PUBLIC REVIEW DRAFT

INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

FOR THE



SEPTEMBER 2025

Prepared for:

City of Escalon
2060 McHenry Avenue
Escalon, CA 95320

BaseCamp Environmental, Inc.

PUBLIC REVIEW DRAFT

INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

FOR THE

MURPHY RANCH SPECIFIC PLAN

Escalon, CA

SEPTEMBER 2025

Prepared for:

CITY OF ESCALON
2060 McHenry Avenue
Escalon, CA 95320
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NOTICE OF INTENT TO RECOMMEND ADOPTION OF A MITIGATED NEGATIVE DECLARATION AND NOTICE OF PUBLIC MEETING

Notice is hereby given that the City of Escalon has prepared an Initial Study (IS) of environmental effects and intends to recommend adoption of a Mitigated Negative Declaration (MND) and Mitigation Monitoring/ Reporting Plan (MMRP) for the Murphy Ranch project. The City of Escalon is the Lead Agency for this project under the California Environmental Quality Act (CEQA).

The project includes an Annexation, Pre-Zoning, Specific Plan, Tentative Subdivision Map, Planned Development, CEQA Initial Study, Mitigated Negative Declaration, and Mitigation Monitoring and Reporting Plan for the development of two parcels totaling 17.98 acres, which are proposed to be subdivided into 73 lots with one and two-story single-family residential units, including underground utilities, street improvements, sound wall, landscape improvements, and park expansion.

The IS/MND analyzes the potential environmental effects of the project in the environmental issue areas specified in the State CEQA Guidelines.

Based on this analysis, the Public Review Draft IS/MND finds that the project will not involve any significant environmental effects, provided that the mitigation measures described in the IS/MND are implemented. The project proponent has agreed to the mitigation measures, and these measures are included in a MMRP to be adopted by the City of Escalon in conjunction with the IS/MND and approval of the project. There are no sites identified under Section 65962.5 of the Government Code located on or near the project site.

Copies of the IS/MND are available for public review at the City of Escalon Planning Department at the address shown above and at the City's website: https://www.cityofescalon.org/government/departments/development_services/planning

The City will accept public and agency comments on the IS/MND during a 20-day review period that will begin on September 24, 2025 and end on October 13, 2025. Comments may be submitted by mail or e-mail to the City at the address shown below:

City of Escalon Planning Department, 2060 McHenry Ave., Escalon, Ca. 95320 or devservices@cityofescalon.org

At the conclusion of the 20-day public review period, the document will be submitted to the City of Escalon Planning Commission for review and recommendation to the City Council on adoption. The Planning Commission will hold a public hearing in the Council Chambers, City Hall, 2060 McHenry Ave, Escalon, California, on Tuesday, October 14, 2025 at 6:30 PM to consider recommendations of adoption of the IS/MND, MMRP, and the project.

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LIST OF ACRONYMS AND ABBREVIATIONS USED IN THIS DOCUMENT

AB	Assembly Bill
ADU	Accessory Dwelling Unit
APN	Assessor's Parcel Number
ARB	California Air Resources Board
BMP	Best Management Practice
CalEEMod	California Emissions Estimator Model
Cal Fire	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CNDDB	California Natural Diversity Data Base
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2e	carbon dioxide equivalent
dB	decibel
dBA	decibel, A-weighted
DTSC	California Department of Toxic Substances Control
EIR	Environmental Impact Report
EPA	U. S. Environmental Protection Agency
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
GAMAQI	Guide for Assessing and Mitigating Air Quality Impacts
GHG	greenhouse gas
gpm	gallons per minute
HCD	California Department of Housing and Community Development
IS/MND	Initial Study/Mitigated Negative Declaration
JADU	Junior Accessory Dwelling Unit
LAFCo	Local Agency Formation Commission
L_{dn}	Day-Night Average Sound Level
LID	Low Impact Development
LOS	Level of Service
mgd	million gallons per day
MS4	Municipal Separate Storm Sewer System
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
PG&E	Pacific Gas and Electric Company

PM_{10}	particulate matter 10 micrometers or less in diameter
$PM_{2.5}$	particulate matter 2.5 micrometers or less in diameter
RHNA	Regional Housing Needs Allocation
ROG	reactive organic gases
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SJCOG	San Joaquin Council of Governments
SJMSCP	San Joaquin County Multi-Species Open Space and Habitat Conservation Plan
SJVAPCD	San Joaquin Valley Air Pollution Control District
SSJID	South San Joaquin Irrigation District
STC	Sound Transmission Class
SWMP	Storm Water Management Program
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
USFWS	U.S. Fish and Wildlife Service
VERA	Voluntary Emission Reduction Agreement
VMT	vehicle miles traveled

MITIGATED NEGATIVE DECLARATION

A. General Project Information

Project Title:	Murphy Ranch Specific Plan
Lead Agency Name and Address:	City of Escalon 2060 McHenry Avenue Escalon, CA 95320
Contact Person and Phone Number:	Diana Trejo, Assistant Planner 209-691-7422
Project Location:	Southeast of intersection of State Route 120 and Brennan Avenue west of Escalon; APNs 225-040-28 and 225-040-29.
Project Sponsor Name and Address:	Florsheim Homes 1701 W. March Lane, Suite D Stockton, CA 95207
General Plan Designation:	Low Density Residential (City) Low Density Residential (County)
Zoning:	AU-20: Agriculture-Urban Reserve, 20-acre minimum (County)
Project Description:	The project proposes City approval of a Specific Plan to guide the development of two parcels totaling 18.00 acres, which are proposed to be subdivided into 72 lots for single-family residential development. Approximately 1.10 acres would be set aside in the southeastern corner of the project site for a combined park and drainage basin. To implement the Specific Plan, the project also includes a Tentative Subdivision Map that would subdivide the two parcels in accordance with the proposed Specific Plan. The project would require annexation of the two parcels to the City of Escalon along with pre-zoning by the City, which would pre-zone the project site as PD, Planned Development.
Surrounding Land Uses and Setting:	The project site is in unincorporated San Joaquin County adjacent to the western city limits of

	Escalon. Existing single-family residential development is located east and south of the project site. Agricultural lands with associated buildings and scattered rural residential development are located west and north of the site. These nearby lands are designated for commercial development in the Escalon General Plan. Railroad tracks owned by the Union Pacific Railroad run along the northern boundary of the project site. Adjacent to and north of these tracks is State Route 120.
Other Public Agencies Whose Approval is Required:	San Joaquin Local Agency Formation Commission (annexation)
Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, has consultation begun?	Requesting tribes have been notified; no consultation has been requested by the tribes.

