's western side and streetlights and electrical poles that run along the eastern edge of the parcel. The parcels located immediately north of the project site, as well as to the south across West Hospital Road, are also largely undeveloped. However, one residential apartment complex is located across West Hospital Road from the southeastern corner of the project site. Residential uses are also located to the northeast of the project site. Areas of light industrial use are located to the east and southeast, across El Dorado Street from the project site. I-5 borders the project site to the west. The San Joaquin General Hospital campus lies across I-5 from the project site.

According to the County's General Plan Land Use Map, the project site is designated (C/FS) Freeway Service Commercial. The C/FS land use designation is intended to provide retail uses serving the needs of freeway travelers. This land use designation is only allowed adjacent to full freeway interchanges where development will be easily accessible and visible to freeway travelers.[1] The project site is currently zoned (AU-20) Agriculture Urban Reserve, 20 acre minimum. The AU-20 zoning district is intended to retain in agriculture those areas planned for future urban development in order to facilitate compact, orderly urban development and appropriate timing and economical provision of services and utilities.[2] The AU-20 zoning district permits a variety of agricultural, and agriculture-related residential and commercial uses.

The proposed project is not subject to the zoning and general plan designations of the project site because the County owns the land and has plenary authority over entitlements and permitting for County-owned property. In addition, the County's land use authority is supported by the Behavioral Health Continuum Infrastructure Program (BHCIP) authorizing legislation (California Welfare &

1 San Joaquin County General Plan 2035, Land Use Element, December 2016 (Updated August 2024) <https://www.sjgov.org/commdev/cgi-bin/cdyn.exe?grp=planning&htm=gp2035> (Accessed September 5, 2024).

2 San Joaquin County Development Title, November 17, 2022, <https://library.municode.com/ca/san_joaquin_county/codes/development_title?nodeId=SJC> (Accessed September 6, 2024).

Institutions Code, § 5960, *et seq*.), which provides that a project funded by BHCIP grants shall be deemed consistent and in conformity with any applicable local plan, standard, or requirement, and allowed as a permitted use within the zone in which the structure is located, and shall not be subject to a conditional use permit, discretionary permit, or to any other discretionary reviews or approvals.

Table 2.A: On-Site and Adjacent Land Uses summarizes surrounding land uses, General Plan land use designations, and zoning designations. **Figure 2-2: General Plan Land Use** depicts the General Plan land use for the project site and surrounding area. **Figure 2-3: Existing Zoning** depicts the zoning for the project site and surrounding area.

Table 2.A: On-Site and Adjacent Land Uses

Direction	Existing Land Use	General Plan Land Use Designation	Zoning Designation
Project Site	Undeveloped	(C/FS) Freeway Service Commercial	(AU-20) Agriculture Urban Reserve
North	Undeveloped; Residential	(C/G) Commercial General	(C-G) General Commercial
East	Undeveloped; Community Commercial; Light Industrial	(C/G) Commercial General	(C-G) General Commercial; (I-L) Limited Industrial
South	Undeveloped; Community Commercial; Residential	(C/FS) Commercial Freeway Service; (I/L) Industrial Limited	(AU-20) Agriculture Urban Reserve
West	Interstate Highway; Public Facility (Hospital)	(I/L) Industrial Limited; (P/F) Public	(P-F) Public Facilities

Source: County of San Joaquin General Plan (County of San Joaquin, December 2016); Development Title of San Joaquin County, California (County of San Joaquin, December 2022); San Joaquin County Geographic Information Systems, <https://sjmap.org/DistrictViewer/> (Accessed September 2024.)

2.2 PROJECT DESCRIPTION

The proposed project would develop the project site with the SJ BeWell Campus. The BeWell Campus would provide high-quality, full-service, person-first oriented behavioral and physical health care treatment and services in a safe, secure, and therapeutic environment. The proposed project is designed to enable consumers and their families to experience a complete continuum of care from intensive oversight and treatment activities to gradually decreased therapeutic contact, enabling consumers to prepare for a self-sustained recovery grounded in their community.

The SJ BeWell Campus is envisioned for development as two campuses: South Campus and North Campus. The South Campus would be initially developed with four buildings of up to 220,000 square feet (SF) of building space, 409 parking spaces, and extensive outdoor amenities including walking trails, activity areas, a community garden, an area of respite, and other landscaped areas. The South Campus would provide a continuum of behavioral health and wellness care, including outpatient, urgent care, and residential treatment services.

The North Campus would be developed after the South Campus and would include ten buildings of up to 155,000 SF of building space that would support expanded outpatient treatment programs, residential treatment services, expanded educational and social resources, and additional programs for family and youth. Both the South Campus and the North Campus are assessed in this Initial Study/Mitigated Negative Declaration (IS/MND) at the project level. Although the SJ BeWell Campus would be developed in phases over time, for purposes of this Initial Study, it is being analyzed as a complete development. The Specific Plan being developed for the SJ BeWell Campus would facilitate

project development by replacing existing designated land use and zoning and establishing project applicable development standards. **Figure 2-4: Conceptual Site Plan**, depicts the proposed project, including the South Campus and the North Campus.

The Campus will serve approximately 14,000 people per year, including consumers accessing the behavioral health programs. By delivering the right level of care and expanding service levels, the proposed project would provide healthcare services that could save the County over $24 million annually in out of county behavioral health placement costs and an additional $3 million in emergency medical services transportation costs. The proposed project would also be anticipated to create numerous temporary construction jobs, as well as approximately 263 permanent professional jobs. The Campus is also expected to generate tens of millions of dollars in economic growth, particularly in the French Camp area. The following sections describe the proposed project in greater detail.

2.2.1 BeWell Campus – South Campus

The South Campus would consist of four buildings of up to 320,000 SF of building space, Buildings A through D. The South Campus would provide up to 174 beds for psychiatric health and substance use disorder residential treatment.

- **Building A: Community and Outpatient**. Building A would serve as the main access point to the SJ BeWell Campus and would provide community and outpatient services in a three-story, 75,790 SF multiuse building. This building would include outpatient mental health and medical clinic services, and campus and community support amenities. Portions of the building would be devoted to a public lobby, community resources, an integrated urgent care clinic (medical & behavioral), administrative offices, a café, and kitchen. The urgent care clinic would include exam rooms and one minor procedure room. The building would be used to facilitate an Adolescent Partial Hospitalization Program (PHP) and Intensive Outpatient Program (IOP). The IOP would include group therapy rooms, family rooms, a parent-child interaction therapy lab, offices, and workstations to provide support services and resources. The building would have a height of 46 feet.

- **Building B: Urgent Care Services**. Building B would provide urgent care services in a single story, 35,250 SF multiuse building. Building B would include a 10-bed Sobering Center; a 16-bed Adult Crisis Stabilization Unit; and a 16-bed Psychiatric Health Facility. In total, Building B would provide 42 beds. Building B would also provide a triage area and lobby. The building would have a height of 18 feet.

- **Building C: Residential Treatment Programs**. Building C would provide residential treatment programs in a two-story, 43,000 SF building. Building C would include adult crisis residential treatment, adult medical detox, adult substance use disorder residential treatment, and adolescent or adult substance use disorder (SUD) residential and withdrawal centers. Up to 68 beds would be provided in Building C. The building would have a height of 32 feet.

- **Building D: Residential Treatment Programs**. Building D would include additional residential treatment facilities in a two-story, 50,000 SF building. Building D would provide up to 64 beds. The building would have a height of 32 feet.

- **South Campus Outdoor Facilities.** The South Campus would provide numerous outdoor facilities for use by the BeWell Campus denizens. Facilities would include walking paths, an art walk and place of respite, a social lawn, a physical activity zone including sports court and outdoor fitness equipment. The South Campus would also provide an outdoor amphitheater, a community gathering place/social hub, and a community garden. Building A would include a yard for use by staff. Building B would provide separate secured yards for the Adult Crisis Stabilization Unit and Psychiatric Health Facility, as well as an outdoor smoking area for the Sobering Center. Building C would provide residential courtyards and a resident plaza would be developed between Buildings C and D.

2.2.2 BeWell Campus – North Campus

The North Campus would consist of ten buildings of up to 155,000 SF of building space: Building E and Building F, as well as eight modular structures (Building G). The North Campus would provide 252 beds for transitional and supportive residential treatment.

- **Building E: Transitional Housing.** Building E would provide supportive or transitional residential services in a three-story, 99,000 SF building. Building E would provide 178 beds. Supportive transitional housing would include independent residential units that would allow recipients of County outpatient PHP and IOP to reside on the campus for up to 18 months. The building would be 46 feet in height.

- **Building F: Supportive Family Housing.** Building F would provide supportive or transitional family residential services in a three-story, 36,000 SF building. Building F would provide 42 beds. Building F would provide residential support services to persons receiving services on campus in need of housing for up to 18 months. The building would be 46 feet in height.

- **Building G: Modular Residential Buildings**. Building G would consist of eight, one story modular buildings. Each Building G unit would be 1,920 SF (15,360 SF total) and would house four beds (32 beds total).

- **North Campus Outdoor Facilities**. The North Campus would maintain areas of open space and walkways between Buildings E, F, and G. The North Campus would connect to the South Campus via a walkway that crosses a central parking lot. A retention basin would be developed to the west of the North Campus, adjacent to the I-5 right of way. The retention basin would be used for site drainage and would be fenced with restricted access.

Table 2.B: Proposed San Joaquin BeWell Campus Facilities provides a summary of the proposed BeWell Campus facilities.

2.2.3 Landscaping

The project site is currently highly disturbed and the existing vegetation largely consists of nonnative grassland. Thirteen trees are found along the southern and western edges of the project site. Electrical poles and street light fixtures run along the eastern side of the project site. A lone electrical pole is located near the southern edge of the project site, midway between South El Dorado Road and I-5. The existing trees are not designated as historic or landmark trees by San Joaquin County.

Table 2.B: Proposed San Joaquin BeWell Campus Facilities

Building	Use	Services	Size (est.)	Stories	Beds
A	Community and Outpatient	Welcome center, outpatient behavioral health services, medical services/urgent care clinic, building and staff support services work service, restaurant/café	75,790 SF	3	0
B	Urgent Care Services	Sobering Center, Adult Crisis Stabilization Unit, Psychiatric Health Facility	35,250 SF	1	42
C	Residential Treatment Programs	Residential treatment	43,000 SF	2	Up to 68
D	Residential Treatment Programs	Residential treatment	50,000 SF	2	64
Outdoor Facilities	n/a	Walking paths, an art walk and place of respite, a social lawn, a physical activity zone including sports court and outdoor fitness equipment, outdoor amphitheater, a community gathering place/social hub, and a community garden, Building A staff yard, Building B secured yards and outdoor smoking area for the Sobering Center, Building C residential courtyards and resident plaza	6 acres	n/a	n/a
E	Transitional Housing	Supportive or transitional residential services	99,000 SF	3	178
F	Supportive Family Housing	Supportive or transitional family residential services	36,000 SF	3	42
G	Modular Residential Buildings	Residential Treatment	15,360 SF	1	32

The proposed project would develop the South Campus with six acres of outdoor areas. This would include walking paths, seating areas, a multi-use lawn, an area of respite with features such as a pond and meditation labyrinth, and a community garden. The lawn area would be bordered to the west by a dry creek bed with bridges and adjacent seating. The project site would be ringed by approximately 91 large trees along the property edges and in the parking areas, to provide shade and help reduce roadway noise. In addition, the proposed project would include 21 large street trees, spaced approximately 30 to 45 feet apart along South El Dorado Street and West Hospital Road. The South Campus would be landscaped with a variety of trees and shrubs, including nine multi trunk accent trees, 101 medium sized shade trees, 85 conifers, 61 small accent trees, and 64 colonnade accent trees. Decorative metal fencing would be developed along the project site perimeter, along the drive aisles and between the street and parking areas.

2.2.4 Vehicle Access, Site Circulation, and Parking

Vehicle access to the project site would be provided via two driveways into the South Campus; one 37 foot opening to South El Dorado Street, roughly mid-way along the project site boundary, and a second 30 foot driveway at the southern boundary of the project site that would open onto West Hospital Road near the I-5 right of way. Both driveways would be secured by vehicular gates. Access to the North Campus would be provided by way of two 25-foot driveways from the South Campus.

Site circulation would be provided by way of 25-foot drive aisles that would ring the buildings on the South Campus, and ring Buildings E and G on the North Campus. Parking would be provided on both sides of the drive aisles. The proposed project would include the development of 540 surface parking spaces: 409 surface parking spaces on the South Campus and 131 surface parking spaces on

the North Campus. The number of proposed parking spaces would exceed the approximate 492 surface parking spaces required under current zoning.

2.2.5 Site Development

The proposed project would be designed in compliance with the California Green Building Standards Code (CALGreen Code) Tier 2 for residential and non-residential buildings to the extent feasible.

The following sustainability features would be incorporated into the design of the proposed project:

- Use of renewable building materials or materials with recycled content where feasible;
- Electric vehicle (EV) capable spaces and EV charging spaces;
- Carpool spaces;
- Bicycle parking racks;
- Window technologies such as tinting or insulated daylighting panels;
- High-performance glazing, overhangs, and landscaping to capture and control natural daylight;
- Use of atriums, skylights, and internal courtyards to provide additional daylighting;
- Low flow faucets and fixtures;
- Native, drought-tolerant landscaping; and
- Mechanisms to direct and capture low-use irrigation and rainfall run-off to landscape areas.

2.2.6 Utilities

The project site is not currently served by sanitary sewer, storm drain, or water service. The proposed project would connect the project site to existing infrastructure in surrounding rights-of-way. Water mains are available in South El Dorado Street and West Hospital Road. For water service, the proposed project would include an extension of the existing 12-inch water main in South El Dorado Street to the northern edge of the South Campus, where it would connect to a 12-inch water main that would connect to project site water and fire infrastructure beneath the main entrance. On site water would be piped throughout the site via6-inch domestic water main connecting to buildings via 3-inch domestic water laterals. Water for fire suppression would be run beneath the access roads and via a 12-inch fire loop.

The proposed project would convey wastewater by way of an onsite 8-inch sanitary sewer main that would connect to the existing sanitary sewer beneath West Hospital Road at Manthey Road. The nearest sanitary sewer manhole is located approximately 0.30 mile to the west at the intersection of Loop Road and Support Street.

Stormwater on site would be collected by way of a 12-inch storm drain pipe that would run beneath the onsite roadways and transect the project site. Stormwater would be conveyed to a detention basin to be developed in the northwestern corner of the project site on the North Campus. As stormwater collects in the detention basin, a pump would discharge the water flow into a storm drain pipe connected to an offsite drainage pipe in Hospital Road. The offsite drainage pipe would convey water to North Road, located north of the General Hospital site. From North Road, stormwater would be discharged into the master retention basin system managed by the San

Joaquin County General Services Division. The proposed project would be responsible for constructing and maintaining these drainage improvements.

2.2.7 Construction

Construction of the proposed project is anticipated to last approximately 18 months, beginning May 2026 and ending September 2027. The SJ BeWell Campus is anticipated to use development funds issued by way of a California Department of Health Care Services (DHCS) BHCIP grant. BHCIP grant funding imposes strict project delivery deadlines.

2.3 METHODOLOGY

The analysis in this IS/MND provides an environmental review of the project pursuant to the California Environmental Quality Act (CEQA). The details of the proposed SJ BeWell project and associated actions are characterized in this chapter and are also addressed in detail throughout Chapter 4.0, CEQA Environmental Checklist, of this IS/MND. If the proposed project is approved, it would be allowed without further environmental review so long as the development complies with the County's regulations and project-specific mitigation measures and conditions of approval.

2.4 REQUIRED PERMITS AND APPROVALS

The County is expected to use this IS/MND in consideration of the proposed project and associated actions. These actions may include, but are not limited to, the following:

- Airport Land Use Commission Consistency Determination
- Adoption of a Mitigated Negative Declaration
- General Plan Amendment
- Specific Plan Adoption
- Zoning Change
- Caltrans Approval
- Right-of-Way Encroachment Permit

2.5 INITIAL STUDY APPENDICES/REFERENCE DOCUMENTS

- Appendix A: CalEEMod Output Sheets
- Appendix B: Biological Resources Assessment
- Appendix C: Cultural Resources Assessment
- Appendix D: Preliminary Geotechnical Report
- Appendix E: Phase I Environmental Site Assessment
- Appendix F: Retention Analysis Memorandum
- Appendix G: Noise and Vibration Impact Analysis
- Appendix H: Transportation Impact Study
- Appendix I: Record of Tribal Consultation
- Appendix J: Sewer Memorandum

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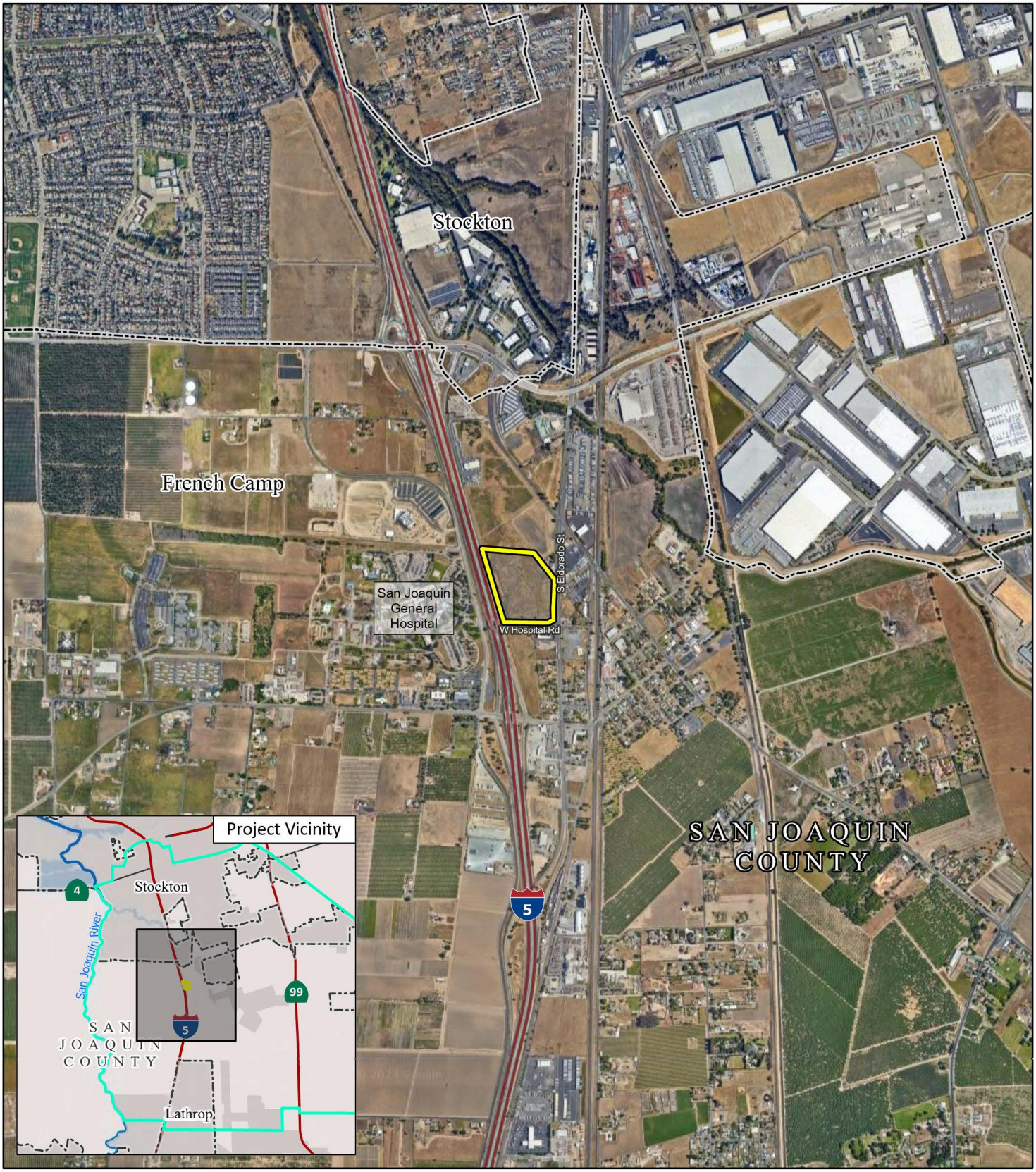

LSA

Project Site

City Boundary

I-5 Freeway

Airport Influence Area for Stockton Municipal Airport

FIGURE 2-1

N

0 1000 2000

FEET

SOURCE: Google Maps (2023)

San Joaquin BeWell Behavioral Health Campus Project

Project Site

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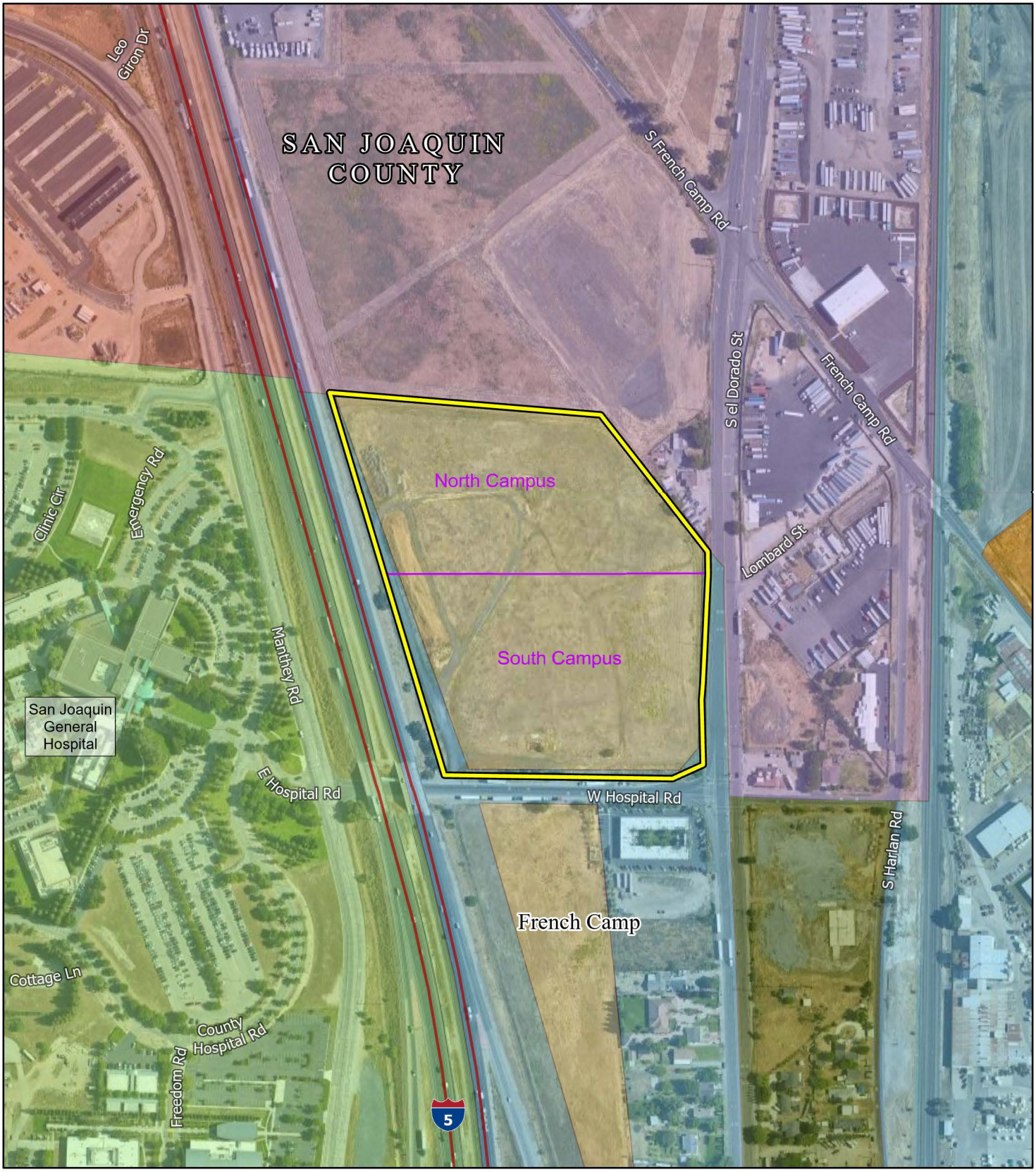

LSA

Project Site

I-5 Freeway

General Plan Land Use

(A/UR) Agriculture Urban Reserve

(C/C) Commercial Community

(C/FS) Freeway Service Commercial

(C/G) Commercial General

(I/L) Industrial Limited

(P/F) Public

(R/M) Residential/Medium Density

N

0 190 380

FEET

SOURCE: Google Maps (2023)

FIGURE 2-2

San Joaquin BeWell Behavioral Health Campus Project

General Plan Land Use

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Project Site

I-5 Freeway

Existing Zoning

(AU-20) Agriculture Urban Reserve

(C-G) General Commercial

(I-L) Limited Industrial

(P-F) Public Facilities

N

0 190 380

FEET

SOURCE: Google Maps (2023)

FIGURE 2-3

San Joaquin BeWell Behavioral Health Campus Project

Existing Zoning

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LSA

FIGURE 2-4

N

0 90 180

FEET

SOURCE: Boulder Associates, 2024

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San Joaquin BeWell Behavioral Health Campus Project

Conceptual Site Plan

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LSA

FIGURE 2-5

San Joaquin BeWell Behavioral Health Campus Project

Rendering – SJ Be Well Campus

SOURCE: Boulder Associates, 2024

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LSA

FIGURE 2-6

San Joaquin BeWell Behavioral Health Campus Project

Rendering – Building A: Community & Outpatient

SOURCE: Boulder Associates, 2024

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FIGURE 2-7

San Joaquin BeWell Behavioral Health Campus Project

Rendering – Building B: Urgent Care Services

SOURCE: Boulder Associates, 2024

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LSA

FIGURE 2-8

San Joaquin BeWell Behavioral Health Campus Project

Rendering – Building C: Residential Treatment

SOURCE: Boulder Associates, 2024

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3.0 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 in Chapter 3.0.

☐ Aesthetics	☐ Agriculture and 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

3.1 DETERMINATION

On the basis of this initial evaluation:

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

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project 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 Impact" or "Potentially Significant Unless Mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ 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 ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Stephanie Lowery — Signature

6/5/25 — Date

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4.0 CEQA ENVIRONMENTAL CHECKLIST

4.1 AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 non-urbanized 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 a 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?	☐	☐	☒	☐

4.1.1 Impact Analysis

a. Would the project have a substantial effect on a scenic vista?

Less Than Significant Impact. A scenic vista is a view of an area that is visually or aesthetically pleasing. Scenic vistas can include views of natural lands and compositions of natural and developed areas. Scenic vistas can include vistas of undisturbed natural areas, unique or unusual features forming an important or dominant portion of a viewshed, and distant vistas offering relief from less attractive nearby features. The project site is located in the unincorporated community of French Camp, just south of the City of Stockton, in San Joaquin County. The County has major landforms known for their natural, rural, and agricultural views, including the Sacramento-San Joaquin Delta (Delta) in the northwest, the foothills of the Diablo Range in the southwest, and the foothills of the Sierra Nevada in the east. Most scenic views in the County are limited to near and medium-range viewpoints due to the poor air quality and flat terrain of the area. Primary viewpoints of the County's scenic vistas are from public recreation areas and roadways, none of which are in the direct vicinity of the project site.

The Delta has national and statewide significance and a historical role in the County due to its importance in providing water to much of California and supporting a thriving agriculture industry in the region. The Delta Protection Commission monitors activities in the primary and secondary zones of the Delta to ensure that development does not conflict with Delta ecosystems, habitats, or agricultural operations. The Delta is located northwest of the project site, and its primary and secondary zones stretch across portions of five counties: Solano, Yolo, Sacramento, San Joaquin, and Contra Costa. According to the Delta Protection Commission Land Use and Resource Management

Plan map, the project site is not located within the primary or secondary zone of the Delta.[3] Other major landforms in the County include the Diablo Range which is southwest of the project site and stretches along the western side of I-580 and I-5, and the foothills of the Sierra Nevada, located over 30 miles east of the project site.

Goals and policies in the San Joaquin County General Plan emphasize the importance of natural resources and scenic landscapes. The County aims to protect and preserve its unique scenic features through the designation of scenic routes and roadways. The project site is not located adjacent to any scenic roadways. The site is currently undeveloped and is surrounded by undeveloped land, residential uses, and light industrial uses. The County General Hospital is located west of the project site, on the western side of I-5. The implementation of the proposed project would be visually consistent with the development of the County General Hospital. There are no scenic vistas directly visible from the project site, and no scenic roadways that serve as viewpoints in the project area. Therefore, the project would not have a substantial effect on a scenic vista. Impacts would be less than significant, and no mitigation is required.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The Caltrans Scenic Highway Mapping System identifies portions of I-580 and I-5 as State-designated scenic highways. The State-designated scenic portion of I-580 is 15.4 miles long and runs from the I-5 junction to the Alameda County line, parallel to the foothills of the Diablo Range. The State-designated scenic portion of I-5 runs from the Stanislaus County line to I-580 and is approximately 28.1 miles in length. Both these designated State scenic highways are approximately 20 miles southwest of the project site and are not visible from the project site. Therefore, the project would not affect any scenic resources within a State scenic highway. No impact would occur, and no mitigation is required.

c. In non-urbanized areas, would the project 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 a 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?

Less Than Significant Impact. The project site is located in the unincorporated community of French Camp, within the Stockton Urbanized Area[4]. The Stockton Urbanized Area has a population of 413,637 and meets the definition of an Urbanized Area under Section 15387 of the *State CEQA Guidelines*.

The project site is zoned for AU-20 (Agriculture-Urban Reserve), which requires minimum parcel sizes of 20 acres. Section 9-600.1 of Title 9 of the County's Municipal Code states that the AU zoning district is intended to "retain in agriculture those areas planned for future urban development in

[3] State of California Delta Protection Commission, Land Use and Resource Management Plan, February 2010 <https://delta.ca.gov/land-use/management-plan/> (Accessed October 2, 2024).

[4] Census Reporter. 2022. Stockton, CA Urbanized Area. < https://censusreporter.org/profiles/40000US85087-stockton-ca-urban-area/> (Accessed October 2, 2024).

order to facilitate compact, orderly urban development and to assure the proper timing and economic provisions of services and utilities."[5] The project site is not currently subject to zoning or other regulations governing scenic quality. The project site would be subject to the Specific Plan being developed for the proposed project, necessitating rezoning of the project site. However, the Specific Plan would not include zoning or other regulations governing scenic quality. The proposed project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant, and mitigation would not be required.

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The project site is currently undeveloped but includes streetlights that run along the eastern edge of the parcel. Existing light sources at the project site consist of lighting from existing adjacent land uses and streets. New development would result in new light sources, such as parking lot lighting, interior and exterior building lighting (included for safety purposes), vehicle headlights, and limited illuminated signage. These new sources of light would be visible from neighboring development and along adjacent roadways.

Development standards in the Specific Plan include lighting requirements applicable to the proposed project. Exterior lighting on the project would use energy-efficient fixtures and lamps that meet the applicable requirements of the California Building Standards Code (Cal. Code Regs., Title 24). Lighting would be shielded or recessed so that direct glare and reflections would be confined to the maximum extent feasible within the boundaries of the site and would be directed downward and away from adjoining properties and public rights-of-way. There would be a sufficient level of lighting at vehicle entrances, driveways, parking and service areas, pedestrian entrances, walkways, and outdoor activity areas to provide security and safety. The proposed project would include light fixtures that match the character of the surrounding buildings and nearby public uses such as the County General Hospital. In addition, the County General Plan Natural and Cultural Resources Element contains Policy NCR-7.7, Reducing Light Pollution, which states "[t]he County shall encourage project designs, lighting configurations, and operational practices that reduce light pollution and preserve views of the night sky."[6] Overall, the lighting design of the project prioritizes design standards that would reduce glare and reflections to stay within the project boundaries and reduce light pollution to preserve views of the night sky. Therefore, impacts from light and glare would be less than significant, and mitigation would not be required.

[5] San Joaquin County Development Title, November 17, 2022. <https://library.municode.com/ca/san_joaquin_county/codes/development_title?nodeId=SJC> (Accessed October 2, 2024).

[6] San Joaquin County General Plan 2035, Natural and Cultural Resources Element, December 2016 (Updated November 2017) <https://www.sjgov.org/commdev/cgi-bin/cdyn.exe?str=general+plan+2035&str=&grp=main&htm=results&typ=page> (Accessed October 3, 2024).

4.2 AGRICULTURE AND FORESTRY RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

4.2.1 Impact Analysis

a. Would the project 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?

No Impact. The project site is currently undeveloped and does not contain any existing agriculture uses. According to the California Department of Conservation (DOC) Farmland Mapping & Monitoring Program (FMMP) California Important Farmland Mapper, the project site is categorized as Vacant or Disturbed Land. The Vacant or Disturbed Land type consists of open field areas that do not qualify for an agricultural category.[7] The project site is surrounded by land categorized as Urban and Built-Up Land, Vacant or Disturbed Land, and Rural Residential land. The project site does not contain any designated farmland as shown on the maps prepared pursuant to the FMMP. Therefore, there would be no impact associated with farmland conversion to non-agricultural use, and no mitigation is required.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The project site is currently zoned (AU-20) Agriculture Urban Reserve, 20 acre minimum. The AU-20 zoning district is intended to retain in agriculture those areas planned for future urban

[7] California Department of Conservation (DOC). 2022 Farmland Mapping and Monitoring Program (FMMP), California Important Farmland Finder. <https://maps.conservation.ca.gov/DLRP/CIFF/> (Accessed October 4, 2024).

development in order to facilitate compact, orderly urban development and appropriate timing and economical provision of services and utilities.[8] The project site is not currently used for agricultural purposes, and there are no Williamson Act contracts applicable to the project site. Therefore, the project does not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur, and no mitigation is required.

c. Would the project 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))?

No Impact. The project site is not used for timberland production and is not zoned as forest land or timberland. Therefore, no impact to forest land or timberland would occur, and no mitigation is required.

d. Would the project result in the loss of forest land or conversion of forestland to non-forest use?

No Impact. The project site is currently undeveloped land. As such, the project site does not contain any forestland and would not convert any forestland to non-forest use. Therefore, no impact would occur, and no mitigation is required.

e. Would the project 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?

Less Than Significant Impact. According to DOC FMMP, all farmable land within San Joaquin County not meeting the definitions of "Prime Farmland," "Farmland of Statewide Importance," or "Unique Farmland" is designated as "Farmland of Local Importance." This includes land that is or has been used for irrigated pasture, dryland farming, confined livestock or dairy facilities, aquaculture, poultry facilities, and dry grazing.[9] As discussed in Response 4.2.1(a), according to the DOC FMMP the project site is surrounded by land categorized as Urban and Built-Up Land, Vacant or Disturbed Land, and Rural Residential Land. Land designated as Farmland is located in areas beyond these areas; however, the proposed project would not involve changes to the surrounding environment that would convert Farmland to non-agricultural use or conversion of forest land to non-forest use. Due to the absence of agriculture and forestry uses in the direct vicinity of the project site, impacts would be less than significant, and no mitigation is required.

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8 San Joaquin County Development Title, November 17, 2022, <https://library.municode.com/ca/san_joaquin_county/codes/development_title?nodeId=SJC>(Accessed September 6, 2024).

9 California Department of Conservation Farmland of Local Importance (2018). <https://www.conservation.ca.gov/dlrp/fmmp/Documents/Farmland_of_Local_Importance_2018.pdf> (Accessed October 4, 2024).

4.3 AIR QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

4.3.1 Impact Analysis

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The proposed project is located in the unincorporated community of French Camp in San Joaquin County and is part of the San Joaquin Valley Air Basin (SJVAB), which is within the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD). The SJVAPCD is responsible for air quality regulation within the eight-county San Joaquin Valley region. Both the State and the federal government have established Ambient Air Quality Standards (AAQS) for six air pollutants, referred to as criteria air pollutants. These criteria pollutants include carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), lead (Pb), and particulate matter 2.5 micrometers or less in diameter ($PM_{2.5}$), and particulate matter 10 micrometers or less in diameter (PM_{10}). The SJVAB is designated as being in non-attainment of the federal standards (National Ambient Air Quality Standards or NAAQS) for O_3 and $PM_{2.5}$ and in non-attainment of the State standards (California Ambient Air Quality Standards or CAAQS) for O_3, PM_{10}, and $PM_{2.5}$..

The federal Clean Air Act requires States to develop clean air plans (known as State Implementation Plans or SIPs) to demonstrate how areas that do not meet the NAAQS will attain those standards. Similarly, the State mandates attainment of the CAAQS. An air quality plan describes air pollution control strategies to be implemented by a city, county, or region classified as a non-attainment area. The main purpose of the air quality plan is to bring the area into compliance with the requirements of the federal and State air quality standards. CEQA requires that certain proposed projects be analyzed for consistency with the applicable air quality plan. To bring the SJVAB into attainment with the AAQS, the SJVAPCD adopted the 2022 Plan for the 2015 8-Hour Ozone Standard in December 2022 to satisfy Clean Air Act requirements and ensure attainment of the 70 parts per billion (ppb) 8-hour ozone standard.

To ensure the SJVAB's continued attainment of the U.S. Environmental Protection Agency (USEPA) PM_{10} standard, the SJVAPCD adopted the 2007 PM_{10} Maintenance Plan in September 2007. SJVAPCD Regulation VIII (Fugitive PM_{10} Prohibitions) is designed to reduce PM_{10} emissions generated by

human activity. The SJVAPCD adopted the 2018 plan for the 1997, 2006, and 2012 $PM_{2.5}$ standards to address the USEPA federal annual $PM_{2.5}$ standard of 12 µg/m^3, established in 2012.

For a project to be consistent with SJVAPCD air quality plans, the pollutants emitted from a project should not exceed the SJVAPCD emission thresholds or cause a significant impact on air quality. In addition, emissions reductions achieved through implementation of offset requirements are a major component of the SJVAPCD air quality plans. As discussed in Section 4.3.1(b) below, construction of the proposed project would not result in the generation of criteria air pollutants that would exceed SJVAPCD thresholds of significance. Additionally, long-term operational emissions associated with the proposed project, including area, energy, and mobile source emissions, would also not exceed SJVAPCD established significance thresholds. Therefore, impacts related to the proposed project's potential to conflict with or obstruct implementation of the applicable air quality plan would be less than significant. No mitigation is required.

b. Would the project 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?

Less Than Significant Impact. The SJVAB is designated as being in non-attainment of the NAAQS for O_3 and $PM_{2.5}$ and in non-attainment of the CAAQS for O_3, PM_{10}, and $PM_{2.5}$. The SJVAPCD's non-attainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. In general, single projects are not sufficient enough in size to result in emissions that would result in non-attainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for criteria pollutants, the SJVAPCD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is unnecessary. The following analysis assesses the potential project-level construction- and operation-related air quality impacts.

Short-Term Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of particulate emissions generated by grading, paving, building, and other activities. Emissions from construction equipment are also anticipated and would include CO, NO_x, reactive organic gases (ROGs), directly emitted particulate matter ($PM_{2.5}$ and PM_{10}), and toxic air contaminants (TACs) such as diesel exhaust particulate matter. Project construction activities would include site preparation, grading, building construction, paving, and architectural coating activities. Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate matter emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which

could be an additional source of airborne dust after it dries. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would depend on soil moisture, silt content of soil, wind speed, and the amount of operating equipment. Larger dust particles would settle near the source, while fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. The SJVAPCD has implemented measures for reducing fugitive dust emissions (PM_{10}) (Regulation VIII measures). With the implementation of Regulation VIII measures, fugitive dust emissions from construction activities would not result in adverse air quality impacts.

In addition to dust-related PM_{10} emissions, exhaust emissions from use of heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO_2, NO_x, ROG, and some soot particulate ($PM_{2.5}$ and PM_{10}). If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

The SJVAPCD has established construction emissions thresholds on an annual basis as shown in Table 4.3.A, below. Construction emissions for the proposed project were analyzed using the California Emissions Estimator Model (CalEEMod) version 2022.1. Construction of the proposed project is anticipated to begin in May 2026 and continue for a period of 18 months, ending in September 2027. The proposed project would not require the import or export of soil, which was also included in CalEEMod. This analysis also assumes use of Tier 2 construction equipment and that the proposed project would comply with SJVAPCD Regulation VIII for fugitive dust control. Other detailed construction information is currently unavailable; therefore, default assumptions (e.g., construction worker and truck trips and fleet activities) from CalEEMod were used. Resultant construction-related emissions are presented in Table 4.3.A. CalEEMod output sheets are included in Appendix A.

Table 4.3.A: Project Construction Emissions (Tons per Year)

Construction Year	Annual Pollutant Emissions (Tons per Year)					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2026	0.1	2.5	2.4	<0.1	0.4	0.2
2027	1.1	1.9	2.2	<0.1	0.3	0.1
Maximum Annual Construction Emissions	**1.1**	**2.5**	**2.4**	**<0.1**	**0.4**	**0.2**
SJVAPCD Significance Threshold	10.0	10.0	100.0	27.0	15.0	15.0
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: LSA (June 2025).
CO = carbon monoxide
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
ROG = reactive organic gas
SJVAPCD = San Joaquin Valley Air Pollution Control District
SO_X = sulfur oxides

As shown in Table 4.3.A, proposed project construction emissions would not exceed the SJVAPCD thresholds for annual construction emissions. In addition to the construction period

thresholds of significance, the SJVAPCD has implemented Regulation VIII measures for dust control during construction to reduce construction fugitive dust impacts to a less than significant level. Implementation of Regulatory Compliance Measure (RCM) AIR-1 would ensure that the proposed project complies with SJVAPCD Regulation VIII. Therefore, construction of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.

Long-Term Operational Emissions. Long-term air pollutant emission impacts associated with the proposed project are those related to mobile sources (e.g., vehicle trips), energy sources (e.g., natural gas), area sources (e.g., architectural coatings and the use of landscape maintenance equipment), and stationary sources (e.g., backup diesel generator). Mobile source emissions include ROG and NO_X emissions that contribute to the formation of ozone. Additionally, PM_{10} emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways.

Energy source emissions result from activities in buildings for which natural gas is used. The quantity of emissions is the product of usage intensity (i.e., the amount of natural gas) and the emission factor of the fuel source. However, the proposed project would be designed to be all-electric and would not utilize natural gas; therefore, the project would not result in energy source emissions.

Typically, area source emissions consist of direct sources of air emissions located at the project site, including architectural coatings and the use of landscape maintenance equipment. Area source emissions associated with the project would include emissions from the use of landscaping equipment and the use of consumer products. Stationary source emissions associated with the project would be generated by the proposed 345-horsepower diesel generator, which is estimated to run for approximately three days per year.

The proposed project would develop the project site with the SJ BeWell Campus. The SJ BeWell Campus would provide behavioral health and wellness care, including outpatient, urgent care, and residential treatment services for a combined total of approximately 354,400 square feet of building area. In addition, the proposed project would provide extensive outdoor amenities including walking trails, activity areas, a community garden, an area of respite, and other landscaped areas.

To assess the operational emissions, the proposed project analysis was conducted using land codes *Medical Office Building, Congregate Care (Assisted Living), City Park,* and *Parking Lot* in CalEEMod. City Park was used as a representative land use for the proposed recreational and open space areas. Trip generation rates for the proposed project were based on the project's trip generation estimate, as identified in Section 4.17, Transportation. As discussed in Section 4.17, Transportation, the proposed project would generate approximately 2,029 average daily trips. In addition, the proposed project would be all-electric and would not include any natural gas or wood-burning devices, consistent with SJVAPCD Rule 4901. As such, the default natural gas data was converted to kilowatt-hour (kWh) and added to the default electricity estimates to account for all energy use for the proposed project, which was included in CalEEMod. The

proposed project would include a 345-horsepower diesel generator that will run for approximately three days per year, which was also included in CalEEMod. Where project-specific data were not available, default assumptions (e.g., energy usage, water usage, and solid waste generation) from CalEEMod were used to estimate project emissions. Modeling results are shown in Table 4.3.B. CalEEMod output sheets are included in Appendix A.

The primary emissions associated with the proposed project are regional in nature, meaning that air pollutants are rapidly dispersed on release or, in the case of vehicle emissions associated with the proposed project; emissions are released in other areas of the SJVAB. The annual emissions associated with project operational trip generation and area sources are identified in Table 4.3.B.