B. 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" prior to mitigation, as indicated by the checklist on the following pages.

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

C. Lead Agency Determination

On the basis of this initial evaluation:

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

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project 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 EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

CITY OF ESCALON

Jaylen French, City Manager _____ Date _____

1.0 INTRODUCTION

1.1 Project Brief

This document is an Initial Study/Mitigated Negative Declaration (IS/MND) for the Murphy Ranch Specific Plan Project (project) which is adjacent to and west of Escalon, California. The 18.00-acre project site is located near the southeast corner of the intersection of Brennan Avenue and State Route 120 (Figures 1-1 to 1-5). The project applicant is Florsheim Homes. This IS/MND has been prepared in compliance with the requirements of the California Environmental Quality Act (CEQA). For the purposes of CEQA, the City of Escalon (City) is the Lead Agency for the project.

The project proposes a Specific Plan to guide development of two adjacent parcels into 72 lots on which single-family residences would be constructed. A park/retention basin would be installed in the southeast corner of the site. Access to the proposed development would be from extensions of Celivo Way and Riesling Way north of California Street. Water, sewer, and storm drainage services would be provided by the City of Escalon upon anticipated annexation to the City. A Tentative Subdivision Map is proposed to permit the proposed residential development of the two parcels in accordance with the Specific Plan. The project would require Specific Plan and Tentative Subdivision Map approval from the City Council with a recommendation from the Planning Commission, along with annexation approval by the San Joaquin Local Agency Formation Commission (LAFCo) with pre-zoning by the City. The applicant would enter into a Development Agreement with the City.

1.2 Purpose of Initial Study

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

Provided that a project is not exempt from CEQA, the first step in the agency's consideration of its potential environmental effects is the preparation of an Initial Study. The purpose of an Initial Study is to determine whether the project would involve "significant" environmental effects as defined by CEQA and to describe feasible mitigation measures that would avoid significant effects or reduce them to a level that would be less than significant. If the Initial Study does not identify significant effects, or if it identifies mitigation measures that would reduce all the significant effects of the project to a less-than-significant level, then the agency prepares a Negative Declaration or Mitigated Negative Declaration. If the project would involve significant effects that cannot be readily

mitigated, then the agency must prepare an Environmental Impact Report (EIR). The agency may also decide to proceed directly with the preparation of an EIR without preparation of an Initial Study.

The Murphy Ranch project is a "project" as defined by CEQA and is not exempt from CEQA consideration. The City has determined that the project involves the potential for significant environmental effects and requires preparation of this Initial Study. The Initial Study describes the proposed project and its environmental setting, it discusses the potentially significant environmental effects of the project, and it identifies feasible mitigation measures that would avoid the potentially significant environmental effects of the project or reduce them to a level that would be less than significant. The Initial Study considers the project's potential for significant environmental effects in the following subject areas:

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

The Initial Study concludes that the project would have significant environmental effects, but that recommended mitigation measures would reduce all these effects to a level that would be less than significant. As a result, the City has prepared a Mitigated Negative Declaration and notified the public of the City's intent to adopt the IS/MND. A copy of the City's Notice of Intent is shown just inside the cover of this document. As of the distribution of the IS/MND for public review, the applicant has accepted all the recommended mitigation measures. The time available for comment on the IS/MND is shown in the Notice of Intent prepared for the project.

1.3 Project Background

The project site is in unincorporated San Joaquin County adjacent to a developed area of western Escalon. The property is comprised of two contiguous parcels. The smaller parcel, occupying the northwest corner of the property, contains a residence (18092 Brennan Avenue) in the northeast corner of the parcel and several dilapidated sheds and shade structures that surround the residence. A second residence (18112 Brennan Avenue) is in the southwest portion of the larger parcel. An animal barn of concrete masonry unit construction is also located in the southwest portion of the property, southeast of the southern residence near the southern property boundary. The remainder of the project site

is vacant and is predominantly in use for livestock pasture. The project site has been used for agricultural production but appears to have been fallow since 1993 (Baez Geotechnical Group 2023a).

Single-family residential development has occurred east and south of the project site. Adjacent to and north of the project site are State Route 120 and railroad tracks operated by the Union Pacific Railroad. Beyond the tracks and the highway are agricultural fields and limited residential and commercial development. Agricultural land is also located west of the project site, across Brennan Avenue.

The Escalon General Plan, adopted in 2005 and updated in 2010 and 2019, has designated the project site for Low Density Residential use. However, the project site is currently unincorporated under the planning jurisdiction of San Joaquin County. However, the San Joaquin County General Plan, adopted in 2016, also designates the site for Low Density Residential development. The existing zoning for the project site is AU-20, Agriculture-Urban Reserve, 20-acre minimum parcel size. The Agriculture-Urban Reserve zone is intended to retain in agriculture those areas planned for future urban development in order to facilitate compact, orderly urban development and to assure the proper timing and economical provision of services and utilities.

The Escalon General Plan Housing Element, an element of the Escalon General Plan, was adopted in 2019. Escalon was allocated a new construction need of 425 housing units in the San Joaquin County Regional Housing Needs Plan, prepared by the San Joaquin Council of Governments (SJCOG), for the 2014 to 2023 planning period. Of the allocated housing units, 192 are for above moderate-income households, while the remainder is allotted to housing for moderate- and lower-income households. As of adoption of the Housing Element, 7 moderate-income and 37 above moderate-income units have been constructed, with an additional 6 above moderate-income units under construction and 9 moderate-income units entitled (City of Escalon 2019a).

In 2022, the California Department of Housing and Community Development (HCD) approved the Regional Housing Needs Plan submitted by SJCOG for the 6th Cycle Housing Element, 2023-2031. Under this new plan, Escalon was allocated a new construction need of 367 housing units. Of these allocated housing units, 90 are identified for very low-income households, 56 for low-income households, 66 for moderate-income households, and 155 for above moderate-income households (SJCOG 2022c). It is expected that the Housing Element will be updated accordingly.

1.4 Environmental Evaluation Checklist Terminology

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

A Potentially Significant Impact occurs when there is substantial evidence that the project could involve a substantial adverse change to the physical environment; i.e., that the environmental effect may be significant, and mitigation measures have not been defined that would reduce the impact to a less than significant level. If there is at least one Potentially Significant Impact identified in the Initial Study, an EIR is required unless mitigation can be applied.

An environmental effect that is Less Than Significant with Mitigation Incorporated is a Potentially Significant Impact that can be avoided or reduced to a level that is less than significant with the application of mitigation measures.

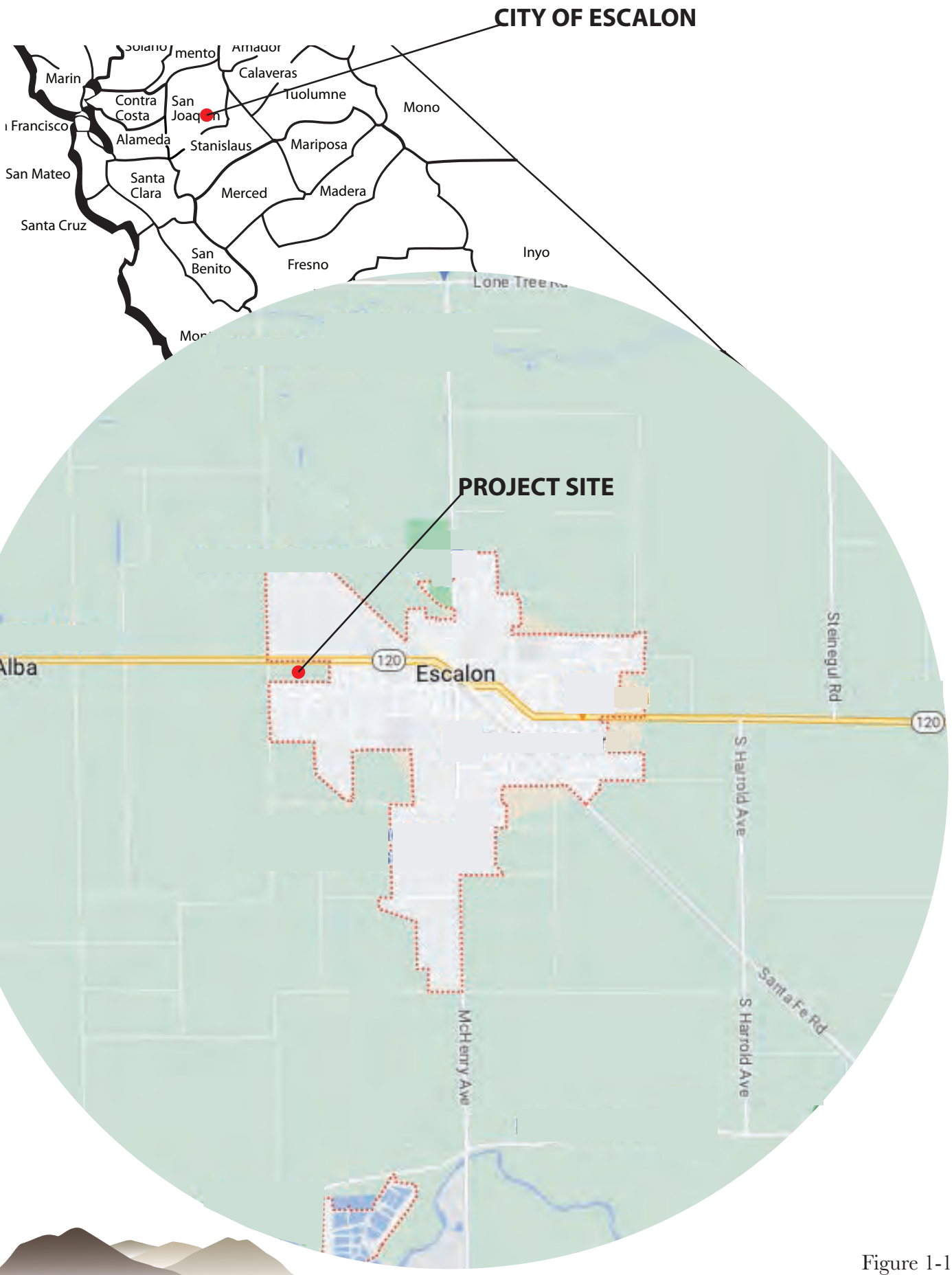
A Less Than Significant Impact occurs when the project would involve effects on an area of environmental concern, but the project would not involve a substantial adverse change to the physical environment and no mitigation measures are required.

A determination of No Impact is self-explanatory.

There are certain existing regulatory requirements that have been established by the City and other agencies with jurisdiction, which are routinely implemented in conjunction with new development; these measures have a mitigating effect that would have the potential to reduce or avoid the potential environmental impacts of a project. These requirements are described in this IS/MND as a part of the existing regulatory setting. If these requirements are not considered adequate to reduce or avoid an environmental impact, this IS/MND identifies additional mitigation measures needed to address the impact. These mitigation measures are described in the appropriate technical section of Chapter 3.0 and are summarized in Table 1-1. All mitigation measures described in this IS/MND are considered feasible and would reduce potentially significant environmental effects of the project to a level that would be less than significant. As of the publication of the Notice of Intent, these mitigation measures have been accepted by the project applicant.