Table 4.3.B: Project Operation Emissions (Tons per Year)

Emission Type	Pollutant Emissions (Tons per Year)					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Mobile Source Emissions	1.4	1.5	11.3	<0.1	2.7	0.7
Area Source Emissions	1.7	<0.1	2.1	<0.1	<0.1	<0.1
Energy Source Emissions	0.0	0.0	0.0	0.0	0.0	0.0
Stationary	<0.1	0.1	0.1	<0.1	<0.1	<0.1
Total Project Operation Emissions	**3.1**	**1.5**	**13.4**	**<0.1**	**2.7**	**0.7**
SJVAPCD Significance Threshold	10.0	10.0	100.0	27.0	15.0	15.0
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: LSA (June 2025).
CO = carbon monoxide
NO_x = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
ROG = reactive organic gas
SJVAPCD = San Joaquin Valley Air Pollution Control District
SO_x = sulfur oxides

The results shown in Table 4.3.B indicate the proposed project's operational emissions would not exceed the significance criteria for annual CO, NO_x, ROG, SO_x, $PM_{2.5}$, or PM_{10} emissions. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the proposed project region is in non-attainment of an applicable AAQS. As a result, impacts would be less than significant, and no mitigation is required.

Long-Term Microscale (CO Hot Spot) Analysis. Vehicular trips associated with the proposed project would contribute to congestion at intersections and along roadway segments in the vicinity of the proposed project site. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of the proposed project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions. CO transport is extremely limited; under normal meteorological conditions, it disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels, affecting local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients).Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes.

In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels.

An assessment of project-related impacts on localized ambient air quality requires that future ambient air quality levels be projected. Existing CO concentrations in the immediate project vicinity are not available. Ambient CO levels monitored at the Stockton air monitoring station located at 702 North Aurora Street (the closest station to the project site monitoring CO), showed a highest recorded 1-hour concentration of 2.6 ppm (the State standard is 20 ppm) and a highest 8-hour concentration of 1.7 ppm (the State standard is 9 ppm) from 2021 to 2023. The highest CO concentrations would normally occur during peak traffic hours; hence, CO impacts calculated under peak traffic conditions represent a worst-case analysis. Reduced speeds and vehicular congestion at intersections result in increased CO emissions.

As described in Section 4.17, Transportation, the proposed project is estimated to generate 2,029 average daily trips, including 179 trips during the a.m. peak hour and 216 trips during the p.m. peak hour. In addition, as discussed in Section 4.17, Transportation, the proposed project would have a less-than-significant vehicle miles traveled (VMT) impact. Therefore, given the extremely low level of CO concentrations in the vicinity of the project site and the anticipated lack of traffic impacts at any intersections, project-related vehicles are not expected to result in CO concentrations exceeding the State or federal CO standards. No CO hot spots would occur, and the project would not result in any project-related impacts on CO concentrations.

Ultimately, based on the analysis presented above and with adherence to RCM AIR-1, construction and operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard. Impacts would be less than significant, and no mitigation is required.

Regulatory Compliance Measure:

RCM AIR-1: Consistent with SJVAPCD Regulation VIII (Fugitive PM_{10} Prohibitions), the following controls are required to be included as specifications for the proposed project and implemented at the construction site:

- All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover.
- All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant.

- All land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking.
- When materials are transported off site, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least 6 inches of freeboard space from the top of the container shall be maintained.
- All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden).
- Following the addition of materials to, or the removal of materials from, the surface of out-door storage piles, said piles shall be effectively stabilized of fugitive dust emission utilizing sufficient water or chemical stabilizer/suppressant.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Sensitive receptors are defined as residential uses, schools, daycare centers, nursing homes, and medical centers. Individuals particularly vulnerable to diesel particulate matter are children, whose lung tissue is still developing, and the elderly, who may have serious health problems that can be aggravated by exposure to diesel particulate matter. Exposure from diesel exhaust associated with construction activity contributes to both cancer and chronic non-cancer health risks.

According to the SJVAPCD, a project would result in a significant impact if it would: individually expose sensitive receptors to TACs resulting in an increased cancer risk greater than 20.0 in one million or in an increased non-cancer risk of greater than 1.0 on the hazard index (chronic or acute).

The project site is located in a rural area in close proximity to existing residential uses that could be exposed to diesel emission exhaust during the construction period. The closest residential uses are located northeast of the project site at approximately 20 ft from the project site boundary line to the single-family residence. Other residential uses are located south and southeast of the project site along West Hospital Road at approximately 100 ft and 235 ft, respectively, from the project site boundary line to the building façade. The nearest sensitive receptor is located east of the project site across El Dorado Street at approximately 230 feet from the project site's eastern boundary to the property line.

A construction HRA, which evaluates construction-period health risk to off-site receptors, was completed for the proposed project, and the analysis is presented below. To estimate the potential

cancer risk associated with construction of the proposed project from equipment exhaust (including diesel particulate matter), a dispersion model was used to translate an emission rate from the source location to a concentration at the receptor location of interest (i.e., a nearby residence and worksites). Dispersion modeling varies from a simpler, more conservative screening-level analysis to a more complex and refined detailed analysis. This refined assessment was conducted using the California Air Resources Board (CARB) exposure methodology with the air dispersion modeling performed using the USEPA dispersion model AERMOD. The model provides a detailed estimate of exhaust concentrations based on site and source geometry, source emissions strength, distance from the source to the receptor, and meteorological data.

Table 4.3.C, below, identifies the results of the analysis assuming the use of Tier 2 construction equipment. Model snapshots of the sources are shown in Appendix A.

Table 4.3.C: Health Risks from Project Construction to Off-Site Receptors

Location	Carcinogenic Inhalation Health Risk in 1 Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Residential Receptor Risk	7.84	0.006	0.000
Worker Receptor Risk	0.17	0.007	0.000
SJVAPCD Significance Threshold	**20.0 in one million**	**1.0**	**1.0**
Significant?	**No**	**No**	**No**

Source: LSA (June 2025).
SJVAPCD = San Joaquin Valley Air Pollution Control District

As shown in Table 4.3.C, the maximum cancer risk for the residential maximally exposed individual (MEI) would be 7.84 in one million, which would not exceed the SJVAPCD cancer risk threshold of 20 in one million. The worker MEI risk would be lower at 0.17 in one million, which would also not exceed the SJVAPCD cancer risk thresholds. The total chronic hazard index would be 0.006 for the residential MEI and 0.007 for the worker MEI, which is below the threshold of 1.0. In addition, the total acute hazard index would be nominal (0.000), which would also not exceed the threshold of 1.0. Therefore, construction of the proposed project would not exceed SJVAPCD thresholds and would not expose nearby sensitive receptors to substantial pollutant concentrations. No significant health risk would occur from project construction emissions.

The proposed project would include the development of the SJ BeWell Campus and would provide behavioral health and wellness care, including outpatient, urgent care, and residential treatment services in a combined total of approximately 354,400 square feet of building area. As identified in Table 4.3.B, project operational emissions of criteria pollutants would be below SJVAPCD significance thresholds; thus, they are not likely to have a significant impact on sensitive receptors. As mentioned above, the proposed project would include a 345-horsepower diesel generator, which is estimated to run for approximately three days per year. The generator would be enclosed and would be located approximately 380 feet away from the closest sensitive receptors. In addition, the proposed project would be required to implement SJVAPCD Rule 9510, Indirect Source Review (ISR). Implementation of Rule 9510 would reduce operational emissions of NO_X and PM_{10} by 33.3 percent and 50 percent, respectively. Compliance with SJVAPCD rules would further limit doses and exposures, reducing potential health risk related to vehicle and equipment emissions to a level that

would not be significant. Once constructed, the proposed project would not be a source of substantial emissions. Therefore, implementation of the proposed project would not result in new sources of TACs and would not expose sensitive receptors to substantial levels of TACs. Sensitive receptors would not be exposed to substantial pollutant concentrations during project operations. This impact would be less than significant, and no mitigation is required.

Valley Fever. Valley fever (coccidioidomycosis) is a disease caused by inhalation of the spores of a fungus that grows in the soil in parts of California. The closest sensitive receptors to the project site include a single-family residence located approximately 20 feet northeast of the project site. Except during high wind conditions, this distance is sufficient enough that particulate matter from ground disturbance would settle prior to reaching the nearest sensitive receptor. In addition, crosswinds influenced by the adjacent roadways would help dissipate any particulate matter associated with the construction phase of the project. Valley fever spores suspended with dust would not be anticipated to reach sensitive receptors. However, during project construction, it is possible that workers could be exposed to valley fever through fugitive dust. The dust control measures in RCM AIR-1, which are consistent with those required under SJVAPCD Regulation VIII, would reduce the exposure to the workers and sensitive receptors. Therefore, dust from the construction of the project is not anticipated to significantly add to the existing exposure of people to valley fever.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. During construction, the various diesel-powered vehicles and equipment in use on the site would create localized odors. These odors would be temporary and are not likely to be noticeable for extended periods of time beyond the project site. The potential for diesel odor impacts is therefore considered less than significant. In addition, the proposed uses that would be developed within the project site are not expected to produce any offensive odors that would result in frequent odor complaints. The proposed project would not create objectionable odors affecting a substantial number of people during project construction or operation, and this impact would be less than significant.

4.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

The following section is based on the Biological Resources Assessment (BRA) prepared for the proposed project in June 2025 and included as Appendix B, Biological Resources Assessment, to this IS/MND.

4.4.1 Impact Analysis

a. Would the project 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?

Less than Significant with Mitigation Incorporated. The project site is located within the boundary of the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). The SJMSCP provides compensation for the conversion of open space to non-open space uses which affect certain plant, fish, and wildlife species, in accordance with the federal Endangered Species Act (ESA) Section 10(a)(1)(B) and California Environmental Species Act (CESA) Section 2081(b). The SJMSCP compensates for conversions of open space for the following activities: urban development,

mining, expansion of existing urban boundaries, non-agricultural activities occurring outside of urban boundaries, and various public agency projects. Generally, the direct take of species is not covered under the SJMSCP; only take of suitable habitat is allowed based on appropriate compensation and implementation of avoidance and minimization measures. Additionally, some special-status species are not covered under the SJMSCP and impacts to these species require direct permitting through the appropriate agency. The SJMSCP includes species-specific Incidental Take Minimization Measures (ITMMs) to minimize impacts to covered species. These ITMMs must be included as conditions of project approval for projects covered under the SJMSCP.

The proposed project would be subject to the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). The SJMSCP, in accordance with Section 10(a)(1)(B)of the federal Endangered Species Act (ESA) and Section 2081(b), Incidental Take Permits, of the California Endangered Species Act (CESA), provides compensation for the conversion of open space to non-open space uses which affect the species covered by the SJMSCP. The SJMSCP includes specific-specific Incidental Take Minimization Measures (ITMMs) to minimize impacts to covered species.

Compensation for impacts to habitat for special-status plant and wildlife species covered under the SJMSCP may be provided by one or more of the following options:

- Payment of the appropriate mitigation fee;
- Dedication of mitigation lands
- Purchase of approved mitigation bank credits; or
- Propose an alternative mitigation plan.

Preparation of the BRA (Appendix B to this IS/MND) involved a literature review and field survey by qualified biologists in order to determine the existence and potential for occurrence of sensitive or special-status plants and animal species.

The records search completed as part of the preparation of the BRA indicates that 19 special-status plant species were identified with potential to occur in the project area. However, the analysis concluded that none of the special-status plant species considered are expected to occur on the project site; therefore, the proposed project would not result in impacts to special-status plants and no mitigation is required.

The analysis completed as part of the BRA identified special-status wildlife species with potential to occur on the project site. These species include Western burrowing owl (*Athene cunicularia*), Swainson's hawk (*Buteo swainsoni*), White-tailed kite (*Elanus leucurus*), and Loggerhead shrike (*Lanius ludovicianus*). Each species is described in greater detail below.

However, none of these special status species were observed on or around the project site as part of the field survey conducted as part of the preparation of the BRA. In addition, the project site was evaluated for the presence of nesting migratory birds and raptors protected under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA). No nesting migratory birds were observed on the project site or in the immediate vicinity during the field survey. While no special-status species or nesting migratory birds or raptors were observed on or around the project

site during the field survey, suitable nesting and foraging habitat is present. Accordingly, the proposed project would have potential to result in impacts to the special-status wildlife species described above, as well as nesting migratory birds or raptors that could occur on the project site.

Western Burrowing Owl. Western burrowing owl (*Athene cunicularia*) is a candidate for listing under the CESA and a SJMSCP covered species. Record searches indicate that the burrowing owl is well documented in the area. The nearest occurrence, dated 2004, is approximately 0.97 mile southwest of the project site in a ruderal area south of West Mathews Road. Although no burrowing owls were observed on the project site, the ruderal grasslands adjacent and within the project site provide potential foraging and nesting habitat for burrowing owl. Therefore, due to the presence of suitable nesting and foraging habitat, burrowing owls are considered to have a moderate potential to forage and nest within the project site.

Construction of the proposed project could directly affect the western burrowing owl if this species is nesting within or near the project site when construction begins. The project would also result in 18 acres of permanent impacts to ruderal grasslands, and, to a lesser extent, disturbed/ruderal habitat which provide suitable foraging and nesting habitat burrowing owl. Implementation of **MM BIO-1** would reduce any potential impact to a less than significant level.

Swainson's Hawk. Swainson's hawk (*Buteo swainsoni*) is a threatened species under the CESA and a SJMSCP covered species. No Swainson's hawks were observed during field surveys. Although no Swainson's hawk were observed on the project site, live oak trees adjacent to the project site provide suitable nesting habitat, and the ruderal grasslands adjacent and within the project site provide potential foraging habitat for Swainson's hawk. Therefore, due to the presence of suitable nesting and foraging habitat, Swainson's hawk is considered to have a moderate potential to forage and nest within the project site.

Construction could directly affect Swainson's hawk if this species is nesting within or near the project site when construction begins. The project would also result in 18 acres of permanent impacts to ruderal grasslands, and, to a lesser extent, disturbed/ruderal habitat which provides suitable foraging habitat for Swainson's hawk. Implementation of **MM BIO-2** would reduce any potential impact to a less than significant level.

White-tailed Kite. White-tailed kite (*Elanus leucurus*) is a fully Protected species in the State of California and is a SJMSCP covered species. No white-tailed kites were observed during the field survey. Although no white-tailed kite were observed on the project site, numerous trees adjacent to the project site provide suitable nesting habitat, and the ruderal grasslands adjacent and within the project site provide potential foraging habitat for white-tailed kite. Therefore, due to the presence of suitable nesting and foraging habitat, white-tailed kite is considered to have a moderate potential to forage and low potential to nest within the project site.

Construction could directly affect white-tailed kite if this species is nesting within or near the project site when construction begins. The project would also result in 18 acres of permanent impacts to ruderal grasslands, and, to a lesser extent, disturbed/ruderal habitat which provide suitable foraging habitat for white-tailed kite. Implementation of **MM BIO-3** would reduce any potential impact to a less than significant level.

Loggerhead Shrike. Loggerhead shrike (*Lanius ludovicianus*) is a California Species of Special Concern and is a SJMSCP covered species. No loggerhead shrikes were observed during the field survey. Although no loggerhead shrikes were observed on the project site, the ruderal grasslands adjacent and within the project site provide suitable foraging habitat for loggerhead shrike. Surrounding shrubs and trees provide potential nesting habitat for loggerhead shrike. Therefore, due to the presence of suitable nesting and foraging habitat, loggerhead shrikes are considered to have a moderate potential to forage and low potential to nest within the project site.

The project would permanently impact 18 acres of ruderal grassland and disturb 1.19 acres of Urban/industrial/built habitat, which is potential nesting and foraging habitat for Loggerhead shrike. Permanent impacts will occur because of project cut and fill activities, project access and staging during construction activities. Implementation of **MM BIO-4** would reduce any potential impact to a less than significant level.

Nesting Migratory Birds and Raptors. No nesting migratory birds were observed on the project site or within the immediate vicinity during the field survey. However, ground nesting migratory birds could nest within the ruderal grasslands on the project site, and other nesting birds and raptors could nest along the perimeter of the project site in adjacent trees.

Construction could directly affect migratory nesting birds nesting within or near the project site when construction begins. The project would also result in 18 of permanent impacts to ruderal grasslands, and disturbed/ruderal habitat which provide suitable nesting habitat. Implementation of **MM BIO-5** would reduce any potential impact to a less than significant level.

It should be noted that the project site is located in an area covered by the SJMSCP. The SJMSCP, in accordance with Section 10(a)(1)(B)of the federal Endangered Species Act (FESA) and Section 2081(b), *Incidental Take Permits*, of the California Endangered Species Act (CESA), provides compensation for the conversion of open space to non-open space uses which affect the species covered by the SJMSCP. The SJMSCP includes specific Incidental Take Minimization Measures (ITMMs) to minimize impacts to covered species. However, because of the disturbed nature of the project site and the results of the BRA indicating that special-status species are not found on the project site, the County has declined to enroll for coverage under the SJMSCP and is thus not required to implement the ITMMs to minimize impacts to covered species. Regardless, implementation of Mitigation Measures MM-BIO-1 through 5, described below, would reduce any impacts to less than significant.

MM BIO-1 **Burrowing Owls.** Direct take of nesting burrowing owls would be in violation of the CFGC Code and MBTA; the burrowing owl is a covered species under the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). However, the SJCOG has adopted CDFW's Staff Report on Burrowing Owls (CDFW 2012) and have prepared additional ITMMs to cover this species. The following ITMMs are consistent with the Staff Report (CDFW 2012) and the provisions of the MBTA:

1. The presence of ground squirrels and squirrel burrows are attractive to burrowing owls. Burrowing owls may therefore be discouraged from entering or occupying construction areas by discouraging the presence of ground squirrels. To accomplish this, the Applicant should prevent ground squirrels from occupying the project site early in the planning process by employing one of the following practices:

    a. The Applicant may plant new vegetation or retain existing vegetation entirely covering the site at a height of approximately 36 inches above the ground. Vegetation should be retained until construction begins. Vegetation will discourage both ground squirrel and owl use of the site.

    b. Alternatively, if burrowing owls are not known or suspected to occur in the project site and the area is an unlikely occupation site for California tiger salamander California red-legged frog, or San Joaquin kit fox, the Applicant may disc or plow the entire project site to destroy any ground squirrel burrows. At the same time burrows are destroyed, ground squirrels should be removed through one of the following approved methods to prevent reoccupation of the project site:

        i. **Anticoagulants.** Establish bait stations using the approved rodenticide anticoagulants Chlorophacinone or Diphacinone. Rodenticides shall be used in compliance with USEPA label standards and as directed by the San Joaquin County Agricultural Commissioner (SJAC).

        ii. **Zinc Phosphide.** Establish bait stations with non-treated grain 5-7 calendar days in advance of rodenticide application and then apply Zinc Phosphide to bait stations. Rodenticides shall be used in compliance with the U.S. EPA label standards and as directed by the SJAC.

        iii. **Fumigants.** Use below-ground gas cartridges or pellets and seal burrows. Approved fumigants include Aluminum Phosphide (Fumitoxin, Phostoxin) and gas cartridges sold by the SJAC office. NOTE: Crumpled newspaper covered with soil is often an effective seal for burrows when fumigants are used. Fumigants shall be used in compliance with the USEPA label standards and as directed by the SJAC.

iv. **Traps.** For areas with minimal rodent populations, traps may be effective for eliminating rodents. If trapping activities are required, the use of traps shall be consistent with all applicable laws and regulations.

2. If the measures described above were not attempted or were attempted but failed, and burrowing owls are known to occupy the project site, then the following measures shall be implemented in accordance with the Staff Report (CDFW, 2012):

   a. Breeding season (February 1 through August 31): Pre-construction surveys for burrowing owls will be performed no more than 14 days prior to initial ground disturbance activities in accordance with the Staff Report (CDFW, 2012).

      i. Any occupied burrows shall not be disturbed and shall be provided with a 250-foot protective buffer until and unless the Technical Advisory Committee (TAC), with the concurrence of the Permitting Agencies (representatives on the TAC); or unless a qualified biologist approved by the Permitting Agencies verifies through non-invasive means that either: 1) the owls have not begun egg laying, or 2) juveniles from the occupied burrows are foraging independently and are capable of independent survival.

      ii. Once the fledglings are capable of independent survival, a Burrowing Owl Exclusion Plan is developed and approved by the applicable CDFW SJMSCP representative/office, and habitat is mitigated in accordance with the Staff Report (CDFW 2012), then the burrows can be destroyed. Pre-construction surveys following destruction of burrows and prior to initial construction activities are recommended to ensure owls do not re-colonize the project site.

      iii. If project activities are delayed or suspended for more than 15 days during the breeding season, surveys will be repeated.

   b. Non-breeding season (September 1 through January 31): Pre-construction surveys following the Staff Report (CDFW 2012) will be performed prior to initial ground disturbance activities. Burrowing owls may be evicted after a Burrowing Owl Exclusion Plan is developed and approved by the applicable CDFW SJMSCP representative/office and habitat

is mitigated in accordance with the Staff Report (CDFW 2012).

MM BIO-2 **Swainson's Hawk.** Direct take of nesting Swainson's hawk would be in violation of the CESA, CFGC, and MBTA. In addition, this species is covered under the SJMSCP. The following measures are consistent with the SJMSCP ITMMs for this species and the provisions of the MBTA:

1. Removal of suitable nest trees shall be completed during the non-nesting season (when the nests are unoccupied), between September 1 and February 15.

2. If suitable nest trees will be retained and ground disturbing activities will commence during the nesting season (February 16 through August 31), all suitable nest trees on the site will be surveyed by a qualified biologist prior to initiating construction-related activities. Surveys will be conducted no more than 14 days prior to the start of work. If an active nest is discovered, a 100-foot buffer shall be established around the nest tree and delineated using orange construction fence or equivalent. The buffer shall be maintained in place until the end of the breeding season or until the young have fledged, as determined by a qualified biologist. If no active nests are present, construction may proceed as planned.

3. In some instances, CDFW may approve decreasing the specified buffers with implementation of other avoidance and minimization measures (e.g., having a qualified biologist on-site during construction activities during the nesting season to monitor nesting activity). If no nesting is discovered, construction can begin as planned. Construction beginning during the non-nesting season and continuing into the nesting season shall not be subject to these measures but will still need to comply with MBTA and CESA (which could include monitoring).

4. Prior to issuance of a grading permit, the Applicant shall implement the SJMSCP conservation strategy, (see Section 2.2.1.1 in the BRA, attached as Appendix B), to provide compensation pursuant to the SJMSCP.

MM BIO-3 **White-Tailed Kite.** Direct take of white-tailed kites would be in violation of the CFGC and MBTA; the white-tailed kite is a covered species under the SJMSCP. The following mitigation measures are

consistent with the SJMSCP ITMMs for this species and the provisions of the MBTA:

1. Preconstruction surveys shall investigate all potential nesting trees in the project site (e.g., especially treetops 15-59 feet above the ground in oak, willow, eucalyptus, cottonwood, or other deciduous trees).

2. Whenever white-tailed kites are noted on site or within the vicinity of the project site during the nesting season (February 15 through September 15), a setback of 100 feet from nesting areas shall be established and maintained during the nesting season for the period encompassing nest building and continuing until fledglings leave nests. This setback applies whenever construction or other ground-disturbing activities must begin during the nesting season in the presence of nests which are known to be occupied. Setbacks shall be marked by brightly colored temporary fencing.

3. Prior to issuance of a grading permit, the Applicant shall implement the SJMSCP conservation strategy, see Section 2.2.1.1 in the BRA, attached as Appendix B), to provide compensation pursuant to the SJMSCP.

MM BIO-4 **Loggerhead Shrike**. Direct take of loggerhead shrike would be in violation of the CFGC and MBTA; loggerhead shrike is a covered species under the SJMSCP. The following mitigation measures are consistent with the SJMSCP ITMMs for this species and the provisions of the MBTA:

1. If project construction is to begin during the nesting season (March 1 - September 15), all suitable nesting habitat in the project site and within 100 feet of the limits of work shall be surveyed by a qualified biologist prior to initiating construction-related activities. Surveys shall be conducted no more than 14 days prior to the start of work.

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

3. Prior to issuance of a grading permit, the Applicant shall implement the SJMSCP conservation strategy to provide compensation pursuant to the SJMSCP.

MM BIO-5 **Nesting Season Construction Restrictions.** The following seasonal work restrictions shall be implemented during construction to minimize the potential for take of nesting birds:

1. If work must begin during the nesting season (February 1 to August 31), a qualified biologist shall survey all suitable nesting habitat in the BSA for presence of nesting birds. This survey shall occur no more than 10 days prior to the start of construction. If no nesting activity is observed, work may proceed as planned. If an active nest is discovered, a qualified biologist shall evaluate the potential for the proposed project to disturb nesting activities. The evaluation criteria shall include, but are not limited to, the location/orientation of the nest in the nest tree, the distance of the nest from the project site, and line of sight between the nest and the project site.

2. If nesting birds are found within 100 feet of the project site during the survey, an initial setback of 100 feet from nesting areas shall be established and protected with environmentally sensitive area (ESA) fencing. ESA fencing shall be maintained during the nesting season until construction is complete or the young have fledged, as determined by a qualified biologist.

3. A qualified biologist shall evaluate the potential for the proposed work to disturb nesting activities considering the 100-foot setback. The evaluation criteria shall include, but are not limited to, the location/orientation of the nest in the nest tree, the distance of the nest to the work limits, the line of sight between the nest and the work limits, and the description of the proposed work.

With the implementation of this mitigation measure, impacts to migratory birds would be less than significant.

b. Would the project 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?

No Impact. As discussed in the BRA (see Appendix B) there are no sensitive habitats, including federal or State protected wetlands or other aquatic resources on or near the project site. The project site is not located within designated critical habitat for any listed plants or wildlife species. No impacts to sensitive habitats identified in local or regional plans, policies, regulations, or by the

California Department of Fish and Game or U.S. Fish and Wildlife Service would occur, and no mitigation is required.

c. Would the project 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?

No Impact. According to the BRA (see Appendix B), no federal or State protected wetlands or other aquatic resources occur within the project site. Therefore, the proposed project would have no impact on State or federally protected wetlands and no mitigation is required.

d. Would the project 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?

Less than Significant Impact. The project site is bound by a multi-lane interstate highway, multi-lane roadways, residential, and light industrial areas, which likely impede significant wildlife movement through the project site. There are no significant migration corridors that exist within the project site. French Camp Slough, which is a tributary to the San Joaquin River, is located approximately 0.42 mile northeast of the project site and likely supports wildlife movement in the vicinity of the project site. However, this movement corridor would not be impacted by the proposed project. There are no native wildlife nursery sites located on or adjacent to the project site. Therefore, the project would have less than significant impacts to established wildlife corridors or wildlife nursery sites and it would not otherwise impact local wildlife movement or inhibit the ability of local wildlife to access the project site. Impacts would be less than significant and no mitigation is required.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less than Significant Impact. The San Joaquin County General Plan includes several policies aimed at protecting natural resources. The proposed project would implement the mitigation measures described in Response 4.41.a to avoid impacts to special-status species, including nesting birds. No impacts to wetlands, other regulated aquatic resources, or sensitive habitats would occur.

The proposed project would not conflict with any other local policies and ordinances, such as the County's Tree Protection Ordinance. Thirteen trees are located along the southern and western edges of the project site. These trees would be removed as part of the proposed project. However, the existing trees are not native oak species or designated as historic or landmark trees by San Joaquin County. Accordingly, any impacts would be less than significant and no mitigation is required.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Less than Significant Impact. The proposed project would be subject to the SJMSCP. The SJMSCP, in accordance with Section 10(a)(1)(B)of the federal Endangered Species Act (FESA) and Section 2081(b), *Incidental Take Permits*, of the California Endangered Species Act (CESA), provides compensation for the conversion of open space to non-open space uses which affect the species covered by the SJMSCP. The SJMSCP compensates for conversions of open space for the following activities: urban development, mining, expansion of existing urban boundaries, non-agricultural activities occurring outside of urban boundaries, levee maintenance undertaken by the San Joaquin Area Flood Control Agency, transportation projects, school expansions, non-federal flood control projects, new parks and trails, maintenance of existing facilities for non-federal irrigation district projects, utility installation, maintenance activities, managing preserves, and similar public agency projects. These activities will be undertaken by both public and private individuals and agencies throughout San Joaquin County. The proposed project represents one of the many types of projects that would be covered under the SJMSCP.

The SJMSCP is implemented by SJCOG in coordination with the plan participants. One of the primary goals of the SJMSCP was to obtain permits from State and federal agencies that would cover projects over the next 50 years. To this end, the USFWS and CDFW have issued incidental take permits in conformance with FESA and CESA. Generally, the direct take of species is not covered under the SJMSCP; only take of suitable habitat is allowed based on appropriate compensation and implementation of avoidance and minimization measures. Additionally, some special-status species are not covered under the SJMSCP and impacts to these species require direct permitting through the appropriate agency.

The SJMSCP includes species-specific Incidental Take Minimization Measures (ITMMs) to minimize impacts to covered species. These ITMMs must be included as conditions of project approval. Compensation for impacts to habitat for special-status plant and wildlife species covered under the SJMSCP may be provided as either payment of the appropriate mitigation fee; dedication of mitigation lands; purchase of approved mitigation bank credits; or through a proposed alternative mitigation plan.

The proposed project would comply with the SJMSCP conditions, consisting of the implementation of applicable avoidance and minimization measures and payment of land conversion fees. Therefore, with the implementation of the mitigation measures included in Response to 4.4.1.a, the project would not result in any conflicts with local policies and ordinances or adopted or approved plans. Impacts would be less than significant and no additional mitigation would be required.

4.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 formal cemeteries?	☐	☐	☒	☐

The following section is based on the Cultural Resources Analysis prepared for the proposed project and included as Appendix C, Cultural Resources Assessment, to this IS/MND.

4.5.1 Technical Analysis

A Cultural Resources Assessment was prepared for the proposed project in December 2024 and is included as Appendix C. The Cultural Resources Assessment analyzed the potential for the proposed project to impact historical, archaeological, and tribal cultural resources in and around the project site. On October 17, 2024, a cultural resources records search was conducted for the project site at the Central California Information Center (CCIC) located at California State University, Stanislaus. It included a review of all recorded historic and prehistoric archaeological sites within 0.5 mile of the project site, as well as a review of known cultural resource survey and excavation reports. The Built Environment Resource Directory (BERD) was also searched and a review of historic-period maps and aerial photographs was conducted. On November 6, 2024, a field survey was completed for the project site.

The results of the CCIC records search indicates that 30 cultural resource studies were previously conducted within one mile of the proposed project. Three of these cultural resources studies included a portion of the project site. One cultural resource encompasses almost the entirety of the project site. In addition, four prehistoric resources and 14 built resources (10 residences, 1 school, 1 road segment, and 3 railroad alignments) were recorded within one mile of the project site. More detailed information on these resources is provided in Appendix C.

4.5.2 Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less than Significant Impact with Mitigation Incorporated. Although the cultural resources records search indicates that the project site is almost entirely encompassed by a historic period archaeological resource (French Camp/P-39-000534/California Historical Landmark #668), the desktop research completed for the Cultural Resources Assessment indicates that the project site

has remained largely undeveloped during the historic period and the field survey identified the project site as being moderately to severely disturbed due to earth moving and agricultural or vegetation abatement activities. The field survey identified no visible cultural materials on the project site. Regardless, the cultural resources records search suggests the project site retains some sensitivity for undocumented subsurface resources. As the proposed project would include ground disturbance in the form of excavation and grading, there is potential for inadvertent discovery of previously unrecorded resources. Incorporation of Mitigation Measures (MM) CUL-1- Worker Environmental Awareness Program (WEAP) and MM-CUL-2 – Inadvertent Discovery of Archaeological Resources, would reduce any potential impact to less than significant.

Mitigation Measures:

MM CUL-1 **Worker Environmental Awareness Program (WEAP).** Prior to commencing construction activities (and thus prior to any ground disturbance on the proposed project site), a Qualified Archaeologist shall conduct initial Worker Environmental Awareness Program (WEAP) training of all construction personnel, including supervisors, present at the outset of the project construction work phase, for which the lead contractor and all subcontractors shall make their personnel available. The training shall describe the type of resources that may be identified, procedures to be followed during ground disturbance, and protocols that apply in the event that unanticipated resources are discovered. The crew shall be cautioned not to collect artifacts and directed to inform a construction supervisor in the event that cultural remains are discovered during the course of construction. A qualified archaeologist is someone who either meets the Secretary of the Interior's Professional Qualification Standards for archaeology (48 Federal Register 44738) and is a Registered Professional Archaeologist or has a Bachelor of Arts in archaeology or a closely related field and is a Registered Archaeologist.

MM CUL-2 **Inadvertent Discovery of Archaeological Resources.** In the event that any cultural resources are encountered during earthmoving activities, all work within 50 feet of the find shall be halted until a qualified archaeologist can evaluate the findings and make recommendations. The archaeologist may evaluate the find in accordance with federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2, to assess the significance of the find and identify avoidance or other measures as appropriate. If suspected prehistoric or historical archaeological deposits are discovered during construction, all work within the immediate area of the discovery shall be redirected and the find must be evaluated for significance by a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983).

c. Would the project disturb any humans remains, including those interred outside of formal cemeteries?

Less than Significant Impact. On October 11, 2024, LSA sent a request to the Native American Heritage Commission (NAHC) for a search of their Sacred Lands File (SLF) to obtain information on potential Traditional Cultural Properties (TCPs) in the vicinity of the project site. On October 31, 2024, the NAHC responded with negative results of the SLF search. Although no known human remains are present within the project site, as described previously, buried and undiscovered archaeological remains, including human remains, have the potential to be present below the ground surface on the project site. Disturbing human remains could violate the State's Health and Safety Code, as well as destroy the resource. In the unlikely event that human remains are encountered during ground disturbance activities, the proper authorities would be notified, and standard procedures for the respectful handling of human remains would be adhered to. To ensure proper treatment of remains in the event of an unanticipated discovery of a burial, human bone, or suspected human bone, State law requires that all excavation or grading in the vicinity of the find halt immediately. The area of the find is to be protected, and the construction contractor immediately notify the County Coroner of the find. Compliance with State law, including implementation of Regulatory Compliance Measure (RCM) CUL-1 below, would ensure that any potential impacts to unknown buried human remains would be less than significant.

Regulatory Compliance Measure:

RCM CUL-1 **Human Remains.** In the event human remains are encountered, State Health and Safety Code Section 7050.5. states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to State Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be Native American, the County Coroner will notify the Native American Heritage Commission (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 and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The MLD recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials, preservation of Native American human remains and associated items in place, relinquishment of Native American human remains and associated items to the descendants for treatment, or any other culturally appropriate treatment.

4.6 ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in a 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?	☐	☐	☒	☐

4.6.1 Impact Analysis

a. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?

Less Than Significant Impact. The discussion and analysis provided below is based on data included in the CalEEMod output sheets prepared for the proposed project, which is included in Appendix A.

Construction-Period Energy Use. The anticipated construction schedule assumes that the proposed project would be built over approximately 18 months. Construction-specific phases were assessed for their energy consumption under each construction sub-phase: grading, site preparation, building construction, paving, and architectural coating activities.

Construction of the proposed project would require energy for the manufacture and transportation of construction materials, preparation of the site for grading activities, and construction of the wellness center. Petroleum fuels (e.g., diesel and gasoline) would be the primary sources of energy for these activities. Construction activities are not anticipated to result in an inefficient use of energy as gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs on the project. Energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. Therefore, the proposed project would result in a less than significant impact during project construction.

Operational Energy Use. Operational energy usage is typically associated with electricity consumption and fuel used for vehicle trips. The proposed project would include a 345-horsepower diesel generator; however, the diesel generator is only expected to run approximately three days per year. Therefore, use of the diesel generator is not expected to substantially increase diesel fuel usage and is not evaluated further.

Table 4.6.A shows the estimated potential increased electricity, gasoline, and diesel demand associated with the proposed project. The electricity and natural gas rates are from the CalEEMod analysis, while the gasoline and diesel rates are based on the traffic analysis in conjunction with U.S. Department of Transportation (USDOT) fuel efficiency data and USEPA fuel economy estimates for 2023 and the California diesel fuel economy estimates for 2025.

Table 4.6.A: Estimated Annual Energy Use of Proposed Project

	Electricity Use (kWh per year)	Natural Gas Use (kBTU per year)	Gasoline (gallons per year)	Diesel (gallons per year)
Proposed Project	8,359,683	0	269,958	174,380

Source: Compiled by LSA (June 2025).
kBTU = thousand British thermal units
kWh = kilowatt hours

As shown in Table 4.6.A, the estimated increase in electricity demand associated with the operation of the proposed project would be 8,359,683 kWh per year. Total electricity consumption in San Joaquin County in 2022 was 5,771,280,050 kWh;[10] therefore, operation of the proposed project would negligibly increase the annual electricity consumption in San Joaquin County by approximately 0.1 percent. In addition, the project would result in energy usage associated with motor vehicle gasoline to fuel project-related trips. As shown above in Table 4.6.A, the proposed project would result in the consumption of 269,958 gallons of gasoline and 174,380 gallons of diesel per year. Based on fuel consumption obtained from CARB's EMFAC2021 emissions model, approximately 269.5 million gallons of gasoline and approximately 96.9 million gallons of diesel will be consumed from vehicle trips in San Joaquin County in 2027. Therefore, vehicle trips associated with the proposed project would increase the annual fuel use in San Joaquin by approximately 0.1 percent for gasoline fuel usage and approximately 0.2 percent for diesel fuel usage. The proposed project would result in fuel usage that is a small fraction of current annual fuel use in San Joaquin County, and fuel consumption associated with vehicle trips generated by project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. Therefore, gasoline demand generated by vehicle trips associated with the proposed project would be a minimal fraction of gasoline and diesel fuel consumption in California.

Electrical demand associated with project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. Furthermore, the proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. The project would be required to adhere to all federal, State, and local requirements for energy efficiency, including the Title 24 standards. Furthermore, the proposed project would be constructed using energy efficient modern building materials and construction practices, and the proposed project also would use new modern appliances and equipment, in accordance with the Appliance Efficiency Regulations (Title 20, CCR Sections 1601 through 1608). The expected energy consumption during construction and operation of the proposed project would be consistent with typical usage rates for residential uses; however, energy consumption is largely a function of personal choice and the physical structure and layout of buildings. As such, the proposed project would not result in a potential significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.

Therefore, the proposed project would result in a less than significant impact during project operation. As such, the proposed project would not result in a potential significant impact due to

[10] CEC. 2022. Electricity Consumption by County. <http://www.ecdms.energy.ca.gov/elecbycounty.aspx> (accessed June 2025).

wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Impacts would be less than significant, and no mitigation is required.

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

Less Than Significant Impact. In 2002, the Legislature passed Senate Bill 1389, which required the California Energy Commission (CEC) to develop an integrated energy plan every two years for electricity, natural gas, and transportation fuels for the California Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero emission vehicles and their infrastructure needs, and encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.

The CEC recently adopted the 2024 Integrated Energy Policy Report.[11] The 2024 Integrated Energy Policy Report provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining energy reliability and controlling costs. The 2024 Integrated Energy Policy Report covers a broad range of topics, including decarbonizing buildings, integrating renewables, energy efficiency, energy equity, integrating renewable energy, updates on Southern California electricity reliability, climate adaptation activities for the energy sector, natural gas assessment, transportation energy demand forecasts, and the California Energy Demand Forecast.

As indicated above, energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. In addition, energy usage associated with operation of the proposed project would be relatively small in comparison to the region's available energy sources, and energy impacts would be negligible at the regional level. Because California's energy conservation planning actions are conducted at a regional level, and because the project's total impact on regional energy supplies would be minor, the proposed project would not conflict with or obstruct California's energy conservation plans as described in the CEC's 2024 Integrated Energy Policy Report. Therefore, the proposed project would not lead to new or substantially more severe energy impacts. Impacts would be less than significant, and no mitigation is required.

[11] CEC. 2024. *2024 Integrated Energy Policy Report*. California Energy Commission. Docket Number: 24-IEPR-01.

4.7 GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

The analysis presented in this section is based upon the *Preliminary Geotechnical Report, Proposed Health Plan of San Joaquin – BeWell* (Preliminary Geotechnical Report) prepared for the proposed project by Siegfried in November of 2023. The Preliminary Geotechnical Report is included within this IS/MND as Appendix D.

4.7.1 Impact Analysis

a. Would the project 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.

Less Than Significant Impact. The California Geological Survey (CGS), a division of the DOC, has published an inventory of maps delineating seismic and geologic hazards within California.

According to the CGS Earthquake Zones of Required Investigation map,[12] the project site is not located within a State-designated Earthquake Fault (Alquist Priolo) Zone. Because no known active or potentially active faults are located within the vicinity of the project site, potential impacts associated with the rupture of a known earthquake fault would be less than significant, and no mitigation is required.

ii. Strong seismic ground shaking?

Less Than Significant with Mitigation Incorporated. According to the Preliminary Geotechnical Report prepared for the proposed project (see Appendix D) the project site is located within a low to moderate seismic region of California, and most active faults within the region are located within the San Francisco Bay Area more than 30 miles away. The United States Geological Survey (USGS) maintains a list of earthquake faults that could potentially result in ground shaking at the project site, based on factors such as distance from the project site, direction from the project site, and the magnitude that each earthquake could generate. Based on mean values from this list, an earthquake with the potential to result in ground shaking at the project site has a mean magnitude of 6.24 and would occur at a radius of 12.9 miles west of the project site.

The proposed project would be subject to all applicable provisions of the 2022 California Building Code (CBC)(Cal. Code Regs, Title 24, Part 2), which would increase the stability of the proposed structures and their ability to withstand potential occurrences of strong seismic ground shaking. In addition to compliance with the 2022 CBC, the Preliminary Geotechnical Report also provides seismic design parameters recommended for the proposed project based on its seismic characteristics, which would be further refined during preparation of the Final Geotechnical Report. With adherence to the 2022 CBC and the recommendations provided in the Final Geotechnical Report, as summarized below in Mitigation Measure (MM) GEO-1, the proposed project would not result in any substantial adverse effects related to strong seismic ground shaking. Impacts would be less than significant with incorporation of MM GEO-1.

Mitigation Measure:

MM GEO-1 **Compliance with Recommendations in the Final Geotechnical Report.** Prior to issuance of demolition or grading permits, the Project Applicant shall submit a Final Geotechnical Report prepared for the project site to the San Joaquin County (County) Community Development Director, or designee, for review and approval. All grading operations and construction shall be conducted in conformance with the recommendations included in the Final Geotechnical Report. Grading plan review shall be conducted by the County Community Development Director, or designee, prior to the start of grading to verify that requirements specified in the Final Geotechnical Report have been appropriately incorporated into final project design. Design, grading, and construction shall be performed in accordance with the

[12] California Department of Conservation (DOC) Earthquake Zones of Required Investigation. 2022. <https://maps.conservation.ca.gov/cgs/EQZApp/> (Accessed October 1, 2024).

requirements of the 2022 California Building Code (CBC) applicable at the time of grading, appropriate local grading regulations, and the recommendations of the geotechnical consultant as summarized in the Final Geotechnical Report for the project.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is caused by sudden temporary increases in pore water pressure due to seismic densification or other displacement of submerged granular soils. Layers of loose sand and sandy silt may, therefore, be subject to liquefaction if these materials are or were to become submerged and are also exposed to strong seismic ground shaking. Seismic ground shaking of relatively loose granular soils that are saturated or submerged can cause the soils to liquefy and temporarily behave as a dense fluid. This loss of support can produce local ground failure such as settlement or lateral spreading that may damage overlying improvements. Liquefaction commonly occurs when three conditions are present simultaneously: (1) high groundwater; (2) relatively loose, cohesion-lacking (sandy) soil; and (3) earthquake-generated seismic waves.

According to the results of borings conducted during preparation of the Preliminary Geotechnical Report, groundwater was encountered beneath the project site at depths of about 24 feet below ground surface (bgs). Potentially liquefiable soils consisting of loose silty sand layer were encountered at a depth of approximately 45 feet bgs. However, medium still to hard cohesive soils, medium dense silty sand, and poorly graded sand, which are generally not susceptible to liquefaction, were encountered above this layer. Further, it should be noted that excavation activities associated with the proposed project are anticipated to reach a maximum depth of 10 feet bgs, substantially more shallow than the location of the potentially liquefiable soils. Because the potentially liquefiable soils are located beneath a substantial layer of non-liquefiable soils, the Preliminary Geotechnical Report considers the risk of liquefaction within the project site to be negligible. Therefore, potential impacts related to seismic-related ground failure would be less than significant, and no mitigation is required.

iv. Landslides?

No Impact. Landslides and mudslides include the movement of soils, rocks, and other man-made or natural materials downslope, which can be caused by an earthquake or heavy rainfall. Landslides are most common where slopes are steep, soils are weak, and groundwater is present. Seismically induced landslides and other slope failures are common occurrences during or soon after earthquakes in areas with significant ground slopes.