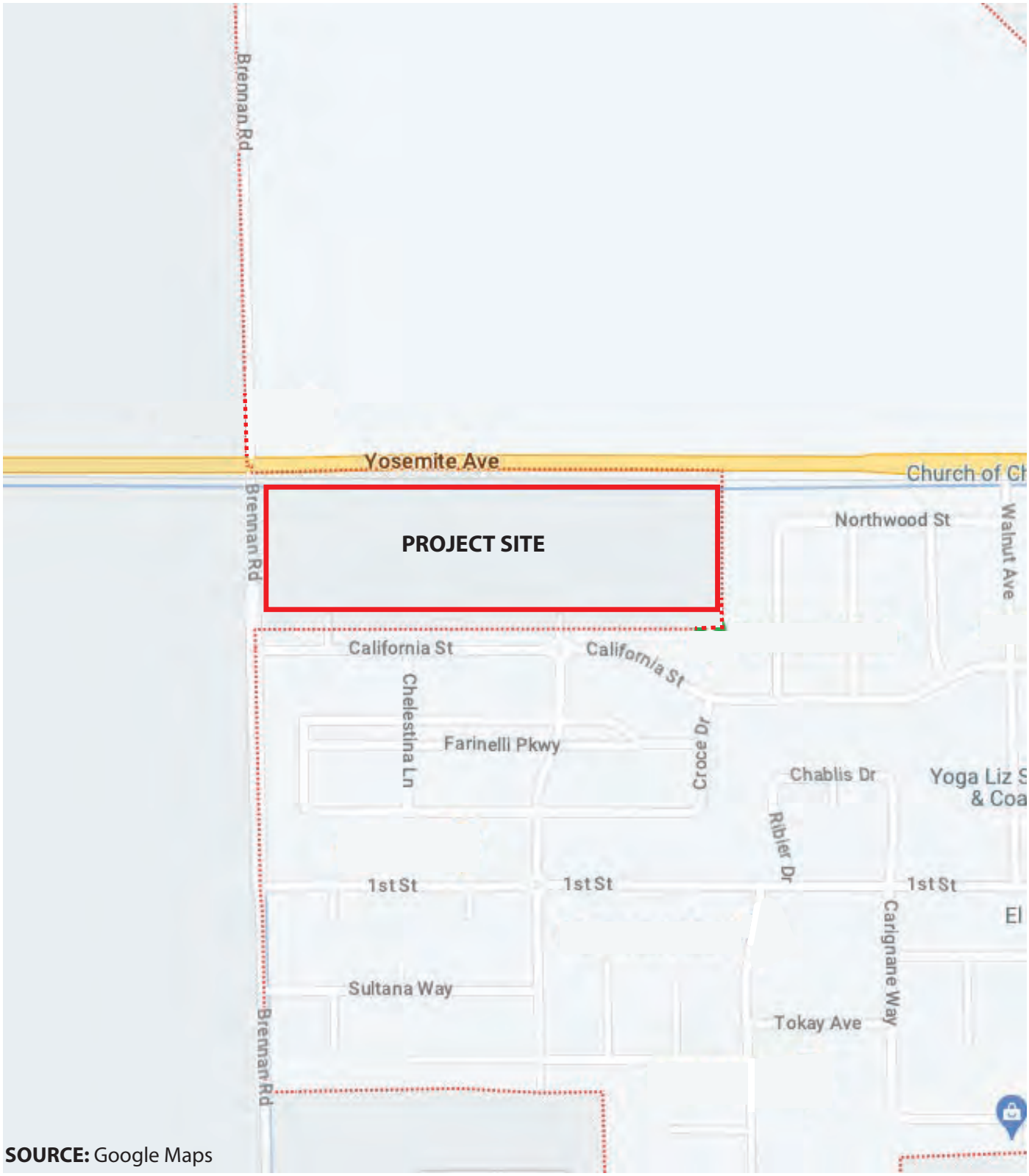
1.5 Summary of Environmental Effects and Mitigation Measures

The pages following the figures contain Table 1-1, Summary of Impacts and Mitigation Measures. The table summarizes the results of the Environmental Checklist Form and associated narrative discussion of the project's potential environmental effects in Chapter 3.0. The potential environmental impacts of the proposed project are summarized in the left-most column of this table. The projected level of significance of each impact without mitigation is indicated in the second column. Mitigation measures proposed to minimize significant environmental effects are shown in the third column, and the significance of the impact, after mitigation measures are applied, is shown in the fourth column.