While the project site is not located within an area that has been mapped by the CGS for landslide susceptibility, this susceptibility can also be inferred based on the project site's physical characteristics. According to the Preliminary Geotechnical Report, because the project site is relatively level and no substantial slopes are present within the site, the risk of landslide is considered negligible. There would be no impacts and no mitigation is required.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Soil erosion or loss of topsoil would be of primary concern during the construction phase of the proposed project. During construction activities such as grading, soils could be temporarily exposed to potential short-term erosion by wind and water. However, potential soil erosion can be addressed through the implementation of standard construction erosion control practices pursuant to the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. Specifically, potential erosion and loss of topsoil during construction of the proposed project would be managed through the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

The project site currently consists of undeveloped land with natural brush and vegetation. Therefore, once operational, the proposed project would result in an increase in impervious surface area within the project site. However, this increase would not substantially increase the volume of runoff from the project site when compared to existing conditions. Ground surfaces within the project site would be sloped away from proposed building pads and paved areas toward runoff inlets or drainage devices in order to guide runoff in a manner that minimizes moisture intrusion into soils below the proposed development.

In addition, the proposed project's design includes landscaped pervious areas intended to capture stormwater runoff. Incorporation of RCMs HYD-1 through RCM HYD-4, discussed further in Section 4.10, Hydrology and Water Quality, would minimize the volume of stormwater runoff within the project site that could potentially contribute to erosion and the loss of topsoil. Therefore, direct and indirect impacts of the proposed project related to erosion and loss of topsoil would be less than significant, and no mitigation is required.

c. Would the project 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 landslides, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant with Mitigation Incorporated. According to the Preliminary Geotechnical Report, soils underlying the project site have been mapped by the Soil Survey of San Joaquin County, California (Soil Survey). According to this Soil Survey, the western portion of the project site is underlain by Manteca fine sandy loam, while the eastern portion of the project site is mapped as Veritas fine sandy loam. Both soil types are considered moderately well drained, with a very low capacity to transmit water. No weak, soft, or compressible soils were encountered in borings conducted as part of the Preliminary Geotechnical Report.

Landslides. As previously discussed in Response 4.7.1(a)(iv), because the project site is located in a relatively flat area with no significant slopes nearby, landslides or other forms of natural slope instability do not represent a significant hazard to the project site. As such, the risk of on- or off-site landslides under the proposed project would be less than significant, and no mitigation is required.

Lateral Spreading. Lateral spreading often occurs on very gentle slopes or flat terrain. The dominant mode of movement is lateral extension accompanied by shear or tensile fracture. This

failure is caused by liquefaction and is usually triggered by rapid ground motion, such as that experienced during an earthquake, but can also be artificially induced. When coherent material, either bedrock or soil, rests on materials that liquefy, the upper units may undergo fracturing and extension and may then subside, translate, rotate, disintegrate, or liquefy and flow.

As previously discussed in Response 4.7.1(a)(iii), the risk of liquefaction on the project site is considered negligible. Nevertheless, the proposed project would be required to comply with all applicable provisions of the 2022 CBC and the seismic design considerations provided in a Final Geotechnical Report, as stated in MM GEO-1. The incorporation of MM GEO-1 into the proposed project would increase the stability of the proposed structures and their ability to withstand potential instances of lateral spreading. Accordingly, the risk of lateral spreading under the proposed project would be less than significant with incorporation of MM GEO-1.

Subsidence. Subsidence refers to broad-scale changes in the elevation of land. Common causes of land subsidence are pumping water, oil, and gas from underground reservoirs; dissolution of limestone aquifers (sinkholes); collapse of underground mines; drainage of organic soils; and initial wetting of dry soils (hydro compaction). Subsidence is also caused by heavy loads generated by large earthmoving equipment. The project site is not located within an area of known subsidence that may be associated with groundwater, peat loss, or oil extraction. As such, the risk of subsidence under the proposed project would be less than significant, and no mitigation is required.

Liquefaction. As previously discussed, because the potentially liquefiable soils underlying the project site are located beneath a substantial layer of non-liquefiable soils, the Preliminary Geotechnical Report considers the risk of liquefaction within the project site to be negligible. Accordingly, the risk of liquefaction under the proposed project would be less than significant, and no mitigation is required.

Collapse. According to the Preliminary Geotechnical Report, hydrocollapse occurs when loose, dry, sandy soils become saturated and settle. These soil types are typically located in arid climates where wind and temperature have the greatest impact, including Southern California and high desert areas. The project site is located in Northern California and is not located in a high desert area. Furthermore, loose, granular soils have not been encountered on the project site. Accordingly, the risk of collapse under the proposed project would be less than significant, and no mitigation is required.

In summary, with implementation of MM GEO-1, the potential impacts of the proposed project related to unstable soils or geologic units that could result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse would be reduced to a less than significant level.

d. Would the project 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?

Less Than Significant with Mitigation Incorporated. Expansive soils are characterized by their ability to undergo substantial volume changes (shrink or swell) due to variations in moisture content as a result of precipitation, landscape irrigation, utility leakage, roof drainage, perched groundwater,

drought, or other factors. Expansive soils contain types of clay minerals that occupy considerably more volume when they are wet or hydrated than when they are dry or dehydrated. Volume changes associated with changes in the moisture content of near-surface expansive soils can cause uplift or heave of the ground when they become wet or, less commonly, cause settlement when they dry out.

Expansive soils are defined as having a Plasticity Index (PI) of 15 or greater, and an Expansion Index (EI) of greater than 20. As noted in the Preliminary Geotechnical Report prepared for the proposed project, soils discovered near the surface of the project site were determined to have a PI of less than 15, which indicates a low potential for expansion. As such, the Preliminary Geotechnical Report determined that risks associated with expansive soils within the project site would be negligible. However, in the unlikely event that expansive soils are encountered during grading activities associated with project construction, the Preliminary Geotechnical Report identifies moisture conditioning and compaction requirements that the project shall adhere to. With the low likelihood of encountering expansive soils within the project site and the project's adherence to moisture conditioning and compaction requirements identified in the Final Geotechnical Report pursuant to MM GEO-1, potential impacts of the proposed project with respect to expansive soils would be less than significant.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The proposed project would not use septic tanks or alternative methods for wastewater disposal. Rather, the proposed project would be serviced by an 8-inch sanitary sewer main that would connect to an onsite holding tank and pump station in the southwestern corner of the project site. The pump station would connect to a 4-inch force main that would run west from the project site beneath West Hospital Road to Manthey Road, south to Mathews Road, west along Mathews Road, then north along Freedom Road to connect to the existing County sewer system. The wastewater disposal needs of the proposed project would be served by the existing public sewer system, and no septic tanks are proposed. Therefore, the project would not result in any impacts related to septic tanks or alternative wastewater disposal methods, and no mitigation is required.

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

Less Than Significant with Mitigation Incorporated. As previously stated, the project site currently consists of undeveloped land occupied by natural brush and vegetation. Borings conducted during preparation of the Preliminary Geotechnical Report revealed undocumented, disturbed fill soils within the project site, reaching a depth of approximately 1 to 2.5 feet bgs. Beneath the undocumented fills, the bores encountered native soils comprised of medium dense to dense silty sand, poorly graded sand, very stiff to hard silt and sandy silt, and very stiff to hard sandy lean clay. Excavation activities associated with the proposed project are anticipated to reach depths greater than 2.5 feet bgs. Accordingly, excavation activities associated with the proposed project are anticipated to extend into native soils.

According to the Final Environmental Impact Report (EIR) prepared by SJCOG for its 2022 RTP/SCS, the SJCOG region, which includes the project site, contains areas of high paleontological sensitivity,

meaning that the geological units underlying these areas have the potential to produce scientifically significant fossils.[13] The geologic unit containing the project site is generally underlain by Pleistocene-Holocene marine and nonmarine (continental) sedimentary rocks.[14] Sediment found within this geologic unit is typically too young (approximately 5,000 years or less) to preserve paleontologically significant resources and are overall anticipated to have a low paleontological sensitivity at ground surface, which increases with depth.

Although the paleontological sensitivity of the geologic unit underlying the project site is considered low, the potential still exists for excavation activities associated with the proposed project to encounter paleontological resources. As such, the proposed project would be subject to MM GEO-2, which would require the presence of a paleontological monitor during excavation activities reaching native soils and sets forth procedures to follow in the event of an inadvertent discovery. With adherence to MM GEO-2, paleontological resources would be assessed and/or protected as they are discovered, and impacts to these resources would be less than significant.

Mitigation Measure:

MM GEO-2

Paleontological Resource Monitoring. Prior to issuance of any grading permit, the Project Applicant shall provide written evidence that a qualified paleontologist has been retained to observe excavation activities that may reach native soils and salvage and catalogue paleontological resources, as necessary. The paleontologist shall be present at the pre-grading conference, shall establish procedures for resource surveillance, and shall establish, in cooperation with the Project Applicant, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts as appropriate. If paleontological resources are found to be significant, the paleontologist shall determine appropriate actions, in cooperation with the State Office of Historic Preservation (SHPO) and the County of San Joaquin, for exploration and/or salvage.

The Project Applicant shall obtain approval of the paleontologist's follow-up report from the County. The report shall include the period of inspection, an analysis of any artifacts found, and the present repository of the artifacts. Excavated finds shall be made available for curatorial purposes to the County of San Joaquin, or its designee, on a first refusal basis. These actions, as well as final mitigation and disposition of the resources, shall be subject to the approval of the County.

[13] San Joaquin Council of Governments (SJCOG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Draft Programmatic Environmental Impact Report, August 2022, <https://www.sjcog.org/DocumentCenter/View/7200/48-Geology-and-Soils-Resources?bidId=> (Accessed November 1, 2024).

[14] Ibid.

4.8 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Greenhouse gas emissions (GHGs) are present in the atmosphere naturally, and are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. However, over the last 200 years, human activities have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere, and enhancing the natural greenhouse effect, which is believed to be causing global climate change. The gases that are widely seen as the principal contributors to human-induced global climate change are:

- Carbon dioxide (CO_2)
- Methane (CH_4)
- Nitrous oxide (N_2O)
- Hydrofluorocarbons
- Perfluorocarbons
- Sulfur hexafluoride (SF_6)

Certain gases, such as water vapor, are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

These gases vary considerably in terms of Global Warming Potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. GWP is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and the length of time that the gas remains in the atmosphere ("atmospheric lifetime"). The GWP of each gas is measured relative to CO_2, the most abundant GHG; the definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO_2 over a specified time period. GHG emissions are typically measured in terms of pounds or tons of "CO_2 equivalents" (CO_2e).

The *State CEQA Guidelines* indicate that a project would normally have a significant adverse green-house gas emission impact if the project would:

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

- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reduction the emissions of greenhouse gases.

Section 15064.4 of the *State CEQA Guidelines* states that: "A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project." In performing that analysis, the lead agency has discretion to determine whether to use a model or methodology to quantify GHG emissions, or to rely on a qualitative analysis or performance-based standards. In making a determination as to the significance of potential impacts, the lead agency then considers the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting, whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project, and the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. In addition, section 15064.7(c) of the CEQA Guidelines specifies that "when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." Neither San Joaquin County nor the SJVAPCD has developed or adopted numeric GHG significance thresholds. Therefore, in the absence of any County or SJVAPCD specific guidelines or thresholds, this analysis evaluates the proposed project for consistency with the Bay Area Air Quality Management District (BAAQMD) *Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans* (Justification Report).[15] As such, since the BAAQMD's GHG thresholds are based on the State's GHG reduction goals, these thresholds would be applicable to the proposed project.

In April 2022, the BAAQMD adopted the Justification Report,[16] which identifies applicable GHG significance thresholds. These thresholds establish whether a project would be consistent with California's efforts to meet long-term climate goals of achieving carbon neutrality by 2045. If a project is designed and built to incorporate design elements related to natural gas, energy, VMT, and EVs, then it would contribute its portion of what is necessary to achieve California's long-term climate goals—its "fair share"—and an agency reviewing the project under CEQA can conclude that the project would not make a cumulatively considerable contribution to global climate change.

The Justification Report provides substantial evidence supporting the use of their thresholds for projects throughout California because the thresholds are applicable to meeting the State's goal. This analysis evaluates the proposed project for consistency with the identified project design elements as the applicable thresholds of significance to establish if the proposed project is achieving

[15] Bay Area Air Quality Management District (BAAQMD). 2022. *Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*. April 2022.

[16] Ibid.

its "fair share" of emission reductions to support long term State goals for GHG emissions and carbon neutrality.

According to the Justification Report, a project would have a less than significant impact related to GHG emissions if it would include the following project design elements:

1. Buildings

    a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).

    b. The project will not result in any wasteful, inefficient, or unnecessary electrical usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.

2. Transportation

    a. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:

        1) Residential projects: 15 percent below the existing VMT per capita
        2) Office projects: 15 percent below the existing VMT per employee
        3) Retail projects: no net increase in existing VMT

    b. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

These project design elements are utilized in the following analysis as the thresholds of significance to evaluate the project's potential GHG emissions impact, given the absence of County or SJVAPCD specified thresholds. The proposed project is also evaluated for consistency with AB 1279, the CARB 2022 Scoping Plan, and SJCOG 2022 RTP/SCS.

4.8.1 Impact Analysis

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. The following includes a discussion of the project's potential impact related to the release of GHG emissions for both construction and project operation.

Construction Emissions. Construction activities associated with the proposed project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of

fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

San Joaquin County does not have an adopted threshold of significance for construction related GHG emissions. As mentioned above, emissions that would occur during construction were quantified and are disclosed for informational purposes. Using CalEEMod, it is estimated that construction of the proposed project would generate approximately 1,009.3 metric tons of CO_2e. Construction GHG emissions were amortized over the life of the project (assumed to be 30 years) and added to the operational emissions. When annualized over the life of the project, amortized construction emissions would be approximately 33.6 MT CO_2e per year. Details are provided in the CalEEMod output sheets provided in Appendix A.

Even though San Joaquin County does not have adopted GHG emission thresholds, the emission results would be temporary in nature and would only occur for the duration of construction. In addition, as described in Section 4.3, Air Quality, the proposed project would be required to implement RCM AIR-1, which would ensure that the proposed project complies with SJVAPCD Regulation VIII (Fugitive PM_{10} Prohibitions). With implementation of RCM AIR-1, construction emissions would be further reduced to the extent feasible. Therefore, impacts would be less than significant, and no mitigation is required.

Operational GHG Emissions. Long-term GHG emissions are typically generated from mobile sources (e.g., cars, trucks, and buses), area sources (e.g., maintenance activities and landscaping), stationary sources (e.g., backup diesel generator), indirect emissions from sources associated with energy consumption, waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). Mobile-source GHG emissions would include project-generated vehicle trips to and from the project site. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site. Energy source emissions would be generated at off-site utility providers as a result of increased electricity demand generated by the project. Waste source emissions generated by the proposed project include energy generated by land filling and other methods of disposal related to transporting and managing project-generated waste. In addition, water source emissions associated with the proposed project are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment. The SJVAPCD has not established a numeric threshold for GHG emissions. As such, emission estimates for operation of the proposed project are quantified and disclosed for informational purposes. As shown in Table 4.8.A, the proposed project would generate approximately 4,644.0 metric tons of CO_2e annually. Mobile source emissions are the largest category, at approximately 61 percent of total CO_2e emissions, followed by energy source emissions at approximately 17 percent of the total, waste source emissions at approximately 20 percent of the total, water source emissions at 1 percent of the total emissions, and area and stationary source emissions at less than 1 percent of the total. CalEEMod output sheets are included in Appendix A.

Table 4.8.A: Operational Greenhouse Gas Emissions

Emissions Category	Operational Emissions (Metric Tons per Year)				
	CO_2	CH_4	N_2O	CO_2e	Percent of Total
Mobile Source	2,786.9	0.1	0.1	2,833.7	61
Area Source	6.1	<0.1	<0.1	6.1	<1
Energy Source	773.5	0.1	<0.1	781.1	17
Water Source	22.2	1.2	<0.1	59.7	1
Waste Source	263.0	26.3	0.0	920.1	20.0
Stationary Sources	9.7	<0.1	<0.1	9.7	<1
Total Operational Emissions				**4,610.4**	**100.0**
Amortized Construction Emissions				33.6	
Total Annual Emissions				**4,644.0**	

Source: Compiled by LSA (June 2025).
Note = Some values may not appear to add up correctly due to rounding.
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
N_2O = nitrous oxide

As discussed above, Section 15064.7(c) of the CEQA Guidelines specifies that "when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." Neither San Joaquin County or the SJVAPCD has developed or adopted numeric GHG significance thresholds. In the absence of any County or SJVAPCD specific guidelines or thresholds, this analysis evaluates the proposed project for consistency with the BAAQMD Justification Report,[17] which identifies project design elements as the applicable thresholds of significance. If a project is designed and built to incorporate design elements related to natural gas, energy, VMT, and EVs, then it would contribute its portion of what is necessary to achieve California's long-term climate goals—its "fair share"—and an agency reviewing the project under CEQA can conclude that the project would not make a cumulatively considerable contribution to global climate change.

Per the significance thresholds described above, a less than significant GHG impact would occur if the project were consistent with the identified design standards.

Natural Gas Usage. The proposed project would not include the use of natural gas for project related operations**.** According to the Justification Report, a less than significant GHG impact would occur if the project does not include natural gas appliances or natural gas plumbing. Therefore, the proposed project would be consistent with this design element. **Energy Usage.** Under this design criterion, the project must not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the *State CEQA Guidelines*. Energy consumption was estimated for the project using default energy intensities by land use type in the CalEEMod output sheets, included in Appendix A.As discussed in Section 4.6, Energy, the estimated increase in electricity demand associated with the operation of the proposed project would be

[17] BAAQMD. 2022. *Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*. April.

8,359,683 kWh per year. Total electricity consumption in San Joaquin County in 2022 was 5,771,280,050 kWh;[18] therefore, operation of the proposed project would negligibly increase the annual electricity consumption in San Joaquin County by approximately 0.1 percent.

The proposed project would be constructed to current Title 24 standards, which would require energy saving building features. As such, based on this analysis, as required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State *CEQA Guidelines*, the proposed project would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy and would incorporate renewable energy and energy efficiency measures into the building design and equipment use.

The proposed project would result in energy usage associated with gasoline to fuel project-related trips. As discussed in Section 4.6, Energy, the proposed project would result in the consumption of 269,958 gallons of gasoline and 174,380 gallons of diesel per year. Based on fuel consumption obtained from EMFAC2021, approximately 269.5 million gallons of gasoline and approximately 96.9 million gallons of diesel will be consumed from vehicle trips in San Joaquin County in 2027. Therefore, vehicle trips associated with the proposed project would increase the annual fuel use in San Joaquin County by approximately 0.1 percent for gasoline fuel usage and approximately 0.2 percent for diesel fuel usage. Therefore, fuel consumption associated with vehicle trips generated by project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

As such, based on this analysis, as required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the *State CEQA Guidelines*, the proposed project would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy and would incorporate renewable energy and energy efficiency measures into the building design, equipment use, and transportation. As such, the proposed project would be consistent with this design element.

Vehicle Miles Traveled. As discussed above, development that does not result in a net increase in existing VMT would be considered to have a less than significant GHG emissions impact from transportation sources or should meet a locally adopted SB 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's 2018 *Technical Advisory on Evaluating Transportation Impacts in CEQA*. As discussed in Section 4.17, Transportation, the proposed project would have a less than significant VMT impact. As such, the proposed project would be consistent with this design element. Furthermore, the proposed project would provide development in an underused area and would be located near residential homes and commercial uses. In addition, the proposed project would provide extensive outdoor amenities including walking trails, activity areas, a community garden, an area of respite, and other landscaped areas. Therefore, the proposed project would encourage people to use non-motorized modes of transportation by providing appropriate amenities that are local serving while connecting to existing uses. Furthermore, the project site is also located near public bus stops, with bus service provided by San Joaquin Regional Transit District (RTD) Route 510 (within a 0.5-mile radius), which would help reduce VMT and single vehicle use. The proposed project

[18] CEC. 2022b. Electricity Consumption by County. <http://www.ecdms.energy.ca.gov/elecbycounty.aspx> (Accessed June 2025).

would be designed to support alternative modes of transportation by including EV parking spaces. As such, the proposed project is not expected to significantly increase VMT in the vicinity of the project site. Therefore, the proposed project would be consistent with this design element.

Electric Vehicle Requirements. The final project design element that the proposed project should include to ensure that it is achieving its "fair share" of GHG emission reductions is compliance with off-street EV requirements in the most recently adopted version of the CALGreen Code Tier 2 measures. The proposed project would include EV parking spaces, consistent with CALGreen Tier 2 standards. Therefore, the proposed project would be consistent with this design element. The proposed project would be consistent with the project design elements that would achieve California's long-term climate goals and would not generate significant GHG emissions that would have a significant effect on the environment. This impact would be less than significant, and no mitigation is required.

b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact with Mitigation Incorporated. The following discussion evaluates the proposed project consistency with the goals of the 2022 Scoping Plan and the SJCOG 2022 RTP/SCS.

2022 Scoping Plan. EO B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan,[19] to reflect the 2030 target set by EO B-30-15 and codified by SB 32. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. SB 32 builds on AB 32 and keeps the State on the path toward achieving its 2050 objective of reducing emissions to 80 percent below 1990 levels. The companion bill to SB 32, AB 197, provides additional direction to the CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 intended to provide easier public access to air emissions data that are collected by CARB was posted in December 2016.

In addition, the 2022 Scoping Plan assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality set by AB 1279 no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

The 2022 Scoping Plan focuses on building clean energy production and distribution infrastructure for a carbon-neutral future, including transitioning existing energy production and transmission infrastructure to produce zero-carbon electricity and hydrogen, and utilizing biogas resulting from wildfire management or landfill and dairy operations, among other substitutes. The 2022 Scoping Plan states that in almost all sectors, electrification will play an important role. The 2022 Scoping Plan evaluates clean energy and technology options and the transition away

[19] California Air Resources Board (CARB). 2017. *California's 2017 Climate Change Scoping Plan*. November.

from fossil fuels, including adding four times the solar and wind capacity by 2045 and about 1,700 times the amount of current hydrogen supply. As discussed in the 2022 Scoping Plan, EO N-79-20 requires that all new passenger vehicles sold in California will be zero-emission by 2035, and all other fleets will have transitioned to zero-emissions as fully possible by 2045, which will reduce the percentage of fossil fuel combustion vehicles.

Energy efficient measures are intended to maximize energy efficiency building and appliance standards, pursue additional efficiency efforts including new technologies and new policy and implementation mechanisms, and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. The elimination of natural gas in new development would help projects implement their "fair share" of achieving long-term 2045 carbon neutrality consistent with State goals. As such, if a project does not utilize natural gas, a lead agency can conclude that it would be consistent with achieving the 2045 neutrality goal and will not have a cumulative considerable impact on climate change.[20] The proposed project would not include natural gas usage and therefore would be implementing its "fair share" of achieving long-term 2045 carbon neutrality consistent with State goals. In addition, the proposed project would be required to comply with the latest Title 24 standards, established by the CEC, regarding energy conservation and green building standards. Therefore, with mitigation the proposed project would comply with applicable energy measures.

Water conservation and efficiency measures are intended to continue efficiency programs and use cleaner energy sources to move and treat water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. As noted above, the project would comply with the CALGreen Code, which includes a variety of different measures, including the reduction of wastewater and water use. The proposed project would be required to comply with the California Model Water Efficient Landscape Ordinance. In addition, the proposed project would also include drought tolerant landscape and implement drip irrigation systems. Therefore, the proposed project would not conflict with any of the water conservation and efficiency measures.

The goal of transportation and motor vehicle measures is to develop regional GHG emissions reduction targets for passenger vehicles. Specific regional emission targets for transportation emissions would not directly apply to the proposed project. As discussed in Section 4.17, Transportation, the proposed project would have a less than significant VMT impact. As described above, the proposed project would provide extensive outdoor amenities that would encourage people to use non-motorized modes of transportation by providing appropriate amenities that are local serving while connecting to existing uses. The project site is also located near public bus stops, with bus service provided by San Joaquin Regional Transit District (RTD) Route 510 (within a 0.5-mile radius), which would help reduce VMT and single vehicle use. Therefore, the proposed

[20] Bay Area Air Quality Management District (BAAQMD). 2022. *Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans.* April. <https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-thresholds-2022/justification-report-pdf.pdf?la=en> (Accessed June 2025).

project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the GHG emissions. This impact would be less than significant.

SJCOG 2022 RTP/SCS. The SJCOG 2022 RTP/SCS[21] reflects transportation planning for San Joaquin County through 2046. The vision, goals, and policies in the 2022 RTP/SCS are intended to serve as the foundation for both short and long-term planning and guide implementation activities. The core vision in the 2022 RTP/SCS is to create a region of diverse, safe, resilient, and accessible transportation options that improve the quality of life for all residents by fostering sustainability, equity, a vibrant economy, clean air, and healthy communities. The 2022 RTP/SCS contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as forecast development that is generally consistent with regional-level general plan data. The actions in the 2022 RTP/SCS address all transportation modes (e.g., highways, local streets and roads, mass transportation, rail, bicycle, and aviation facilities and services) and consists of short and long-term activities that address regional transportation needs. While the actions are organized by the five key policy areas, many of them support multiple goals and policies. Some actions are intended to support the SCS and reduce GHG emissions directly, while others are focused on the RTP's broader goals. The 2022 RTP/SCS does not require that local General Plans, Specific Plans, or zoning be consistent with the 2022 RTP/SCS, but provides incentives for consistency for governments and developers.

The proposed project would not interfere with the SJCOG's ability to achieve the region's GHG reductions. Furthermore, the proposed project is not regionally significant per *State CEQA Guidelines* Section 15206, and it would not conflict with the 2022 RTP/SCS targets because those targets were established and are applicable on a regional level. The proposed project would develop the project site with the SJ BeWell Campus. The SJ BeWell Campus would provide behavioral health and wellness care, including outpatient, urgent care, and residential treatment services for a combined total of approximately 354,400 square feet of building area. As such, the proposed project land uses would be consistent with the growth assumptions used in the 2022 RTP/SCS. Therefore, it is anticipated that implementation of the proposed project would not interfere with the SJCOG's ability to implement the regional strategies outlined in the 2022 RTP/SCS. The proposed project would comply with existing State regulations adopted to achieve the overall GHG emissions reduction goals and would be consistent with applicable plans and programs designed to reduce GHG emissions. Therefore, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and any impact would be less than significant.

[21] San Joaquin Council of Governments. 2022. *2022 Regional Transportation Plan and Sustainable Communities Strategy.* August 25. <https://www.sjcog.org/608/Adopted-2022-RTPSCS-Plan> (Accessed June 2025).

4.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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?	☐	☐	☐	☒

The analysis presented in this section is based upon the Phase I Environmental Site Assessment (ESA) prepared for the proposed project by Kimley-Horn and Associates, Inc. in August of 2024. The Phase I ESA was performed in general accordance with (1) the USEPA Standards and Practices for All Appropriate Inquiries (AAI), 40 CFR Part 312 and (2) guidelines established by the American Society for Testing and Materials (ASTM) in the Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process/Designation E 1527-21 (ASTM Standard Practice E 1527-21). The Phase I ESA is included within this IS/MND as Appendix E.

4.9.1 Impact Analysis

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Hazardous materials are chemicals that could potentially cause harm during an accidental release or mishap, and are defined as being toxic, corrosive, flammable,

reactive, and an irritant or strong sensitizer.[22] Hazardous substances include all chemicals regulated under the USDOT's "hazardous materials" regulations and the USEPA's "hazardous waste" regulations. Hazardous wastes require special handling and disposal because of their potential to damage public health and the environment. The probable frequency and severity of consequences from the routine transport, use, or disposal of hazardous materials are affected by the type of substance, the quantity used or managed, and the nature of the activities and operations.

Construction activities associated with the proposed project would use a limited amount of hazardous and flammable substances/oils during heavy equipment operation for site excavation, grading, and construction. The amount of hazardous chemicals present during construction is limited and would comply with existing government regulations. The potential for the release of hazardous materials during project construction is low, and even if a release were to occur, it would not result in a significant hazard to the public, surrounding land uses, or environment due to the small quantities of these materials associated with construction activities.

The proposed project involves the construction various buildings and facilities to provide behavioral health and wellness care services, including but not limited to outpatient, urgent care, and residential treatment services. No manufacturing, industrial, or other uses utilizing large amounts of hazardous materials would occur within the project site. The proposed land uses typically do not present an operational hazard associated with the accidental release of hazardous substances into the environment because these uses are not anticipated to use, store, dispose of, or transport large volumes of hazardous materials. Project operation would involve the use of potentially hazardous materials (e.g., solvents, cleaning agents, paints, fertilizers, and pesticides) typical of the proposed land uses that, when used correctly and in compliance with existing laws and regulations, would not result in a significant hazard to people in the vicinity of the proposed project.

In addition, long-term operational activities typical of the proposed medical facilities are likely to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, radiologicals, pesticides, sterilants, and disinfectants, and the handling of discarded needles. Such materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Local regulations would include those set forth by the San Joaquin County Environmental Health Department (EHD), which would require the project Applicant to complete a Medical Waste Generator Information Packet to satisfaction of the EHD. In the event that more than 200 pounds of medical waste would be generated within the project site every month, a permit from the EHD would be required. Further, all hazardous materials to be stored or used on site must be reported to the California Environmental Reporting System (CERS). As such, the volume of hazardous waste generated within the project site would be monitored by relevant agencies to ensure that it remains at levels below what would constitute a significant risk to the public or the environment.

[22] A "sensitizer" is a chemical that can cause a substantial proportion of people or animals to develop an allergic reaction in normal tissue after repeated exposure to a chemical (United States Department of Labor 2017).

Given that the proposed project would not generate substantial qualities of hazardous waste and would comply with all applicable hazardous waste regulations and standards, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant, and no mitigation is required.

b. Would the project 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?

Less Than Significant with Mitigation Incorporated. During preparation of the Phase I ESA, research and interviews regarding previous land uses on the project site were conducted, and did not indicate any historical land uses that have involved the presence of large volumes of hazardous materials. Preparation of the Phase I ESA also involved a reconnaissance survey of the project site in order to determine the presence of hazardous materials under existing conditions that could result in potential release of hazardous materials into the environment upon development of the proposed project. The site survey did not uncover evidence of any prior or potential future chemical releases. However, it was observed during the reconnaissance survey that multiple stockpiles of gravel, concrete, and sand of undetermined origins are present on the project site. Due to the undetermined nature of these materials, the Phase I ESA recommends the testing and proper disposal of these materials prior to development of the proposed project (see MM HAZ-1). Implementation of MM HAZ-1 would ensure that the development of the proposed project would not create a significant hazard to the public or the environment through the release of previously unidentified hazardous materials.

The Phase I ESA also included an evaluation of potentially harmful vapors within the project site. Specifically, a Tier 1 Vapor Encroachment Screening (VES) was performed to determine the presence of a Vapor Encroachment Condition (VEC), or vapors containing contaminants of concern underlying the project site with the potential to cause soil and/or groundwater contamination. The VES ultimately concluded that while a VEC could not be comprehensively ruled out, one was unlikely to exist, and therefore is not considered a significant risk to the proposed project.

During construction, the proposed project would comply with existing regulations and implementation of the SWPPP pursuant to RCM HYD-1 (see Section 4.10, Hydrology and Water Quality), which would reduce the potential for the release of hazardous materials during construction of the proposed project. Regardless, if a hazardous release were to occur, it would not be anticipated to result in a significant hazard to the public, surrounding land uses, or environment as the quantities of these materials associated with construction activities would be small.

As stated above in Response 4.9.1(a), operations of the proposed project would use limited amounts of hazardous substances associated with the proposed institutional land uses, the potential release of which would not create a significant hazard to the public or the environment. Based on this, and the information presented above, the proposed project would not 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. Impacts would be less than significant with incorporation of Mitigation Measure (MM) HAZ-1.

Mitigation Measure:

MM HAZ-1 **Compliance With Recommendations in the Phase I Environmental Site Assessment.** Prior to the issuance of demolition or grading permits, the project Applicant shall arrange for testing of the existing stockpiles of gravel, concrete and soil within the project site in accordance with ASTM standards and shall submit the results of this testing to the Director of the San Joaquin County (County) Environmental Health Department (EHD), or designee, for review and approval. After receiving approval from the County EHD Director, or designee, the project Applicant shall dispose of the stockpiled materials in a manner consistent with applicable regulations.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. There are no schools located within 0.25 mile of the project site. The nearest school to the project site is French Camp School, an elementary school located approximately 0.34 mile east of the project site.

As noted in Response 4.9.1(a), the proposed project is not anticipated to release hazardous emissions or handle hazardous or acutely hazardous materials, substances, or wastes in significant quantities. Construction activities associated with the proposed project would use a limited amount of hazardous and flammable substances/oils during heavy equipment operation for site excavation, grading, and construction. The amount of hazardous chemicals present during construction is limited and would comply with existing government regulations. The proposed facilities would not require the use, storage, disposal, or transport of large volumes of hazardous materials that could cause serious environmental damage in the event of an accident. Although hazardous substances would be present and utilized at these facilities to some degree, the quantity of these substances would not reach levels of concern to nearby schools and would be handled in accordance with all applicable regulations. Therefore, impacts related to hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or wastes within 0.25 mile of an existing or proposed school would be less than significant, and no mitigation is required.

d. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant Impact. Government Code Section 65962.5 (also known as the Cortese List), requires the California Department of Toxic Substances Control (DTSC) to compile and update annually a list of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code and to submit this list to the Secretary for Environmental Protection.

Preparation of the Phase I ESA included a review of various federal and state/tribal regulatory databases, including those compiled pursuant to Government Code Section 65962.5. The Phase I ESA does not identify the project site as being listed as a site of concern in any of the relevant

databases. Properties adjacent to or in the vicinity of the project site were also considered within the records search on the basis of their potential to present an environmental risk to the project site.

A recognized environmental condition (REC) is defined by the ASTM as the presence or likely presence of hazardous substances or petroleum products in, on, or at a property. Similarly, controlled RECs (CRECs) and historical RECs (HRECs) pertain to environmental conditions that have been appropriately remediated and do not pose a present risk.

The search of Cortese List resources, as well as additional databases, did not reveal the presence of RECs, CRECs, or HRECs at either the project site or any properties within the project site vicinity. As such, development of the project site would not create a significant hazard to the public or the environment, and impacts would be less than significant. No mitigation is required.

e. Would the project be located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Less Than Significant Impact. The proposed project is located within the Airport Influence Area (AIA) of Stockton Metropolitan Airport (SCK or Airport), as delineated in the Airport Land Use Commission's (ALUC's) 2018 Airport Land Use Compatibility Plan Update (ALUCP) for the Airport. SCK is a domestic, commercial service airport, located approximately 1.7 miles east of the project site. The project site is located in Zones 7a and 7b as identified in the ALUCP. In addition, the project site is located beneath the 14 Code of Federal Regulations (CFR) Part 77 horizontal and conical imaginary airspace surfaces for the Airport. The safety compatibility criteria for areas within Zones 7a and 7b place no limits on residential dwelling units, limits maximum non-residential intensity of use to 450 persons per acre, and requires 10 percent of the parcel remain open space. The proposed project is consistent with these requirements. In addition, land uses prohibited in Zones 7a and 7b are limited to hazards to flight (i.e., physical [e.g., tall objects], visual, and electronic forms of interference with the safety of aircraft operations, or wildlife hazard attractants), new dumps and landfills, and outdoor stadiums. Airspace review in Zones 7a and 7b is generally limited to objects greater than 100 feet tall. Finally, the proposed project is located outside the CNEL noise contours for the Airport as identified in the ALUCP (see Response to 4.13.c). Accordingly, the proposed project would not exceed the noise and safety criteria established in the ALUCP would not result in a safety hazard or excessive noise for people residing or working in the project area. Regardless, the proposed project would be submitted to the ALUC for a consistency determination before final review. Accordingly, this impact would be less than significant, and no mitigation is required.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The County of San Joaquin developed an EOP[23] in February of 2022 in order to establish a blueprint for emergency planning and management. According to the EOP, I-5,

[23] San Joaquin County Emergency Operations Plan, 2022, <https://www.sjgov.org/department/oes/emergency-plans> (Accessed November 4, 2024).

which is directly adjacent to the western project site boundary, would be highly utilized as a regional evacuation route in the event of an emergency. However, it should be noted that evacuation routes for emergency situations are contingent upon the scale and location of each emergency and could change depending on the direction of evacuation required by the situation. Furthermore, the proposed project would not result in any direct impacts to I-5 that could interfere with potential emergency operations.

Project site access would be provided via one driveway along South El Dorado Street and one driveway along West Hospital Road. As discussed in Section 4.17, Transportation, all equipment and vehicles associated with construction of the proposed project would be staged within the project site in order to avoid major operational disruptions along nearby transportation corridors, and therefore would not interfere with emergency operations during the construction period. Further, the proposed project would generally not result in any significant impacts to study intersection operations under existing or future (2040) conditions. In the few instances where the proposed project could result in a new deficiency or exacerbate an existing deficiency, potential impacts would be addressed through the proposed project's payment of both Traffic Impact Mitigation Fee (TIMF) and the Regional Transportation Impact Fee (RTIF) program fees, which would fund both local and regional transportation improvements that would address any potential operational deficiencies. As such, the proposed project does not include any characteristics (e.g., permanent road closures or long-term blocking of road access) that would physically impair or otherwise conflict with an emergency response plan or emergency evacuation plan. Impacts would be less than significant, and no mitigation is required.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. Refer to Section 4.20, Wildfire, of this IS/MND for a detailed analysis of the proposed project's potential impacts related to wildfire. As discussed in Section 4.20, California Department of Forestry and Fire Protection (CAL FIRE) mapping indicates that the project site is not located within a Fire Hazard Severity Zone (FHSZ). Furthermore, the County's General Plan Public Health and Safety Element lists "Communities at Risk" for wildland fires. This list does not identify French Camp, including the project site or any parcels within its vicinity as being at risk for wildland fire. The project site is located within a partially urbanized area, adjacent to areas of residential, institutional, and industrial development.

The proposed project does not include any materials or features that are particularly flammable or would increase risks to people or structures. In fact, the proposed project would replace the existing dry vegetation found on the project site with hardscaping and irrigated landscaping, which would decrease the ability of fire to spread within the project site. Therefore, the proposed project would not expose people or structures to a significant risk of loss, injury, or death from wildland fires. No impacts would occur, and no mitigation is required.

4.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater 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 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?	☐	☐	☒	☐

4.10.1 Impact Analysis

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant with Mitigation Incorporated. Under existing conditions, the 18-acre project site is largely undeveloped and covered with vegetation, with the exception of a gravel road that generally runs through the project site's western side and streetlights and electrical poles that run along the eastern edge of the parcel. As such, the project site is almost entirely comprised of previously disturbed surface area but does not include any existing stormwater Best Management Practices (BMPs) to treat runoff prior to discharge. The proposed project would involve development of the project site with various buildings and facilities to provide behavioral health and wellness care services, including landscaped areas, internal circulation corridors, and parking areas.

Under existing conditions, the project site generally consists of pervious surface area. Stormwater generated within the project site generally percolates through the exposed soils. Stormwater that remains as surface runoff flows in the northeastern direction into an existing drainage ditch along El Dorado.

Under the proposed project, the project site would be developed with approximately 358,000 SF of impervious surface area.

Stormwater runoff generated within the project site would be collected by way of a proposed 12-inch storm drainpipe that would run beneath the onsite roadways and transect the project site and ultimately drain to a detention basin that would be located in the northwestern corner of the North Campus. This detention basin has been designed in accordance with San Joaquin County Improvement Standards Section 3-4.05 and would have the ability to treat and detail the runoff volume from two 100-year, 24-hour storm events. Specifically, the detention basin could treat a total volume of 186,000 cubic feet of stormwater, more than double the required volume. The basin would also have a water quality forebay in accordance with the County water quality requirements. Water would be piped via a small diameter force main from the terminal discharge of the detention basin to West Hospital Road, west under I-5 to South Manthey Road, north along South Manthey Road to West North Road, and then west to an offsite retention basin located north of the San Joaquin County Morgue.

Pollutants of concern during construction include, but are not limited to: solid or liquid chemical spills; wastes from paints, stains, sealants, glues, lime, pesticides, herbicides, wood preservatives and solvents, asbestos fibers, paint flakes or stucco fragments; fuels, oils, lubricants, and hydraulic, radiator or battery fluids; concrete, detergent or floatable wastes; wastes from any engine/equipment steam cleaning or chemical degreasing; and super-chlorinated potable water line flushing. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. During construction activities associated with the proposed project, excavated soil would be exposed, and there would be an increased potential for soil erosion and sedimentation compared to existing conditions. In addition, chemicals liquid products, petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste may be spilled or leaked and have the potential to be transported via stormwater runoff into receiving waters. Stormwater runoff is regulated by the National Pollutant Discharge Elimination System (NPDES) Program (established through the federal Clean Water Act [CWA]). The objective of the NPDES Program is to control and reduce pollutant discharges to surface water bodies. Compliance with NPDES permits is mandated by State and federal statutes and regulations. Locally, the NPDES Program is administered by the Central Valley Regional Water Quality Control Board (RWQCB). Construction activities can be subject to the SWRCB NPDES *General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, Order No. 2022-0057-DWQ, NPDES No. CAS000002* (Construction General Permit) depending on the degree of soil disturbance. Any construction activity, including grading, that would result in the disturbance of one acre or more of soil would require compliance with SWRCB's Construction General Permit, which requires preparation of a Stormwater Pollution Prevention Program (SWPPP) and implementation of construction BMPs to address water quality concerns during construction activities. Construction BMPs would include, but not be limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site as well as Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters.

Operational activities of the proposed project are subject to NPDES MS4 permits, which are issued in two phases by the SWRCB and RWQCBs. Phase I MS4 permits are issued to medium (serving

between 100,000 and 250,000 people) and large (serving more than 250,000 people) municipalities.[24] Most of these permits are issued to a group of co-permittees encompassing an entire metropolitan area. The Phase II Small MS4 Permits are issued to smaller municipalities (populations of less than 100,000 people), including the County, and nontraditional small MS4s (e.g., military bases, public campuses, and prison and hospital complexes). The Phase II Small MS4 Permit (Order No. 2013-0001-DWQ, NPDES No. CAS000004), as amended, covers Phase II permittees statewide and became effective on July 1, 2013. Based on its location and characteristics, the proposed project would be subject to the requirements of the Phase II Small MS4 Permit. In addition, San Joaquin County has an existing Phase I MS4 Permit in which many of the programs required under Phase II have already been developed. The Phase II Small MS4 Permit specifies required actions in order to reduce the discharge of pollutants in stormwater to the maximum extent practicable (MEP) in order to achieve statewide water quality standards and objectives. The Phase II Small MS4 Permit includes Site Design and Low Impact Development (LID) Runoff requirements for new development and redevelopment, as well as hydromodification control requirements, where applicable. The LID requirements emphasize landscape-based site design features that are already required elsewhere (e.g., the Water Efficient Landscape Ordinance required under Assembly Bill 1881).

In order to comply with the Phase II Small MS4 Permit, the County of San Joaquin developed a Storm Water Management Program (SWMP) in September 2003.[25] The SWMP includes BMPs intended to reduce, to the MEP, the quantity of stormwater and the discharge of pollutants into the stormwater system. The SWMP consists of the six minimum control measures (MCM), each containing its own BMPs, established by the USEPA and the SWRCB for Phase II permittee discharges. The six SWMP MCMs are as follows:

1. Public Education and Outreach – Stormwater Impacts
2. Public Involvement/Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Runoff Control
5. Post-Construction – New Development and Redevelopment
6. Pollution Prevention/Good Housekeeping for Municipal Operations

Operational BMPs identified within the SWMP MCMs include various training and informational programs, post-construction maintenance, source reduction, and materials management.

Section 9-606 of the San Joaquin County Development Title codifies requirements related to water quality and stormwater discharges under development projects. Pursuant to Section 9-606, development projects are required to provide drainage facilities within and downstream from the project site, which must be approved by the San Joaquin County Director of Public Works prior to

[24] California Water Boards. Storm Water Program – MS4 Municipal Permits. <https://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/#phaseiims4> (Accessed December 2024).

[25] San Joaquin County. 2003. Storm Water Management Program. September 30. <https://www.waterboards.ca.gov/water_issues/programs/stormwater/swmp/san_joaquin_co_swmp_cvrl.pdf> (Accessed December 2024).

the issuance of building permits. Specifically, when a development would cause an increase in stormwater runoff, drainage facilities shall be included in the project's design that would attenuate the flow rate and concentration of storm water discharged onto other properties to the pre-project condition. In addition, Section 9-606 requires the preparation of a drainage report for all development projects, which shall be prepared in accordance with the County's Improvement Standards.

Construction. During construction, the total disturbed soil area would be greater than 1 acre. As such, the proposed project is subject to the requirements of the Construction General Permit, as specified in RCM HYD-1. The Construction General Permit requires preparation of a SWPPP and implementation of construction BMPs during construction activities. Construction BMPs would include, but are not limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site as well as Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters.

Exploratory borings collected as part of the Preliminary Geotechnical Report prepared for the proposed project (Appendix D to this IS/MND) encountered groundwater at a depth of approximately 24 feet bgs. Excavation activities associated with the proposed project are anticipated to reach a maximum depth of 10 feet bgs. As such, groundwater dewatering is not anticipated during construction of the proposed project, though still a possibility. As specified in RCM HYD-2, in the event groundwater dewatering activities would occur, the proposed project would comply with the Central Valley RWQCB NPDES *CAG995002 Order R5-2022-0006-02 for Waste Discharge Requirements Limited Threat Discharges to Surface Water* (Groundwater Discharge Permit). In compliance with the requirements of the Groundwater Discharge Permit, groundwater would be tested and treated (if necessary) prior to discharge to surface waters. With adherence to RCM HYD-2, groundwater dewatering during construction activities, if necessary, would not introduce pollutants to receiving waters at levels that would violate water quality standards or water discharge requirements, degrade water quality, or alter the quality of receiving waters.

Infiltration of stormwater can have the potential to affect groundwater quality in areas of shallow groundwater. As discussed above, the groundwater table was not encountered up to a depth of 24 feet bgs. Pollutants in stormwater are generally removed by soil through absorption as water infiltrates. Therefore, in areas of deep groundwater, there is more absorption potential and, as a result, less potential for pollutants to reach groundwater. Therefore, due to the depth to groundwater, it is not expected that any stormwater that may infiltrate during construction would affect groundwater quality because there is not a direct path for pollutants to reach the groundwater table. Therefore, project construction would not substantially degrade groundwater quality.

With implementation of RCM HYD-1 and RCM HYD-2, which require adherence to the NPDES Construction General Permit and Groundwater Discharge Permit, construction of the proposed project would not interfere with surface water quality standards, waste discharge requirements, and surface water quality.

Operation. The proposed project consists of a wellness campus to treat substance use disorders and co-occurring behavioral health disorders. The proposed project would include various buildings, landscaped areas, and circulation/parking areas associated with the proposed land uses. Pollutants of concern from long-term operations of the proposed project include suspended solids/sediments, nutrients, heavy metals, pathogens (bacteria/virus), pesticides, oil and grease, and trash and debris.

As previously stated, operational activities are subject to the Phase II Small MS4 Permit, as summarized in RCM HYD-3. The Phase II Small MS4 Permit prohibits illicit discharges, sets limits on pollutants being discharged into receiving waters, and requires implementation of technology-based standards. Pursuant to requirements of the Phase II Small MS4 Permit, Site Design and LID BMPs would be utilized for treatment of storm water on site using project design features. Specifically, the project design includes a detention basin that would be located in the northwestern corner of the North Campus. This detention basin has been designed in accordance with San Joaquin County Improvement Standards Section 3-4.05 and would have the ability to treat and detail the runoff volume from a 100-year, 24-hour storm. Specifically, the detention basin could treat a total volume of 186,000 cubic feet of stormwater, more than double the required volume. Water would be piped from the detention basin to off-site stormwater conveyance infrastructure. The use of a detention basin within the project site represents a conventional BMP, as it would temporarily detain stormwater runoff by releasing water over time. A feasibility study prepared by Siegfried on October 4, 2024 (Appendix F to this IS/MND) determined that either a detention or retention basin would be capable of adequately addressing applicable drainage requirements of the project site. Further, pursuant to Mitigation Measure (MM) HYD-1 below, the project Applicant would be required to prepare a Water Quality Management Plan (WQMP) documenting ways in which the proposed project would incorporate BMPs and comply with applicable water quality requirements.

As discussed previously, infiltration of stormwater could have the potential to affect groundwater quality in areas of shallow groundwater. Due to the depth to groundwater, it is not expected that any stormwater that may infiltrate during construction would affect groundwater quality because there is not a direct path for pollutants to reach groundwater. In addition, the proposed project would be required to implement operational BMPs to pre-treat stormwater before it could reach groundwater. With implementation of MM HYD-1, as well as RCM HYD-1 through RCM HYD-3, which are required and based on local and State regulations, construction and operational impacts related to waste discharge requirements, water quality standards, and degradation of surface or groundwater quality would be less than significant.

Mitigation Measure:

MM HYD-1 **Water Quality Management Plan.** Prior to issuance of building permits, the project Applicant shall submit a Final Water Quality Management Plan (WQMP) to County of San Joaquin (County) Public Works Department, or designee, for review and approval. The Final WQMP shall specify the Best Management Practices (BMPs) to be incorporated into the project design to target pollutants of concern in runoff from the project site. The County

Public Works Department, or designee, shall ensure that the BMPs specified in the Final WQMP are incorporated into the final project design.

Regulatory Compliance Measures:

RCM HYD-1 **Construction General Permit.** Prior to issuance of a grading permit, the project Applicant shall obtain coverage under the State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) *General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, Order No. 2022-0057-DWQ, NPDES No. CAS000002* (Construction General Permit). This shall include submission of Permit Registration Documents (PRDs), including a Notice of Intent for coverage under the permit to the State Water Resources Control Board (SWRCB) via the Stormwater Multiple Application and Report Tracking System (SMARTs). The project Applicant shall provide the Waste Discharge Identification Number (WDID) to the Director of the County of San Joaquin (County) Public Works Department, or designee, to demonstrate proof of coverage under the Construction General Permit. Project construction shall not be initiated until a WDID is received from the SWRCB and is provided to the Director of the County Public Works Department, or designee. A Stormwater Pollution Prevention Plan (SWPPP) shall be prepared and implemented for the proposed project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction best management practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. Upon completion of construction and stabilization of the site, a Notice of Termination shall be submitted via SMARTs.

RCM HYD-2 **Groundwater Discharge Permit.** If groundwater dewatering is required during construction of the proposed project, the project Applicant shall submit a Notice of Intent (NOI) for coverage under the permit to the Central Valley RWQCB at least 60 days prior to the start of excavation activities and anticipated discharge of dewatered groundwater to surface waters in order to obtain coverage under the *Central Valley RWQCB NPDES CAG995002 Order R5-2022-0006-02 for Waste Discharge Requirements Limited Threat Discharges to Surface Water* (Groundwater Discharge Permit). Groundwater dewatering activities shall comply with all applicable provisions in the Groundwater Discharge Permit, including water sampling, analysis, treatment (if required), and reporting of dewatering-

related discharges. Upon completion of groundwater dewatering activities, a Notice of Termination shall be submitted to the Central Valley RWQCB.

RCM HYD-3 **MS4 Permit.** Prior to the issuance of grading or building permits, the Director of the County of San Joaquin (County) Public Works Department, or designee, shall ensure compliance with the requirements of the NPDES General Permit for Waste Discharge Requirements (WDRs) for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4s), Order No. 2013-0001-DWQ, NPDES No. CAS000004 (Phase II Small MS4 Permit). BMPs required under the Phase II Small MS4 Permit shall be incorporated into the project design to target pollutants of concern in runoff from the project site. The County Public Works Department Director, or designee, shall ensure that the BMPs are incorporated into the final project design, and shall implement, maintain and operate all such BMPs in a timely and reasonably diligent manner.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. The groundwater basin underlying the project site is the San Joaquin Valley Basin (Basin), Eastern San Joaquin Subbasin (Subbasin). The Subbasin is drained by the San Joaquin River and its major tributaries.

The San Joaquin Flood Control and Water Conservation District (SJCFCWCD) prepares semi-annual Groundwater Reports in order to monitor and analyze groundwater levels within the Basin and Subbasin. According to the Fall 2023 Groundwater Report, the Subbasin is considered a critically over-drafted basin.[26]

Construction. Overall, construction of the proposed project would not generate a substantial demand for groundwater. Please refer to Section 4.23, Utilities and Service Systems, for a detailed discussion of water supply and demand during construction of the proposed project. As mentioned previously, according to the Preliminary Geotechnical Investigation (Appendix D) prepared for the proposed project, groundwater was encountered in borings as shallow as 24 ft bgs during a field investigation. While groundwater dewatering during construction could decrease groundwater supplies or interfere with groundwater recharge, this activity is unlikely to occur during construction of the proposed project. However, because it is still a possibility, the proposed project would adhere to RCM HYD-2. As specified in RCM HYD-2, in the event groundwater dewatering activities would occur, the proposed project would comply with the

[26] San Joaquin County Flood Control and Water Conservation District. 2023. Groundwater Report. <https://www.sjwater.org/Portals/0/Fall%202023_ESJ%20Groundwater%20Monitoring%20Report_FINAL_r.pdf?ver=2r467U8M0L5o4jzat_DlXg%3d%3d> (Accessed December 2024).

Groundwater Discharge Permit, under which groundwater would be tested and treated (if necessary) prior to discharge to surface waters. With adherence to RCM HYD-2, groundwater dewatering, if necessary, during construction activities, would not interfere with groundwater recharge. In addition, if groundwater dewatering is required during construction of the proposed project, dewatering activities would be temporary, and the volume of groundwater removed would not be substantial. Therefore, construction of the proposed project would not substantially decrease groundwater supplies such that the project may impede sustainable groundwater management or recharge of the basin. Construction impacts associated with substantial decrease in groundwater supplies or interference with groundwater recharge would be less than significant, and no mitigation is required.

Operation. Operations of the proposed project would not directly require groundwater extraction. Water usage within the project site, which may be partially sourced from groundwater sources and supplemented by purchased imported water and surface water, would be typical of the proposed land uses. Refer to Section 4.23, Utilities and Service Systems, for more details regarding the proposed project's anticipated water usage.

As discussed in Section 4.23, the water supply that would serve the project site consists of both purchased surface water and groundwater. Specifically, the groundwater is sourced from five wells located at the Dr. Joe Waidhofer Water Treatment Plant (DJW WTP) in the City of Stockton. This groundwater is pumped from the San Joaquin Valley Basin, Eastern San Joaquin Subbasin, and is blended with purchased surface water for processing through the DJW WTP.

As previously stated, the proposed project would increase the impervious area on the project site by approximately 18 acres. The increase in impervious surface area as a result of project implementation would decrease on-site infiltration and therefore could potentially interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin. However, in order to address this potential impact, the project site design includes an oversized detention basin, including a water quality forebay in accordance with County water quality requirements, that would be capable of holding stormwater runoff from two 100-year storm events. Discharge from this detention basin would occur at a rate of approximately 100 gallons per minute (gpm) to the existing off-site terminal retention basin located north of the San Joaquin County Morgue. As such, the proposed project would not result in outfall to existing waterways in the vicinity of the project site, and would not interfere with groundwater recharge

For the reasons listed above, and with implementation of RCM HYD-2 if construction dewatering is required, impacts related to the decrease of groundwater supplies or interference with groundwater recharge would be less than significant, and no mitigation is required.

c. Would the project 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 substantial erosion or siltation on-or off-site?

Less Than Significant Impact. While the proposed project would not alter the course of an existing stream or river, the proposed project would result in changes to the ratio of impervious surfaces to pervious surfaces within the project site. As previously stated, the proposed project would develop a vacant parcel and would therefore increase the proportion of impervious surface within the project site. Specifically, the proposed project would increase impervious coverage of the project site by approximately 358,000 SF, and the overall runoff coefficient for the project site would be 0.71. An increase in impervious surface area would increase the volume of runoff during a storm and has the potential to increase pollutant loading to downstream receiving waters.

Construction. During construction activities, soil would be exposed and disturbed, drainage patterns would be temporarily altered during grading and other construction activities, and there would be an increased potential for soil erosion and siltation compared to existing conditions. Additionally, during a storm event, soil erosion and siltation could occur at an accelerated rate. As discussed above in Response 4.10(a) and as specified in RCM HYD-1, the Construction General Permit requires preparation of a SWPPP to identify construction BMPs to be implemented as part of the proposed project to reduce impacts to water quality during construction, including those impacts associated with soil erosion and siltation. With compliance with the Construction General Permit as indicated in RCM HYD-1, construction impacts related to on- or off-site erosion or siltation would be less than significant, and no mitigation is required.

Operation. The proposed project would involve the construction of various buildings, landscaped areas, and paved surfaces within a currently undeveloped project site, which would change the existing ratio of impervious to pervious surfaces within the project site. Under proposed conditions, the impervious surface area of the project site would increase by approximately 358,000 SF, which could subsequently increase peak flow runoff and volumes from those under existing conditions. In order to address this potential impact, pursuant to Section 9-606 of the San Joaquin County Development Title, a drainage report would be required under the proposed project. As specified in Regulatory Compliance Measure (RCM) HYD-4, a Final Drainage Report would be required in order to demonstrate that the design features incorporated into the proposed project would ensure that the project would not increase runoff from the project site beyond that generated under existing conditions. Furthermore, the County would require the proposed project's design to comply with the volume reduction requirements outlined in the City and County's joint 2023 Stormwater Quality Control Criteria Plan (SWQCCP) to reduce post-project runoff volume to pre-project volumes for the 85th percentile rainfall event.[27] The use of a detention basin within the project site

[27] City of Stockton and County of San Joaquin Stormwater Quality Control Criteria Plan, August 20, revised January 2023, <https://cms3.revize.com/revize/stockton/Documents/Services/Water,%20Sewer%20&%20Stormwater/Stormwater/Stormwater_Quality_Control_Criteria_Plan_SWQCCP_2020.pdf> (Accessed October 29, 2024).

represents a conventional BMP, as it would temporarily detain stormwater runoff by releasing water over time. A feasibility study prepared by Siegfried on October 4, 2024 (Appendix F) determined that both the detention or retention basin would be capable of adequately addressing applicable drainage requirements of the project site.

Hydromodification is defined as hydrologic changes resulting from increased runoff from increases in impervious surfaces. Hydromodification impacts can included changes in downstream erosion and sedimentation. Projects subject to specific hydromodification requirements must implement measures for site-design, source control, runoff reduction, stormwater treatment, and baseline hydromodification management. Because stormwater runoff generated within the project site would be conveyed to the proposed on-site detention basin and would not enter nearby waterways, hydromodification is not subject to hydromodification requirements. Based on the analysis presented above, the proposed project is not anticipated to result in outfall to nearby waterways, and therefore would not result in substantial downstream erosion or siltation. Impacts would be less than significant, and no mitigation is required.

RCM HYD-4 **Final Drainage Report.** Prior to issuance of a grading permit, the Applicant shall prepare a Final Drainage Report to demonstrate that the post-construction runoff from the project site does not exceed existing conditions. The project Applicant shall provide the Final Drainage Report to the County of San Joaquin (County) Public Works Director, or designee, for review and approval.

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

Less Than Significant Impact.

Construction. Construction activities would alter the on-site drainage pattern, potentially compacting on-site soil and increasing the potential for flooding compared to existing conditions. As discussed in Response 4.10(c-i) above, the Construction General Permit requires preparation of a SWPPP to identify construction BMPs to be implemented as part of the proposed project, as specified in RCM HYD-1. The SWPPP would include construction BMPs to control and direct on-site surface runoff to ensure that flooding does not occur. Proper management of stormwater during construction would reduce impacts associated with on and off-site flooding to a less than significant level.

Operation. As previously noted, development of the project site under the proposed project would not increase the volume of runoff from the project site compared to existing conditions due to the increase of impervious surfaces for the proposed condition. The proposed project would also feature BMPs, such as the proposed detention basin, in order to reduce peak flow rates generated within the project site under post-project conditions.

With the proposed incorporation of stormwater runoff BMPs, operation of the proposed project would not increase the rate or amount of surface runoff in a manner that would result in flooding on- or off site. Impacts would be less than significant, and no mitigation is required.

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?

Less Than Significant Impact.

Construction. As discussed in the Response to Question 4.10(a), pollutants of concern during construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals, and each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. Drainage patterns would be temporarily altered during grading and other construction activities, and construction-related pollutants could be spilled, leaked, or transported via storm runoff into adjacent drainages and downstream receiving waters. The proposed project would be required to contain runoff from construction equipment and vehicle washing within the project site unless treated to remove sediment and other pollutants. As previously discussed, the proposed project must comply with the Construction General Permit, as specified in RCM HYD-1, which requires the preparation of a SWPPP and implementation of construction BMPs, both of which would address the presence of pollutants in stormwater generated within the project site.

Operation. Expected pollutants of concern from long-term project operations include suspended solids/sediments, nutrients, heavy metals, pathogens (bacteria/virus), pesticides, oil and grease, and trash and debris. As previously discussed, the proposed project's compliance with the Phase II Small MS4 Permit, as specified in RCM HYD-3, as well as provisions of the San Joaquin SWMP, would ensure the implementation of applicable BMPs to target pollutants of concern during operations of the proposed project. Further, as previously discussed, the project site design includes a detention basin that has been designed in accordance with San Joaquin County Improvement Standards Section 3-4.05, and would have the ability to treat and detail the runoff volume from a 100-year, 24-hour storm. As such, the proposed project would not discharge substantial sources of polluted runoff from the project site during operations. Further, pursuant to RCM HYD-4, a Final Drainage Report would be required in order to determine the changes to drainage properties within the project site under the proposed project and address such changes as necessary.

With compliance with applicable regulations, including the Construction General Permit, Phase II Small MS4 permit, and County Development Title as specified in RCM HYD-1, RCM HYD-3, and RCM HYD-4, impacts associated with creating or contributing runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff would be less than significant, and no mitigation is required.

iv. Impede or redirect flood flows?

Less Than Significant Impact. According to the Flood Insurance Rate Map (FIRM) No. 06077C0470F (effective October 16, 2009) classifies the project site as Zone X, or Area with Reduced Flood Risk

due to Levee.[28] As such, the project site is protected from the 1-percent-annual-chance or greater flood hazard by a levee system, and does not face substantial flooding risks. Further, according to the 2022 Central Valley Flood Protection Plan Update,[29] levees within the Lower San Joaquin River-Delta South Region, in which the project site is located, undergo consistent maintenance and seepage repairs by local maintaining agencies (LMAs). In addition, systemwide improvement frameworks (SWIF) reports are consistently submitted to the USACE. As such, local policies ensure that the levees protecting the project site are well-maintained and capable of adequately protecting the project site from flooding risks.

Further, pursuant to PHS-2.19 and PHS-2.20 of the County's General Plan Public Health and Safety Element,[30] the County maintains a San Joaquin County Flood Evacuation Plan, Dam Failure Plan, and community flood evacuation maps. Nevertheless, the proposed project would be subject to a Flood Protection Development Impact Fee to be imposed by the County of San Joaquin. The fee is due and payable prior to issuance of the building permit and will be based on the current schedule at the time of payment. Given on the low risk of flooding within the project site and the project's compliance with RCM HYD-5 requiring the payment of a Flood Protection Development Impact Fee, impacts associated with impeding or redirecting flood flows would be less than significant, and no mitigation is required.

Regulatory Compliance Measure:

RCM HYD-5 **Flood Protection Development Impact Fee.** At the time of grading permit application, the Project Applicant shall pay the appropriate Flood Protection Development Impact Fee, based on the current schedule at the time of payment. The Project Applicant shall receive confirmation from both San Joaquin County Public Works Department and San Joaquin Council of Governments (SJCOG), respectively, that the appropriate fee has been paid prior to the issuance of grading permits.

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Less Than Significant Impact. As discussed above in Response 4.10(d), the project site is not located within an area susceptible to flood hazards and would therefore would not result in the risk of releasing pollutants during flooding.

Tsunamis are ocean waves generated by tectonic displacement of the seafloor associated with shallow earthquakes, seafloor landslides, rock falls, and exploding volcanic islands. Upon reaching

[28] Federal Emergency Management Agency (FEMA). 2009. Flood Insurance Rate Map (FIRM) No. 06077C0470F. October 16. <https://msc.fema.gov/portal/home>(accessed December 2024).

[29] State of California Department of Water Resources. 2022. Central Valley Flood Protection Plan Update 2022. November. <https://cvfpb.ca.gov/wp-content/uploads/2022/12/Central_Valley_Flood_Protection_Plan_Update_2022_ADOPTED.pdf> (accessed December 2024).

[30] San Joaquin County. 2016. General Plan 2035 Public Health and Safety Element. December. <https://www.sjgov.org/commdev/cgi-bin/cdyn.exe/file/Planning/General%20Plan%202035/Part%203.3a_Public%20Health%20and%20Safety_2016-11-21.pdf> (Accessed December 2024).

shallow coastal waters, the waves can reach up to 50 ft in height, causing great devastation to near-shore structures. The project site is not located within a coastal area, and is located approximately 51 miles east of the nearest coastline. Therefore, the project site is not subject to inundation from tsunamis, and there is no risk of release of pollutants due to inundation from tsunami.

Seiching occurs when seismic ground shaking induces standing waves (seiches) inside water retention facilities (e.g., reservoirs and lakes). Such waves can cause retention structures to fail and flood downstream properties. According to the Preliminary Geotechnical Report prepared for the proposed project (Appendix D to this IS/MND), there are no known lakes or partially enclosed bodies of water within a half-mile radius of the project site; therefore, the project site is not subject to inundation from seiche waves, and there is no risk of release of pollutants due to inundation from seiche.

Based on the information presented above, the project site is not at risk of pollutant release associated with inundation from a flood, tsunami, or seiche. Impacts would be less than significant, and no mitigation is required.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As previously stated, the project site is within the jurisdiction of the Central Valley RWQCB. The Central Valley RWQCB has adopted a Water Quality Control Plan (Basin Plan) that designates beneficial uses for all surface and groundwater within their jurisdiction and establishes the water quality objectives and standards necessary to protect those beneficial uses. As summarized below, the proposed project would comply with the applicable NPDES permits and would implement construction and operational BMPs to reduce pollutants of concern in stormwater runoff. The Central Valley RWQCB has created a specific Basin Plan for the Sacramento and San Joaquin River Basins and was revised in February 2019 with approved amendments. This Basin Plan describes objectives and implementation programs to protect the beneficial uses specific to the Sacramento and San Joaquin Rivers, as well as surveillance and monitoring activities to evaluate the effectiveness of the Basin Plan.

As discussed in the Response 4.10(e), during construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and sedimentation compared to existing conditions. In addition, chemicals, liquid products, petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste may be spilled or leaked and have the potential to be transported via stormwater runoff into receiving waters. As specified in RCM HYD-1, the proposed project would be required to comply with the NPDES Construction General Permit, which requires preparation of a SWPPP and implementation of construction BMPs to control stormwater runoff and discharge of pollutants.

As previously discussed, the primary pollutants of concern during project operations are suspended solids/sediments, nutrients, heavy metals, pathogens (bacteria/virus), pesticides, oil and grease, and trash and debris. As discussed in RCM HYD-3, the proposed project would comply with the Phase II Small MS4 Permit, which would ensure the implementation of all applicable and feasible Site Design

and LID BMPs in order to treat stormwater runoff and reduce impacts to water quality during operation.

Because the proposed project would comply with applicable NPDES and regional regulations and includes implementation of construction and operational BMPs to reduce pollutants of concern in stormwater runoff, the project would not result in water quality impacts that would conflict with the Central Valley Basin Plan.

As discussed in the Response 4.10(a), due to the depth to groundwater in comparison to anticipated excavation activities, it is not expected that any stormwater that may infiltrate during construction would affect groundwater quality because pollutants in stormwater are generally removed by soil through absorption as water infiltrates. In addition, the project would be required to implement operational BMPs to treat stormwater before it could reach groundwater. Additionally, the water demand anticipated under the proposed project would not require substantial groundwater extraction with the potential to decrease groundwater supplies. Therefore, the proposed project does not have the potential to substantially impact groundwater quality, interfere with groundwater recharge, or decrease groundwater supplies. For the reasons outlined above and with implementation of RCM HYD-1 through RCM HYD-4, a less than significant impact would occur related to conflict with or obstruction implementation of water quality control plans or sustainable groundwater management plans, and no mitigation is required.

4.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

4.11.1 Impact Analysis

a. Would the project physically divide an established community?

No Impact. The physical division of an established community typically refers to the construction of a feature or removal of a means of access that would impair mobility within an existing community, or between a community and outlying areas.

As described in Section 2.0, Project Description, of this IS/MND, the 18-acre project site currently consists of undeveloped land. The project site is surrounded by transportation corridors to the west (I-5), south (West Hospital Road), and east (South El Dorado Street). The project site is bordered to the north by undeveloped parcels and residential land uses. Excluding one parcel developed with a non-conforming residential apartment complex, the parcels located to the south of the project site, across West Hospital Road, are undeveloped. Additional residential development is located to east of the project site. Under current conditions, these two clusters of residential development are separated by two sets of rail tracks. Access from one side of the rail tracks to the other is provided by way of French Camp Road, northeast of the project site, and Ash Street, southeast of the project site. Other land uses within the general vicinity of the project site are generally industrial and institutional.

Although implementation of the proposed project would establish new land uses within the currently undeveloped project site, these uses would not divide any of the existing residential clusters in the project site vicinity. Further, vehicular access to the project site would be provided via driveways along existing roadways, including one driveway along South El Dorado Street and one driveway along West Hospital Road. As such, the proposed project would not change the existing street layout in the surrounding area or introduce any new physical barriers or other impediments that would interfere with or alter existing access to the surrounding community. Therefore, the proposed project would not result in the physical division of an established community. No impact would occur, and no mitigation is required.

b. Would the project 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?

Less Than Significant Impact. A project's inconsistency with a policy is only considered significant if such inconsistency would cause significant physical environmental impacts. This IS/MND section

determines whether any project inconsistencies with public land use policies and documents would be potentially significant and whether mitigation is feasible. Under this approach, a policy conflict is not in and of itself considered a significant environmental impact. An inconsistency between a proposed project and an applicable land use plan is a legal determination that may or may not indicate the likelihood of environmental impact. In some cases, an inconsistency may be evidence that an underlying physical impact is significant and adverse, while in other cases such an inconsistency may not result in significant physical impacts.

The project site is located within the unincorporated community of French Camp, which is home to approximately 4,421 residents and is located approximately four miles south of downtown Stockton in San Joaquin County. While the project site is within the City of Stockton's Sphere of Influence (SOI),[31] the project site is under the County's jurisdiction regarding matters of land use regulation and planning. Regionally and locally adopted land use plans, policies, and regulations that would apply to the proposed project including the SJCOG 2022 RTP/SCS, the San Joaquin County General Plan, the Airport Land Use Compatibility Plan (ALUCP) for Stockton Metropolitan Airport, and the San Joquin County Development Title. In addition, the County's land use authority over the project is supported by the BHCIP authorizing legislation (California Welfare & Institutions Code, § 5960 *et seq*.), which provides that a project funded by BHCIP grants shall be deemed consistent and in conformity with any applicable local plan, standard, or requirement, and allowed as a permitted use within the zone in which the structure is located, and shall not be subject to a conditional use permit, discretionary permit, or to any other discretionary reviews or approvals.

The following sections evaluate the proposed project's consistency with applicable land use plans.

SJCOG 2022 RTP/SCS. The SJCOG serves as the metropolitan planning organization and the regional transportation planning agency for San Joaquin County, in which the project site is located. Pursuant to Senate Bill (SB) 375, California's regional planning agencies are required to include a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy in their Regional Transportation Plans. In accordance with SB 375, SJCOG has adopted the 2022 RTP/SCS, a long-range planning document that sets forth a vision for the County and its growth.

Table 4.7.A below evaluates the consistency of the proposed project with applicable policies and supportive strategies set forth in the 2022 RTP/SCS.

San Joaquin County General Plan. State law (Government Code Section 65300) requires counties and cities to prepare and adopt general plans to guide current and future physical development. The San Joaquin County General Plan, adopted in 2016, addresses all geographic areas in the unincorporated county, including the project site. The General Plan provides a comprehensive framework for the County's growth and protection of natural resources across four elements: Community Development; Public Facilities and Services; Public Health and Safety; and Resources.

[31] City of Stockton Envision Stockton 2040 General Plan, December 2018, <https://cms3.revize.com/revize/stockton/Documents/Business/Planning%20&%20Engineering/General%20Plan/Stockton_General_Plan_Adopted.pdf> (Accessed October 25, 2024).

Table 4.7.A: Regional Transportation Plan/Sustainable Communities Strategy Consistency Analysis

RTP/SCS Policy/Supportive Strategy	Project Consistency
Enhance the Environment for Existing and Future Generations and Conserve Energy	
Strategy No. 1: Encourage efficient development patterns that maintain agricultural viability and natural resources.	**Consistent.** The project site is zoned Agriculture Urban Reserve, 20 acre minimum (AU-20) in the County's Development Title, which permits a variety of agricultural, and agriculture-related residential and commercial uses. However, the California Department of Conservation (DOC) classifies this land as "Vacant or Disturbed Land,"[1] which the DOC defines as "open field areas that do not qualify for an agricultural category, mineral and oil extraction areas, and rural freeway interchanges". As stated in Section 2.0, Project Description, of this IS/MND, the project site is currently highly disturbed and the existing vegetation largely consists of nonnative grassland, indicating a poor agricultural potential and a lack of current agricultural operations. As such, development of the proposed project would not conflict with SJCOG's strategy of maintaining agricultural viability. Further, the proposed project would support the preservation of natural resources through its use of renewable materials and building materials made with recycled content where feasible. The proposed project ultimately promotes SJCOG's strategy of encouraging efficient development as it would develop an underutilized parcel served by existing roadways and surrounded by existing development and utility infrastructure.
Strategy No. 3: Enhance the connection between land use and transportation choices through projects supporting energy and water efficiency.	**Consistent.** The proposed project would include various energy and water efficiency features, including features meeting the current Title 24 Standards, such as energy-efficient heaters, air conditioning systems, and/or other appliances. Further, exterior lighting within the project site would use energy-efficient fixtures/lamps. Window technologies such as tinting or insulated daylighting panels would also be featured in order to decrease the energy costs associated with heating and cooling. The proposed project would incorporate water-efficient landscaping through the use of native, drought-tolerant plants consistent with the County's Model Landscape Ordinance. The proposed project would ensure water efficiency pertaining to indoor water use through the inclusion of low flow faucets and fixtures.
Improve the Quality of Life for Residents	
Strategy No. 28: Promote a broader range of housing types.	**Consistent.** The proposed project would include two Residential Treatment buildings, which would allow for long-term crisis and substance abuse treatment for patients residing within the San Joaquin County BeWell campus. This facility would provide all amenities necessary for patients to live comfortably on the campus while receiving the care they need. The proposed project also includes transitional housing and transitional family housing buildings, which would consist of independent residential units that allow residents to prepare for life outside of the San Joaquin County BeWell campus. As such, the proposed project would provide a unique housing type to address a specific need that has been identified by the County. These residential buildings would broaden the range of housing currently present within the County and would address housing needs specific to the context of behavioral health and substance abuse issues.

Source: San Joaquin Council of Governments Regional Transportation Plan/Sustainable Communities Strategy, August 2022 < https://www.sjcog.org/DocumentCenter/View/7337/Executive-Summary-Final> (Accessed October 2, 2024).

[1] California Department of Conservation (DOC) California Important Farmland Finder. 2022. <https://maps.conservation.ca.gov/DLRP/CIFF/> (Accessed October 1, 2024).

As discussed in Section 2.0, Project Description, of this IS/MND, the project site is designated (C/FS) Freeway Service Commercial by the County's General Plan Land Use Map, which is contained in the Community Development Element. The C/FS land use designation is intended to provide retail uses serving the needs of freeway travelers. This land use designation is only allowed adjacent to full freeway interchanges where development will be easily accessible and visible to freeway travelers.[32] The proposed project includes the development of a behavioral and physical health care treatment campus and therefore would not be consistent with the travel-oriented intention of this land use designation. In order to resolve this potential inconsistency, a General Plan Amendment is proposed as part of the project in order to change the land use designation of the project site to Mixed-Use (M/X). Once approved, the General Plan Amendment would ensure that the proposed project would be consistent with the land use designations governing the project site.

The proposed project also includes the establishment of a Specific Plan to guide development of the San Joaquin BeWell Behavioral Health Campus through the establishment of development standards and design guidelines consistent with the design of the proposed project. California Government Code (Title 7, Division 1, Chapter 3, Article 8, Sections 65450-65457) permits the adoption and administration of specific plans as an implementation tool for the local general plan. Specific plans must demonstrate consistency in regulations, guidelines, and programs with the goals and policies set forth in the general plan. As demonstrated in Appendix A of the proposed San Joaquin BeWell Specific Plan, the BeWell Specific Plan is consistent with the goals and policies of the San Joaquin County General Plan. Subsequently, all future development plans on the project site must be consistent with the Specific Plan. Projects that are found to be consistent with the Specific Plan will be deemed consistent with the San Joaquin County General Plan. Therefore, because the proposed project would be consistent with the proposed BeWell Specific Plan and the proposed Specific Plan would be consistent with the County's General Plan, the proposed project would inherently be consistent with the County's General Plan. Nevertheless, Table 4.7.B below evaluates the consistency of the proposed project with applicable goals and policies set forth in the County's General Plan.

[32] San Joaquin County General Plan 2035, Land Use Element, December 2016 (Updated August 2024) <https://www.sjgov.org/commdev/cgi-bin/cdyn.exe?grp=planning&htm=gp2035> (Accessed September 5, 2024).

Table 4.7.B: General Plan Consistency Analysis

Goal/Policy	Project Consistency
Community Development Element	
Goal LU-1: Direct most urban development towards cities and urban and rural communities within the unincorporated county to promote economic development, while preserving agricultural lands and protecting open space resources.	
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.	**Consistent.** The proposed project would construct fourteen buildings to comprise the SJ BeWell campus, which would provide patients with behavioral and physical health care treatment. The proposed project would be located just across Interstate 5 (I-5) from the San Joaquin General Hospital. A bus stop for the San Joaquin General Hospital is located approximately 650 feet west of the project site. This bus service provides eight buses per weekday on RTD Route 90 between Stockton and Tracy. On weekends, this stop is served by RTD Route 710 with hourly service between the Hospital and central Stockton. As such, the proposed project is strategically located near an existing healthcare institution and transit stop. The project site is currently undeveloped but could be served by existing roadways including West Hospital Road and South El Dorado Street. The proposed project would contribute to a reduction in urban sprawl by developing an underutilized parcel surrounded by existing development and capable of connecting to existing utility infrastructure that currently serves land uses within the project site's immediate vicinity. Further, the proposed project would utilize low flow fixtures and energy efficient compliances in accordance with Title 24 Standards. As previously stated, the zoning of the project site is Agriculture Urban Reserve, 20 acre minimum (AU-20), which permits a variety of agricultural, and agriculture-related residential and commercial uses. However, the California DOC classifies this land as "Vacant or Disturbed Land,"[1] which the DOC defines as "open field areas that do not qualify for an agricultural category, mineral and oil extraction areas, and rural freeway interchanges". As stated in Section 2.0, Project Description, of this IS/MND, the project site is currently highly disturbed and the existing vegetation largely consists of nonnative grassland, indicating a poor agricultural potential and a lack of current agricultural operations. As such, development of the proposed project would not conflict with the County's policy of conserving agricultural resources.
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.	**Consistent.** The unincorporated community of French Camp, in which the project site is located, is classified by the San Joaquin County General Plan as an Urban Community. Furthermore, the project site is adjacent to existing roadways and urban development including residential, light industrial, and institutional uses. These existing uses are currently served by utility infrastructure that could adequately serve the project site via the establishment of new utility connections.

Table 4.7.B: General Plan Consistency Analysis

Goal/Policy	Project Consistency
LU-1.6 New Employment-Generating Uses. The County shall direct new employment-generating uses to locate within Urban and Rural Communities and City Fringe Areas, at freeway interchanges, and in other areas designated for commercial or industrial development. The County may allow employment-generating uses in other unincorporated areas when development proposals demonstrate that the project will not conflict with adjacent uses and will provide: jobs to County residents; adequate infrastructure and services (i.e., water, sewer, drainage, and transportation); and positive tax benefits to the County.	**Consistent.** As previously stated, the project site is located within the Urban Community of French Camp and could be served by connections to existing utility infrastructure. In addition, the project site is located adjacent to I-5. The proposed project would create new employment opportunities, including temporary construction work and permanent operational work such as medical and administrative positions. As such, the proposed project would provide a new employment-generating use in an appropriate location as set forth in the County's General Plan.
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.	**Consistent.** The DOC FMMP has published the California Important Farmland Finder, which provides geospatial data pertaining to various agricultural classifications throughout the State. According to the California Important Farmland Finder, the project site is classified as "Vacant or Disturbed Land,"[1] which the DOC defines as "open field areas that do not qualify for an agricultural category, mineral and oil extraction areas, and rural freeway interchanges". As such, the proposed project would not threaten the preservation of prime farmland and would not convert any viable agricultural land.
Goal LU-2: Promote efficient development and land use practices in new development that provide for the protection of vital resources and enhancement of communities.	
LU-2.1 Compatible and Complimentary Development. The County shall ensure that new development is compatible with adjacent uses and complements the surrounding natural or agricultural setting.	**Consistent.** The proposed project would provide behavioral and physical health care treatment in close proximity to the San Joaquin General Hospital and would provide care services to complement those offered at the San Joaquin General Hospital. Further, the proposed SJ BeWell Specific Plan would set forth various development regulations and design guidelines to ensure the aesthetic compatibility of the proposed project with surrounding land uses, including scale and architectural elements. Materials and colors that would be used in the design of the proposed project would be earthy and natural in style, reflective of the regional setting.
LU-2.2 Sustainable Building Practices. The County shall promote and, where appropriate, require sustainable building practices that incorporate a "whole system" approach to designing and constructing buildings that consume less energy, water and other resources, facilitate natural ventilation, use daylight effectively, and are healthy, safe, comfortable, and durable.	**Consistent.** Section 4.10 of the proposed San Joaquin Specific Plan describes the sustainable design features to be incorporated into the proposed project, including building materials and architectural features, water conservation practices, and energy efficiency. The proposed project would include various energy efficiency features, including features meeting the current Title 24 Standards, such as energy-efficient heaters, air conditioning systems, and/or other appliances. Further, exterior lighting within the project site would use energy-efficient fixtures/lamps. Window technologies such as tinting or insulated daylighting panels would also be featured in order to decrease the energy costs associated with heating and cooling. Further, natural

Table 4.7.B: General Plan Consistency Analysis

Goal/Policy	Project Consistency
	daylight would be utilized in the project's design to the extent possible, including through the use of atriums and skylights. The proposed project would incorporate water-efficient landscaping through the use of native, drought-tolerant plants consistent with the County's Model Landscape Ordinance. The proposed project would ensure water efficiency pertaining to indoor water use through the inclusion of low flow faucets and fixtures.
LU-2.5 Development Standard Manuals. The County shall maintain manuals specifying standards for development.	**Consistent.** The proposed San Joaquin County BeWell Specific Plan would serve as the development guidance document for the proposed project and as previously stated, would specify development regulations and design guidelines pursuant to the County's General Plan and Development Title.
LU-2.8 Environmental Assessments and Mitigation. The County shall evaluate proposed new development projects for their potential environmental impacts and shall require all feasible mitigation of identified significant impacts. The County shall require, as appropriate, that projects for which an EIR is prepared the consideration of infill locations for new development in the alternatives evaluation.	**Consistent.** This IS/MND serves as the CEQA compliance document for the proposed project. All potential environmental impacts of the proposed project are evaluated in this document and mitigated to a point of less than significant under applicable CEQA thresholds.
LU-2.10 Soils Information. The County shall consider the soils information from the Farmland Mapping and Monitoring Program during review of proposed new development projects.	**Consistent.** As previously stated, the DOC FMMP has published the California Important Farmland Finder, which provides geospatial data pertaining to various agricultural classifications throughout the State. According to the California Important Farmland Finder, the project site is classified as "Vacant or Disturbed Land," which the DOC defines as "open field areas that do not qualify for an agricultural category, mineral and oil extraction areas, and rural freeway interchanges." As such, soils underlying the project site have been disturbed, as discussed in more detail in the Preliminary Geotechnical Report prepared for the proposed project.
LU-2.14 General Plan Land Use Amendments. When reviewing proposed General Plan amendments to change or modify land use designations or the land use diagram or a zoning reclassification, the County shall consider the following: • consistency of the proposal with the Vision and Guiding Principles and the goals and policies of the General Plan • new physical, social, or economic factors that were not present when the time of General Plan was adopted; • reasonable alternative sites in the vicinity that are already planned for the use and can accommodate the proposal; • potential for an undesirable, growth-inducing precedent or premature conversion of agricultural land;	**Consistent.** As previously stated, the proposed project would include an amendment to the County's General Plan in order to change the Project site's land use designation to Mixed-Use (M/X) to accommodate the proposed development as well as an amendment to the County's Zoning Map to reclassify the project site as the San Joaquin County BeWell Specific Plan. This section of the IS/MND evaluates the proposed project's consistency with the County's General Plan. The IS/MND as a whole considers the existing environmental setting and the proposed project's potential to result in significant adverse changes to that setting. The County, as the lead agency under CEQA, will ultimately evaluate the proposed project in light of all the considerations listed in LU-2.14, and will decide whether or not to approve the proposed project and its associated discretionary actions.

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Goal/Policy	Project Consistency
• the availability of infrastructure and services; and the effect on the fiscal health of the County.	
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 importance, unique farmland, farmland of local importance, and confined animal agriculture; • potential for impacts on surrounding farming operations and practices; • provision of infrastructure and services to the new use and the potential impact of service demands or on the surrounding area; and • protecting habitat restoration opportunities.	**Consistent.** As discussed further in this section, the San Joaquin County Zoning Map designates the project site as Agriculture Urban Reserve, 20 acre minimum (AU-20). The AU-20 zoning district is intended to retain in agriculture those areas planned for future urban development in order to facilitate compact, orderly urban development and appropriate timing and economical provision of services and utilities. The AU-20 zoning district permits a variety of agricultural, and agriculture-related residential and commercial uses, which the proposed project would not be consistent with. As such, a Specific Plan is proposed under the project that would establish development standards and design guidelines consistent with the design of the proposed project and derived from the County's Mixed-Use (M/X) Zone. Once adopted by ordinance, the Specific Plan would serve as the zoning for all uses within the project site. Once the Specific Plan is adopted, the project site would be designated on the County's Zoning Map as the San Joaquin BeWell Specific Plan. Therefore, the proposed project would change the zoning of the project site from agricultural uses to non-agricultural uses and would involve amendments to both the County's General Plan and the County's Development Title. As previously stated, despite the current zoning of the project site as Agriculture Urban Reserve, 20 acre minimum (AU-20), the California DOC classifies this land as "Vacant or Disturbed Land", which the DOC defines as "open field areas that do not qualify for an agricultural category, mineral and oil extraction areas, and rural freeway interchanges". As stated in Section 2.0, Project Description, of this IS/MND, the project site is currently highly disturbed and the existing vegetation largely consists of nonnative grassland, indicating a poor agricultural potential and a lack of current agricultural operations. As such, development of the proposed project would not conflict with the County's policy of conserving agricultural resources. The project site is located in a generally developed area and is not located in the vicinity of ongoing agricultural operations. The County, as the lead agency under CEQA, will ultimately evaluate the proposed project in light of all the considerations listed in LU-2.15, and will decide whether or not to approve the proposed project and its associated discretionary actions.
LU-2.16 Agriculture-Urban Reserve Designation. The County shall require a General Plan amendment to permit urban development on lands the County designates Agriculture-Urban Reserve.	**Consistent.** Under current County General Plan Land Use Designations, the project site is designated for Agriculture Urban Reserve, 20 acre minimum (AU-20), land uses. As previously discussed in this section, a General Plan Amendment is proposed under the project to change this land use designation to Mixed-Use (M/X), which would be consistent with the proposed urban development.