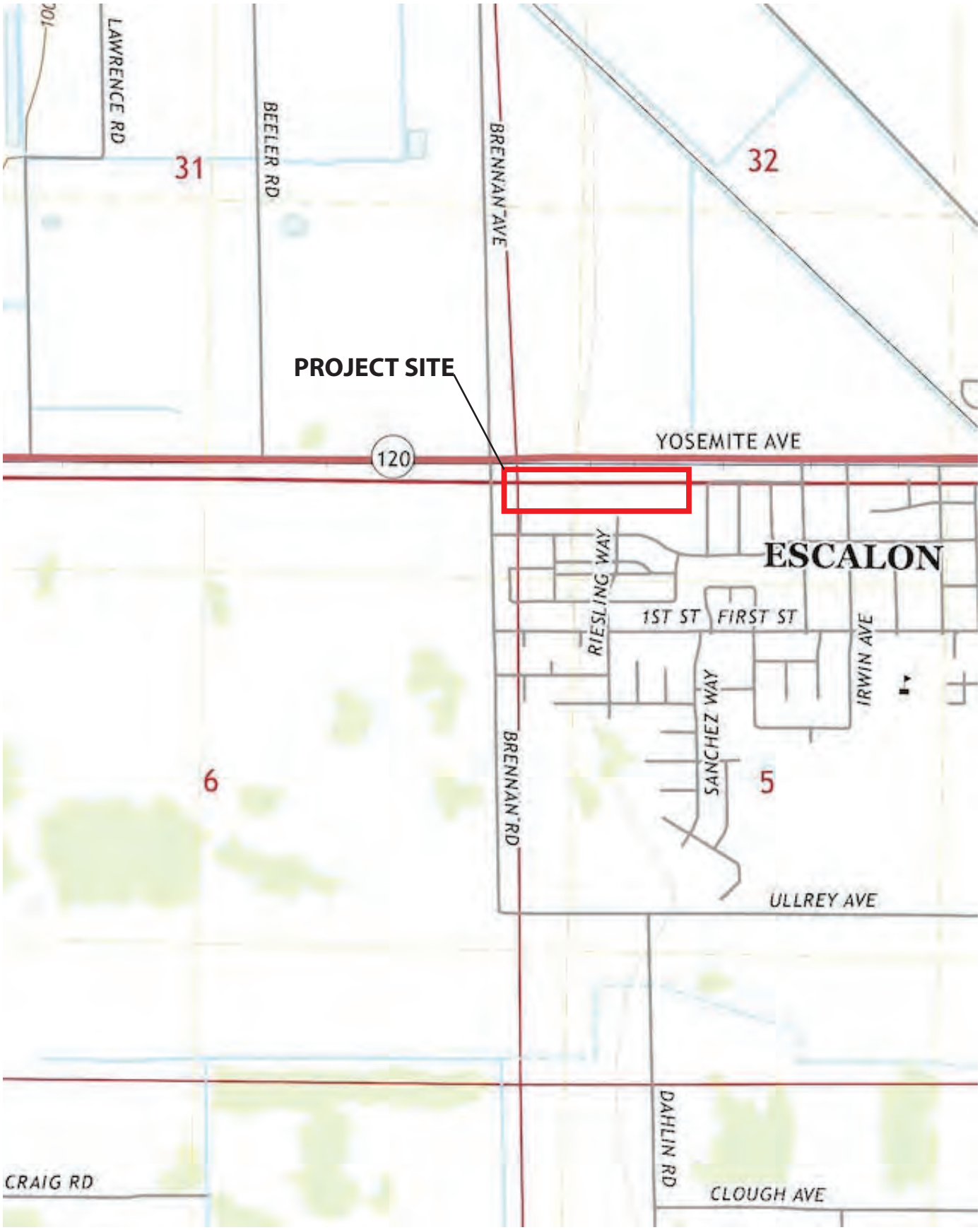
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Figure 1-1
REGIONAL LOCATION MAP



SOURCE: Google Maps

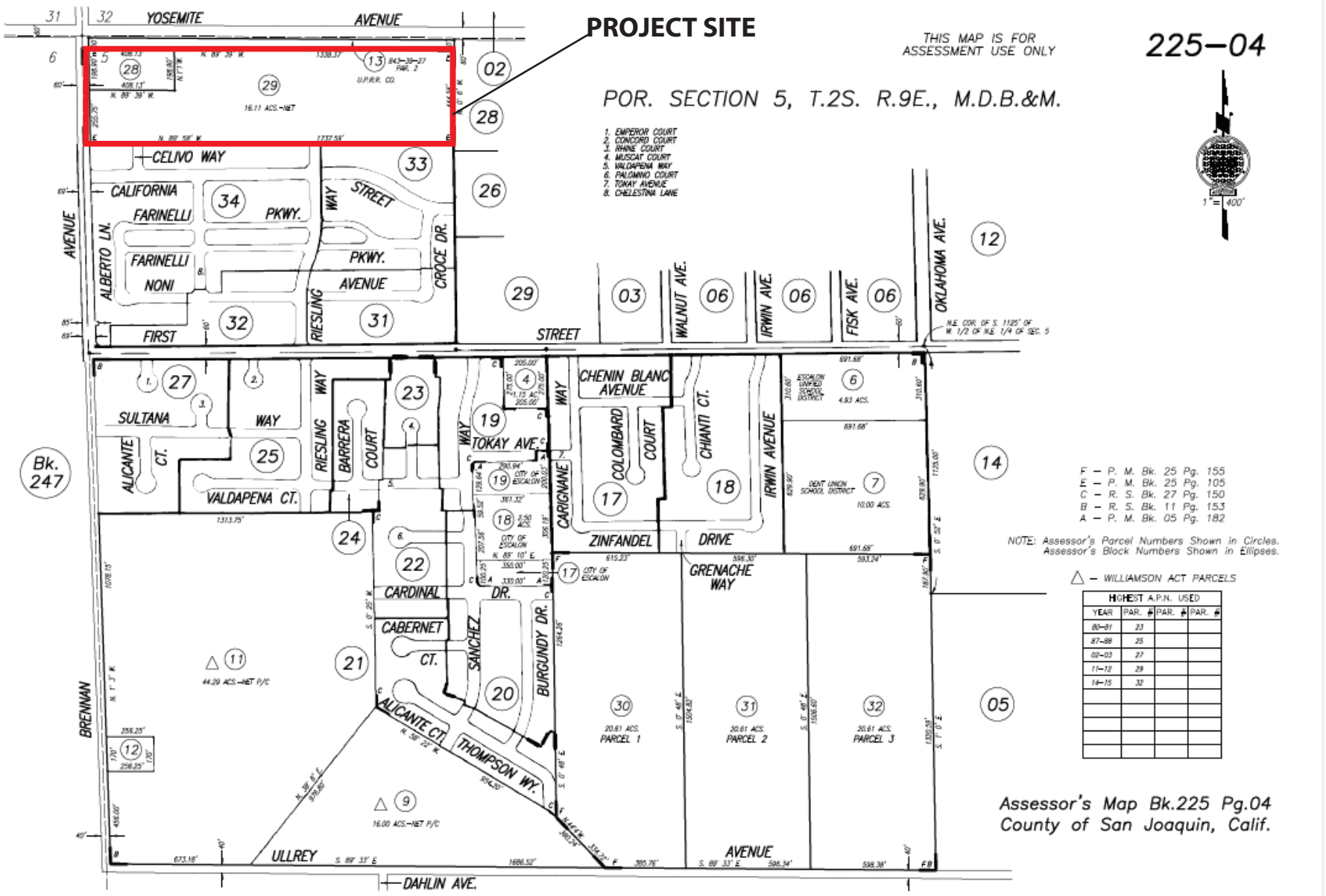
Figure 1-2
STREET MAP



SOURCE: USGS Quadrangle Map, Avena CA , 2021



SOURCE: Google Earth



BaseCamp Environmental

Figure 1-5
ASSESSOR PARCEL MAP

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
3.1 AESTHETICS			
a) Scenic Vistas	LS	None required	-
b) Scenic Resources	LS	None required	-
c) Visual Character and Quality	LS	None required	-
d) Light and Glare	LS	None required	-
3.2 AGRICULTURE AND FORESTRY RESOURCES			
a) Agricultural Land Conversion	LS	None required	-
b) Agricultural Zoning and Williamson Act	LS	None required	-
c, d) Forest Land Conversion and Zoning	NI	None required	-
e) Indirect Conversion of Farmland of Forest Land	NI	None required	-
3.3 AIR QUALITY			
a) Air Quality Plan Consistency	LS	None required	-
b) Cumulative Emissions	LS	None required	-
c) Exposure of Sensitive Receptors to Pollutants	LS	None required	-
d) Odors and Other Emissions	NI	None required	
3.4 BIOLOGICAL RESOURCES			
a) Special-Status Species	LS	None required	-
b) Riparian and Other Sensitive Habitats	NI	None required	-
c) State and Federal Jurisdictional Wetlands	LS	None required	-

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
d) Fish and Wildlife Movement	LS	None required	-
e) Local Biological Requirements	NI	None required	-
f) Conflict with Habitat Conservation Plans	NI	None required	-
3.5 CULTURAL RESOURCES			
a) Historical Resources	PS	CULT-1: Prior to final site plan approval, a qualified architectural historian shall review the two existing structures on the project site and provide a report on their historical significance. If one or both structures are determined to be a significant historical resource, then the architectural historian shall provide in the report recommendations on the disposition of the identified resource, which shall be incorporated within the final site plans or made conditions of approval for the project.	LS
b) Archaeological Resources	PS	CULT-2: If any subsurface cultural resources are encountered during project construction, all construction activities within 50 feet of the encounter shall be halted until a qualified archaeologist can examine these materials, determine their significance, and, if significant, recommend mitigation measures that would reduce potential effects to a level that is less than significant. Recommended measures could include, but are not limited to, 1) preservation in place, or 2) excavation, recovery, and curation by qualified professionals. The City of Escalon Community Development Department shall be notified, and the project developer shall be responsible for retaining qualified professionals, implementing recommended mitigation measures, and documenting mitigation efforts in a written report to the City's Community Development Department, consistent with the requirements of the CEQA Guidelines. If burial resources or tribal cultural resources are discovered, the City shall notify the appropriate tribal representative,	LS

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
		who may examine the materials with the archaeologist and advise the City as to their significance and disposition.	
c) Human Burials	LS	None required	-
3.6 ENERGY			
a) Project Energy Consumption	LS	None required	-
b) Consistency with Energy Plans.	LS	None required	-
3.7 GEOLOGY AND SOILS			
a-i) Fault Rupture Hazards	NI	None required	-
a-ii, iii) Seismic Hazards	LS	None required	-
a-iv) Landslides	NI	None required	-
b) Soil Erosion	PS	GEO-1: Prior to commencement of construction activity, the developer shall prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) for the project and file a Notice of Intent with the State Water Resources Control Board (SWRCB) in compliance with the Construction General Permit and City of Escalon storm water requirements. The SWPPP shall be available on the construction site at all times. The developer shall incorporate an Erosion Control Plan consistent with all applicable provisions of the SWPPP within the site improvement and building plans. The developer also shall submit the SWRCB Waste Discharger's Identification Number to the City prior to approval of development or grading plans.	LS
c) Geologic Instability	PS	GEO-2: The project shall incorporate into its design and construction the recommendations of the geotechnical	LS

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
		report *Geotechnical Investigation, Murphy Ranch Residential Subdivision, 18092 & 18112 Brennan Road, Escalon, California,* prepared by Baez Geotechnical Group on August 31, 2023, or a comparable study. The design and construction plans shall be reviewed by the City for consistency with the recommendations in the geotechnical report and shall be approved prior to final subdivision map approval.	
d) Expansive Soils	NI	None required	-
e) Adequacy of Soils for Wastewater Disposal	NI	None required	-
f) Paleontological Resources and Unique Geological Features	PS	GEO-3: If any subsurface paleontological resources are encountered during construction of the project, all construction activities within 50 feet of the encounter shall be halted until a qualified paleontologist can examine these materials, determine their significance and, if significant, recommend further mitigation measures that would reduce potential effects to a level that is less than significant. Recommended measures may include, but are not limited to, 1) preservation in place, or 2) excavation, recovery, and curation by qualified professionals. The City of Escalon Community Development Department shall be notified, and the project developer shall be responsible for retaining qualified professionals, implementing recommended mitigation measures, and documenting mitigation efforts in a written report to the City's Community Development Department, consistent with the requirements of the CEQA Guidelines.	LS
3.8 GREENHOUSE GAS EMISSIONS			
a, b) Project GHG Emissions and Consistency with GHG Reduction Plans	LS	None required	-