Table 4.7.B: General Plan Consistency Analysis

Goal/Policy	Project Consistency
GOAL LU-3: Preserve and enhance the character and scale of San Joaquin County's communities and rural areas, including their architectural heritage and historic character.	
LU-3.1 Contextual and Compatible Design. The County shall ensure that new development respects San Joaquin County's heritage by encouraging new development to respond to local context, be compatible with the traditions and character of each community, and develop in an orderly fashion which is compatible with the scale of surrounding structures.	**Consistent.** The proposed project is designed in a manner that is consistent with the local context, including landscaping, massing, and building materials. The proposed project would be developed in an orderly fashion consistent with the development plan established in the proposed Specific Plan. The Specific Plan also sets forth development standards, including landscaping requirements, minimum setbacks, maximum building height, and parking requirements. As such, the proposed project would be consistent in scale with surrounding development.
LU-3.7 Development Along Freeways and Highways. The County shall ensure new development located along freeways and highways protects the public from the adverse effects of vehicle-generated air emissions, noise, and vibration, by using such techniques as: • requiring extensive landscaping and trees along the freeway fronting elevation; and • include design elements that reduce noise and provide for proper filtering, ventilation, and exhaust of vehicle air emissions.	**Consistent.** The project site is located adjacent to the Interstate 5 (I-5) freeway facility. As stated in Section 3.8, Landscaping Requirements, of the proposed Specific Plan, all areas not used for buildings, parking, or storage shall be landscaped, which would include the project site's frontage with I-5. In order to establish a peaceful environment that promotes the comfort and wellness of its patients and residents, the proposed project would screen views of I-5 from the campus to the extent possible.
Goal LU-5: Promote the development of regional and locally-serving commercial uses in communities and other areas of the unincorporated County.	
LU-5.20 Mixed-Use Community Centers and Corridors. The County shall encourage both vertical and horizontal mixed-use development within community centers and near or along transportation and transit corridors, bicycle paths, and pedestrian facilities as a means of providing efficient land use, housing, and transportation options for county residents. The County shall ensure that mixed-use developments include appropriate transit, bicycle, and pedestrian facilities.	**Consistent.** As previously stated, the proposed project would include a General Plan Amendment to change the County General Plan Land Use designation of the project site to Mixed-Use (M/X). This designation would encapsulate the variety of land uses that would be provided under the proposed project. As previously stated, the project site's southern boundary along West Hospital Road includes an existing bus stop served by San Joaquin RTD Route 510. Another bus stop is located across South El Dorado Street to the east of the project site, also served by RTD Route 510. Also to the west of the project site is a bus stop for the San Joaquin General Hospital, which is served by RTD Route 90 on weekdays and RTD Route 710 on weekends. As such, the proposed project is located along a transit corridor. Further, the proposed project would also include designated parking areas for bicycles and carpooling vehicles.
LU-5.21 Mixed Uses. The County shall encourage mixed-use development in urban communities, provided it does not create land use conflicts and provides for a close physical and functional relationship of project components.	**Consistent.** As previously stated, the proposed project would consist of a mixed-use development and would be located within an urbanized portion of the County surrounded by various development types. All components of the proposed project would serve the ultimate goal of establishing a wellness campus to treat substance use disorders and co-occurring behavioral health disorders.

Table 4.7.B: General Plan Consistency Analysis

Goal/Policy	Project Consistency
LU-5.22 Mixed-Use Development. The County shall require new mixed-use developments to be developed under a single plan that details the full buildout of the development and any associated phasing for construction and includes specific design guidelines and standards that address the overall site design, scale of development, relationship to adjacent uses, circulation and parking, architecture, infrastructure, and landscaping.	**Consistent.** The proposed San Joaquin County BeWell Specific Plan would unite all elements of the proposed project under a singular plan. The proposed Specific Plan includes both phases of the proposed project, including both the North Campus and the South Campus. In addition, the proposed Specific Plan includes design guidelines and development standards to guide the physical characteristics of the proposed project.
Goal LU-7: Provide for the long-term preservation of productive farmland and to accommodate agricultural services and related activities that support the continued viability of the County's agricultural industry.	
LU-7.1 Protect Agricultural Land. The County shall protect agricultural lands needed for the continuation of viable commercial agricultural production and other agricultural enterprises.	**Consistent.** Although the project site is currently zoned for Agriculture Urban Reserve, 20 acre minimum (AU-20) land uses, the project site is highly disturbed and vacant under existing conditions. No agricultural activities currently operate within the project site and are unlikely to operate within the site in the future due to its disturbed condition. This is further supported by the project site's classification as "Vacant or Disturbed Land" by the California Department of Conservation (DOC), which is defined as "open field areas that do not qualify for an agricultural category, mineral and oil extraction areas, and rural freeway interchanges." The project site is located in a generally developed area and is not located in the vicinity of ongoing agricultural operations. Therefore, the proposed project would not interfere with the continuation of viable commercial agricultural production
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.	**Consistent.** As previously stated, the project site is currently zoned as Agriculture Urban Reserve, 20 acre minimum (AU-20). The project site is currently vacant and therefore does not involve any operational characteristics that have a detrimental impact on future urban development such as the proposed project.
Goal C-1: Maintain a planning framework that promotes the viability of Urban and Rural Communities and coordinates development within City Fringe Areas, while protecting the agricultural, open space, scenic, cultural, historic and natural resources heritage of the County.	
C-1.2 Character and Quality of Life. The County shall encourage new development in Urban and Rural communities to be designed to strengthen the desirable characteristics and historical character of the communities, be supported by necessary public facilities and services, and be compatible with historical resources and nearby rural or resource uses.	**Consistent.** The County's General Plan designates the community of French Camp, in which the project site is located, as an Urban Community. The proposed project would strengthen the desirable characteristics of the community by providing a state-of-the-art, aesthetically appealing facility to serve an identified public health need. As previously stated, the project site is generally surrounded by urban development served by existing utility infrastructure. As such, the proposed project's utility needs could be supported through connections to existing utilities serving nearby land uses.

Table 4.7.B: General Plan Consistency Analysis

Goal/Policy	Project Consistency
C-1.3 Protect Established Communities. Within Urban and Rural Communities, the County shall ensure that new development provides sensitive transitions between existing and new neighborhoods, and require new development, both private and public, respect and respond to those existing physical characteristics, buildings, streetscapes, open spaces, and urban form that contribute to the overall character and livability of each community.	**Consistent.** The County's General Plan designates the community of French Camp, in which the project site is located, as an Urban Community. As discussed in the proposed Specific Plan, the design of the San Joaquin County BeWell campus would be compatible with the character of the surrounding community and the regional context. The proposed project would incorporate landscaping in strategic locations throughout the project site in order to provide a gradual visual transition to the site and soften the urban appearance of the proposed structures.
C-1.9 Available Infrastructure. The County shall only approve new development in Urban Communities and City Fringe Areas where adequate infrastructure is available or can be made available from an existing City, agency, or special district for the development, and there are adequate provisions for long-term infrastructure maintenance and operations.	**Consistent.** The County's General Plan designates the community of French Camp, in which the project site is located, as an Urban Community. As previously stated, the project site is generally surrounded by urban development including residential, institutional, and light industrial land uses, all of which are served by existing roadways and utility infrastructure. This infrastructure could potentially serve the project site via the establishment of connections.
C-1.10 Land Use Designation Amendments. For applications to amend a land use designation within an Urban or Rural Community the County shall consider the land uses within the entire community boundary and determine whether changes in other areas of the community may be warranted. In cases where the County determines other changes should be made, the applicant for the amendment shall be required to include the other changes as part of the amendment subject to agreement by other property owners.	**Consistent.** The proposed project includes a General Plan Amendment in order to change the land use designation of the project site from Freeway Service Commercial (C/FS) to Mixed-Use (M/X). Once approved, the General Plan Amendment would ensure that the proposed project would be consistent with the land use designations governing the project site.
Goal C-2: Provide a realistic planning area around each Urban Community that provides a framework for economic development, the provision of infrastructure and services, and overall quality of life.	
C-2.3 Urban Community Growth. The County shall direct new growth and development to Urban Communities that have available land within their established boundaries and adequate infrastructure and services to accommodate planned residential, commercial services, and employment uses.	**Consistent.** The County's General Plan designates the community of French Camp, in which the project site is located, as an Urban Community. The project site is generally surrounded by existing developed yet is undeveloped, underutilized, and available for potential development. Due to the surrounding urban development, the project site could be adequately served by existing roadways and utility infrastructure.
Infrastructure and Public Services Element	
Goal TM-1: To maintain a comprehensive and coordinated multimodal transportation system that enhances the mobility of people, improves the environment, and is safe, efficient, and cost effective.	
TM-1.15 Transportation Funding. The County shall support transportation system improvements by collecting fair share transportation impact fees from new development, supporting ballot measures to maintain existing and/or establish new sales tax revenue for the maintenance and improvement of transportation infrastructure, and applying for Federal and State discretionary transportation funds.	**Consistent.** The proposed project would be subject to both the Traffic Impact Mitigation Fee (TIMF) and the Regional Transportation Impact Fee (RTIF) programs and would therefore be subject to fees that would fund both local and regional transportation improvements that would address potential operational deficiencies. Fees would be submitted to the County as part of project approval.

Table 4.7.B: General Plan Consistency Analysis

Goal/Policy	Project Consistency
Goal TM-3: To maintain a safe, efficient, and cost-effective roadway system for the movement of people and goods.	
TM-3.3 Onsite Circulation Systems. The County shall require new development to design on-site circulation systems and parking facilities to minimize backup on County roadways.	**Consistent.** The proposed project is primarily residential and residents would generally be expected to remain on the project site while seeking treatment in a residential setting. The proposed project is not anticipated to generate substantial amounts of traffic and would provide adequate on site circulation and parking to minimize backup on County roadways.
Goal TM-8: To ensure that the air transportation system accommodates the growth of air commerce and general aviation needs within the parameters of compatible surrounding uses.	
TM-8.5 Compatible Land Uses. The County shall require that only compatible land uses be permitted near airports, in accordance with the Airport Land Use Plan.	**Consistent.** The proposed project is located within the AIA of Stockton Metropolitan Airport and is subject to the ALUCP for the Airport. The project site is located in Zones 7a and 7b as identified in the ALUCP. In addition, the project site is located beneath the 14 Code of Federal Regulations (CFR) Part 77 horizontal and conical imaginary airspace surfaces for the Airport. The safety compatibility criteria for areas within Zones 7a and 7b place no limits on residential dwelling units, limits maximum non-residential intensity of use to 450 persons per acre, and requires 10 percent of the parcel remain open space. The proposed project is consistent with these requirements. In addition, land uses prohibited in Zones 7a and 7b are limited to hazards to flight (i.e., physical [e.g., tall objects], visual, and electronic forms of interference with the safety of aircraft operations, or wildlife hazard attractants), new dumps and landfills, and outdoor stadiums. Airspace review in Zones 7a and 7b is generally limited to objects greater than 100 feet tall. Finally, the proposed project is located outside the CNEL noise contours for the Airport as identified in the ALUCP. Accordingly, the proposed project would not exceed the noise and safety criteria established in the ALUCP. The proposed project would be submitted to the ALUC for a consistency determination before final review.
Goal IS-2: To ensure appropriate public utility agencies are in place for the long-term maintenance of infrastructure and provision of services.	
IS-2.6 New Development Requirements. The County shall require new development to provide water, sewer, storm water, and/or street lighting service(s), using one of the following methods, subject to County review and approval: • Obtain a will-serve letter from an existing Special District, Community Service District, Mello-Roos Community Facilities District or other non-city public utility agency and obtain LAFCO approval for annexation or out-of-agency service; • Obtain a will-serve letter from a city and obtain LAFCo approval for out-of-agency service; • Fund the formation of a new Community Service District, Mello-Roos Community Facilities District or other non-County public utility agency that would perform ongoing maintenance.; or • When approved by the Director of Public Works, fund the formation of a new County Service Area	**Consistent.** Refer to Section 4.19, Utilities and Service Systems, of this IS/MND for a detailed discussion of the proposed project's compliance with will-serve letter requirements.

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Goal/Policy	Project Consistency
(CSA) that would provide ongoing maintenance services.	
Goal IS-4: To ensure reliable supplies of water for unincorporated areas to meet the needs of existing and future residents and businesses, while promoting water conservation and the use of sustainable water supply sources.	
IS-4.8 Water Conservation Measures. The County shall require existing and new development to incorporate all feasible water conservation measures to reduce the need for water system improvements.	**Consistent.** The proposed project would implement all feasible water conservation matters as provided subject to project approval by the County.
IS-4.19 Water Efficient Landscaping. The County shall encourage water efficient landscaping and use of native, drought-tolerant plants consistent with the Model Landscape Ordinance.	**Consistent.** The proposed project would implement landscape design consistent with the County's Model Landscape Ordinance.
Goal IS-5: To maintain an adequate level of service in the water systems serving unincorporated areas to meet the needs of existing and future residents and businesses, while improving water system efficiency.	
IS-5.1 Adequate Water Treatment and Distribution Facilities. The County shall ensure, through the development review process, that adequate water, treatment and distribution facilities are sufficient to serve new development, and are scalable to meet capacity demands when needed. Such needs shall include capacities necessary to comply with water quality and public safety requirements.	**Consistent.** The proposed applicant would pay applicable water infrastructure fees prior to County approval of the proposed project.
IS-5.4 Water Infrastructure Fees. As a condition of approval for new developments, the County shall require verification of payment of fees imposed for water infrastructure capacity per the fee payment schedule from the appropriate local agency prior to the approval of any final subdivision map.	**Consistent.** The proposed applicant would pay applicable wastewater infrastructure fees prior to County approval of the proposed project.
Goal IS-6: To ensure wastewater treatment facilities and septic systems are available and adequate to collect, treat, store, and safely dispose of wastewater.	
IS-6.9 Wastewater Facility Infrastructure Fees. As a condition of approval for new developments, the County shall have verification of payment of fees imposed for wastewater infrastructure capacity per the fee payment schedule from the local wastewater agency.	**Consistent.** The proposed applicant would pay applicable wastewater infrastructure fees prior to County approval of the proposed project.
Public Health and Safety Element	
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.	
PHS-1.10 Emergency Vehicles Access. The County shall require all new developments to provide, and existing developments to maintain, adequate primary and alternative access for emergency vehicles.	**Consistent.** As discussed in Section 4.12, Transportation, Mitigation Measure (MM) TRA-1 would require exemptions from a fire code official pertaining to the distance from the proposed structures to the access road, as well as the required drive aisle width. Once these exemptions have been secured, the proposed project would maintain adequate access for emergency vehicles.

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Goal/Policy	Project Consistency
Goal PHS-2: To protect people and property from flood hazards.	
PHS-2.3 Evaluation of Flood Protection for New Development. The County shall require evaluation of potential flood hazards prior to approval of new development projects to determine whether the proposed development is reasonably safe from flooding, and shall approve such development consistent with applicable State and Federal laws.	**Consistent.** This IS/MND evaluates the proposed project in the context of potential flood hazards using flood hazard maps published by the Federal Emergency Management Agency (FEMA). According to the Preliminary Geotechnical Report prepared for the proposed project, FEMA Flood Insurance Rate Map (FIRM) Map Number 06077C0470F classifies the project site as Zone X, or Reduced Flood Risk due to Levee. Refer to Section 4.10, Hydrology and Water Quality, of this IS/MND for a more detailed discussion of this topic. As such, the project site is reasonably safe from flooding and suitable for development.
Goal PHS-3: To protect life and property from seismic and geologic hazards.	
PHS-3.1: The County shall consider the risk to human safety and property from seismic and geologic hazards in designating the location and intensity for new development and the conditions under which that development may occur.	**Consistent.** As discussed in Section 4.7, Geology and Soils, of this IS/MND, a Preliminary Geotechnical Report was prepared for the proposed project in order to analyze seismic and geologic risks and design considerations pertaining to the project site. The analysis presented in Section 4.7, which is supported by the Preliminary Geotechnical Report as well as external sources, ultimately determines that the proposed project would not face substantial seismic or geologic risks.
Goal PHS-5: To protect public health, agricultural crops, scenic resources, and the built and natural environments from air pollution.	
PHS-5.7 TAC Exposure Reduction Measures for New Development. The County shall require new development projects to implement all applicable best management practices that will reduce exposure of sensitive receptors (e.g., hospitals, schools, daycare facilities, elderly housing and convalescent facilities) to toxic air contaminants.	**Consistent.** The air quality analysis prepared for the proposed project indicates that construction emissions of TACs would not exceed would not exceed the SJVAPCD cancer risk thresholds. Operation of the proposed project would not be a source of substantial emissions. Therefore, implementation of the proposed project would not result in new sources of TACs and would not expose sensitive receptors to substantial levels of TACs. Sensitive receptors would not be exposed to substantial pollutant concentrations during project operation. See Response to 4.3.1.c.
Goal PHS-6: To reduce greenhouse gas emissions as part of the Statewide effort to combat climate change.	
PHS-6.7 New Development. The County shall require new development to incorporate all feasible mitigation measures to reduce construction and operational GHG emissions.	**Consistent.** As discussed in Section 4.8, Greenhouse Gas Emissions, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.
Goal PHS-8: To promote the safe operation of public and private airports and protect the safety of County residents.	
PHS-8.2 Coordination with San Joaquin County ALUC. The County shall coordinate with the San Joaquin County Airport Land Use Commission (ALUC) on land use planning around airports and submit development proposals for land within the airport area of influence for review by the ALUC for consistency with the Airport Land Use Compatibility Plan.	**Consistent.** According to the ALUCP prepared for the Stockton Metropolitan Airport,[2] the project site is located within the AIA for Stockton Metropolitan Airport Influence Area. As such, the Project Applicant has coordinated with the San Joaquin County ALUC, and the proposed project was submitted to the San Joaquin County ALUC for a consistency review on June 13, 2024, and all associated fees will be paid prior to project approval by the County.

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Goal/Policy	Project Consistency
Goal PHS-9: To protect county residents from the harmful and nuisance effects of exposure to excessive noise.	
PHS-9.1 Noise Standards for New Land Uses. The County shall require new development to comply with the noise standards shown in Tables 9-1 and 9-2 through proper site and building design, such as building orientation, setbacks, barriers, and building construction practices.	**Consistent.** The proposed project is designed to be consistent with the County's noise standards for new land uses.
PHS-9.2 Airport Noise Compatibility Criteria. The County shall require new development within airport areas of influence be consistent with the Airport Noise Compatibility Criteria in the Airport Land Use Compatibility Plan.	**Consistent.** The proposed project is consistent with ALUCP policies and would be submitted to the ALUC for a consistency determination before final review.
PHS-9.3 Screening Distances. The County shall require new development proposed to be located adjacent to major freeways or railroad tracks to be consistent with the Federal Transit Administration (FTA) noise screening distance criteria.	**Consistent.** The County's General Plan Noise Element requires outdoor activity areas for medical services to meet a noise level of 65 dBA L_{dn} and interior spaces to meet a noise level of 45 dBA L_{dn}. The noise analysis completed for the proposed project indicates that after distance attenuation and shielding from the proposed buildings and fencing, the noise levels at the project site would be below the acceptable level of 65 dBA L_{dn}. Similarly, with windows closed interior noise levels would remain below the County's interior noise level standard of 45 dBA L_{dn}. See Appendix G, Noise and Vibration Report.
Natural and Cultural Resources Element	
Goal NCR-1: To conserve and enhance the County's open space resources.	
NCR-1.2 Open Space in Urban Communities. The County shall ensure that open space within urban communities is provided through the development and maintenance of open space and recreation areas.	**Consistent.** The proposed project would provide various open space areas throughout the project site, including a courtyard that would host outdoor activities for patients and residents on campus.
Goal NCR-6: To protect San Joaquin County's valuable architectural, historical, archeological, and cultural resources.	
NCR-6.5 Protect Archaeological and Historical Resources. The County shall protect significant archeological and historical resources by requiring an archeological report be prepared by a qualified cultural resource specialist prior to the issuance of any discretionary permit or approval in areas determined to contain significant historic or prehistoric archeological artifacts that could be disturbed by project construction.	**Consistent.** A Cultural Resources Assessment was prepared by a qualified archaeologist and is attached to this IS/MND as Appendix C: Cultural Resources Assessment.
NCR-6.6 Tribal Consultation. The County shall consult with Native American tribes regarding proposed development projects and land use policy changes consistent with the State's Local and Tribal Intergovernmental Consultation requirements.	**Consistent.** Pursuant to the provisions of Assembly Bill (AB) 52, letters have been sent to appropriate Native American contacts, notifying them of the proposed project and inviting them to participate in the tribal consultation process. Refer to Section 4.18, Tribal Cultural Resources, of this IS/MND for more information regarding this process.

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Goal/Policy	Project Consistency
Goal NCR-7: To protect and enhance the unique scenic features of San Joaquin County.	
NCR-7.7 Reducing Light Pollution. The County shall encourage project designs, lighting configurations, and operational practices that reduce light pollution and preserve views of the night sky.	**Consistent.** As stated in the proposed Specific Plan, exterior lighting within the project site would be angled downward shielded or recessed to avoid glare and reflections toward the sky or adjoining properties.

Source: San Joaquin County General Plan 2035, December 2016 <https://www.sjgov.org/commdev/cgi-bin/cdyn.exe?grp=planning&htm=gp2035> (Accessed October 2, 2024).

[2] San Joaquin County's Aviation System, Stockton Metropolitan Airport. Airport Land Use Compatibility Plan. May 2016 (Amended February 2018) < https://www.sjcog.org/DocumentCenter/View/1318/2016-Stockton-Metropolitan-Airport-ALUCP---Amended-February-2018?bidId=> (Accessed October 3, 2024).

As shown in Table 4.7.B above, the proposed project would generally be consistent with the applicable goals and policies of the San Joaquin County General Plan. Even if the proposed project may conflict with a distinct policy or goal, the proposed project is nonetheless consistent with the San Joaquin County General Plan because after considering all aspects of the proposed development, the proposed project would further the objectives and policies of the General Plan without obstructing their attainment. A given project need not be in perfect conformity with every general plan policy to be consistent, which is particularly applicable to vague, general polices that "encourage" actions.

ALUCP for Stockton Metropolitan Airport. The proposed project is located within the AIA of Stockton Metropolitan Airport (SCK or Airport) and is subject to the 2018 ALUCP for the Airport. The project site is located in Zones 7a and 7b as identified in the ALUCP. In addition, the project site is located beneath the 14 CFR Part 77 horizontal and conical imaginary airspace surfaces for the Airport. The safety compatibility criteria for areas within Zones 7a and 7b place no limits on residential dwelling units, limits maximum non-residential intensity of use to 450 persons per acre, and requires 10 percent of the parcel remain open space. The proposed project is consistent with these requirements. In addition, land uses prohibited in Zones 7a and 7b are limited to hazards to flight (i.e., physical [e.g., tall objects], visual, and electronic forms of interference with the safety of aircraft operations, or wildlife hazard attractants), new dumps and landfills, and outdoor stadiums. Airspace review in Zones 7a and 7b is generally limited to objects greater than 100 feet tall. Accordingly, the proposed project would be consistent with ALUCP policies. The proposed project would be submitted to the ALUC for a consistency determination before final review.

San Joaquin County Development Title. Because the project site is located within unincorporated San Joaquin County, the County's Development Title governs zoning within the project site. According to the San Joaquin County Zoning Map, the project site is currently zoned Agriculture Urban Reserve, 20 acre minimum (AU-20). Pursuant to the San Joaquin County Development Title, the AU-20 zoning district is intended to retain in agriculture those areas planned for future urban development in order to facilitate compact, orderly urban

development and appropriate timing and economical provision of services and utilities.[33] The AU-20 zoning district permits a variety of agricultural, and agriculture-related residential and commercial uses.

The proposed project includes the development of a behavioral and physical health care treatment campus and therefore would not be consistent with the intention of the AU-20 zoning district. However, as previously discussed, the proposed project includes the establishment of the San Joaquin BeWell Specific Plan within the project site. As previously stated, Appendix A of the proposed BeWell Specific Plan demonstrates that it would be consistent with the goals and policies of the San Joaquin County General Plan. Therefore, projects that are found to be consistent with the Specific Plan will be deemed consistent with the County's General Plan.

The Specific Plan establishes development standards and design guidelines consistent with the design of the proposed project and derived from the County's Mixed-Use (M-X) Zone. Once adopted by ordinance, the Specific Plan would serve as the zoning for all uses within the project site. Once the Specific Plan is adopted, the project site would be designated on the County's Zoning Map as the San Joaquin BeWell Specific Plan. Where conflicts occur between the County Development Title and the Specific Plan, the Specific Plan would take precedence. Where standards are not included in the Specific Plan, the underlying County Development Title provisions would remain applicable.

Therefore, approval of the proposed amendment to the San Joaquin County Zoning Map to change the zoning to Mixed-Use (M-X)/Specific Plan would not result in any land use inconsistencies. Impacts would be less than significant, and no mitigation is required.

[33] San Joaquin County Development Title, November 17, 2022, <https://library.municode.com/ca/san_joaquin_county/codes/development_title?nodeId=SJC> (Accessed September 6, 2024).

4.12 MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

4.12.1 Impact Analysis

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Less Than Significant Impact. According to the County General Plan, mineral resources within the County primarily consist of sand and gravel aggregate with limited mining of peat, gold, and silver. There are existing mining operations within the County related to sand and gravel aggregate operations that are economically important to the County. The General Plan Natural and Cultural Resources Element outlines Policy NCR-4.1 which requires mineral deposits of significance identified by the State Division of Mines and Geology as MRZ-2 Mineral Resource Zones, to remain in agricultural or open spaces uses until extraction of the resource.[34]

The Surface Mining and Reclamation Act (SMARA) of 1975 established a land classification system to identify areas that have the potential to generate mineral resources. SMARA's classification system for such lands was established as four Mineral Resource Zones (MRZs) as follows:

a. **MRZ-1:** These are areas where the available geologic information indicates no significant mineral deposits or a minimal likelihood of significant mineral deposits.

b. **MRZ-2:** These are areas where the available geologic information indicates there are significant mineral deposits or there is a likelihood of significant mineral deposits. However, the significance of the deposit is undetermined.

c. **MRZ-3:** These are areas where the available geologic information indicates that mineral deposits are inferred to exist; however, the significance of the deposit is undetermined.

d. **MRZ-4:** There are areas where there is not enough information available to determine the presence or absence of mineral deposits.

[34] San Joaquin County General Plan 2035, Natural and Cultural Resources Element, December 2016 (Updated November 2017) <https://www.sjgov.org/commdev/cgi-bin/cdyn.exe?str=general+plan+2035&str=&grp=main&htm=results&typ=page> (Accessed October 11, 2024).

According to the Department of Conservation CGS Mineral Land Classification Map, the project site is within SMARA Study Areas Special Report (SR) 160 and Special Report (SR) 199.[35] SR 199 is an update of the mineral classification for the Portland Cement Concrete (PCC) Aggregate in the Stockton-Lodi Production-Consumption Region in the County which was previously described in SR 160. The SR 199 discusses the reclassification of PCC aggregate in the Stockton-Lodi P-C Region. The project site is designated as being within a SMARA study area because there are existing mineral operations in the region. SR 199 states that there is land within the study area classified as MRZ-1, MRZ-2, and MRZ-3.[36] Granite Construction Company located in French Camp approximately 1.75 miles south of the project site, is a recycling operation of minor importance to the supply of PPC-grade aggregate. The Granite Construction Company is the nearest MRZ-2 for PCC-grade aggregate to the project site. The implementation of the project site would not preclude the use of the Granite Construction Company and would not result in the loss of availability of a known mineral resource that would be of value to the region or residents of the State. Therefore, impacts would be less than significant, and no mitigation is required.

b. Would the project 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?

No Impact. Refer to 4.12.1(a) above. The County General Plan outlines the importance of mineral resources as discussed above in 4.12.1(a). There are no locally important mineral resource recovery sites discussed in the County General Plan. Therefore, no impact would occur, and no mitigation is required.

[35] California Department of Conservation. 2022. California Geological Survey Information Warehouse. Mineral Land Classification. <https://maps.conservation.ca.gov/mineralresources/#webmaps> (Accessed October 11, 2024).

[36] California Department of Conservation. 2024. CGS. Special Report 199: Update of Mineral Land Classification. < https://www.conservation.ca.gov/cgs/documents/publications/special-reports/SR_199-MLC-Report.pdf> (Accessed October 11, 2024).

4.13 NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

The following section is based on the *Noise and Vibration Impact Analysis* prepared for the proposed project by LSA in May 2025, included as Appendix G to this IS/MND.

4.13.1 Technical Background

The following section discusses the fundamentals of noise and vibration, as well as the regulatory settings applicable to the proposed project.

4.13.1.1 Characteristics of Sound

Noise is usually defined as unwanted sound. Noise consists of any sound that may produce physiological or psychological damage and/or interfere with communication, work, rest, recreation, and sleep.

To the human ear, sound has two significant characteristics: pitch and loudness. Pitch is generally an annoyance, while loudness can affect the ability to hear. Pitch is the number of complete vibrations, or cycles per second, of a sound wave, which results in the tone's range from high to low. Loudness is the strength of a sound, and it describes a noisy or quiet environment; it is measured by the amplitude of the sound wave. Loudness is determined by the intensity of the sound waves combined with the reception characteristics of the human ear. Sound intensity is the average rate of sound energy transmitted through a unit area perpendicular to the direction in which the sound waves are traveling. This characteristic of sound can be precisely measured with instruments. The analysis of the project defines the noise environment of the project area in terms of sound intensity and its effect on adjacent sensitive land uses.

4.13.1.2 Measurement of Sound

Sound intensity is measured with the A-weighted decibel (dBA) scale to correct for the relative frequency response of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies of sound, similar to the human ear's de-emphasis of these frequencies. Decibels (dB), unlike the linear scale (e.g., inches or pounds), are measured on a logarithmic scale representing points on a sharply rising curve.

For example, 10 dB is 10 times more intense than 0 dB, 20 dB is 100 times more intense than 0 dB, and 30 dB is 1,000 times more intense than 0 dB. Thirty decibels (30 dB) represent 1,000 times as much acoustic energy as 0 dB. The decibel scale increases as the square of the change, representing the sound pressure energy. A sound as soft as human breathing is about 10 times greater than 0 dB. The decibel system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. A 10 dB increase in sound level is perceived by the human ear as only a doubling of the sound's loudness. Ambient sounds generally range from 30 dB (very quiet) to 100 dB (very loud).

Sound levels are generated from a source, and their decibel level decreases as the distance from that source increases. Sound levels dissipate exponentially with distance from their noise sources. For a single point source, sound levels decrease approximately 6 dB for each doubling of distance from the source. This drop-off rate is appropriate for noise generated by stationary equipment. If noise is produced by a line source (e.g., highway traffic or railroad operations), the sound decreases 3 dB for each doubling of distance in a hard site environment. Line source sound levels decrease 4.5 dB for each doubling of distance in a relatively flat environment with absorptive vegetation.

There are many ways to rate noise for various time periods, but an appropriate rating of ambient noise affecting humans also accounts for the annoying effects of sound. The equivalent continuous sound level (L_{eq}) is the total sound energy of time-varying noise over a sample period. However, the predominant rating scales for human communities in the State of California are the L_{eq} and Community Noise Equivalent Level (CNEL) or the day-night average noise level (L_{dn}) based on A weighted decibels. CNEL is the time-weighted average noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly L_{eq} for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours) and a 10 dBA weighting factor applied to noises occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours). L_{dn} is similar to the CNEL scale but without the adjustment for events occurring during the relaxation. CNEL and L_{dn} are within 1 dBA of each other and are normally interchangeable. The San Joaquin County uses the L_{dn} noise scale for long-term traffic noise impact assessment.

Other noise rating scales of importance when assessing the annoyance factor include the maximum instantaneous noise level (L_{max}), which is the highest sound level that occurs during a stated time period. The noise environments discussed in this analysis for short-term noise impacts are specified in terms of maximum levels denoted by L_{max}, which reflects peak operating conditions and addresses the annoying aspects of intermittent noise. It is often used together with another noise scale, or noise standards in terms of percentile noise levels, in noise ordinances for enforcement purposes. For example, the L_{10} noise level represents the noise level exceeded 10 percent of the time during a stated period. The L_{50} noise level represents the median noise level. Half the time the noise level exceeds this level, and half the time it is less than this level. The L_{90} noise level represents the noise level exceeded 90 percent of the time and is considered the background noise level during a monitoring period. For a relatively constant noise source, the L_{eq} and L_{50} are approximately the same.

Noise impacts can be described in three categories. The first category includes audible impacts, which are increases in noise levels noticeable to humans. Audible increases in noise levels generally refer to a change of 3 dB or greater because this level has been found to be barely perceptible in exterior environments. The second category, potentially audible, refers to a change in the noise

level between 1 dB and 3 dB. This range of noise levels has been found to be noticeable only in laboratory environments. The last category includes changes in noise levels of less than 1 dB, which are inaudible to the human ear. Only audible changes in existing ambient or background noise levels are considered potentially significant.

4.13.1.3 Physiological Effects of Noise

Physical damage to human hearing begins at prolonged exposure to sound levels higher than 85 dBA. Exposure to high sound levels affects the entire system, with prolonged sound exposure in excess of 75 dBA increasing body tensions, thereby affecting blood pressure and functions of the heart and the nervous system. In comparison, extended periods of sound exposure above 90 dBA would result in permanent cell damage. When the sound level reaches 120 dBA, a tickling sensation occurs in the human ear, even with short-term exposure. This level of sound is called the threshold of feeling. As the sound reaches 140 dBA, the tickling sensation is replaced by a feeling of pain in the ear (i.e., the threshold of pain). A sound level of 160–165 dBA will result in dizziness or a loss of equilibrium. The ambient or background noise problem is widespread and generally more concentrated in urban areas than in outlying, less developed areas.

Table 4.13.A lists definitions of acoustical terms.

Table 4.13.A: Definitions of Acoustical Terms

Term	Definitions
Decibel, dB	A unit of sound measurement that denotes the ratio between two quantities that are proportional to power; the number of decibels is 10 times the logarithm (to the base 10) of this ratio.
Frequency, hertz	Of a function periodic in time, the number of times that the quantity repeats itself in 1 second (i.e., the number of cycles per second).
A-Weighted Sound Level, dBA	The sound level obtained by use of A-weighting. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise. (All sound levels in this report are A-weighted unless reported otherwise.)
L_{01}, L_{10}, L_{50}, L_{90}	The fast A-weighted noise levels that are equaled or exceeded by a fluctuating sound level 1%, 10%, 50%, and 90% of a stated time period, respectively.
Equivalent Continuous Noise Level, L_{eq}	The level of a steady sound that, in a stated time period and at a stated location, has the same A-weighted sound energy as the time-varying sound.
Community Noise Equivalent Level, CNEL	The 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 5 dBA to sound levels occurring in the evening from 7:00 p.m. to 10:00 p.m. and after the addition of 10 dBA to sound levels occurring in the night between 10:00 p.m. and 7:00 a.m.
Day/Night Noise Level, L_{dn}	The 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 10 dBA to sound levels occurring in the night between 10:00 p.m. and 7:00 a.m.
L_{max}, L_{min}	The maximum and minimum A-weighted sound levels measured on a sound level meter, during a designated time interval, using fast time averaging.
Ambient Noise Level	The all-encompassing noise associated with a given environment at a specified time. Usually a composite of sound from many sources from many directions, near and far; no particular sound is dominant.
Intrusive	The noise that intrudes over and above the existing ambient noise at a given location. The relative intrusiveness of a sound depends upon its amplitude, duration, frequency, time of occurrence, and tonal or informational content, as well as the prevailing ambient noise level.

Sources: (1) Technical Noise Supplement (Caltrans 2013); (2) *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018).
Caltrans = California Department of Transportation FTA = Federal Transit Administration

Table 4.13.B shows common sound levels and their sources.

Table 4.13.B: Common Sound Levels and Their Noise Sources

Noise Source	A-Weighted Sound Level in Decibels	Noise Environments	Subjective Evaluations
Near Jet Engine	140	Deafening	128 times as loud
Civil Defense Siren	130	Threshold of Pain	64 times as loud
Hard Rock Band	120	Threshold of Feeling	32 times as loud
Accelerating Motorcycle at a Few Feet Away	110	Very Loud	16 times as loud
Pile Driver; Noisy Urban Street/ Heavy City Traffic	100	Very Loud	8 times as loud
Ambulance Siren; Food Blender	95	Very Loud	—
Garbage Disposal	90	Very Loud	4 times as loud
Freight Cars; Living Room Music	85	Loud	—
Pneumatic Drill; Vacuum Cleaner	80	Loud	2 times as loud
Busy Restaurant	75	Moderately Loud	—
Near Freeway Auto Traffic	70	Moderately Loud	Reference level
Average Office	60	Quiet	One-half as loud
Suburban Street	55	Quiet	—
Light Traffic; Soft Radio Music in Apartment	50	Quiet	One-quarter as loud
Large Transformer	45	Quiet	—
Average Residence without Stereo Playing	40	Faint	One-eighth as loud
Soft Whisper	30	Faint	—
Rustling Leaves	20	Very Faint	—
Human Breathing	10	Very Faint	Threshold of Hearing
—	0	Very Faint	—

Source: LSA (2025).

4.13.1.4 Fundamentals of Vibration

Vibration refers to ground-borne noise and perceptible motion. Ground-borne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors, where the motion may not be discernible, but without the effects associated with the shaking of a building there is less adverse reaction. Vibration energy propagates from a source through intervening soil and rock layers to the foundations of nearby buildings. The vibration then propagates from the foundation throughout the remainder of the structure. Building vibration may be perceived by occupants as the motion of building surfaces, the rattling of items sitting on shelves or hanging on walls, or a low-frequency rumbling noise. The rumbling noise is caused by the vibration of walls, floors, and ceilings that radiate sound waves. Annoyance from vibration often occurs when the vibration exceeds the threshold of perception by 10 dB or less. This is an order of magnitude below the damage threshold for normal buildings.

Typical sources of ground-borne vibration are construction activities (e.g., blasting, pile-driving, and operating heavy-duty earthmoving equipment), steel-wheeled trains, and occasional traffic on rough roads. Problems with both ground-borne vibration and noise from these sources are usually localized to areas within approximately 100 feet from the vibration source, although there are examples of ground-borne vibration causing interference out to distances greater than 200 feet as detailed in the

Federal Transit Administration's (FTA) 2018 Transit Noise and Vibration Impact Assessment Manual (FTA Manual). When roadways are smooth, vibration from traffic, even heavy trucks, is rarely perceptible. It is assumed for most projects that the roadway surface will be smooth enough that ground-borne vibration from street traffic will not exceed the impact criteria; however, construction of the project could result in ground-borne vibration that may be perceptible and annoying.

Ground-borne noise is not likely to be a problem because noise arriving via the normal airborne path will usually be greater than ground-borne noise.

Ground-borne vibration has the potential to disturb people and damage buildings. Although it is very rare for train-induced ground-borne vibration to cause even cosmetic building damage, it is not uncommon for construction processes such as blasting and pile-driving to cause vibration of sufficient amplitudes to damage nearby buildings (FTA 2018). Ground-borne vibration is usually measured in terms of vibration velocity, either the root-mean-square (RMS) velocity or peak particle velocity (PPV). The RMS is best for characterizing human response to building vibration, and PPV is used to characterize the potential for damage. Decibel notation acts to compress the range of numbers required to describe vibration. Vibration velocity level in decibels is defined as

$$L_v = 20 \log_{10} [V/V_{ref}]$$

where "L_v" is the vibration velocity in decibels (VdB), "V" is the RMS velocity amplitude, and "V_{ref}" is the reference velocity amplitude, or 1 x 10-6 inches per second (in/sec) used in the United States.

4.13.2 Regulatory Setting

The applicable noise standards governing the project site include the criteria in the CALGreen Code, San Joaquin County's General Plan Public Health and Safety Element, and the San Joaquin County Municipal Code.

4.13.2.1 Federal Guidelines.

Federal Transit Administration. Although the County does not have daytime construction noise level limits for activities that occur within the specified hours in Section 9-404.060 to determine potential CEQA noise impacts, construction noise was assessed using criteria from the FTA Manual. Table 4.13.C shows the FTA's Detailed Assessment Construction Noise Criteria based on the composite noise levels per construction phase.

Table 4.13.C: Detailed Assessment Daytime Construction Noise Criteria

Land Use	Daytime 8-hour L_{eq} (dBA)
Residential	80
Commercial	85
Industrial	90

Source: *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018).
dBA = A-weighted decibels
L_{eq} = equivalent continuous sound level

4.13.2.2 State of California

Green Building Standards Code. The CALGreen Code contains mandatory measures for non-residential building construction in Section 5.507 on Environmental Comfort. These noise standards are applied to new construction in California for controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when non-residential structures are developed in areas where the exterior noise levels exceed 65 dBA CNEL, such as within a noise contour of an airport, freeway, railroad, and other noise source. If the development falls within an airport or freeway 65 dBA CNEL noise contour, buildings shall be constructed to provide an interior noise level environment attributable to exterior sources that does not exceed an hourly equivalent level of 50 dBA Leq in occupied areas during any hour of operation.

4.13.2.3 San Joaquin County

San Joaquin County General Plan. San Joaquin County General Plan Public Health and Safety Element includes several noise control programs designed to protect the County's citizens from the adverse effects of uncontrolled noise by controlling noise at its source, as well as attenuating noise between the source and the receiver. The General Plan Noise Element includes the following goals that are applicable to the proposed project:

- **Goal PHS-9:** To protect county residents from the harmful and nuisance effects of exposure to excessive noise.
    - **PHS-9.1: Noise Standards for New Land Uses** – The County shall require new development to comply with the noise standards shown in Tables PHS-1 and PHS-2 (Tables 4.13.D and 4.13.E of this document) through proper site and building design, such as building orientation, setbacks, barriers, and building construction practices.
    - **PHS-9.2: Airport Noise Compatibility Criteria** – The County shall require new development within airport areas of influence be consistent with the Airport Noise Compatibility Criteria in the Airport Land Use Compatibility Plan.
    - **PHS-9.3: Screening Distances** – The County shall require new development proposed to be located adjacent to major freeways or railroad tracks to be consistent with the FTA noise screening distance criteria.
    - **PHS-9.4: Acceptable Vibration Levels** – The County shall require construction projects anticipated to generate a significant amount of vibration to ensure acceptable interior vibration levels at nearby vibration-sensitive uses based on FTA criteria.
    - **PHS-9.7: Require Acoustical Study** – The County shall require a project applicant to prepare an acoustical study for any proposed new residential or other noise-sensitive development when the County determines the proposed development may expose people to noise levels exceeding acceptable General Plan noise levels.

Table 4.13.D: Non-Transportation Noise Level Performance Standards

NON-TRANSPORTATION NOISE LEVEL PERFORMANCE STANDARDS FOR NOISE-SENSITIVE USES AT OUTDOOR ACTIVITY AREAS[1, 2]		
Noise Level Descriptor	**Daytime[3] (7:00 am – 10:00 pm)**	**Nighttime[3] (10:00 pm – 7:00 am)**
Hourly Leq dB	50	45
Maximum Level, dB	70	65

Notes: These standards apply to new or existing residential areas affected by new or existing non-transportation sources.

[1] Where the location of outdoor activity areas is unknown or is not applicable, the noise standard shall be applied at the property line of the receiving land use. When determining the effectiveness of noise mitigation measures, the standards shall be applied on the receiving side of noise barriers or other property line noise mitigation measures.

[2] Refer to Mountain House Master Plan, Table 11.2, Exterior Noise Standards for Noise-Sensitive Uses Affected by Non-Transportation Noise Sources, Page 11.12, for Mountain House Noise Standards.

[3] Each of the noise level standards specified shall be reduced by 5 dB for impulsive noise, single tone noise, or noise consisting primarily of speech or music.

Table 4.13.E: Transportation Noise Level Performance Standards

MAXIMUM ALLOWABLE NOISE EXPOSURE FROM TRANSPORTATION NOISE SOURCES[1]		
Noise Sensitive Land Use Types	**Outdoor Activity Areas[2] (dB Ldn)**	**Interior Spaces (dB Ldn)**
Residential	65	45
Administrative Office	-	45
Child Care Services–Child Care Centers	-	45
Community Assembly	65	45
Cultural & Library Services	-	45
Educational Services: General	-	45
Funeral & Interment Services – Undertaking	65	45
Lodging Services	65	45
Medical Services	65	45
Professional Services	-	45
Public Services (excluding hospitals)	-	45
Public Services (hospitals only)	65	45
Recreation – Indoor Spectator	-	45
Religious Assembly	65	45

Notes: These standards apply to new or existing residential areas affected by new or existing non-transportation sources.

[1] Refer to Mountain House Master Plan, Chapter 11, Noise, for Mountain House Noise Standards.

[2] Where the location of outdoor activity areas is unknown or is not applicable, the noise standard shall be applied at the property line of the receiving land use. When determining the effectiveness of noise mitigation measures, the standards shall be applied on the receiving side of noise barriers or other property line noise mitigation measures.

San Joaquin County Municipal Code. Section 9-404.060 of the San Joaquin County Municipal Code sets regulations for specific activities. Section 9-404.060 (a), Construction, sets the following regulation on construction activities:

"General construction noise shall be limited to weekdays from 6:00 a.m. to 9:00 p.m. Pre-construction activities, including loading and unloading, deliveries, truck idling, backup beeps, and radios, also are limited to these construction noise hours."

4.13.2.4 Applicable Vibration Standards

Federal Transit Administration. Vibration standards included in the FTA Manual are used in this analysis for ground-borne vibration impacts on human annoyance. The criteria for environmental impact from ground-borne vibration and noise are based on the maximum levels for a single event. Table 4.13.F provides the criteria for assessing the potential for interference or annoyance from vibration levels in a building.

Table 4.13.F: Interpretation of Vibration Criteria for Detailed Analysis

Land Use	Max L_v (VdB)[1]	Description of Use
Workshop	90	Vibration that is distinctly felt. Appropriate for workshops and similar areas not as sensitive to vibration.
Office	84	Vibration that can be felt. Appropriate for offices and similar areas not as sensitive to vibration.
Residential Day	78	Vibration that is barely felt. Adequate for computer equipment and low-power optical microscopes (up to 20×).
Residential Night and Operating Rooms	72	Vibration is not felt, but ground-borne noise may be audible inside quiet rooms. Suitable for medium-power microscopes (100×) and other equipment of low sensitivity.