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
3.9 HAZARDS AND HAZARDOUS MATERIALS			
a) Hazardous Material Transport, Use, and Storage	LS	None required	-
b) Release of Hazardous Materials	PS	HAZ-1: Prior to the start of demolition of the residences and the barn, the contractor shall screen for the presence of asbestos-containing building materials in and around these structures. If asbestos-containing building materials are found, then a demolition permit from the City shall include a Demolition Permit Release Form from the SJVAPCD prior to its issuance. The Demolition Permit Release Form certifies that the proposed demolition complies with the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP), which govern asbestos removal, and with SJVAPCD Rule 4002. All of the regulated asbestos abatement shall be completed by a state-certified asbestos abatement contractor prior to the start of demolition. HAZ-2: Prior to the start of demolition of the residences and the barn, the contractor shall screen for the presence of lead-based paints in and around these structures. If lead-based paints are found, then they shall be removed in accordance with the California Code of Regulations, Title 17, Division 1, Chapter 8, Sections 35001-36100. This requires that work on any structure built before January 1, 1978 must use lead-safe work practices, including containment and cleaning the work area after the project is completed. The regulations also cover accreditation of training providers and certification of individuals to perform lead abatement and set work practice standards for lead hazard evaluations and the abatement of lead hazards. The lead-based paint abatement shall be completed prior to the start of demolition.	LS

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
c) Hazardous Materials Releases near Schools	NI	None required	-
d) Hazardous Materials Sites	LS	None required	-
e) Public Airport Operations	NI	None required	-
f) Emergency Response and Evacuations	PS	HAZ-3: Prior to the start of project construction, the developer shall prepare and implement a Traffic Control Plan, which shall include such items as traffic control requirements, resident notification of access closure, and daily access restoration. The contractor shall specify dates and times of road closures or restrictions, if any, and shall ensure that adequate access will be provided for emergency vehicles. The Traffic Control Plan shall be reviewed and approved by the City Department of Public Works and shall be coordinated with the Escalon Police Department and the Escalon Consolidated Fire Protection District if construction will require road closures or lane restrictions.	LS
g) Wildland Fire Hazards	NI	None required	-
3.10 HYDROLOGY AND WATER QUALITY			
a) Surface Water Quality	LS	None required	_
b) Groundwater Supplies and Recharge	LS	None required	-
c-i, ii, iii) Drainage Patterns and Runoff	LS	None required	-
c-iv) Flood Flows	NI	None required	-
d) Other Flooding Hazards	LS	None required	-
e) Conflict with Water Quality or Groundwater Plans	NI	None required	-

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
3.11 LAND USE AND PLANNING			
a) Division of Established Communities	NI	None required	-
b) Conflicts with Plans, Policies and Regulations Mitigating Environmental Effects	LS	None required	-
3.12 MINERAL RESOURCES			
a, b) Availability of Mineral Resources	NI	None required	-
3.13 NOISE			
a) Exposure to Noise Exceeding Local Standards	PS	NOISE-1: The project shall install a noise barrier at the locations identified in Figure 2 in the report *Environmental Noise Assessment, Murphy Ranch Residential Development Escalon, California,* prepared by Bollard Acoustical Consultants September 8, 2023. The noise barriers could take the form of masonry wall, earthen berm, or a combination of the two. A wood or wood composite fence would also be a sufficient noise barrier, provided that the fence slats overlap by a minimum of two inches and are screwed to the framing rather than nailed. NOISE-2: For the lots identified in green in Figure 2 in the Bollard Acoustical report, the project shall install window and door assembly upgrades of Sound Transmission Class (STC) 32 for any upper floors of residences. At the first-floor building facades and at second-floor building facades further removed from roadway and railroad without an annotated STC rating recommendation on Figure 2, standard STC 27 window and door assemblies would be adequate. NOISE-3: All equipment used on the construction site during all project phases shall be fitted with mufflers in	LS

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
		accordance with manufacturers' specifications. Mufflers shall be installed on construction equipment at all times on the construction site.	
b) Exposure to Groundborne Vibration or Noise	LS	None required	-
c) Public Airport and Private Airstrip Noise	NI	None required	-
3.14 POPULATION AND HOUSING			
a) Unplanned Population Growth	LS	None required	-
b) Displacement of Housing or People	LS	None required	-
3.15 PUBLIC SERVICES			
a) Fire Protection	LS	None required	-
b) Police Protection	LS	None required	-
c) Schools	LS	None required	-
d, e) Parks and Other Public Facilities	LS	None required	-
3.16 RECREATION			
a, b) Recreational Facilities	LS	None required	-
3.17 TRANSPORTATION			
a) Conflict with Transportation Plans, Ordinances and Policies	LS	None required	-

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
b) Conflict with CEQA Guidelines Section 15064.3(b)	LS	None required	-
c) Traffic Hazards	LS	None required	-
d) Emergency Access	LS	None required	-
3.18 TRIBAL CULTURAL RESOURCES			
a, b) Tribal Cultural Resources	PS	Mitigation Measure CULT-1.	LS
3.19 UTILITIES AND SERVICE SYSTEMS			
a) Relocation or Construction of New Facilities	LS	None required	-
b) Water Systems and Supply	LS	None required	-
c) Wastewater Treatment Capacity	LS	None required	-
d, e) Solid Waste Services	LS	None required	-
3.20 WILDFIRE			
a) Emergency Response Plans and Emergency Evacuation Plans	PS	Mitigation Measure HAZ-1.	LS
b) Exposure of Project Occupants to Wildfire Hazards	NI	None required	-
c) Installation and Maintenance of Infrastructure	NI	None required	-
d) Risks from Runoff, Post-Fire Slope Instability, or Drainage Changes	NI	None required	-
3.21 MANDATORY FINDINGS OF SIGNIFICANCE			

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
a) Findings on Biological and Cultural Resources	PS	Mitigation measures in Sections 3.4 and 3.5.	LS
b) Findings on Individually Limited but Cumulatively Considerable Impacts	LS	None required	-
c) Findings on Adverse Effects on Human Beings	LS	None required	-

Notes: NI = No Impact; LS = Less Than Significant; PS = Potentially Significant

2.0 PROJECT DESCRIPTION

2.1 Project Location

The project site is located immediately west of the City of Escalon, near the southeastern corner of the intersection of State Route 120 and Brennan Avenue (see Figures 1-1 to 1-5). The 18.00-acre project site is on two adjacent parcels identified as Assessor's Parcel Number (APN) 225-040-28 and APN 225-040-29. The site is shown on the U.S. Geological Survey's Avena, California, 7.5-minute quadrangle map as within Section 5, Township 2 South, Range 9 East, Mt. Diablo Base and Meridian. The approximate latitude and longitude of the project site is 37º 47' 52" North and 121º 42' 00" West, respectively.