Source: *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018).
[1] As measured in 1/3-octave bands of frequency over a frequency range of 8 to 80 Hertz.
FTA = Federal Transit Administration
Max = maximum
L_V = vibration velocity
VdB = vibration velocity in decibels

Table 4.13.G lists the potential vibration building damage criteria associated with construction activities, as suggested in the FTA Manual. FTA guidelines show that a vibration level of up to 0.5 in/sec in PPV is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster) and would not result in any construction vibration damage. For non-engineered timber and masonry buildings, the construction building vibration damage criterion is 0.2 in/sec in PPV.

Table 4.13.G: Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
Reinforced concrete, steel, or timber (no plaster)	0.50
Engineered concrete and masonry (no plaster)	0.30
Non-engineered timber and masonry buildings	0.20
Buildings extremely susceptible to vibration damage	0.12

Source: *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018).
FTA = Federal Transit Administration
PPV = peak particle velocity
in/sec = inch/inches per second

4.13.3 Existing Noise Setting

The primary existing noise sources in the vicinity of the project site include vehicle traffic on I-5, El Dorado Street, and Hospital Road, in addition to occasional aircraft noise and railroad activities.

4.13.3.1 Long-Term Ambient Noise Measurements

To assess existing noise levels, LSA conducted three long-term noise measurements in the vicinity of the project site. The long-term (24-hour) noise level measurements were conducted on November 7 through November 8, 2024, using three Larson Davis Spark 706RC Dosimeters. Table 4.13.H provides a summary of the measured hourly noise levels from the long-term noise level measurements. Noise measurement sheets are provided in Appendix G. Figure 4-1 shows the long-term monitoring locations.

Table 4.13.H: Existing Noise Level Measurements

Location Number	Location Description	Daytime Noise Levels[1] (dBA L_{eq})	Nighttime Noise Levels[2] (dBA L_{eq})	Average Daily Noise Levels (dBA L_{dn})	Primary Noise Sources
LT-1	On a tree near southwest corner of project site, approximately 280 feet away from the I-5 centerline and 940 feet away from the Hospital Road centerline.	62.8-69.8	64.0-68.9	73.1	Vehicle traffic on I-5, aircraft operations
LT-2	On a tree south of Hospital Road, west of Eldorado Palms Apartments, approximately 40 feet away from the Hospital Road centerline and 420 feet away from the El Dorado Street centerline.	63.5-66.8	60.7-67.7	72.0	Vehicle traffic on I-5, Hospital Road, aircraft operations
LT-3	On a pole west of residence at 5601 El Dorado Street, approximately 85 feet away from the El Dorado Street centerline.	59.7-66.1	61.0-67.2	71.0	Vehicle traffic on I-5, El Dorado Street, Occasional railroad activities

Source: LSA (2025).
[1] Daytime Noise Levels = noise levels during the hours of 7:00 a.m. to 10:00 p.m.
[2] Nighttime Noise Levels = noise levels during the hours of 10:00 p.m. to 7:00 a.m.
L_{dn} = Day-night Noise Level dBA = A-weighted decibels L_{eq} = equivalent continuous sound level

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LSA

LEGEND

Project Site Boundary

LT-1 Long-term Noise Monitoring Location

FIGURE 4-1

N

0 150 300

FEET

SOURCE: Google Earth 2024

San Joaquin BeWell Behavioral Health Campus

Noise Monitoring Locations

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4.13.4 Impact Analysis

a. Would the project result in 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?

Less than Significant Impact.

Construction Noise Impacts. Two types of short-term noise impacts could occur during the construction of the proposed project. First, construction crew commutes and the transport of construction equipment and materials to the project site would incrementally increase noise levels on surrounding access roads. Although there would be a relatively high single-event noise-exposure potential causing intermittent noise nuisance, the effect on longer-term ambient noise levels would be small when compared to the existing daily traffic volume of 7,261 on South El Dorado Street. During the overlap of the building construction phase and architectural coating phase, approximately 1,685 Passenger Car Equivalent (PCE) trips would occur during an average day from worker and hauling activities, resulting in a traffic noise increase of approximately 0.91 dBA. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, short-term construction-related impacts associated with worker commutes and equipment transport to the project site would be less than significant.

The second type of short-term noise impact is related to noise generated during construction, which includes site preparation, grading, building construction, paving, and architectural coating on the project site. Construction is completed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. Table 4.13.I lists typical construction equipment noise levels recommended for noise impact assessments, based on a distance of 50 feet between the equipment and a noise receptor, taken from the Federal Highway Administration's (FHWA) *FHWA Roadway Construction Noise Model* (FHWA 2006).

Each piece of construction equipment operates as an individual point source. Using the following equation, a composite noise level can be calculated when multiple sources of noise operate simultaneously:

$$Leq\ (composite) = 10 * \log_{10}\left(\sum_{1}^{n} 10^{\frac{Ln}{10}}\right)$$

Table 4.13.I: Typical Construction Equipment Noise Levels

Equipment Description	Acoustical Usage Factor (%)[1]	Maximum Noise Level (L_{max}) at 50 ft[2]
Auger Drill Rig	20	84
Backhoes	40	80
Compactor (ground)	20	80
Compressor	40	80
Cranes	16	85
Dozers	40	85
Dump Trucks	40	84
Excavators	40	85
Flat Bed Trucks	40	84
Forklift	20	85
Front-end Loaders	40	80
Graders	40	85
Impact Pile Drivers	20	95
Jackhammers	20	85
Paver	50	77
Pickup Truck	40	55
Pneumatic Tools	50	85
Pumps	50	77
Rock Drills	20	85
Rollers	20	85
Scrapers	40	85
Tractors	40	84
Trencher	50	80
Welder	40	73

Source: *FHWA Roadway Construction Noise Model User's Guide,* Table 1 (FHWA 2006).
Note: Noise levels reported in this table are rounded to the nearest whole number.
[1] Usage factor is the percentage of time during a construction noise operation that a piece of construction equipment is operating at full power.
[2] Maximum noise levels were developed based on Specification 721.560 from the Central Artery/Tunnel program to be consistent with the City of Boston's Noise Code for the "Big Dig" project.
FHWA = Federal Highway Administration
ft = foot/feet
L_{max} = maximum instantaneous sound level

Using the equations from the methodology above, the reference information in Table 4.13.I, and the construction equipment list provided, the composite noise levels of each construction phase were calculated. The project construction composite noise levels at a distance of 50 feet would range from 74 dBA L_{eq} to 88 dBA L_{eq}, with the highest noise levels occurring during the site preparation and grading phases.

Once composite noise levels are calculated, reference noise levels can then be adjusted for distance using the following equation:

$$Leq\ (at\ distance\ X) = Leq\ (at\ 50\ feet) - 20 * \log_{10}\left(\frac{X}{50}\right)$$

In general, this equation shows that doubling the distance would decrease noise levels by 6 dBA while halving the distance would increase noise levels by 6 dBA.

The nearest noise sensitive receptors to the project site are residential uses in the surrounding area. Table 4.13.J: Potential Construction Noise Impacts at Nearest Receptor, shows the nearest noise sensitive uses to the project site, their distance from the center of construction activities, and composite noise levels expected during construction. These noise level projections do not consider intervening topography or barriers. Construction equipment calculations are provided in Appendix G.

Table 4.13.J: Potential Construction Noise Impacts at Nearest Receptor

Receptor (Location)	Composite Noise Level (dBA L_{eq}) at 50 ft[1]	Distance (ft)	Composite Noise Level (dBA L_{eq})
Residential (northeast)	88	440	70
Residential (south)		660	66
Residential (southeast)		820	64

Source: LSA (2025).

[1] The composite construction noise level represents the site preparation and grading phases which are expected to result in the greatest noise level as compared to other phases.

dBA L_{eq} = average A-weighted hourly noise level

ft = foot/feet

While construction noise will vary, it is expected that composite noise levels during construction at the nearest off-site sensitive uses (residential) to the northeast would reach 70 dBA L_{eq} during daytime hours. These predicted noise levels would only occur when all construction equipment is operating simultaneously and, therefore, are assumed to be rather conservative in nature. While construction-related short-term noise levels have the potential to be higher than existing ambient noise levels in the vicinity of the project site under existing conditions, the noise impacts would no longer occur once project construction is completed.

As it relates to off-site uses, construction-related noise impacts would remain below the 80 dBA L_{eq}, 1-hour construction noise level criteria for daytime construction noise level criteria as established by the FTA for residential land uses. Compliance with the San Joaquin Municipal Code construction hours would ensure that construction noise does not disturb the sensitive uses during hours when ambient noise levels are likely to be lower (i.e., at night). Accordingly, construction related noise impacts would be considered less than significant, and no mitigation is required.

Operational Noise Impacts. Operational noise impacts would be associated with traffic noise and stationary noise sources on the project site. The following sections discuss the potential impacts associated with both noise sources.

Long-Term Off-Site Traffic Noise Impacts. The FHWA Highway Traffic Noise Prediction Model (FHWA RD-77-108) was used to evaluate traffic-related noise conditions along street segments in the project vicinity. This model requires various parameters, including traffic volumes, vehicle mix, vehicle speed, and roadway geometry, to compute typical equivalent

noise levels during daytime, evening, and nighttime hours. The resulting noise levels are weighted and summed over 24-hour periods to determine the L_{dn} values. The existing, baseline, and future, without and with project average daily trip (ADT) volumes were obtained from the Transportation Impact Study (TIS) prepared for the proposed project by W-Trans in June of 2025 (included within this IS/MND as Appendix H). The standard vehicle mix for Southern California roadways was used for roadways in the project vicinity. Tables 4.13.K, 4.13.L, and 4.13.M below list the traffic noise levels for without and with project scenarios under existing, baseline, and future scenarios, respectively. Similar to the approach undertaken with respect to the air quality analysis presented in Section 4.3, Air Quality, of this IS/MND, these noise levels represent the worst-case, conservative scenario. This scenario assumes a higher trip generation than presented in the TIS, and that no shielding is provided between the traffic and the location where the noise contours are drawn. The specific assumptions used in developing these noise levels and the model printouts are provided in Appendix G to this IS/MND.

The results of the calculations, as shown in Tables 4.13.K, 4.13.L, and 4.13.M above, indicate that an increase of up to 0.8 dBA L_{dn} is expected along the road segments in the vicinity of the project. A noise level increase of less than 3 dBA would not be perceptible to the human ear; therefore, the traffic noise increase in the vicinity of the project site resulting from the proposed project would be less than significant.

Long-Term Stationary Noise Impacts to Off-Site Receptors. The proposed project would operate various rooftop mechanical equipment, including HVAC units, atop the proposed buildings. Based on the project site plan, the project is assumed to have rooftop HVAC units atop each proposed building and assumed to operate 24 hours per day. The HVAC equipment could operate 24 hours per day and would generate sound power levels (L_w) of up to 87 dBA L_w or 72 dBA L_{eq} at 5 feet, based on manufacturer data.

The closest off-site sensitive use during operation of the proposed project would be the existing single-family residences to the northeast of the project site, approximately 100 feet away from the nearest proposed building (Building E). After distance attenuation and shielding from the proposed rooftop HVAC screening walls, noise generated from on-site HVAC equipment proposed buildings would potentially reach up to 41.0 dBA L_{eq}, which would not exceed the County's exterior daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise standards of 50 dBA L_{eq} and 45 dBA L_{eq}, respectively, for residential uses. Therefore, with similar HVAC equipment to the previously mentioned reference equipment or by providing quieter HVAC equipment, the County's exterior noise level standard would be met, and noise associated with the on-site HVAC equipment would be less than significant.

Based on the analysis of off-site traffic noise impacts and stationary operational noise impacts presented above, operational noise impacts of the proposed project would be less than significant, and no mitigation is required.

Table 4.13.K: Existing (2025) Traffic Noise Levels Without and With Project

Roadway Segment	Without Project Traffic Conditions					With Project Traffic Conditions					
	ADT	Centerline to 70 dBA L_{dn} (ft)	Centerline to 65 dBA L_{dn} (ft)	Centerline to 60 dBA L_{dn} (ft)	L_{dn} (dBA) 50 ft from Centerline of Outermost Lane	ADT	Centerline to 70 dBA L_{dn} (ft)	Centerline to 65 dBA L_{dn} (ft)	Centerline to 60 dBA L_{dn} (ft)	L_{dn} (dBA) 50 ft from Centerline of Outermost Lane	Increase from Baseline Conditions
French Camp Road West of Manthey Road	13,280	< 50	93	286	66.3	13,330	< 50	93	287	66.3	0.0
French Camp Road East of Manthey Road	14,550	< 50	101	314	66.7	14,600	< 50	101	315	66.7	0.0
French Camp Road West of El Dorado Street	5,810	< 50	< 50	91	61.5	6,620	< 50	< 50	104	62.1	0.6
French Camp Road East of El Dorado Street	7,110	< 50	< 50	111	62.4	7,290	< 50	< 50	114	62.5	0.1
Manthey Road South of French Camp Road	4,750	< 50	< 50	53	59.1	4,770	< 50	< 50	53	59.1	0.0
Frank West Circle North of French Camp Road	1,480	< 50	< 50	< 50	52.1	1,480	< 50	< 50	< 50	52.1	0.0
Arch Airport Road East of French Camp Road	20,130	< 50	139	433	67.9	20,180	< 50	139	435	67.9	0.0
El Dorado Street North of French Camp Road	10,630	< 50	100	307	66.4	10,740	< 50	101	310	66.4	0.0
El Dorado Street South of French Camp Road	9,530	< 50	90	276	65.9	10,630	< 50	100	307	66.4	0.5
Hospital Road East of El Dorado Street	230	< 50	< 50	< 50	47.0	230	< 50	< 50	< 50	47.0	0.0
Hospital Road West of El Dorado Street	1,710	< 50	< 50	< 50	56.2	2,050	< 50	< 50	< 50	57.0	0.8
Mathews Road East of Manthey Road	13,740	< 50	128	397	67.5	14,030	< 50	130	405	67.6	0.1
Mathews Road West of Manthey Road	10,470	< 50	99	303	66.3	10,730	< 50	101	310	66.4	0.1

Source: LSA (2025).
ADT = average daily traffic
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibels
ft = foot/feet

Table 4.13.L: Baseline Traffic Noise Levels Without and With Project

Roadway Segment	Without Project Traffic Conditions					With Project Traffic Conditions					
	ADT	Centerline to 70 dBA L_{dn} (ft)	Centerline to 65 dBA L_{dn} (ft)	Centerline to 60 dBA L_{dn} (ft)	L_{dn} (dBA) 50 ft from Centerline of Outermost Lane	ADT	Centerline to 70 dBA L_{dn} (ft)	Centerline to 65 dBA L_{dn} (ft)	Centerline to 60 dBA L_{dn} (ft)	L_{dn} (dBA) 50 ft from Centerline of Outermost Lane	Increase from Baseline Conditions
French Camp Road West of Manthey Road	15,450	< 50	107	333	67.0	15,500	< 50	107	334	67.0	0.0
French Camp Road East of Manthey Road	21,330	< 50	146	459	68.4	21,380	< 50	147	460	68.4	0.0
French Camp Road West of El Dorado Street	6,540	< 50	< 50	103	62.1	7,350	< 50	< 50	115	62.6	0.5
French Camp Road East of El Dorado Street	7,680	< 50	< 50	120	62.8	7,860	< 50	< 50	123	62.9	0.1
Manthey Road South of French Camp Road	7,270	< 50	< 50	79	60.9	8,080	< 50	< 50	88	61.4	0.5
Frank West Circle North of French Camp Road	1,480	< 50	< 50	< 50	52.1	1,480	< 50	< 50	< 50	52.1	0.0
Arch Airport Road East of French Camp Road	28,300	66	194	609	69.3	28,350	66	194	610	69.4	0.1
El Dorado Street North of French Camp Road	11,400	< 50	107	329	66.7	11,510	< 50	108	332	66.7	0.0
El Dorado Street South of French Camp Road	10,300	< 50	97	298	66.2	11,400	< 50	107	329	66.7	0.5
Hospital Road East of El Dorado Street	230	< 50	< 50	< 50	47.0	230	< 50	< 50	< 50	47.0	0.0
Hospital Road West of El Dorado Street	1,790	< 50	< 50	< 50	56.4	2,130	< 50	< 50	< 50	57.2	0.8
Mathews Road East of Manthey Road	17,710	57	163	511	68.6	18,020	58	166	520	68.7	0.1
Mathews Road West of Manthey Road	10,750	< 50	101	311	66.4	11,030	< 50	104	319	66.5	0.1

Source: LSA (2025).
ADT = average daily traffic
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel
ft = foot/feet

Table 4.13.M: Future Traffic Noise Levels Without and With Project

Roadway Segment	Without Project Traffic Conditions					With Project Traffic Conditions					
	ADT	Centerline to 70 dBA L_{dn} (ft)	Centerline to 65 dBA L_{dn} (ft)	Centerline to 60 dBA L_{dn} (ft)	L_{dn} (dBA) 50 ft from Centerline of Outermost Lane	ADT	Centerline to 70 dBA L_{dn} (ft)	Centerline to 65 dBA L_{dn} (ft)	Centerline to 60 dBA L_{dn} (ft)	L_{dn} (dBA) 50 ft from Centerline of Outermost Lane	Increase from Baseline Conditions
French Camp Road West of Manthey Road	20,430	< 50	140	440	68.2	20,480	< 50	141	441	68.2	0.0
French Camp Road East of Manthey Road	26,310	60	180	566	69.3	26,360	60	180	567	69.3	0.0
French Camp Road West of El Dorado Street	14,580	< 50	73	227	65.5	15,390	< 50	77	239	65.8	0.3
French Camp Road East of El Dorado Street	17,370	< 50	87	270	66.3	17,550	< 50	87	273	66.3	0.0
Manthey Road South of French Camp Road	14,860	< 50	53	160	64.0	14,540	< 50	< 50	157	63.9	-0.1
Frank West Circle North of French Camp Road	1,480	< 50	< 50	< 50	52.1	1,480	< 50	< 50	< 50	52.1	0.0
Arch Airport Road East of French Camp Road	29,880	69	205	643	69.6	29,930	69	205	644	69.6	0.0
El Dorado Street North of French Camp Road	16,470	< 50	152	475	68.3	16,580	< 50	153	478	68.3	0.0
El Dorado Street South of French Camp Road	13,440	< 50	125	388	67.4	14,540	< 50	135	420	67.7	0.3
Hospital Road East of El Dorado Street	780	< 50	< 50	< 50	52.3	780	< 50	< 50	< 50	52.3	0.0
Hospital Road West of El Dorado Street	1,790	< 50	< 50	< 50	56.4	2,140	< 50	< 50	< 50	57.2	0.8
Mathews Road East of Manthey Road	17,710	57	163	511	68.6	18,020	58	166	520	68.7	0.1
Mathews Road West of Manthey Road	10,750	< 50	101	311	66.4	11,030	< 50	104	319	66.5	0.1

Source: LSA (2025).
ADT = average daily traffic
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel
ft = foot/feet

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact.

Construction Vibration Impacts. This construction vibration impact analysis discusses the level of human annoyance using vibration levels in RMS (VdB) and assesses the potential for building damages using vibration levels in PPV (in/sec). This is because vibration levels calculated in RMS are best for characterizing human response to building vibration, while vibration level in PPV is best for characterizing potential for damage.

Table 4.13.N shows the PPV and VdB values at 25 feet from the construction vibration source. As shown in Table 4.13.N, bulldozers, and other heavy-tracked construction equipment (expected to be used for this project) generate approximately 0.089 PPV in/sec or 87 VdB of ground-borne vibration when measured at 25 feet, based on the FTA Manual. The distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings and the project construction boundary (assuming the construction equipment would be used at or near the project setback line).

Table 4.13.N: Vibration Source Amplitudes for Construction Equipment

Equipment	Reference PPV/L_V at 25 ft	
	PPV (in/sec)	L_V (VdB)[1]
Pile Driver (Impact), Typical	0.644	104
Pile Driver (Sonic), Typical	0.170	93
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large Bulldozer[2]	**0.089**	**87**
Caisson Drilling	0.089	87
Loaded Trucks[2]	**0.076**	**86**
Jackhammer	0.035	79
Small Bulldozer	0.003	58

Source: *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018).
[1] RMS vibration velocity in decibels (VdB) is 1 µin/sec.
[2] Equipment shown in **bold** is expected to be used on site.
µin/sec = microinches per second
ft = foot/feet
FTA = Federal Transit Administration
in/sec = inch/inches per second
L_V = velocity in decibels
PPV = peak particle velocity
RMS = root-mean-square
VdB = vibration velocity decibels

The formulae for vibration transmission are provided below and Tables 4.13.O and 4.13.P below provide a summary of off-site construction vibration levels.

$$L_vdB\ (D) = L_vdB\ (25\ ft) - 30\ Log\ (D/25)$$

$$PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$$

Table 4.13.O: Potential Construction Vibration Annoyance Impacts at Nearest Receptor

Receptor (Location)	Reference Vibration Level (VdB) at 25 ft[1]	Distance (ft)	Vibration Level (VdB)
Residential (northeast)	87	440	50
Residential (south)		660	44
Residential (southeast)		820	42

Source: LSA (2025).
[1] The reference vibration level is associated with a large bulldozer, which is expected to be representative of the heavy equipment used during construction.
[2] The assessment distance is associated with the average condition, identified by the distance from the center of construction activities to surrounding uses.
ft = foot/feet
VdB = vibration velocity decibels

Table 4.13.P: Potential Construction Vibration Damage Impacts at Nearest Receptor

Receptor (Location)	Reference Vibration Level (PPV) at 25 ft[1]	Distance (ft)	Vibration Level (PPV)
Residential (northeast)	0.089	20	0.124
Residential (south)		100	0.008
Residential (southeast)		235	0.003

Source: LSA (2025).
[1] The reference vibration level is associated with a large bulldozer, which is expected to be representative of the heavy equipment used during construction.
[2] The assessment distance is associated with the peak condition, identified by the distance from the perimeter of construction activities to surrounding structures.
ft = foot/feet
PPV = peak particle velocity

As previously shown in Table 4.13.F, the threshold at which vibration levels would result in annoyance would be 78 VdB for daytime residential uses. As shown in Table 4.13.G, the FTA guidelines indicate that for a non-engineered timber and masonry building, the construction vibration damage criterion is 0.2 in/sec in PPV.

Based on the information provided in Table 4.13.O, vibration levels are expected to approach 50 VdB at the closest sensitive use (residential) to the northeast and would not exceed the annoyance thresholds.

Based on the information provided in Table 4.13.P, the closest structure to external construction activities are the residential uses to the northeast. Using the reference data from Table 4.13.N and the equation above, it is expected that vibration levels generated by dump trucks and other large equipment would generate ground-borne vibration levels of up to 0.124 PPV (in/sec) at the closest structures to the project site. This vibration level would not exceed the 0.2 in/sec PPV threshold considered safe for non-engineered timber and masonry buildings, which would result in a less than significant impact. Vibration levels at all other buildings would be lower.

Therefore, construction would not result in any vibration damage. Impacts would be less than significant, and no mitigation is required.

Operational Vibration Impacts. The proposed project would not generate vibration levels related to on-site operations. Vibration related to project-related traffic on adjacent roadways would be unusual as on-road vehicles have rubber tires and suspension systems that provide vibration isolation. Based on a reference vibration level of 0.076 in/sec PPV, structures greater than 20 feet from the roadways that serve project-related trips would experience vibration levels below the most conservative standard of 0.12 in/sec PPV; therefore, vibration generated by project-related traffic on adjacent roadways would be less than significant, and no mitigation is required.

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 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Less than Significant Impact. The proposed project is located within the Airport Influence Area (AIA) of Stockton Metropolitan Airport (SCK or Airport), as delineated in the Airport Land Use Commission's 2018 Airport Land Use Compatibility Plan Update (ALUCP) for the Airport. SCK is a domestic, commercial service airport, located approximately 1.7 miles east of the project site. The project site is located outside the Airport's 65 dBA CNEL noise contour as provided in the ALUCP. In addition to SCK, San Joaquin General Hospital is located approximately 0.15 miles west of the project site and operates a helipad. Based on previous analyses completed by LSA, assuming a conservative scenario in which three (3) helipad activities occur in the same day, including one during evening hour and one during nighttime hours, the 60 dBA CNEL noise contour is approximately 600 feet from the center of the helipad. At a distance of approximately 780 feet from the existing helipad, the proposed project is located outside of the 60 dBA CNEL noise contour. Accordingly, the proposed project would not expose people residing or working in the vicinity of the project site to excessive noise levels due to the proximity of a private airstrip or public or public use airport. Therefore, this impact would be less than significant, and no mitigation is required.

4.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

4.14.1 Impact Analysis

a. Would the project 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)?

Less Than Significant Impact. The proposed project is located in the unincorporated area of French Camp which is described as an Urban Community in the County General Plan. The County General Plan states that French Camp had a population of 4,421 according to 2008-2012 U.S. Census Data[37], yet as of 2022 the population has dropped to 3,860 residents.[38] The project site is currently zoned as Agricultural-Urban Reserve (AU-20) which is a designation that provides a reserve for urban development and is in the logical path of development around an Urban Community. With this zoning designation, population growth resulting from a development within the AU-20 designated site would be expected and not result in unplanned population growth.

The proposed project includes the construction and operation of buildings providing residential treatment programs and supportive transitional housing. Buildings C and D of the South Campus are intended to house patients in the residential treatment programs and includes 130 beds total. Buildings C and D is intended to include the Adult Crisis Residential Treatment Facility which is a program where clients self-admit and receive short stay treatment for an average of 15-30 days. The Adult Medical Detox program is also part of Buildings C and D and is a self-admit program where the client may leave at any time. The Adolescent Substance Abuse Disorder Residential Treatment Program is dedicated to adolescents between the ages of 12-18 years old. This program would provide 16 beds and provide care for an average of 15-30 days.

The North Campus includes Buildings E, F, and G and provides 150,360 square feet of supportive transitional housing. These buildings would support persons receiving service at the wellness

37 San Joaquin County General Plan 2035, Community Development Element. December 2016 (Updated November 2017) <https://www.sjgov.org/commdev/cgi-bin/cdyn.exe?str=general+plan+2035&str=&grp=main&htm=results&typ=page> (Accessed October 15, 2024).

38 Census Reporter. 2022. French Camp, CA. < https://censusreporter.org/profiles/16000US0626028-french-camp-ca/> (Accessed October 15, 2024).

campus with the opportunity to live on campus for up to 18 months. Buildings E, F, and G would provide 426 beds. It is anticipated that the temporary residents of the BeWell Campus would come from within San Joaquin County rather than inducing a new population growth from outside the County because the BeWell Campus is intended to support the need for substance use disorder treatment in the County. The Campus is intended to provide accessible care to French Camp and San Joaquin County where mental health/behavioral health is one of the highest need priorities in the County. It can be reasonably assumed that campus employees and residents would be individuals who already live in the County. Because the project site does not currently contain any residential uses, the implementation of the proposed project could potentially result in a localized increase in the project area's population. The proposed project would induce minor population growth by adding facility employees and temporary residents. Between the residential uses proposed in the South Campus and North Campus, there are 426 beds available for use for 15-30 days and up to 18 months. There are a total of 540 parking spaces under the proposed project that would most likely serve facility employees and visitors. The addition of approximately 263 permanent employees and up to 426 temporary residents at a time may represent a small percent of San Joaquin County's 2022 population of 793,229.[39]

The project site is currently undeveloped and would require construction and utilities to service the project site. Although the proposed project includes infrastructure improvements such as extension of water services and implementation of driveways, these improvements would not include roadway expansions or improvements that would indirectly induce unplanned population growth. The internal circulation of the proposed project would include the implementation of driveways to enter/exit the existing roadways West Hospital Road and South El Dorado Street. Therefore, potential impacts related to unplanned population growth either directly or indirectly would be less than significant, and no mitigation is required.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed project includes the construction and operation of the San Joaquin BeWell Campus which would provide accessible mental healthcare to French Camp and the San Joaquin County. The project would consist of 14 buildings with 540 parking spaces, landscaping, amenities, and walkways set into a campus setting. The project site is currently undeveloped and does not contain any existing housing. Therefore, there are no people living on the project site that would be displaced with the development of the proposed project, and there would be no impact related to the displacement of substantial numbers of existing people or housing. No mitigation is required.

[39] Census Reporter. 2022. San Joaquin County, CA. < https://censusreporter.org/profiles/05000US06077-san-joaquin-county-ca/> (Accessed October 15, 2024).

4.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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, in order 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?	☐	☐	☒	☐

4.15.1 Impact Analysis

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

i. Fire Protection?

Less Than Significant Impact. Fire protection services for unincorporated areas of the County are provided by independent special district fire departments, CALFIRE, and contracted service with city fire departments. The project site is served by the French Camp McKinley Fire District; additional fire protection services to County facilities in the French Camp area are provided pursuant to mutual aid agreements with surrounding fire districts that would include coverage for the BeWell Campus project. French Camp McKinley Fire District operates French Camp Fire Station 11-1, located approximately one mile east of the project site at 310 French Camp Road. Station 11-1 is staffed with three career firefighters and their apparatus includes a Chief 11-1 vehicle that is designed to serve as the Incident Command Post (ICP) at major incidents, Engine 11-1 which serves as the front-line fire suppression and Emergency Medical Service (EMS) unit, Engine 11-2 which serves as the reserve type 1 pumper, and Engine 11-3 which is a Type 3 Wildland pumper often deployed on mutual aid assignments throughout California.[40] Fire Station 11-1 also uses Utility 11-1 vehicle for day-to-day functions around the district and an OES apparatus vehicle supplied by the California Office of Emergency Services.[41] In 2022, there were 1,215 incidents reported which Station 11-1

[40] French Camp Mckinley Fire District. Stations and Apparatus. < https://www.frenchcampfire.com/stations-and-apparatus> (Accessed October 16, 2024).

[41] Ibid.

responded to in an average of 6:44 minutes.[42] The majority of reports consisted of "Rescue and EMS" incidents which accounted for 47.16% of reports, and "Good Intent Calls" which made up 25.76% of calls.[43] "Good Intent Calls" are calls in which upon arrival and investigation of the scene, there is no threat.

According to the County General Plan DEIR, French Camp-Mckinley averages 6:15 minutes and is in the 4- to 6-minute range that national and state guidelines call for urban fire departments.[44] In case of incident calls to the project site, the fire station is located approximately one mile east of the project site and the travel time between the fire station and project site is approximately three minutes. The French Camp Fire District is party to a mutual aid agreement with surrounding communities which allows for other fire departments to provide immediate assistance in the event of an emergency in order to ensure that the Fire District's resources are not overwhelmed during an emergency.

Fire department access design would be in accordance with California Fire Code and the French Camp McKinley Fire Department General Conditions. The fire access lane that is proposed along the South Campus' perimeter would meet turning radius requirements determined by the Fire Code Official. The proposed project is located within an area that is already serviced by the French Camp Mckinley Fire District. As discussed in Section 4.14, Population and Housing, the proposed project is anticipated to result in a small, localized increase in population, but it is likely that the campus employees, residents, and visitors are existing County residents who are already served by French Camp McKinley Fire District or other fire protection services in the County. In addition, the proposed project would be staffed with health care professionals and operate medical urgent care services that may reduce paramedic-related calls to the fire district.

The proposed project would not increase average response times and would not substantially increase calls for service to the project site. Regardless, as new development within the County, the proposed project would be subject to Section 9-610.060, Fire Protection Facilities Improvement Fee, of the San Joaquin County Development Title. Under Section 9-610.060, fire districts within San Joaquin County, including French Camp McKinley Fire District, can establish development impact fees to finance fire facilities necessary to serve new developments. The County of San Joaquin Board of Supervisors adopted a resolution to establish a fire facilities fee within the French Camp McKinley Fire District on December 12, 2023. The fees took effect on February 31, 2024. As such, the proposed project would be subject to a Fire Protection Facilities Improvement Fee, meaning that the County of San Joaquin Community Development, on behalf of the French Camp McKinley Fire District, would collect impact fees from the Project Applicant based on the square footage and land use type of the proposed project. The French Camp McKinley Fire Department has identified specific improvements that could be funded through this program, including a new water tender, a new command vehicle, a new training pod container, improvements to existing Fire Station 11-1, and software system updates. As such, improvements to French Camp McKinley Fire District facilities funded by the project's payment of a Fire Protection Facilities Improvement Fee, pursuant to RCM PS-1, would ensure the

[42] French Camp Mckinley Fire District. Response Statistics. < https://www.frenchcampfire.com/response-statistics> (Accessed October 16, 2024).

[43] Ibid.

[44] San Joaquin County General Plan 2035. Draft EIR. 2014. <https://www.sjgov.org/commdev/cgi-bin/cdyn.exe?grp=planning&htm=eir> (Accessed October 17, 2024).

French Camp McKinley Fire District's ability to adequately serve the project site and the surrounding service area. With adherence to RCM PS-1, potential impacts related to fire protection services would be less than significant, and no mitigation is required.

Regulatory Compliance Measure:

RCM PS-1 **Fire Protection Facilities Improvement Fee.** At the time of building permit application, the Project Applicant shall pay a Fire Protection Facilities Impact Fee to the San Joaquin County Community Development Department, on behalf of the French Camp McKinley Fire District, based on the current schedule at the time of payment. The Project Applicant shall receive confirmation from the French Camp McKinley Fire District that the appropriate fees have been paid prior to the issuance of grading permits.

ii. Police Protection?

Less Than Significant Impact. Unincorporated areas of the County are provided police services through the San Joaquin County Sheriff's Office (SJSO). The SJSO is responsible for an estimated 21% of the County's population. According to the County Sheriff's 2023 Annual Report, the County Sheriff serves 159,170 people who live in SJSO jurisdiction. The 2023 Annual Report states that SJSO received 80,392 calls for service and the average response time for Priority 1 calls were 14 minutes and 7 seconds.[45] Response times vary depending on the number of officers in a patrol area and the density of the population being served. The unincorporated areas of the County are divided into 10 districts or "beat areas" that are staffed by sheriffs who provide emergency response service to citizens in their beat area. The project site is located within Beat 6 which covers the French Camp area.[46] The nearest Sheriff station is located approximately 1.5 miles west of the project site at 7000 Michael Canlis Boulevard.

The proposed project consists of two campuses of buildings for behavioral health and wellness care that would provide full-service support to patients such as outpatient, urgent care, and residential treatment services. The project's vision is to provide accessible mental healthcare to French Camp and San Joaquin County to improve health equity in an area that has low show rates due to proximity of services. The BeWell Campus includes residential treatment services available for residents to live in for up to 18 months during their wellness journey. This resource may reduce SJSO Patrol Division calls who respond to calls for service relating to encampments, trespassing, drug and medical waste, and mental health issues. Typically, the patrol division has a patrol deputy respond to Homeless Outreach calls to further assess the circumstances and specific needs of the call. These calls often result in Community Car/Community Revitalization Unit (CRU) division deployment or communication with outreach services and other agencies. The CRU is part of the SJSO Special Services Division and addresses quality of life issues by working as liaisons with mental health professionals. These SJSO resources may receive less calls with the implementation of the proposed

[45] San Joaquin County. 2023. 2023 Annual Report <https://sjsheriff.org/> (Accessed October 17, 2024).

[46] San Joaquin GIS Mapper. Sheriff Beats Layer. < https://sjmap.org/DistrictViewer/> (Accessed October 17, 2024).

project because the project would provide mental health services and temporary housing that community members in crisis could self-admit to for support. A Sobering Center under the proposed project would service individuals with mental illness and/or substance use disorders who are under the influence of alcohol or drugs. The Sobering Center would provide a safe space for short-term monitoring and management as an alternative to jail and emergency services. With implementation of the proposed project's services, law enforcement officers may response to less mental health-related issues and respond to other emergency calls such as public safety concerns and violent crimes.

As discussed previously in Section 4.14, Population and Housing, population in the project area would increase considering the project site is currently undeveloped. The development and operation of the project would result in a population growth due to the facility employees, patients, and visitors that are expected to visit the project site. This project is proposed to support the mental health needs of the French Camp and County area which suggests that the implementation of the project would not invite a substantial amount of new people that do not currently reside in the County. The officer to resident service ratio is not expected to substantially increase or impact police protection services as a direct result of the proposed project. Service ratios may remain within the service ratios of 0.95 officers and 1.47 officers per 1,000 residents as recorded in the County General Plan DEIR.[47]

The proposed project aims to maintain a safe environment for patients, employees, and visitors. Project components include security arms adjacent to ingress/egress locations and site fencing to control access to the site from outside pedestrians and vehicles. Driveways, parking areas, walkways, and outdoor recreational areas would have sufficient levels of lighting to provide security and safety. These design features and the presence of medical professionals and staff would keep police service demands to the project site to a minimum. With access to mental health services such as a sobering center on the project site, it is likely that SJSO service calls regarding mental health and substance abuse could decrease, thereby reducing police service demand in the area, and offsetting any increase in calls that would occur form the implementation of the project. Therefore, the proposed project would not substantially impair police protection response times, service ratios, or performance objectives. The project would not trigger a need for new or altered police facilities, the construction of which could cause significant environmental impacts. Therefore, potential impacts related to police protection services would be less than significant, and no mitigation is required.

iii. Schools?

Less Than Significant Impact. The project site is in the unincorporated area of French Camp and is served by Manteca Unified School District (MUSD) which consists of 20 elementary schools and five high schools. The project site area is served by French Camp Elementary School, located at 241 East Fourth Street, approximately 0.50 miles east of the project site. French Camp Elementary School serves Kindergarten through 8th grade students and reported 600 total student enrolled for the

[47] San Joaquin County General Plan 2035. Draft EIR. 2014. <https://www.sjgov.org/commdev/cgi-bin/cdyn.exe?grp=planning&htm=eir> (Accessed October 17, 2024).

2023-24 school year.[48] The project site area is also served by East Union High School, located at 1700 Union Road in the City of Manteca, approximately five miles south of the project site. East Union High School serves 9th through 12th grade students with a total enrollment of 1,510 students for the 2023-2024 school year.[49]

Although the project site is served by these schools, it is not anticipated that the proposed project would generate additional student enrollment. The temporary residential uses included as part of the proposed project are intended for relatively short-term use (15-30 days, up to 18 months for patients in the transitional housing units). In the event treatment services are provide to adolescents, it is not anticipated that school-aged patients would leave the facility to attend school while residing on the campus. As such, children enrolled in this program would not increase the demand on schools in the vicinity of the project.

MUSD prepared a Student Population Forecast in 2023 to track the expected growth of the district. Based on an attendance area matrix that considered school boundaries of residences, French Camp Elementary had a total enrollment of 576 students in 2023.[50] The total school capacity of the French Camp Elementary is 766 students, therefore the school is under capacity. Similarly, East Union High School is under capacity with 1,500 students enrolled with a total capacity of 2,026 students. The forecast report projects school enrollment and capacity for 2024 through 2033. Over the 10-year period, French Camp Elementary is forecasted to experience 12% net growth, or a total of 659 students. This is below the total capacity of 766 students. Similarly, East Union High School forecasts 20% net growth over the next 10-years, or a total of 1,603 students in 2033. This is below the total capacity of 2,000 students. This indicates that the schools have capacity to accommodate any new students. Therefore, the project would not be anticipated to have a significant impact on schools related to the provision of new or physically altered school facilities, or a need for new or physically altered school facilities, the construction of which could cause significant environmental impacts. Potential impacts related to schools would be less than significant, and no mitigation is required.

iv. Parks?

Less Than Significant Impact. Refer to Section 4.16, Recreation. Impacts would be less than significant and no mitigation is required.

v. Other public facilities?

Less Than Significant Impact. The Stockton-San Joaquin County Public Library (SSJCPL) system offers public library services throughout the County. SSJCPL consists of 16 public libraries across the City of Stockton and the County. The nearest library to the project site is the Weston Ranch Branch Library located at 1453 West French Camp Road in the City of Stockton, approximately 1.70 miles west of

48 California Department of Education School Profile: French Camp Elementary. <https://www.cde.ca.gov/sdprofile/details.aspx?cds=39685936042311> (Accessed October 17, 2024).

49 California Department of Education School Profile: East Union High School. <https://www.cde.ca.gov/sdprofile/details.aspx?cds=39685933932001 > (Accessed October 17, 2024).

50 MUSD Student Population Forecast 2023-2024. 2024. <https://www.mantecausd.net/our-district/facilities-program/boundaries> (Accessed October 17, 2024).

the project site. The West Ranch Branch is part of the MUSD Educational Center campus and provides a collection of books and media in English and Spanish.

Although the proposed project may increase the population at the project site, the BeWell Campus is anticipated to serve existing San Joaquin County residents and therefore the increase in population at the project site would not generate new patrons for the Weston Ranch Branch Library or other local libraries within the SSJCPL system. The proposed project would not increase demand for library facilities in the vicinity and impacts to library facilities would be less than significant. No mitigation is required.

4.16 RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

4.16.1 Impact Analysis

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?

Less Than Significant Impact. The proposed project would provide numerous outdoor recreational activities such as walking paths, an art walk and place of respite, a social lawn, a physical activity zone including sports courts, outdoor fitness equipment, an outdoor amphitheater, a social hub, and a community garden. The North Campus would have open space areas and walkways between buildings while also connecting to the South Campus. Building A, which is part of the South Campus, would also have a designated yard area for use by staff. These outdoor recreational facilities are intended to be used by patients, employees, and visitors. Temporary residents, employees, and patients of the proposed project are not anticipated to use off-site park and recreational facilities because the BeWell Campus would provide full-service recreation facilities as on-site amenities for the daily needs of the proposed temporary residents. While some project employees and visitors may use other public park and recreation facilities, the increase in park and recreational facility use would be negligible and unlikely to result in substantial deterioration. Therefore, potential impacts to parks and recreational facilities would be less than significant, and no mitigation is required.

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?

Less Than Significant Impact. As discussed in Response 4.16.1(a), the proposed project would provide recreational facilities for residents, employees, and visitors. The proposed project includes the construction of outdoor recreational amenities intended for use by facility patients and residents. These recreational amenities are part of the behavioral and physical health care services that are intended to provide patients with a safe and supportive environment. Therefore, the construction of these recreational amenities would be in accordance with County policies and not require the expansion of existing recreational facilities which could cause significant environmental impacts. Impacts related to parks and recreation would be less than significant, and no mitigation is required.

4.17 TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☒	☐	☐

The analysis presented in this section is based upon the Transportation Impact Study (TIS) prepared for the proposed project by W-Trans in June 2025. The TIS is included as Appendix H to this IS/MND.

4.17.1 Impact Analysis

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant with Mitigation Incorporated. Under current conditions, the project site consists of a vacant lot bound by Interstate 5 (I-5) to the west, West Hospital Road to the south, and South El Dorado Street to the east. The San Joaquin County General Plan classifies West Hospital Road as a local street and South El Dorado Street as a minor arterial roadway. Existing transportation infrastructure within the project site vicinity is generally vehicle-focused, as the only pedestrian or bicycle facilities nearby are the crosswalks and pedestrian phasing at the traffic signal at South El Dorado Street/Hospital Road intersection, located on the southeast corner of the project site.

As discussed previously in this IS/MND, the project site is directly served by RTD Route 510. Existing Route 510 bus stops are located on the project site's southern boundary on West Hospital Road, near the intersection of El Dorado Street, and on South El Dorado Street, near the intersection with West Hospital Road, opposite the project site. Another bus stop is located approximately 700 feet west of the project site near the entrance to San Joaquin General Hospital. In addition to RTD Route 510, this bus stop is served by RTD Route 90 on weekdays and RTD Route 710 on weekends.

Construction. As discussed in Section 2.0, Project Description, proposed project construction is anticipated to last for 18 months. Construction activity would result in worker and truck trips to and from the project site. These construction related trips would be temporary in nature and would end once construction is completed. Proposed project construction would be phased appropriately to ensure that associated vehicle trips are spaced out and do not result in any substantial delays along adjacent roadways. In addition, equipment and vehicles associated with project construction would be staged within the project site in order to avoid major operational

disruptions along nearby transportation corridors. Construction activities associated with the proposed project's frontage along West Hospital Road would occur in close proximity to the existing RTD bus stop discussed above. However, public access to this bus stop would be fully maintained during construction.

Construction phasing and equipment staging on the project site would reduce conflicts with applicable programs, plans, ordinances or policies addressing the circulation system. Impacts would be less than significant, and no mitigation would be required.

Operations.

Roadway Facilities. For purposes of evaluating conflicts with applicable programs, plans, ordinances or policies addressing the circulation system, the major policy documents governing the roadway facilities that would be potentially affected by the proposed project are the County's *General Plan 2035*[51] and the City of Stockton's *Envision Stockton 2040 General Plan*.[52] In 2013, SB 743 was signed into law, initiating an update to the State CEQA Guidelines to change how lead agencies evaluate transportation impacts in their CEQA documents. Beginning on July 1, 2020, the level of service (LOS) metric was replaced by vehicle miles traveled (VMT) for purposes of evaluating transportation impacts. However, both the City of Stockton and the County General Plans were last updated prior to this date, and therefore contain policies pertaining to LOS analysis metrics. Therefore, in order to analyze consistency between the proposed project and each General Plan, a LOS analysis is presented below. Impacts utilizing the VMT threshold are discussed in Section 4.17(b).

In order to analyze the proposed project's potential impacts related to conflicts with programs, plans, ordinances or policies governing roadway operations within the vicinity of the project site, intersection operating conditions at selected intersections under Existing and Existing plus Project scenarios were evaluated using intersection capacity utilization (ICU) and Highway Capacity Manual (HCM), 6th Edition,[53] methodologies. The ICU methodology compares the volume-to-capacity (V/C) ratios of conflicting turn movements at an intersection, sums these critical conflicting V/C ratios for each intersection approach, and determines the overall ICU. The resulting ICU, or delay, is expressed in terms of LOS, where LOS A represents free-flow activity and LOS F represents overcapacity operation. The HCM methodology calculates the delay experienced by vehicles passing through the intersection. Based on these methodologies, the various LOS ratings can be explained as follows:

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51 San Joaquin County General Plan 2035, Land Use Element, December 2016 <https://www.sjgov.org/commdev/cgi-bin/cdyn.exe/file/Planning/General%20Plan%202035/GENERAL%20PLAN%202035.pdf> (Accessed September 5, 2024).

52 City of Stockton Envision Stockton 2040 General Plan, Adopted December 4, 2018, <https://cms3.revize.com/revize/stockton/Documents/Business/Planning%20&%20Engineering/General%20Plan/Stockton_General_Plan_Adopted.pdf> (Accessed October 10, 2024).

53 Transportation Research Board Highway Capacity Manual, Sixth Edition: A Guide for Multimodal Mobility Analysis, 2017.

- **LOS A** – V/C ratio of 0.00–0.60. Primarily free-flow conditions at average travel speeds. Vehicles are seldom impeded in their ability to maneuver in the traffic stream. Delays at intersections are minimal.

- **LOS B** – V/C ratio of 0.61–0.70. The control delay ranges from 10 to 15 seconds per vehicle. Unimpeded operations at average travel speeds. The ability to maneuver in the traffic stream is slightly restricted; delays are not bothersome.

- **LOS C** – V/C ratio of 0.71–0.80. The control delay ranges from 15 to 25 seconds per vehicle. Stable operations; however, ability to change lanes and maneuver may be more restricted than LOS B, and longer queues are experienced at intersections.

- **LOS D** – V/C ratio of 0.81–0.90. The control delay ranges from 25 to 35 seconds per vehicle. Congestion occurs and a small change in volume increases delays substantially.

- **LOS E** – V/C ratio of 0.91–1.00. Severe congestion occurs with extensive delays accompanied by low travel speeds.

- **LOS F** – V/C ratio greater than 1.00. Extremely low speeds and intersection congestion occurs with high delays and extensive queuing.

The following 11 study intersections were analyzed in the TIS:

1. French Camp Road/Manthey Road;
2. French Camp Road/I-5 South Ramps;
3. French Camp Road/I-5 North Ramps;
4. French Camp Road/Arch Airport Road-Frank West Circle;
5. French Camp Road/South El Dorado Street;
6. West Hospital Road/Manthey Road;
7. Hospital Road/South El Dorado Street;
8. West Mathews Road/Manthey Road;
9. West Mathews Road/I-5 South Ramps;
10. West Mathews Road/I-5 North Ramps; and
11. Mathews Road/South El Dorado Street.

Of the 11 study intersections, four are located within the City of Stockton, while the remaining seven are located within unincorporated San Joaquin County.

The four intersections located within the City of Stockton are subject to the roadway performance metrics set forth in the City's General Plan.[54] The City's General Plan establishes LOS D as its general roadway performance standard, with exceptions such as LOS E for French Camp Road/Manthey Road and French Camp Road/I-5 South Ramps, as well as

[54] City of Stockton Envision Stockton 2040 General Plan, Adopted December 4, 2018, <https://cms3.revize.com/revize/stockton/Documents/Business/Planning%20&%20Engineering/General%20Plan/Stockton_General_Plan_Adopted.pdf> (Accessed October 10, 2024).

LOS F for French Camp Road/I-5 North Ramps and French Camp Road/Arch Airport Road-Frank West Circle.

The remaining seven study intersections, located within unincorporated San Joaquin County, are subject to the programs, plans, and policies addressing the circulation system set forth in the County's General Plan. The County's General Plan establishes LOS C as its roadway performance standard, or LOS D for intersections located on minor arterials or roadways designated in SJCOG's Congestion Management Plan (CMP). As such, study area intersections along South El Dorado Street (minor arterial) and Mathews Road west of I-5 (CMP roadway) would be subject to the LOS D standard.

Based on the City and County standards identified above, the proposed project would have a significant impact with respect to applicable plans addressing the circulation system if it would deteriorate a study intersection's LOS from an acceptable LOS to an unacceptable LOS. Neither General Plan sets forth thresholds for cases in which roadways already operate at a deficient LOS under existing conditions, but common industry practice suggests that an increase in delay of more than 5 seconds can be considered a substantial adverse impact.

Vehicle access to the project site would be provided via one driveway along South El Dorado Street and one driveway along West Hospital Road. Internal circulation within the project site would be provided via roadways approximately 25 feet in width connecting various campus buildings and services. In addition, the proposed project also includes a total of 540 surface parking spaces, providing 131 more parking spaces than required based on the size of the development. The campus would provide various employment opportunities for medical and administrative staff as well as dwelling units for residential treatment and transitional/supportive housing programs. As such, the proposed project would increase the occupancy of the project site from its current vacant condition, thereby increasing the number of vehicle trips to and from the project site.

The TIS prepared for the proposed project utilized trip generation rates provided in the *11th Edition of Trip Generation*, which was published by the Institute of Transportation Engineers (ITE) in 2021. This analysis considered the nuance of the proposed project in that some residents of the site would be engaged in residential treatment and would not be participating in vehicle trips. It should also be noted that while the proposed buildings would provide accommodation in the form of beds, for the purpose of the transportation analysis it was assumed that each dwelling unit would contain one bed as per-bed trip generation data from ITE is limited. As summarized below in Table 4.17.A, the proposed project is forecast to generate 2,029 daily trips, including 179 trips during the a.m. peak hour and 216 trips during the p.m. peak hour.

The trip generation forecasts presented in Table 4.17.A above were distributed to the surrounding roadway network in order to determine potential roadway operation impacts under Existing Plus Project conditions in comparison to existing conditions in terms of LOS. Table 4.17.B below provides a summary of LOS at the 11 study intersections under existing conditions.

Table 4.17.A: Proposed Project Trip Generation Forecast

Land Use	Units	Daily		AM Peak Hour				PM Peak Hour			
		Rate	Trips	Rate	Trips	In	Out	Rate	Trips	In	Out
South Campus											
Bldg A – Community and Outpatient	93 empl	8.71	810	0.75	70	52	18	1.02	95	35	60
Bldg B – Urgent Care Services	47 empl	3.31	156	0.37	17	14	3	0.35	16	5	11
Bldg C – Residential Treatment	73 empl	3.31	242	0.37	27	21	6	0.35	26	8	18
Bldg D – Residential Treatment	50 empl	3.31	166	0.37	19	14	5	0.35	18	6	12
Sub-Total for South Campus			**1,374**		**133**	**101**	**32**		**155**	**54**	**101**
North Campus											
Bldg E – Transitional Housing	178 du	4.81	463	0.18	32	19	13	0.24	43	17	26
Bldg F – Supportive Housing	42 du	4.81	109	0.18	8	5	3	0.24	10	4	6
Bldg G – Supportive/Transitional Housing	32 du	4.81	83	0.18	6	3	3	0.24	8	3	5
Total			**2,029**		**179**	**128**	**51**		**216**	**78**	**138**

Source: Transportation Impact Study for the San Joaquin BeWell Project, W-Trans, June 3, 2025.
Bldg = Building du = dwelling unit empl = employees

Table 4.17.B: Existing Peak Hour Intersection Levels of Service

Study Intersection	Control	Delay (LOS)				
		Standard	AM Peak Hour		PM Peak Hour	
			E	E + P	E	E + P
French Camp Rd/Manthey Rd	Signal	<80.0 (E)	77.6 (E)	78.8 (E)	12.8 (B)	12.9 (B)
French Camp Rd/I-5 S Ramps	Signal	<80.0 (E)	9.5 (A)	9.6 (A)	8.2 (A)	8.2 (A)
French Camp Rd/I-5 N Ramps	Signal	- (F)	17.4 (B)	17.5 (B)	11.0 (B)	11.0 (B)
French Camp Rd/Arch Airport Rd-Frank West Cir	Signal	- (F)	16.0 (B)	16.6 (B)	15.2 (B)	16.3 (B)
French Camp Rd/S El Dorado St	Signal	<55.0 (D)	18.6 (B)	20.0 (C)	18.2 (B)	19.0 (B)
W Hospital Rd/Manthey Rd	AWSC	<25.0 (C)	12.9 (B)	13.0 (B)	10.2 (B)	10.4 (B)
Hospital Rd/S El Dorado St	Signal	<55.0 (D)	7.8 (A)	8.8 (A)	9.0 (A)	9.8 (A)
W Mathews Rd/Manthey Rd	AWSC	<35.0 (D)	**84.6 (F)**	**90.3 (F)**	**58.0 (F)**	**61.1 (F)**
W Mathews Rd/I-5 S Ramps	TWSC	<35.0 (D)	**55.6 (F)**	**59.2 (F)**	27.0 (D)	28.7 (D)
W Mathews Rd/I-5 N Ramps	TWSC	<35.0 (D)	33.7 (D)	**36.2 (E)**	21.4 (C)	22.4 (C)
Mathews Rd/S El Dorado St	AWSC	<35.0 (D)	**35.9 (E)**	**44.5 (E)**	32.3 (D)	**38.6 (E)**

Source: Transportation Impact Study for the San Joaquin BeWell Project, W-Trans, June 3, 2025.
Note: **bold** text indicates deficient operation.
AWSC = all-way stop control
E = Existing
E + P = Existing Plus Project
Cir = Circle
LOS = Level of Service
NB = northbound
Rd = Road
SB = southbound
St = Street
TWSC = two-way (or one-way) stop control

As shown in Table 4.17.B above, seven of the 11 study intersections operate at an acceptable LOS under existing conditions and would continue to do so under the proposed project. However, under the proposed project, West Mathews Road/I-5 North Ramps would degrade from LOS D to LOS E during the a.m. peak hour. Additionally, Mathews Road/South El Dorado Street would operate at a deficient LOS E both without and with project traffic. Additionally, the southbound approach to West Mathews Road/I-5 South Ramps and West Mathews Road/Manthey Road currently operate at a deficient LOS F, which would remain the case with the addition of project traffic. As such, the proposed project would result in

several conflicts with the LOS standards set forth in both the City and the County General Plans. However, the TIS notes that the proposed project's deficiencies along Mathews Road are not considered significant impacts because these intersections are already planned for signalization within the next year. As such, the addition of project traffic to the study intersections would not result in deficient conditions given the planned signalization of the Mathews Road intersections and acceptable operations at the other study intersections. With signal controls installed, four intersections along Mathews Road would also operate acceptably under the "baseline" scenario, as discussed further below.

The "baseline" scenario, as analyzed in the TIS, includes nearby pending and approved projects such as the signalization of the intersections on Mathews Road at Manthey Road, I-5 South Ramps, I-5 North Ramps, and South El Dorado Street as planned for the nearby the Veterans Affairs (VA) Hospital project. Table 4.17.C below provides a summary of LOS at the 11 study intersections under baseline conditions.

Table 4.17.C: Baseline Peak Hour Intersection Levels of Service

Study Intersection	Control	Delay (LOS)				
		Standard	AM Peak Hour		PM Peak Hour	
			F	F + P	F	F + P
French Camp Rd/Manthey Rd	Signal	<80.0 (E)	**280.0 (F)**	**281.2 (F)**	**91.0 (F)**	**91.8 (F)**
French Camp Rd/I-5 S Ramps	Signal	<80.0 (E)	11.8 (B)	11.9 (B)	9.0 (A)	9.1 (A)
French Camp Rd/I-5 N Ramps	Signal	- (F)	27.9 (C)	28.6 (C)	14.0 (B)	14.1 (B)
French Camp Rd/Arch Airport Rd-Frank West Cir	Signal	- (F)	17.9 (B)	18.5 (B)	17.2 (B)	18.7 (B)
French Camp Rd/S El Dorado St	Signal	<55.0 (D)	20.9 (C)	22.4 (C)	19.3 (B)	19.9 (B)
W Hospital Rd/Manthey Rd	AWSC	<25.0 (C)	**26.8 (D)**	**27.6 (D)**	15.3 (C)	15.6 (C)
Hospital Rd/S El Dorado St	Signal	<55.0 (D)	7.9 (A)	8.8 (A)	9.1 (A)	9.9 (A)
W Mathews Rd/Manthey Rd	Signal	<55.0 (D)	52.7 (D)	53.2 (D)	14.1 (B)	14.0 (B)
W Mathews Rd/I-5 S Ramps	Signal	<55.0 (D)	29.9 (C)	30.5 (C)	16.4 (B)	16.7 (B)
W Mathews Rd/I-5 N Ramps	Signal	<55.0 (D)	16.3 (B)	16.1 (B)	7.2 (A)	7.2 (A)
Mathews Rd/S El Dorado St	Signal	<55.0 (D)	49.1 (D)	48.6 (D)	26.1 (C)	26.8 (C)

Source: Transportation Impact Study for the San Joaquin BeWell Project, W-Trans, June 3, 2025.
Note: **bold** text indicates deficient operation.

AWSC = all-way stop control
B = Baseline
B + P = Baseline Plus Project
Cir = Circle
LOS = Level of Service
NB = northbound
Rd = Road
SB = southbound
St = Street

As shown in Table 4.17.C, most study intersections would operate at an acceptable LOS with or without the proposed project, with the exception of French Camp Road/Manthey Road, which would operate at LOS F during both peak hours with or without the project, and West Hospital Road/Manthey Road, which would operate at LOS D during the a.m. peak hour with or without the project. As previously stated, for the purposes of this analysis, an increase in delay of more than 5 seconds can be considered a substantial adverse impact in the event that the LOS of an intersection is already deficient. Because both intersections already operate at a deficient LOS under baseline conditions without the proposed project, and the proposed project would not increase this existing delay by more than five seconds, the

proposed project would not result in a significant impact pertaining to conflict with applicable plans under the baseline condition.

The TIS also examined how the proposed project could potentially affect future operations of the study intersections. Using growth and various planned intersection improvements, traffic volumes for the year 2040 were estimated and used to compare conditions with the proposed project versus without the proposed project. It should be noted that the model used to determine these future (2040) conditions may be subject to updates at some point in the future to reflect future transportation needs and major projects. Table 4.17.D below provides a summary of LOS at the 11 study intersections under future (2040) conditions.

Table 4.17.D: Future (2040) Peak Hour Intersection Levels of Service

Study Intersection	Control	Delay (LOS)				
		Standard	AM Peak Hour		PM Peak Hour	
			F	F + P	F	F + P
French Camp Rd/Manthey Rd	Signal	<80.0 (E)	71.7 (E)	72.1 (E)	33.8 (C)	33.9 (C)
French Camp Rd/I-5 S Ramps	Signal	<80.0 (E)	11.0 (B)	11.0 (B)	9.3 (A)	9.3 (A)
French Camp Rd/I-5 N Ramps	Signal	- (F)	21.7 (C)	21.8 (C)	16.8 (B)	26.7 (C)
French Camp Rd/Arch Airport Rd-Frank West Cir	Signal	- (F)	22.5 (C)	23.2 (C)	26.7 (C)	30.4 (C)
French Camp Rd/S El Dorado St	Signal	<55.0 (D)	34.3 (C)	35.8 (D)	45.4 (D)	50.7 (D)
W Hospital Rd/Manthey Rd	AWSC	<25.0 (C)	19.8 (C)	20.2 (C)	12.5 (B)	12.7 (B)
Hospital Rd/S El Dorado St	Signal	<55.0 (D)	7.7 (A)	8.5 (A)	8.8 (A)	9.8 (A)
W Mathews Rd/Manthey Rd	Signal	<55.0 (D)	46.5 (D)	46.8 (D)	13.8 (B)	13.8 (B)
W Mathews Rd/I-5 S Ramps	Signal	<55.0 (D)	28.4 (C)	28.9 (C)	16.6 (B)	16.8 (B)
W Mathews Rd/I-5 N Ramps	Signal	<55.0 (D)	13.9 (B)	13.7 (B)	6.7 (A)	6.8 (A)
Mathews Rd/S El Dorado St	Signal	<55.0 (D)	48.5 (D)	48.1 (D)	29.3 (C)	31.1 (C)

Source: Transportation Impact Study for the San Joaquin BeWell Project, W-Trans, June 3, 2025.
Note: **bold** text indicates deficient operation.

AWSC = all-way stop control
Cir = Circle
Rd = Road
F = Future
LOS = Level of Service
SB = southbound
F + P = Future Plus Project
NB = northbound
St = Street

As shown in Table 4.17.D, the proposed project would not result in any significant impacts to study intersection operations under future (2040) conditions. Accordingly, based on the analysis presented above, the proposed project would not result in any significant adverse impacts to operations of any of the 11 study intersections.

The San Joaquin County Public Works Department has established the Traffic Impact Mitigation Fee (TIMF) program, which enables development projects to fund local transportation improvements attributable to new development based on traffic generation.[55] This program establishes fee rates for development projects based on their

[55] San Joaquin County Traffic Impact Mitigation Fee Program Annual Report Fiscal Year Ending on June 30, 2023, October 2023, <https://www.sjgov.org/docs/default-source/public-works-documents/transportation/timf-reports/2022_timf_finalreport.pdf?sfvrsn=955ff3ba_18> (Accessed October 10, 2024).

land use type and square footage in order to cover the costs of roadway improvements that would address potential deficiencies resulting from each project. In addition to the TIMF program under the County, SJCOG has established a Regional Transportation Impact Fee (RTIF) program to accomplish a similar goal of funding transportation improvements, but on a regional scale.

The proposed project would be subject to both the TIMF and the RTIF program and would be required to pay fees that would fund both local and regional transportation improvements that would address potential operational deficiencies. These fees could be used to implement improvements to intersections within the project site vicinity, if identified in respective nexus studies, which may assist the project in promoting consistency with relevant plans, policies, and programs addressing the surrounding roadway system. Accordingly, payment of the TIMF and RTIF fees would ensure conflicts with programs, plans, ordinances, or policies employing LOS in addressing the circulation system would be less than significant.

Transit, Pedestrian, and Bicycle Facilities. As discussed in the TIS, the County's General Plan contains several policies addressing pedestrian facilities within the overall circulation system. Specifically, Public Facilities and Services Element Policies TM-2.3, TM-2.7, TM-3.2, and TM-4.9 include requirements for safe and accessible pedestrian facilities, including curbs, gutters, and sidewalks:

- **TM-2.3 Land Use Patterns** The County shall encourage the development of uses in Urban Communities that support the use of public transit, bicycling, walking, and other alternatives to the automobile.

- **TM-2.7 New Development** The County shall require all new developments to provide their fair share of roadway facilities for alternative transportation modes to reduce automobile demand.

- **TM-3.2 Urban Roadways** The County shall require, where feasible, new development in Urban Communities to construct roadways to County standards and complete streets principles, including curb, gutter, and sidewalks. Bike lanes shall be required, where feasible, for improvements identified in the San Joaquin County Bicycle Master Plan.

- **TM-4.9 Parking Facility Design** The County shall ensure that new automobile parking facilities are designed to facilitate safe and convenient pedestrian access, including clearly defined corridors and walkways connecting parking areas with buildings.

Transit Facilities.-The County's General Plan does not contain policies relevant to development projects regarding transit other than generally providing access as discussed below under Pedestrian Facilities. As previously stated, the project site is located in the vicinity of RTD bus stops. However, given the undeveloped nature of the site and the lack of existing pedestrian facilities, the proposed project would need to improve pedestrian access to transit. The proposed project includes development of curb, gutter, and sidewalks along the project site frontage on West Hospital Road and El Dorado Street. The development of

sidewalks along the south side of the project site would improve the RTD Route 510 bus stop in this location, which is currently unpaved.

In addition to the bus stop on West Hospital Street, it is reasonable to assume that the proposed project would result in an increased volume of pedestrian crossings between the project site and the RTD Route 510 bus stop on South El Dorado Street, across from the project site and as well as the RTD bus stop west of I-5 at San Joaquin General Hospital.

Under existing conditions, the crosswalk providing access to the bus stop on El Dorado Street is subject to accessibility issues. This recommendation is discussed further below under pedestrian facilities.

Pedestrian Facilities. As previously discussed, the County's General Plan contains several policies addressing pedestrian facilities within the overall circulation system. Specifically, Public Facilities and Services Element Policies TM-4.9, TM-2.3, TM-2.7, and TM-3.2 include requirements for safe and accessible pedestrian facilities, including curbs, gutters, and sidewalks.

Pedestrian facilities are generally limited in the project site vicinity. Crosswalks and pedestrian phasing are present at the intersection of South El Dorado Street and Hospital Road, though the curbs surrounding this intersection lack pedestrian sidewalks. The roadways surrounding the project site generally contain gaps and obstacles that would impede pedestrian access. The proposed project would include development of curbs, gutters, and sidewalks approximately five feet wide along the project site frontage on El Dorado Street and West Hospital Road.

As currently designed, the proposed project does not provide an accessible path to the RTD bus stop on South El Dorado Street across from the project site. Pedestrians with limited mobility, particularly those in wheelchairs, would be unable to access the pedestrian push button on the northwest corner of the intersection of El Dorado Street and Hospital Road due to its location behind a raised curb which restricts access to the cross walk push button. Wheelchair users would be forced to navigate into traffic to avoid the raised curb in order to access the push button. Implementation of Mitigation Measure (MM) TRA-1, would improve the island on northwest corner of northwest corner of South El Dorado Street/Hospital Road enabling access to the push button for all pedestrians, including wheelchair users. With the proposed project's adherence to MM TRA-1, accessibility issues pertaining to the RTD stop across El Dorado Street from the project site would be addressed, potential impacts related to conflicts with policies related to pedestrian and transit facilities would be less than significant.

Bicycle Facilities. Section 9-406.090 of the County's Municipal Code states that one short-term bicycle parking space and one long-term bicycle parking space shall be included for every 20 vehicle parking spaces provided. CALGreen also contains short-term and long-term bicycle parking requirements for non-residential projects.

According to the *San Joaquin County Bicycle Master Plan Update*,[56] several bicycle facilities currently exist or are planned for future development within the project site vicinity. Bicycle facilities can be categorized as follows:

- **Class I Multi-Use Path**: a completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross flows of motorized traffic minimized.
- **Class II Bike Lane**: a striped and signed lane for one-way bike travel on a street or highway.
- **Class III Bike Route**: signing only for shared use with motor vehicles within the same travel lane on a street or highway.
- **Class IV Bikeway**: also known as a separated bikeway, a Class IV Bikeway is for the exclusive use of bicycles and includes a separation between the bikeway and the motor vehicle traffic lane. The separation may include, but is not limited to, grade separation, flexible posts, inflexible physical barriers, or on-street parking.

A Class I multi-use path currently exists on French Camp Road and Arch Airport Road between the I-5 South Ramps and Sperry Road, in the form of a wide sidewalk with posted signage delineating part of the sidewalk for pedestrians and part of the sidewalk for bicyclists. Additional bike lanes are proposed for French Camp Road, Manthey Road, Mathews Road, South Delivery Drive and South El Dorado Street. Bike lanes are planned along French Camp Road between its western terminus and Arch Airport Road, although these lanes are classified as Class II in the Bicycle Master Plan and Class IV in the E*nvision Stockton 2040 General Plan*. Similarly, planned bike lanes along South El Dorado Street between the Stockton City Limit and West Hospital Road are classified as Class II bike lanes in *San Joaquin County Bicycle Master Plan Update* and Class IV in the Envision Stockton 2040 General Plan. Given that this segment of El Dorado Street is located within the County's jurisdiction, future bike lanes along this segment would be Class II as planned in the *San Joaquin County Bicycle Master Plan Update.*

Based on the requirements for bicycle parking set forth by the County's Municipal Code and CalGreen, 27 short-term and 27 long-term bicycle parking spaces are required under the proposed project. As currently proposed, the proposed project does not include any bicycle parking facilities, which is inconsistent with code requirements. Inclusion of the required bicycle parking spaces and development of a Class II bicycle lane along the eastern side of the project site on El Dorado Road would be incorporated into the proposed project as a condition of approval for the project. As such, potential impacts related to conflicts with policies related to bicycle facilities would be less than significant.

56 San Joaquin County Bicycle Master Plan Update, November 2020, < https://www.sjgov.org/commdev/cgi-bin/cdyn.exe/file/Planning/EIR%20Schulte%20Road%20Logistics%20Center/Reference%20Materials%20(DEIR)-%2014800%20W.%20Schulte%20Road%20Logistics%20Center/County%20of%20San%20Joaquin%202010_Bicycle%20Master%20Plan.pdf> (Accessed October 10, 2024).

As identified in the discussion above, the proposed project would not contribute to LOS deficiencies in the project area. Regardless, roadway improvements funded by the TIMF and RTIF, pursuant to RCM TRA-1, would address these potential deficiencies. Payment of the TIMF and RTIF fees would ensure conflicts with programs, plans, ordinances, or policies employing LOS in addressing the circulation system would be less than significant.

Potentially significant impacts related to conflicts with programs, plans, ordinances, or policies covering transit and pedestrian facilities would be reduced to a less than significant level with the implementation of MM TRA-1.

Improvements to bicycle facilities would be incorporated into the proposed project as a condition of project approval and any impacts to programs, plans, ordinances, or policies addressing bicycle facilities would be less than significant.

With mitigation incorporated, the proposed project would be consistent with all applicable goals, policies, plans, and programs that address the circulation system, and impacts would be less than significant.

Mitigation Measure:

MM TRA-1 **Crosswalk Safety Improvements.** Prior to the issuance of a certificate of occupancy, the Director of the County of San Joaquin Department of Public Works and/or the Chief of the French Camp McKinley Fire Department shall ensure that the *BeWell* islands in the crosswalks on the northwest and southwest corners of South El Dorado Street/Hospital Road would be improved to enable users in mobility devices to access the crosswalk push buttons allowing navigation through the crosswalks without need to enter traffic.

Regulatory Compliance Measure:

RCM TRA-1 **Traffic Impact Mitigation Fee and Regional Transportation Impact Fee.** At the time of grading permit application, the Project Applicant shall pay appropriate Traffic Impact Mitigation Fees (TIMF) and Regional Transportation Impact Fees (RTIF), based on the current schedule at the time of payment. The Project Applicant shall receive confirmation from both San Joaquin County Public Works Department and San Joaquin Council of Governments (SJCOG), respectively, that the appropriate fees have been paid prior to the issuance of grading permits.

b. Would the project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?

Less Than Significant Impact. On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law, which directed the Governor's Office of Planning and Research (OPR) to establish new CEQA guidance for jurisdictions that removes the level of service (LOS) method, which focuses on

automobile vehicle delay and other similar measures of vehicular capacity or traffic congestion, from CEQA transportation analysis. Rather, vehicle miles traveled (VMT), or other measures that promote "the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses," are now used as the basis for determining significant transportation impacts in the State.

As part of a January 2018 update to the State CEQA Guidelines, Section 15064.3 codifies that project-related transportation impacts are typically best measured by evaluating the project's VMT. Specifically, subdivision (b) focuses on specific criteria related to transportation analysis. Subdivision (b)(2) addresses VMT associated with transportation projects and states that projects that reduce VMT, such as pedestrian, bicycle, and transit projects, should be presumed to have a less than significant impact. Subdivision (b)(4) stipulates that lead agencies have the discretion to formulate a methodology that would appropriately analyze a project's VMT. San Joaquin County established parameters for VMT analyses in its *VMT Thresholds Study*, which was prepared by GHD in July 2020. The County's parameters are consistent with guidance provided in the publication *Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory, California Governor's Office of Planning and Research* prepared by OPR in 2018. Both documents indicate that a project generating vehicle travel that is 15 or more percent below the existing countywide VMT per capita may indicate a less than significant VMT impact.

It should be noted that services provided under the proposed project would include residential treatment programs. Specifically, the proposed project would provide up to 174 beds for psychiatric health and substance use disorder residential treatment. These programs would allow patients to reside on the project site for the duration of their treatment, thereby reducing VMT. VMT associated with the proposed project would be further reduced given the project site's proximity to several transit facilities , which would enable employees and patients to access the project site without driving in a single-occupancy vehicle.

The San Joaquin Council of Governments (SJCOG) travel demand model and the Longitudinal-Employer Household Dynamics (LEHD) Program were utilized to determine the baseline average residential VMT of the County as 26.63 and the baseline average employee VMT as 19.05. A project generating VMT 15 percent or more below each of these values would have a less than significant impact related to VMT.

The County's *VMT Thresholds Study* includes a screening map to establish geographic areas that achieve a VMT that is 15 percent below regional average thresholds, therefore allowing projects within these areas to screen out from detailed VMT analysis. According to the screening map presented in the County's *VMT Thresholds Study* (refer to Figure 4-2), the project site is located within a screened area for both residential and employee travel. As such, impacts of the proposed project related to VMT can be presumed to be less than significant. No further analysis or mitigation is required.

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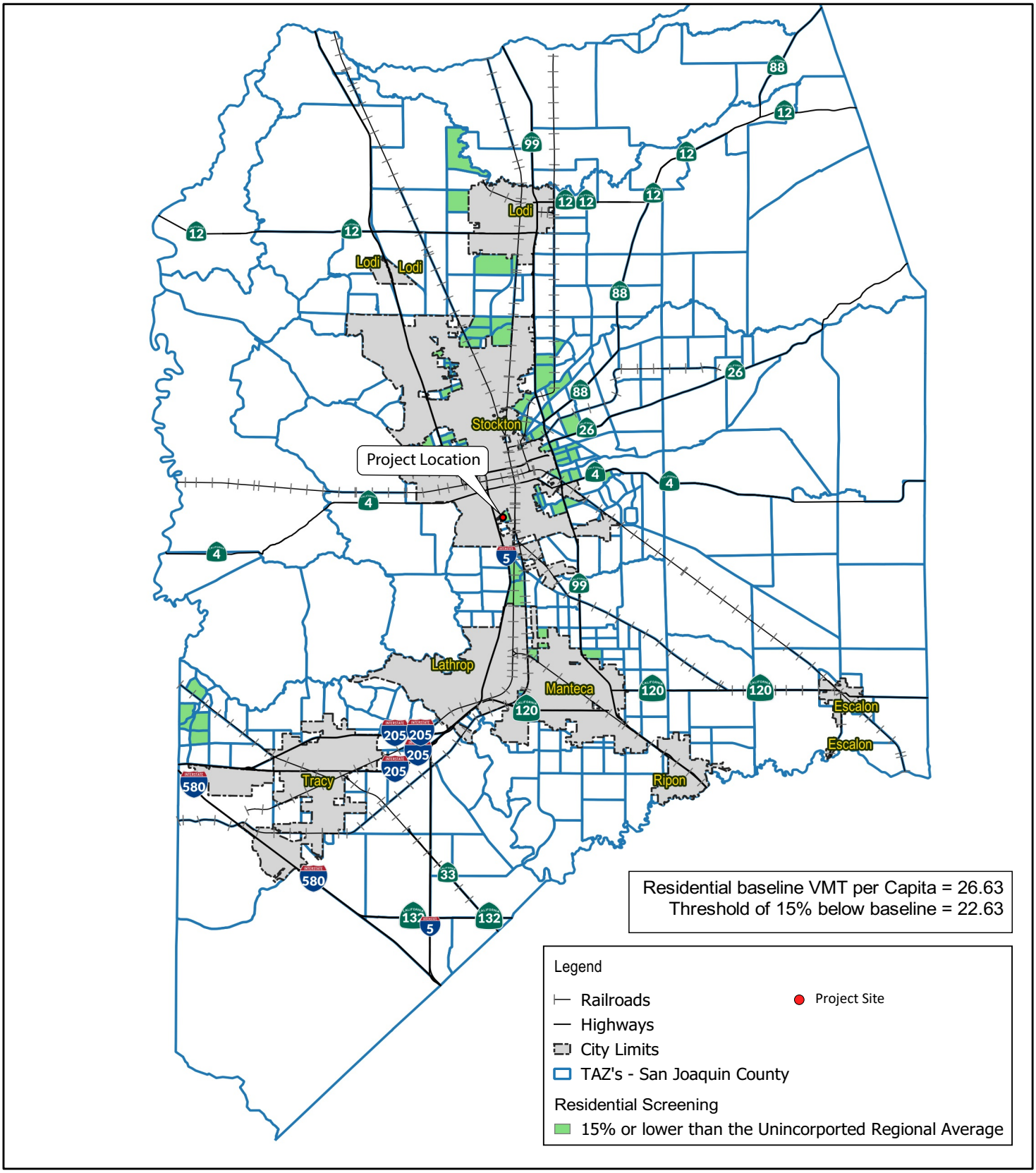

LSA

FIGURE 4-2
Page 1 of 2 (Residential)

0 5 10
MILES

San Joaquin Be Well Behavioral Health Campus Project
County Vehicle Miles Traveled Screening Maps

SOURCE: GHD

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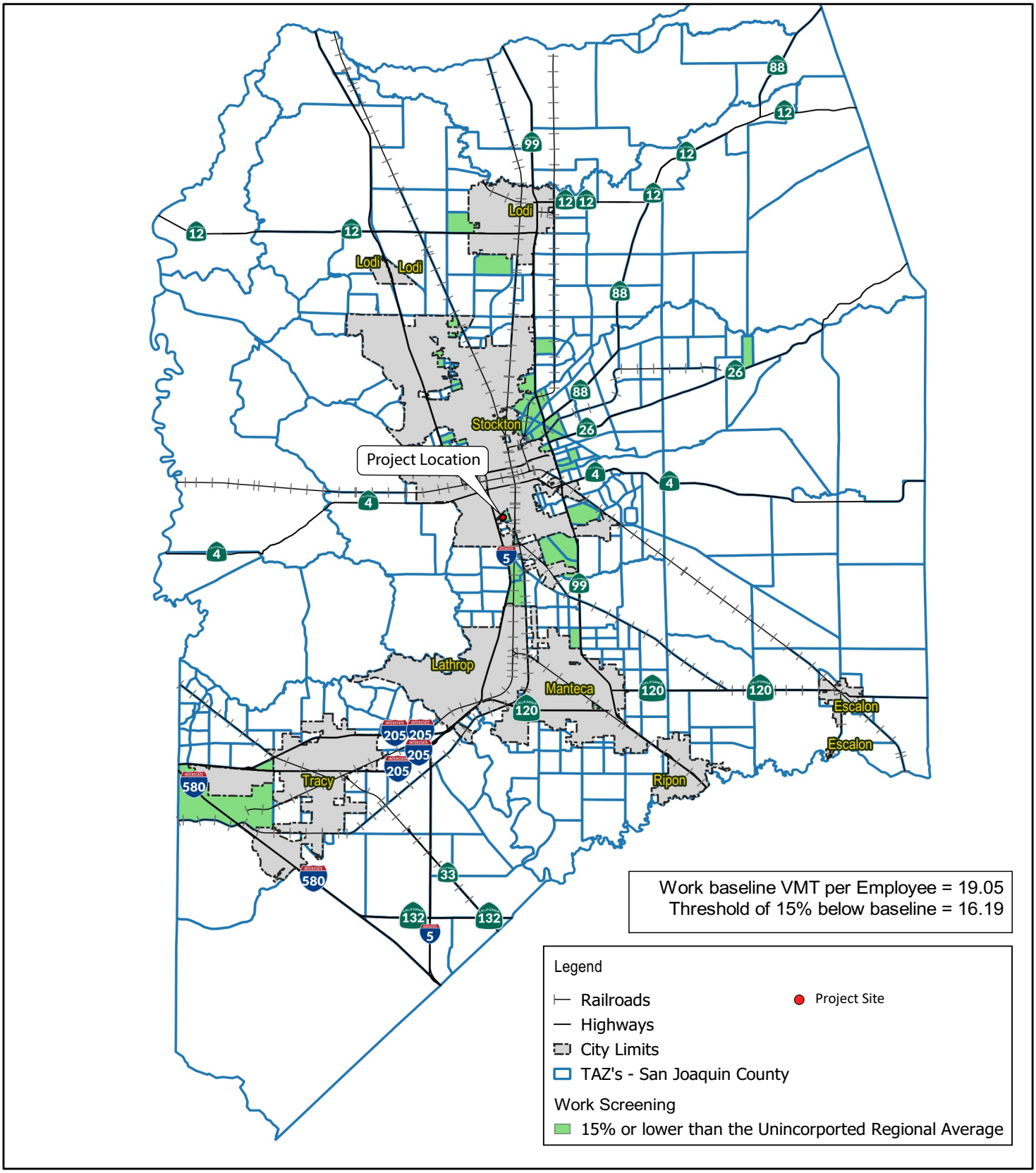

LSA

FIGURE 4-2
Page 2 of 2 (Employee)

0 5 10
MILES

SOURCE: GHD

I:\2024\20242005.01\G\Vehicle_Miles.ai (5/27/2025)

San Joaquin Be Well Behavioral Health Campus Project
County Vehicle Miles Traveled Screening Maps

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c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant with Mitigation Incorporated. The TIS analyzes several safety related issues associated with the proposed project. These issues include sight distance, site access, and queuing. Each issue is discussed in greater detail below.

Site Distance. As previously discussed, vehicular access to the project site would be provided by two driveways; one 37-foot opening to South El Dorado Street, roughly mid-way along the project site boundary, and a second 30-foot driveway at the southwestern corner of the project site that would open onto West Hospital Road near the I-5 right of way. According to the TIS, the line of sight from each driveway would not be restricted by any permanent structures under the proposed project; however, under existing conditions, large semi-trucks have been regularly observed parking along the northern curb of West Hospital Road. While it is assumed that truck parking would not continue in this location following development of the proposed project, including construction of the gutter, curb, and sidewalk improvements, in the event that trucks continue to park in this location following project completion, there is potential for a reduction in sight distance between drivers exiting the project site from the driveway on West Hospital Road and through travelers on the roadway.

According to the Caltrans Highway Design Manual,[57] an approaching travel speed of 30 mph, which is consistent with the maximum speed observed along West Hospital Road, requires a corner sight distance of 200 feet. The posted speed limit on South El Dorado Street is 45 mph, which requires a corner sight distance of 360 feet. During preparation of the TIS, sight distances from the proposed project driveways were measured, and were determined to be consistent with the requirements stated above. However, it was observed that semi-trucks were parked along West Hospital Road near the proposed driveway locations, which could potentially obstruct sight distances for vehicles exiting the project site. Implementation of MM TRA-2 would achieve the required sight distance avoiding a potentially dangerous intersection, by restricting truck parking along the northern edge of West Hospital Road to areas beyond 200 feet of either side of the driveway. Accordingly, with implementation of mitigation, adequate sight distances would be maintained under the proposed project and any increase in hazards due to sight distance would be less than significant.

Site Access. The TIS evaluated the need for left-turn lanes at the project driveway on West Hospital Road and South El Dorado Street. The analysis determined that based on Existing plus Project, Baseline plus Project, and Future plus Project volumes, a left-turn lane is not warranted on West Hospital Road at the project driveway during either of the peak periods evaluated. However, under Existing plus Project volumes, a left-turn lane is warranted at the project driveway on South El Dorado Street during both the a.m. and p.m. peak hours. Implementation of MM TRA-3 would include development of a left turning lane on El Dorado Street. This would

57 California Department of Transportation Highway Design Manual Seventh Edition, July 2020 (Updated August 2023), <https://dot.ca.gov/-/media/dot-media/programs/design/documents/hdm-complete--092923-a11y3.pdf> (Accessed October 10, 2024).

enable turning traffic to decelerate without impeding through traffic, and mitigate the safety impact to a less-than-significant level.

Queuing. One potential transportation-related hazard considered in the TIS prepared for the proposed project is traffic queuing, which occurs when the capacity of a turn pocket is exceeded. This can cause queuing vehicles to extend past the end of their intended turn pocket and into a through lane of traffic or a visually restricted area. This can result in blocked through lanes, which could result in dangerous intersection conditions and potentially increase the likelihood of collisions.

In order to evaluate potential safety concerns associated with the project's contribution to traffic queuing in the project site vicinity, the TIS analyzed queuing at the 11 study intersections under the proposed project in comparison to existing, baseline, and future scenarios. The TIS found that queues could generally be adequately contained within existing turn lanes or ramps with the addition of project traffic, with the exception of the northbound left-turn lanes of two intersections (French Camp Road/South El Dorado Street and Mathews Road/South El Dorado Street). At these intersections, the addition of traffic from the proposed project would result in queuing and stacking that could potentially result in dangerous intersection conditions. Implementation of MM TRA-4 would require the County of San Joaquin Department of Public Works to evaluate if and when changes in signal timing would be required to accommodate changes to traffic patterns associated with the addition of project traffic through regular monitoring of intersection performance and routine signal timing updates. In addition, MM TRA-4 would require restriping of the painted median along French Camp Road/South El Dorado Street to add 75 feet of storage capacity for the northbound left-turn lane, extending the turn lane from 150 feet to a total length of 225 feet. With implementation of MM TRA-4, the project's impact on queuing would be reduced to less than significant.

Traffic Signal Warrants. A traffic signal warrant analysis was also completed to determine whether the proposed project would require signalization of any of the study intersections to address potentially hazardous roadway conditions. This analysis concluded that additional traffic signals would not be warranted and potential impact to roadway condition safety would be less than significant.

Finally, internal circulation within the project site would be provided by an access road encompassing the perimeter of the South Campus, providing access to the surface parking surrounding the campus and to the two driveways connecting the South Campus to the North Campus. These driveways would connect to another access road encompassing the perimeter of North Campus. This fire access lane would meet turning radius requirements determined by the Fire Department. As such, the proposed circulation system would not include any sharp curves or turns that would result in hazardous conditions.

The proposed project would develop a vacant parcel of land with a behavioral health and wellness facility in a generally developed portion of the unincorporated community of French Camp. This proposed development would be consistent with surrounding land uses and available infrastructure and would not introduce any incompatible uses into the project site or the project vicinity. Therefore, the proposed project would not substantially increase hazards

due to a geometric design feature (e.g., a sharp curve or dangerous intersection) or incompatible uses (e.g., farm equipment). Impacts associated with internal circulation would be less than significant.

MM TRA-2 **Semi-Truck Parking Prohibition.** The County's Director of Public Works or designee will undertake the necessary steps, including facilitating amendments to the San Joaquin County Municipal, to increase sight lines at the West Hospital Road driveway by either prohibiting parking on West Hospital Road, introducing a weight limit to restrict semitruck access, or by constructing curb extensions at the driveway.

MM TRA-3 **Left Turning Lane.** The County's Director of Public Works or designee will ensure that the South El Dorado Street driveway shall be designed to include a left-turn lane inbound from South El Dorado Street. This facility should be constructed to enable turning traffic to decelerate and stop if needed for left turns out of the way of through traffic. This measure shall be completed prior to issuance of a certificate of occupancy for the SJ BeWell site.

MM TRA-4 **Turning Lane Extensions.** Extend the northbound left-turn lanes at French Camp Road/South El Dorado Street by 75 feet to a total length of 225 feet. This measure shall be completed within six months of occupancy of the SJ BeWell site.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. Section 4-1000 of the County of San Joaquin Municipal Code adopts the California Fire Code (CFC) as the standard for the County, along with several relevant amendments. In addition, the San Joaquin Fire Chiefs Association has prepared a Fire Apparatus Access Road Standard applicable to the project site. CFC Section 503.1 requires fire access roads to be provided within 150 feet of all exterior building walls. Fire access roads are roads traversable by fire response equipment and are at least 20 feet wide with vertical clearances of at least 13.5 feet. The proposed project includes a drive aisle/fire access lane along the perimeter of South Campus, providing access to the surface parking surrounding the campus and to the two driveways connecting the South Campus to the North Campus. However, the TIS notes that some of the proposed building exteriors would be located greater than 150 feet from the proposed drive aisle, which would be inconsistent with the requirements discussed above. Accordingly, the Project Applicant would be required to obtain an exemption to this requirement from the County Fire Marshall or designee as a condition of approval for project development.

In addition, while the proposed project would include 25-foot drive aisles provided around the project site that satisfy Code requirements for width, proposed security gates at several locations could cause potential obstructions. The security gates proposed under the project may cause potential obstructions to emergency vehicles as the Fire Apparatus Access Road Standard prohibits gates from extending into the required minimum 20-foot access road width. As such, the gates

would need to be redesigned in a manner that maintains a minimum width requirement or the Project Applicant would need to secure an exemption from the County Fire Marshall or designee as a condition of approval for project development.

As previously stated, construction of the proposed project would not result in substantial road closures or delays that would impede emergency access to the project site or land uses within the project site vicinity. Construction-related equipment would be staged within the project site and would not represent an obstacle to emergency access. Further, the proposed Specific Plan Development Standards pertaining to setbacks, as presented in Section 3.3 of the proposed Specific Plan, include a note that encroachments of up to two feet into setbacks are only allowed under the condition that they do not compromise emergency access. Similarly, Section 4.5, Landscape Design, of the proposed Specific Plan specifies that landscaping of the proposed project shall be spaced so that it does not restrict access to emergency facilities. As such, the proposed project's design would prioritize emergency access and ensure that no design elements interfere with such access. Any impact would be less than significant.

4.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
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 Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

The following discussion is based in part on consultation between San Joaquin County and Native American Tribes. Documentation of consultation is provided in Appendix I: Record of Tribal Consultation.

4.18.1 Regulatory Background

Assembly Bill (AB) 52 requires meaningful consultation with California Native American Tribes on potential impacts to Tribal Cultural Resources, as defined in Public Resources Code Section 21074 as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resource. Per Public Resources Code Section 21080.3.1, a tribe must submit a written request to the relevant lead agency if it wishes to be notified of proposed projects in its traditionally and culturally affiliated area. The lead agency must provide written formal notification to the tribes that have requested it within 14 days of determining that a project application is complete or of deciding to undertake a project. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Consultation concludes when either (1) the parties agree to mitigation measures to avoid a significant effect, if one exists, on a tribal cultural resource, or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. AB 52 also addresses confidentiality during tribal consultation per Public Resources Code Section 21082.3(c).

California Government Code Section 65352.3 (adopted pursuant to the requirements of Senate Bill 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan, or to designate open space that includes Native American Cultural Places. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction, and are identified, upon request, by the NAHC.

4.18.2 Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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 Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact. As discussed in Section 4.5, Cultural Resources, the NAHC is a State agency that maintains the SLF, an official list of sites that are of cultural and religious importance to California Native American tribes. The NAHC was contacted on October 11, 2024, in order to request a SLF search for the project site and a list of potential Native American contacts for consultation pursuant to AB 52 and CEQA PRC Section 21080.3.1, subdivisions (b), (d), as well as SB 18 and California Government Code Section 65352.3. The NAHC responded on October 31, 2024, with negative results for the project site. The NAHC also provided a list of suggested Native American contacts for consultation outreach efforts.

In compliance with AB 52, letters have been distributed to local Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project and have previously requested to be notified of future projects proposed by the County. The letters, which were sent on January 21, 2025, via certified mail, provided each tribe with an opportunity to request consultation with the County regarding the proposed project. The purpose of this effort was to provide Native American tribes with the opportunity for meaningful participation and to identify known tribal cultural resources on or near the project site. The record of tribal consultation efforts is included as Appendix I to this IS/MND. The following tribes/organizations received letters pursuant to AB 52 and SB 18:

1. Amah Mutsun Tribal Band
2. Buena Vista Rancheria of Me-Wuk Indians
3. California Tribal Temporary Assistance for Needy Families (TANF) Partnership
4. Confederated Villages of Lisjan Nation
5. Muwekma Ohlone Tribe of the San Francisco Bay Area

6. Northern Valley Yokut / Ohlone Tribe
7. Tule River Indian Tribe
8. Wilton Rancheria
9. United Auburn Indian Community

In compliance with AB 52, tribes had 30 days from the date of receipt of notification to request consultation on the proposed project. Information provided through the AB 52 tribal consultation process typically informs the assessment as to whether tribal cultural resources are present within the project site and the significance of any potential impacts to such resources. In compliance with SB 18, tribes had 90 days from the date of receipt of notification to request consultation on the proposed project.

On April 18, 2025, County staff received a response from the Confederated Villages of Lisjan Nation, requesting to be on the contact list. The tribe did not initiate formal consultation. No other responses were received during the consultation period.

As discussed in Section 4.5, Cultural Resources, of this IS/MND, limited potential exists for the proposed project to impact tribal cultural resources due to significant prior disturbance from past grading and development activities on the project site and in the surrounding area. Mitigation Measure CUL-2 and Regulatory Compliance Measure CUL-1, identified in Section 4.5, Cultural Resources, sets forth procedures for handling inadvertent discoveries of archaeological resources and human remains, including those determined to be Native American.

To date, no other responses from the Native American community have been received as part of the AB 52 and SB 18 tribal consultation effort. As a result of the County's consultation efforts, no known tribal cultural resources have been identified within the project site. As such, adherence to MM CUL-2 and RCM CUL-1 would ensure that impacts related to the inadvertent discovery of archaeological resources and Native American human remains would be less than significant.

4.19 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater 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?	☐	☐	☒	☐

4.19.1 Impact Analysis

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact.

Water. Water needs for the proposed project would be served by Division 7 of the Stockton East Water District (SEWD).[58] SEWD provides water supplies for both agricultural and urban uses in the region.

California's Urban Water Management Planning Act requires every large-scale municipal water supplier to adopt and submit an Urban Water Management Plan (UWMP) to the California Department of Water Resources (DWR) every five years. In June 2021, the SEWD adopted the UWMP 2020 Update.[59] According to the 2020 UWMP, the SEWD's water supply consists of purchased surface water and groundwater. Specifically, SEWD purchases surface water from the New Melones Reservoir and the New Hogan Reservoir, and its groundwater is sourced from five

[58] Stockton East Water District Directors' Division, Revised June 2010, <https://www.sewd.net/files/f93231468/boundary-map-SEWD.pdf> (Accessed October 11, 2024).

[59] Stockton East Water District Urban Water Management Plan 2020 Update, June 2021, <https://www.sewd.net/files/267c2658c/Stockton-East-Water-District-Urban-Water-Management-Plan-2020-060821.pdf> (Accessed October 11, 2024).

wells located at the Dr. Joe Waidhofer Water Treatment Plant (DJW WTP) in the City of Stockton. The SEWD pumps groundwater from the San Joaquin Valley Basin, Eastern San Joaquin Subbasin, and blends it with purchased surface water for processing through the DJW WTP. The DJW WTP is permitted to process up to 65 million gallons per day (MGD).

The project site is currently vacant and does not generate any water demand. In order to serve demand generated by the proposed project, lateral connections would be established to connect the project site to the existing 12-inch county water mainline running beneath South El Dorado Street at West Hospital Road. Water lines would be constructed within the project site to flow to existing water infrastructure within the project site vicinity. A 6-inch domestic water main would run along the eastern and southern boundary of the Project site. This 6-inch domestic water line will connect to several 3-inch domestic water laterals that would supply water to the various facilities within the project site. Water for fire suppression would be run beneath the access roads and via a 12-inch fire loop.

Water demand generated by the proposed project would be typical of institutional and residential land uses of a similar nature. It is estimated that the total planned domestic water usage by employees, patients, visitors, and residents, as well as for irrigation, would amount to approximately 8,900 gallons per day. This represents 0.0137 percent of the total daily processing capacity of the DJW WTP; therefore, the project's contribution to water demand within the service region would be considered negligible. The proposed project would be adequately served by existing water supply infrastructure, with the exception of minor connections to facilities adjacent to the project site.

Furthermore, the proposed project would be required by the County to obtain a will-serve letter from SWED, as stated in Policy IS-2.6 of the County's General Plan. As such, prior to issuance of a building permit, written confirmation will be provided by the SEWD that the proposed project would be adequately served by existing water infrastructure upon the establishment of connections.

As such, the proposed project would not necessitate the construction of new or expanded water facilities that could cause a significant environmental impact. Impacts would be less than significant, and no mitigation is required.

Wastewater Treatment. The proposed project is required by the County to acquire a will-serve letter from the City of Stockton Municipal Utilities Department, as stated in Policy IS-2.6 of the County's General Plan. This will-serve letter was received on October 16, 2024, and stated that the proposed project could connect to any of four existing City sewer service locations determined to be acceptable by the Municipal Utilities Department, which operates the City's existing public wastewater treatment system. A Sewer Memorandum was prepared by Siegfried on October 30, 2024 (Appendix J) evaluating the feasibility of each approved connection option.

Wastewater flows from the project site would be serviced by an 8-inch sanitary sewer main that would connect to an onsite holding tank and pump station in the southwestern corner of the project site. The pump station would connect to a 4-inch force main that would run west from the project site beneath West Hospital Road to Manthey Road, south to Mathews Road, west

along Mathews Road, then north along Freedom Road to connect to the existing County sewer system. The wastewater disposal needs of the proposed project would be served by the existing public sewer system The 8-inch sanitary sewer main would connect to 6-inch sanitary sewer laterals serving various facilities throughout the project site.

The City of Stockton 2022 Wastewater Master Plan Update[60] provides a comprehensive summary of the City's wastewater collection and treatment system. This document also assesses the City's wastewater system in the context of growth projected by the *Envision Stockton 2040 General Plan* and analyzes potential expansions and improvements. According to the Wastewater Master Plan Update, the City's wastewater collection system comprises over 1,000 miles of gravity mains, 35 pumps, and 37 miles of active force mains that ultimately convey all flows to the Regional Wastewater Control Facility (RWCF). Based on modeling presented in the Wastewater Master Plan Update, the RWCF can experience a peak flow of up to 78.5 mgd during 10-year, 24-hour storm conditions.

As previously stated, the proposed project's total water usage would amount to approximately 8,900 gallons per day. This includes both indoor and outdoor water use. In the absence of a project-specific wastewater generation estimate, wastewater generation for the project can be assumed to be 90 percent of the project's indoor water demand, to account for evaporation and absorption losses. 90 percent of the proposed project's total water usage, including indoor water use is approximately 8,010 gpd. This volume would amount to 0.01 percent of the RWCF peak flow processing capability. As such, the anticipated wastewater generation by the proposed project is negligible compared the peak flows experienced by the RWCF. Regardless, as previously discussed the City's Municipal Utilities Department has determined that the proposed project would be feasibly served by City and County infrastructure. Therefore, the proposed project would not require the substantial relocation or expansion of existing wastewater infrastructure, with the exception of minor connections to existing facilities in the project site vicinity.

As previously stated, the City of Stockton's Municipal Utilities Department provided a will-serve letter to confirm that the proposed project could be adequately served by existing wastewater infrastructure upon the establishment of connections. As such, the proposed project would not necessitate the construction of new or expanded wastewater facilities that could cause a significant environmental impact. Impacts would be less than significant, and no mitigation is required.

Stormwater Drainage. Refer to Section 4.10, Hydrology and Water Quality, of this IS/MND for a detailed discussion of the drainage characteristics of the proposed project. As discussed in Section 4.10, the proposed project would comply with the requirements established by the San Joaquin County Flood Control and Water Conservation District. Stormwater runoff generated during construction of the proposed project shall be managed through the preparation and

[60] City of Stockton Wastewater Master Plan Update, September 2022, <https://cms3.revize.com/revize/stockton/Documents/Services/Water,%20Sewer%20&%20Stormwater/Sewer/COS_MUD__Wastewater_Master_Plan_Update_2022.pdf> (Accessed October 11, 2024).

implementation of a SWPPP. Post-construction stormwater runoff shall be managed through the implementation of a site-specific WQMP.

As previously stated, the proposed project would develop a vacant parcel and would therefore increase the proportion of impervious surface within the project site. Specifically, the proposed project would increase impervious coverage of the project site by approximately 358,000 SF, and the overall runoff coefficient for the project site would be 0.71.

Stormwater runoff generated within the project site would be collected by way of a proposed 12-inch storm drainpipe that would run beneath the onsite roadways and transect the project site and ultimately drain to a detention basin that would be located in the northwestern corner of the North Campus. This detention basin has been designed in accordance with San Joaquin County Improvement Standards Section 3-4.05 and would have the ability to treat and detail the runoff volume from a 100-year, 24-hour storm. Specifically, the detention basin could treat a total volume of 186,000 cubic feet of stormwater, more than double the required volume. Water would be piped from the detention basin to West Hospital Road, west under I-5 to Manly Road, north along Manly Road to North Road, and then west to a pumping station north of the Mary Graham Children's Shelter. From the pumping station, stormwater would be piped to an offsite terminal basin located north of the San Joaquin County Morgue.

As such, the proposed project would require the construction of new stormwater drainage infrastructure within the project site to connect to existing public infrastructure, which would occur concurrently with construction of other features associated with the proposed project in order to minimize potential environmental impacts.

Further, as a New Development Priority Project, the County would require the proposed project's design to comply with the volume reduction requirements outlined in the City and County's joint 2023 Stormwater Quality Control Criteria Plan (SWQCCP) to reduce post-project runoff volume to pre-project volumes for the 85th percentile rainfall event.[61] The use of a detention basin within the project site represents a conventional BMP, as it would temporarily detain stormwater runoff by releasing water over time. A feasibility study prepared by Siegfried on October 4, 2024 (Appendix F) determined that both the detention or retention basin would be capable of adequately addressing applicable drainage requirements of the project site.

As discussed in Section 4.10, the proposed project's drainage design would comply with the applicable MS4 Permit, which regulates urban stormwater runoff, surface runoff, and drainage that flow into the MS4 system. Under the MS4 Permit, the City is responsible for regulating inflows to and discharges from its municipal storm drainage system. Implementation of RCM HYD-1, as provided in Section 4.10, which requires developing and implementing construction BMPs in compliance with the City's MS4 Permit, and Regulatory Compliance Measure HYD-2, also provided in Section 4.10, which requires compliance with the City's MS4 Permit, would

61 City of Stockton and County of San Joaquin Stormwater Quality Control Criteria Plan, August 20, revised January 2023, <https://cms3.revize.com/revize/stockton/Documents/Services/Water,%20Sewer%20&%20Stormwater/Stormwater/Stormwater_Quality_Control_Criteria_Plan_SWQCCP_2020.pdf> (Accessed October 29, 2024).

reduce any impacts to stormwater and drainage facilities to less than significant. Therefore, impacts to stormwater drainage facilities would be less than significant with the incorporation of Regulatory Compliance Measures HYD-1 and HYD-2. No mitigation is required.

***Electric Power*.** Electric power would be provided to the project site by Pacific Gas and Electric Company (PG&E). PG&E provides natural gas and electric service to approximately 16 million customers throughout its service area, which spans 70,000 square miles.[62] According to the CEC, total electricity consumption in the PG&E service area in 2022 was approximately 77,887 gigawatt-hours (GWh).[63] Total electricity consumption in San Joaquin County in 2022 was approximately 5,771 GWh.[64]

Short-term construction activities associated with the proposed project would be limited to providing power to the staging area and portable construction equipment and would not substantially increase demand for electricity. The heavy equipment used for construction would primarily be powered by diesel fuel. Given the limited nature of potential demand for electricity during construction and the availability of existing power lines adjacent to the project site, there would not be a need to construct new or alter existing electric transmission facilities. Impacts to local regional supplies of electricity would be less than significant during construction.

Refer to Section 4.6, Energy, of this IS/MND for further discussion related to the project's operational impacts with respect to existing and projected supplies of electricity. Under current conditions, above ground electrical lines run along South El Dorado Street and West Hospital Road. New electrical connections would be extended to reach the project site to serve the anticipated electricity demand generated by operations of the proposed project. In a letter dated June 11, 2024, PG&E confirmed that the proposed project does not appear to directly interfere with existing PG&E facilities or impact PG&E easement rights.[65]

Operation of the proposed project would increase on-site electricity demand. CalEEMod Version 2022.1.1.29 was used to calculate the approximate annual electricity demand of the proposed project. Based on the CalEEMod outputs, the estimated potential increase in electricity demand associated with the operation of the proposed project is kilowatt-hours (kWh) per year. Total electricity consumption in San Joaquin County in 2022 was approximately 5,771.28 GWh.[66] Therefore, operation of the proposed project would increase the annual electricity consumption in San Joaquin County by less than 1 percent, which is considered a negligible amount. Service

62 Pacific Gas and Electric Company Profile, <https://www.pge.com/en/about/company-information/company-profile.html> (Accessed October 18, 2024).

63 California Electricity Commission (CEC) Electricity Consumption by Entity, 2022, <http://www.ecdms.energy.ca.gov/elecbyutil.aspx> (Accessed October 18, 2024).

64 California Electricity Commission (CEC) Electricity Consumption by County, 2022, <http://www.ecdms.energy.ca.gov/elecbycounty.aspx> (Accessed October 18, 2024).

65 Personal communication, PG&E, June 11, 2024.

66 California Energy Commission, Electricity Consumption by County <https://ecdms.energy.ca.gov/elecbycounty.aspx> (Accessed December 3, 2024).

providers utilize projected demand forecasts in order to provide an adequate supply or plan for surplus in their service areas.

The proposed project would comply with Title 24, the California Green Building Standards Code. As previously stated, the proposed project would utilize window technologies such as tinting and insulated daylighting panels in order to decrease the electricity needed for building cooling. Additionally, the proposed project would be required to adhere to all federal, State, and local requirements for energy efficiency, which would substantially reduce electricity usage. Because the proposed project would only represent a small fraction of electricity demand in San Joaquin County, and would meet Title 24 requirements, the proposed project would not necessitate the construction of new or expanded electric power facilities that could cause a significant environmental impact. Impacts would be less than significant, and no mitigation is required.

Natural Gas. In addition to electric power, PG&E would also provide natural gas service to the project site. According to the California Energy Commission (CEC), total natural gas consumption in the PG&E service area in 2022 was approximately 4,422 million therms.[67] Total natural gas consumption in San Joaquin County in 2022 was approximately 187 million therms.[68]

Because the proposed project would establish new development on a currently undeveloped site, the proposed project would increase natural gas demand within the project site. Nearby land uses are already served by existing natural gas infrastructure. As such, additional points of connection to existing gas lines would be established under the proposed project. The service would be established in accordance with PG&E's policies and extension rules on file with the California Public Utilities Commission.

The proposed project would be required to adhere to all federal, State, and local requirements for energy efficiency, including the Title 24 standards, which would significantly reduce natural gas usage. CalEEMod Version 2022.1.1.29 was used to calculate the approximate annual natural gas demand of the proposed project. The estimated potential increase in natural gas demand associated with the proposed project is 93,661 kBTU per year. As discussed above, the total natural gas consumption within the PG&E service area was 4,422 million therms. Therefore, operation of the proposed project would negligibly increase the annual natural gas consumption in the PG&E service area. As such, the proposed project would not necessitate the construction of new or expanded natural gas facilities that could cause a significant environmental impact. Impacts would be less than significant, and no mitigation is required.

Telecommunications. Cable, internet, and telephone services are provided to the County's residents by major third-party purveyors. Cellular services provided by all major cellular networks are available in the County. Construction activities associated with the proposed project would not substantially increase the demand for telecommunications facilities. In addition, the proposed project would not involve the construction or relocation of new or

67 California Electricity Commission (CEC) Electricity Consumption by Entity, 2022, <http://www.ecdms.energy.ca.gov/elecbyutil.aspx> (Accessed October 18, 2024).

68 California Electricity Commission (CEC) Electricity Consumption by County, 2022, <http://www.ecdms.energy.ca.gov/elecbycounty.aspx> (Accessed October 18, 2024).

expanded telecommunications facilities. The existing land uses surrounding the project site are already served by existing telecommunications services and facilities. Therefore, implementation of the proposed project would not result in impacts related to the construction or relocation of existing telecommunications facilities, and no mitigation is required.

Summary. Aside from the establishment of connection lines to existing utility infrastructure, the supply and distribution network of utilities and service systems would generally remain unchanged. The water, wastewater, stormwater drainage, natural gas, electricity, and telecommunications needs generated by the proposed project would not exceed the existing supply and distribution network, or the available service capacities of the respective service providers. Levels of service to off-site users would not be adversely affected. Effects related to utility improvements and connections proposed as part of the project would be less than significant with compliance to applicable efficiency standards and practices as noted. No mitigation is required.

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. The project site is vacant under existing conditions and therefore does not generate any water demand. Therefore, the proposed project would increase water demand on the project site from existing conditions. As previously stated, water demand generated by employees, patients, visitors, and residents would amount to approximately 2,400 gallons per day. Where feasible, the proposed project would include various water efficiency design features, such as low flow faucets and fixtures, as well as the conveyance of low use irrigation and rainfall runoff to landscaped areas.

According to the SEWD 2020 UWMP, SEWD's projected water supply is able to meet projected water demands between the years of 2025 and 2045 during normal years, single dry years, and multiple dry years. At the time of the preparation of the 2020 UWMP, the projected 2025 water supply was 170,000 af. In 2045, the total water supply is projected to be 165,000 af under a normal year scenario, marking a slight decrease in water supply between 2025 and 2045. However, water demand under a normal year is projected to decrease significantly between within this same time period. In 2025, the projected demand total is 82,340 af, which would experience a sharp drop to just 16,527 af by 2045. Therefore, SEWD anticipates having a larger water surplus in 2045 (148,472 af) as compared to 2025 (87,660 af). This increasing surplus indicates that SEWD's water supply would sufficiently meet water demand generated by the proposed project through the year 2045.

The proposed project's anticipated water demand of 2,400 gallons a day would amount to approximately 876,000 gallons a year. This amounts to 0.002 percent[69] of the 2025 projected water supply and 0.002 percent[70] of the 2045 projected water supply according to the 2020 UWMP. As such, the proposed project would represent a minimal percentage of projected water supply within the SEWD service region, and the proposed project could be adequately served by existing water supply. Nevertheless, Section 9-610.050 of the County's Development Title requires new

[69] 876,000 gallons = approximately 2.7 af; 2.7 af / 170,000 af = 0.002 percent.
[70] 876,000 gallons = approximately 2.7 af; 2.7 af / 165,000 af = 0.002 percent.

developments in unincorporated San Joaquin County to pay a Water Facilities Impact Fee, which would help pay for water facilities to mitigate the potential impacts related to new developments, "including but not limited to projects to convey and treat an additional supply of and to allow for the conjunctive use of, the groundwater and surface waters."[71] If the Board of Supervisors has adopted a specific development impact fee via a Board Resolution by the time building permits are issued for the proposed project, the project would be subject to such fees. The payment of these fees would further ensure the proposed project could be adequately served by the existing water supply. The proposed project would also be required by the County to obtain a will-serve letter from SWED, as stated in Policy IS-2.6 of the County's General Plan. As such, prior to issuance of a building permit, written confirmation will be provided by the SEWD that the proposed project would be adequately served by existing water supply.

Based on the analysis presented above, and with compliance with RCM UTL-1, the proposed project would be adequately served by existing water supplies during normal, dry and multiple dry years. Impacts would be less than significant, and no mitigation is required.

Regulatory Compliance Measure:

RCM UTL-1 **Water Supply Facilities Impact Mitigation Fee.** Prior to the issuance of building permits, San Joaquin County Community Development Department shall ensure that the Project Applicant has paid the appropriate Water Supply Facilities Impact Mitigation Fee based on the current schedule at the time of payment.

c. Would the project 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?

Less Than Significant Impact. As stated above in Response 4.19.1(a), wastewater flows from the project site would be conveyed to the public sewage system and ultimately treated by the City of Stockton's existing public system, which is operated by the City's Municipal Utilities Department. According to the City of Stockton Wastewater Master Plan Update, the City's wastewater collection system comprises over 1,000 miles of gravity mains, 35 pumps, and 37 miles of active force mains that ultimately convey all flows to the RWCF Based on modeling presented in the Wastewater Master Plan Update, the RWCF can experience a peak flow of up to 78.5 mgd during 10-year, 24-hour storm conditions.

As previously discussed, the anticipated wastewater generation by the proposed project is negligible compared to the peak flows experienced by the RWCF. Furthermore, the proposed project is required by the County to acquire a will-serve letter from the City of Stockton Municipal Utilities Department, as stated in Policy IS-2.6 of the County's General Plan. This will-serve letter was received on October 16, 2024, and stated that the proposed project could connect to any of four

[71] County of San Joaquin Development Title Section 9-610.050 - Water Facilities Impact Fee, <https://library.municode.com/ca/san_joaquin_county/codes/development_title?nodeId=SERIES_600INSTSEFI_CH9-610DEIMFEIN_9-610.050WAFAIMFE> (Accessed October 18, 2024).

existing City sewer service locations determined to be acceptable by the Municipal Utilities Department, which operates the City's existing public wastewater treatment system. A Sewer Memorandum was prepared by Siegfried on October 30, 2024 (Appendix J) in order to evaluate the feasibility of each approved connection option.

As previously discussed, wastewater flows from the project site would be conveyed via an onsite holding tank and pump station to the County's existing sewer system. The City's Municipal Utilities Department has indicated in a will-serve letter that the proposed project would be adequately served by existing wastewater infrastructure upon the establishment of connections prior to the issuance of a building permit.

As such, the wastewater treatment provider serving the project site would have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. Impacts would be less than significant, and no mitigation is required.

d. Would the project 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?

Less Than Significant Impact. San Joaquin County has an agreement with Waste Management Services (WMS) to provide general waste collection services, including organic recycling services, to residents and businesses. San Joaquin County contains five Class III sanitary landfills, one Class II sanitary landfill, three transfer stations, and one planned transfer station.[72]

Construction waste generated under the proposed project is anticipated to be minimal compared to waste generated throughout the lifetime of the proposed project during operation. The proposed project would also reduce potential impacts related to solid waste during construction through the use of building materials with recycled content where feasible. Further, the proposed project would be subject to Ordinance #4370, or the Construction, Demolition and Landscaping Debris Recycling and Diversion Ordinance, which was passed by the San Joaquin County Board of Supervisors in 2009. This ordinance requires the diversion of 50% of all construction and demolition (C&D) waste, excluding inert and organic material, and 90% of inert and organic materials from the landfill through reuse and recycling.[73] San Joaquin County provides a C&D Recycling Program[74] at the Lovelace Materials Recovery Facility and Transfer Station, which accepts C&D materials from any development project within San Joaquin County and is located approximately 3 miles southeast of the project site. As such, the proposed project would be required to meet applicable County requirements pertaining to the diversion of C&D waste from landfills. Based on this compliance,

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72 Recycling Market Development Zone San Joaquin County, <https://www2.calrecycle.ca.gov/BizAssistance/RMDZ/Zones/Details/32#:~:text=The%20San%20Joaquin%20County%20Recycling,highways%2C%20and%20three%20interstate%20highways.> (Accessed October 18, 2024).

73 San Joaquin County Department of Public Works – Solid Waste – Construction and Demolition Diversion Program, <https://www.sjgov.org/department/pwk/solid-waste/how-do-i-recycle-or-dispose-/construction-and-demolition-diversion-program> (Accessed October 18, 2024).

74 Ibid.

construction of the proposed project would not generate waste in excess of State or local standards or infrastructure.

As previously described, the proposed project would develop a new behavioral health and wellness facility on a previously undeveloped site and would therefore introduce a new source of solid waste generation within the project site. According to CalEEMod outputs (Appendix A to this IS/MND), the proposed project would generate approximately 2,614.52 tons per year of solid waste, or approximately 7.16 tons per day.

The nearest County solid waste processing facility to the project site is the Lovelace Materials Recovery Facility and Transfer Station, which, as stated above, would also accept C&D waste generated during the proposed project's construction period. The Lovelace Materials Recovery Facility and Transfer Station processes an average of 743 tons of waste daily,[75] which is then transported to the Foothill Sanitary Landfill via County-owned transfer trucks. The Foothill Sanitary Landfill is the largest landfill in the County and processes an average daily volume of 952 tons.[76] As such, anticipated solid waste generation under the proposed project would represent less than one percent[77] of the daily capacity of the Lovelace Materials Recovery Facility and Transfer Station and less than 0.8 percent[78] of the daily capacity of the Foothill Sanitary Landfill. Therefore, the proposed project would generate a negligible amount of solid waste within the context of the larger region and service area.

Further, operations of the proposed project would comply with Policy PHS-6.5, Diversion, Recycling, and Reuse, of the County's General Plan, which states, "the County shall achieve a 75 percent diversion of landfilled waste based on 1990 levels by 2020 and shall achieve a diversion rate of 90 percent by 2035."[79]

The proposed project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure. Moreover, the project would not otherwise impair the attainment of solid waste reduction goals. Refer to Response 4.19(e) for additional details. Therefore, the project would result in a less than significant impact to solid waste and landfill facilities, and no mitigation is required.

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75 San Joaquin County Department of Public Works – Solid Waste – Lovelace Facility, <https://www.sjgov.org/department/pwk/solid-waste/san-joaquin-county-solid-waste-facilities/lovelace-mrf-and-transfer-station> (Accessed October 18, 2024).

76 San Joaquin County Department of Public Works – Solid Waste – Foothill Sanitary Landfill, <https://www.sjgov.org/department/pwk/solid-waste/san-joaquin-county-solid-waste-facilities/foothill-sanitary-landfill> (Accessed October 18, 2024).

77 (7.16 / 743) * 100 = approximately 0.96 percent

78 (7.16 / 952) * 100 = approximately 0.75 percent

79 San Joaquin County General Plan 2035, Land Use Element, December 2016 (Updated August 2024) <https://www.sjgov.org/commdev/cgi-bin/cdyn.exe?grp=planning&htm=gp2035> (Accessed September 5, 2024).

f. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. The California Integrated Waste Management Act of 1989 (AB 939) changed the focus of solid waste management from landfill to diversion strategies (e.g., source reduction, recycling, and composting). The purpose of the diversion strategies is to reduce dependence on landfills for solid waste disposal. AB 939 established mandatory diversion goals of 25 percent by 1995 and 50 percent by 2000.

AB 341 (2011) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the State that not less than 75 percent of solid waste generated be source-reduced, recycled, or composted by the year 2020 and annually thereafter. In addition, AB 341 required the California Department of Resources Recycling and Recovery (CalRecycle) to develop strategies to achieve the State's policy goal. CalRecycle has conducted multiple workshops and published documents that identify priority strategies to assist the State in reaching the 75 percent goal by 2020.

AB 1826 (2014) requires businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. AB 1826 also requires that local jurisdictions implement an organic waste recycling program to divert organic waste generated by businesses. Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

SB 1383 (2016) establishes methane emissions reduction targets in a statewide effort to reduce emissions of short-lived climate pollutants (SLCP) in various sectors of the State economy. SB 1383 establishes the following targets to reduce the 2014 statewide level of organic waste that is disposed of: a 50 percent reduction by 2020, and a 75 percent reduction by 2025. CalRecycle has the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target – no less than 20 percent of currently disposed edible food should be recovered for human consumption by 2025. The San Joaquin County SB 1383 Organic Waste Diversion Ordinance went into effect on March 15, 2022. Under this ordinance, businesses must either subscribe to a waste collection system that complies with SB 1383, qualify for a waiver, or use acceptable alternative compliance methods. In a manner consistent with SB 1383, the proposed project would include designated containers for each type of waste, including recycling and organic waste. The County splits businesses into two tiers regarding the recovery of edible food waste pursuant to SB 1383. The proposed project would fall under the Tier Two (health facilities with on-site food facility and greater than 100 beds),[80] meaning it must comply with edible food recovery requirements under SB 1383 by January 1st, 2024.

[80] San Joaquin County Department of Public Works – Solid Waste – SB 1383 Requirements for Business in Unincorporated County, 2024, <https://www.sjgov.org/department/pwk/solid-waste/sb-1383---requirements-for-business-in-unincorporated-san-joaquin-county> (Accessed October 28, 2024).

San Joaquin County, as a whole, has already achieved California's 50 percent waste diversion mandate.[81] The County also provides various resources to guide residents, businesses, and facilities through the process of compliance with applicable regulations. Using this guidance, the proposed project would comply with all applicable standards related to solid waste diversion, reduction, and recycling during project construction and operation. Therefore, the proposed project is anticipated to result in less than significant impacts related to potential conflicts with federal, State, and local management and reduction statutes and regulations pertaining to solid waste, and no mitigation is required.

[81] San Joaquin County Department of Public Works – Solid Waste – Commercial Recycling, <https://www.sjgov.org/department/pwk/solid-waste/businesses/commercial-recycling> (Accessed October 21, 2024).

4.20 WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

4.20.1 Impact Analysis

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The California Department of Forestry and Fire Protection (CAL FIRE) has mapped areas of significant fire hazards in the State through its Fire and Resources Assessment Program (FRAP). CAL FIRE released a set of updated maps on March 24, 2025. These maps designate areas of California as different fire hazard severity zones (FHSZ), based on a hazard scoring system using subjective criteria for fuels, fire history, terrain influences, housing densities, and occurrence of severe fire weather where urban conflagration could result in catastrophic losses. As part of this mapping system, CAL FIRE is responsible for wildland fire protection for land areas that are generally unincorporated and they are classified as State Responsibility Areas (SRAs). In areas where local fire protection agencies (e.g., City and County fire departments) are responsible for wildfire protection, the lands are classified as Local Responsibility Areas (LRAs). CAL FIRE currently identifies nearly all of French Camp, including the project site, as an LRA.

In addition to establishing local or State responsibility for wildfire protection in a specific area, CAL FIRE categorizes areas into Fire Hazard Severity Zones (FHSZ), including Moderate, High, and Very High classifications. According to the CAL FIRE Local Responsibility Area Fire Hazard Severity Zones map for the City, no portion of French Camp, nor the project site, is designated as FHSZ.

The County General Plan states that there are four San Joaquin County communities that are identified as Communities at Risk for wildland fires: Bellota, Clements, Linden, and Lockeford. The project site is not within or near these communities. The project site would be served by the French McKinley Fire District which is located approximately one mile east of the project site. The County

General Plan Public Health and Safety Element outlines policies to minimize the risk of wildland and urban fire hazards in high fire hazard areas. Although the project is not within a CALFIRE FHSZ or County-designated high fire hazard area, the proposed project would take appropriate measures to provide adequate emergency response. The proposed project would include a drive aisle/fire access lane along the South Campus's perimeter to provide access to the surface parking area which would meet turning radius requirements determined by the Fire Code Official. Therefore, the proposed project would comply with applicable codes and ordinances for emergency vehicle access.

In February 2022, the County of San Joaquin Emergency Operations Plan (EOP) was developed to describe the framework under which various entities would work together during emergencies and natural disasters in which the people, property, and environment of San Joaquin County are negatively impacted by natural or human-caused hazards.[82] The plan establishes a systematic process to facilitate emergency preparedness and coordinate personnel, facilities, and other resources of the County into an efficient organization. It includes the County's compliance 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. EOP facilitates multi-agency and multi-jurisdictional coordination with federal, tribal, state, and other local government agencies. The proposed project would not interfere with the established roles, responsibilities, procedures, and policies described in the EOP. The employees, visitors, patients, and temporary residents would adhere to County emergency response and evacuation instructions in the event of an emergency. Therefore, the project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Potential impacts would be less than significant, and no mitigation is required.

b. Would the project, 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?

Less Than Significant Impact. The project site is flat undeveloped land and does not contain any significant natural or manufactured slopes. It is surrounded by other undeveloped parcels, light residential uses, and the County General Hospital across I-5. The project is not within a high fire hazard area, however the County General Plan outlines Policy PHS 4.5 Vegetation and Fuel Management which requires new development to establish a long-term comprehensive vegetation and fuel management program consistent with State Codes 4290 and 4291 for wildland fire interface and vegetation management.[83]

The project site currently contains non-native vegetation. Development of the project site would reduce the amount of vegetation and combustible materials necessary for the uncontrolled spread of wildfire. Construction of the BeWell Campus would include vegetation removal in accordance with the CBC and California Fire Code. As such, the implementation of the proposed project would

82 San Joaquin County Emergency Operations Plan. 2022. <https://www.sjgov.org/department/oes/emergency-plans> (Accessed October 9, 2024).

83 San Joaquin County General Plan 2035, Public Health and Safety Element, December 2016 (Updated November 2017) <https://www.sjgov.org/commdev/cgi-bin/cdyn.exe?str=general+plan+2035&str=&grp=main&htm=results&typ=page> (Accessed October 9, 2024).

reduce the likelihood of a wildfire or the uncontrolled spread of a wildfire at the project site. The on-site population would increase considering the project site is currently undeveloped. Although this increase may increase the likelihood of a fire occurring on site, the project would be designed in accordance with CBC and California Fire Code to reduce risk of fire at the project site. Furthermore, the project site is not located in a State Responsibility Area (SRA) or a FHSZ and so impacts related to wildfire risks that could expose project occupants to pollutant concentrations from a wildfire is less than significant. No mitigation is required.

c. Would the project 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?

Less Than Significant. The project site is not currently served by water service and would require the connection to the existing infrastructure in surrounding rights-of-way. For water service, the proposed project would include an extension of the existing 12-inch water main in South El Dorado Street to the northern edge of the South Campus, where it would connect to a 12-inch water main that would connect to project site water and fire infrastructure beneath the main entrance. On site water would be piped throughout the site via 6-inch domestic water main connecting to buildings via 3-inch domestic water laterals. Water for fire suppression would be run beneath the access roads and via a 12-inch fire loop. The connection of these utilities to the project site is not expected to result in temporary or ongoing impacts to the environment. The project is proposed to have driveways and a fire access lane to provide emergency access to the site. Access to the site would be provided via one driveway along South El Dorado Street and another driveway along West Hospital Road. The fire access lane would be along the South Campus perimeter to provide access to the surface parking surrounding the campus site. The project is not located within an SRA or FHSZ and is not expected to have any project installments that would exacerbate fire risk. The development of the proposed project and associated infrastructure would not expect to exacerbate fire risk. In accordance with the CBC and California Fire Code, the proposed project is not expected to exacerbate fire risks, impacts would be less than significant, and no mitigation is required.

d. Would the project 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?

Less Than Significant Impact. As designated by CALFIRE, the project site is not located within or near any FHSZ.[84] The project site is generally flat and is not within an area that is susceptible to landslides.[85] According to the U.S. Landslide Inventory and Susceptibility Map, there are few areas in the French Camp area with any landslide susceptibility. The map shows that the project site has negligible risk to landslides, and approximately 1.35 miles southeast of the project site there is a low risk of a possible landslide in the area. Therefore, the risk of downslope or downstream flooding or

84 California Department of Forestry and Fire Protection (CALFIRE) FHSZ SRA Map. <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008> (Accessed October 9, 2024).

85 United States Geological Survey. n.d. U.S. Landslide Inventory. <https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=ae120962f459434b8c904b456c82669d> (Accessed October 9, 2024).

landslides as a result of runoff, post-fire instability, or drainage changes is expected to be minimal. The construction and operation of the project would be in accordance with the CBC and California Fire Code to reduce the risk of fire at the project site. Less than significant impacts would occur, and no mitigation is required.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to 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?	☐	☒	☐	☐

4.21.1 Impact Analysis

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?

Less Than Significant with Mitigation Incorporated. Based on the discussion in Section 4.4, Biological Resources, the proposed project is anticipated to result in less than significant impacts to habitat, wildlife species, and/or plant and animal communities with incorporation of Mitigation Measures (MM) BIO-1 through BIO-5. Adherence to these Mitigation Measures would ensure the proposed project's avoidance of direct take and habitat disturbance of Burrowing owls, Swainson's hawk, white-tailed kites, loggerhead shrike, or nesting birds, respectively. As such, the proposed project would not substantially reduce the habitat or population of a fish or wildlife species, nor reduce the range of a rare or endangered plant or animal.

As discussed in Section 4.5, Cultural Resources, the Cultural Resources Assessment prepared for the proposed project indicates that the project site remained largely undeveloped during the historic period and the field survey identified the project site as being moderately to severely disturbed due to earth moving and agricultural or vegetation abatement activities. No structures are currently present on the project site, and a field survey conducted during preparation of the Cultural Resources Assessment identified no visible cultural materials on the project site. However, because the project site may retain some sensitivity for undocumented subsurface archaeological resources, MM CUL-1 and MM CUL-2 would be incorporated into the proposed project. Under MM CUL-1, construction workers present on the project site would be trained to identify and report cultural

resources as they are discovered, and MM CUL-2 sets forth procedures for handling inadvertent discoveries of cultural resources.

As discussed in Section 4.18, Tribal Cultural Resources, the County requested a search of the SLF by the NAHC for the project site. According to NAHC correspondence, a search of the SLF returned negative results for the project site. Pursuant to the provisions of AB 52, the County distributed notification letters to local Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project and have previously requested to be notified of future projects proposed by the County. On April 18, 2025, County staff received a response from the Confederated Villages of Lisjan Nation, requesting to be on the contact list. The tribe did not initiate formal consultation. No other responses were received during the consultation period.

For the reasons stated above, the proposed project does not 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. Impacts would be less than significant with implementation of the mitigation measures identified above.

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)?

Less Than Significant with Mitigation Incorporated. A cumulative impact could occur if the proposed project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present and reasonably foreseeable future projects for each resource area discussed in this IS/MND. The cumulative study area is confined to the general vicinity of the proposed project, including locations that could reasonably utilize the same routes for construction vehicles or the same utility service providers during operations. Table 4.21.A below provides a summary of related projects in the vicinity of the project site, which are used in the cumulative impact analysis.

As shown above in Table 4.21.A, there are several other projects planned within the regional vicinity of the project site in the County of San Joaquin. Some of these projects involve construction activities that may overlap with the timeline of construction activities under the proposed project. As previously stated, a cumulative impact could occur if multiple projects contribute construction vehicle trips to the same regional arterial roadways. However, routes for each project listed in Table 4.21.A, as well as the proposed project, are not necessarily known at this time and may be subject to change based on transportation patterns within the region. While these projects could utilize the same major corridors that provide connectivity across the region, these roadways are generally designed to accommodate a higher volume of vehicle traffic that could include construction vehicle trips. As such, the potential overlap between the construction period of the proposed project and that of the various projects listed in Table 4.21.A is not anticipated to result in cumulatively considerable impacts.

Table 4.21.A: Related Projects

Project	Location	Description	Status
County of San Joaquin			
PA-2300024 (A)	6001 South French Camp Road	An Administrative Use Permit for a tractor trailer and heavy equipment dealership facility including construction of a 76,404 square foot sales, rental, service, and warehouse building, a 25,275 square foot wash and storage building, a 27,301 square foot repair shop, and a 3,967 square foot wash and storage building.	Approved by the San Joaquin County Community Development Department on April 3, 2025.
PA-2200279	6344 South French Camp Road	A Site Approval to establish truck parking for 102 trucks and trailers and a 4,464-square-foot structure 3 truck repair bays and a truck wash. On site utilities would include a private well, septic system, and detention pond.	Approved by County Board of Supervisors on August 14, 2024.

Source: San Joaquin County Community Development Department. 2025. Map of Active Planning Applications. <https://www.sjgov.org/commdev/cgi-bin/cdyn.exe?grp=planning&htm=active&typ=apd> (Accessed January 17, 2025).

The project site is located in a somewhat urbanized area that contains existing development, including industrial, residential, and institutional land uses. The proposed project would rely on and can be accommodated by the existing road system, public services, and large-scale utility infrastructure, and its contributions to service demands would be relatively minimal. Based on the Project Description and the conclusions reached throughout Chapter 4 of this IS/MND regarding each individual environmental factor, impacts related to the proposed project are less than significant or can be reduced to less than significant levels with the incorporation of mitigation measures. Because all potentially significant impacts can be mitigated to a less than significant level, such impacts would not be cumulatively significant. The proposed project's contribution to any significant cumulative impacts would therefore be less than cumulatively considerable with incorporation of the various mitigation measures prescribed within the IS/MND.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant With Mitigation Incorporated. Previous sections of this IS/MND reviewed the proposed project's potential impacts, and regulatory compliance/mitigation measures related to Air Quality (RCM AIR-1), Biological Resources (MMs BIO-1 through BIO-5), Cultural Resources (MMs CUL-1 and CUL-2 and RCM CUL-1), Geology and Soils (MMs GEO-1 and GEO-2), Greenhouse Gas Emissions (GHG-1), Hazards and Hazardous Materials (MM HAZ-1), Hydrology and Water Quality (MM HYD-1 and RCMs HYD-1 through HYD-5), Public Services (RCM PS-1), Transportation (MM TRA-1 and RCM TRA-1), and Utilities and Service Systems (RCM UTL-1). As concluded in these previous discussions, the proposed project would result in less than significant environmental impacts with adherence to the regulatory compliance measures and implementation of the recommended mitigation measures. Therefore, the proposed project would not result in environmental impacts that would cause substantial adverse effects on human beings.

5.0 LIST OF PREPARERS

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