2.2 Project Details

The project proposes City approval of a Specific Plan that would guide the development of the identified two parcels, currently located in unincorporated San Joaquin County and totaling 18.00 acres. For the purposes of this CEQA document, the project site is the Specific Plan area.

The Specific Plan proposes the subdivision of the two parcels into 72 lots that would allow for the subsequent development of detached single-family homes (Figure 2-1). The homes would have a diverse mix of architectural styles and would be constructed on lots ranging in size from 6,048 square feet to 10,172 square feet. The Specific Plan adheres to the development standards listed for the R-1, Low Density Residential District as set forth in the Escalon Zoning Ordinance Section 17.14.040, including:

- Minimum lot area 6,000 square feet for interior lots and 7,000 square feet for corner lots.
- Minimum density of two/maximum density of six dwelling units per net acre.
- Maximum building lot coverage 65 percent.
- Minimum lot frontage 60 feet for interior lots, 70 feet for corner lots, 30 feet for cul-de-sac lots.
- Minimum lot depth 90 feet.
- Maximum height two stories, not exceeding 35 feet.

The Specific Plan also defines various setback requirements depending on residence layout, and minimum floor areas depending on number of bedrooms per unit. The Specific Plan allows Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) in compliance with California Government Code Sections 65852.2 and 65852.22.

The Specific Plan contains design guidelines that would apply to residential development. Three housing styles would be allowed: Boutique, Ranch, and Vineyard. Elements of each style are defined in the Specific Plan, along with design standards for other features such as walls and fences. In accordance with City requirements, a wood fence approximately

seven feet in height would be installed along the southern and eastern boundaries of the project site that are adjacent to existing residences outside the site.

Approximately 1.10 acres in the southeastern corner of the Specific Plan area have been designated as a park site, adjacent to the existing Shadowood Park managed by the City of Escalon. The park acreage meets the minimum required park land as set forth in Escalon Municipal Code Section 16.02.330. The park site would serve dual uses as a park and a storm drainage basin to collect and detain drainage anticipated to be generated by project development. The park site would expand the existing Shadowood Park and enlarge the existing storm drainage basin to accommodate runoff from the proposed development. A split-face masonry wall, approximately six feet in height, would be placed along the western, northern, and eastern boundaries of the park.

Access

Access to the Specific Plan area is proposed from extensions of existing Celivo Way and Riesling Way, both of which currently end just north of California Street (Figure 2-2). All new streets would have curb, gutter, and sidewalk installed in accordance with City specifications and with Escalon Municipal Code Chapter 12.04.

An internal street loop connecting to these street extensions would provide access to each lot. For the portion of the loop adjacent to the Union Pacific railroad tracks, a "parkway street" would be developed (Figure 2-3). The parkway street, to be constructed within a 50-foot right-of-way, would consist of two travel lanes: one 10 feet wide, and the other 14 feet wide. North of the travel lanes would be an 11-foot-wide parkway, which would be landscaped. A portion of this landscaped area would be set aside for future use as a bore pit for the future installation of water and sewer lines beneath SR 120. The date of this installation has not been determined. A masonry wall, approximately eight feet tall, would separate the parkway from the tracks. On the south side of the parkway street, an on-street space approximately eight feet wide would be available for parking, and a sidewalk approximately 5.5 feet wide would be installed next to the parking area.

The remaining loop would be constructed as a local residential street. This portion of the loop would also be constructed within a 50-foot right-of-way, but the two travel lanes would each be 10 feet wide. An on-street area for parking, approximately eight feet wide, would be available on both sides, along with a sidewalk approximately 5.5 feet wide.

The Celivo Way extension to the project site would be constructed within a 50-foot right-of-way. The extension would consist of two travel lanes, each 12 feet wide. On each side of the travel lane area, a four-foot-wide shoulder, a four-foot-wide parkway, and a five-foot-wide sidewalk would be installed. The Riesling Way extension would be constructed within a 54-foot right-of-way. Like the Celivo Way extension, there would be two travel lanes 12 feet in width. Each side of the travel lane area would have a shoulder, parkway, and sidewalk of the same width as the Celivo Way extension, except the parkways associated with the Riesling Way extension would be six feet in width.

The proposed improvements by the project along its Brennan Avenue frontage would occur within an existing 78-foot right-of-way. They would consist of a 12-footwide travel lane,

a seven-foot landscape strip, an 8-foot-wide pedestrian/bicycle trail, and another landscape strip seven feet in width. A masonry wall, approximately six feet in height, would be placed adjacent to this landscape strip, thus separating the Brennan Avenue frontage from the remainder of the project site. A raised median that would eventually be expanded to 10 feet in width is proposed in the center of Brennan Avenue. The Brennan Avenue frontage would have curb, gutter, and sidewalk installed in accordance with City specifications and with Escalon Municipal Code Chapter 12.04.

Utilities

All public utilities would be installed underground within 10-foot-wide easements, provided along public street frontages, and in accordance with City of Escalon standards. Water and sewer services would be provided to the project by the City of Escalon. The project would connect to existing City water and sewer lines beneath California Street, Riesling Way, and Celivo Way. These connections would be contingent on the annexation of the project site to the City, which would be pursued in a separate action following City Specific Plan and Tentative Map approvals. An 8-inch diameter looped water line would be installed in the future planned streets. New sewer lines, also installed in the streets, would connect to existing 8-inch diameter sewer lines. water and sewer lines would be constructed in conformance with the City's Water System and Sewer System Master Plans, respectively.

Storm drainage would be collected from the project by on-site drainage lines that would ultimately connect to the proposed detention basin. The new basin would expand the capacity of the existing and adjacent Shadowood Park basin. The storm drainage system would be designed and constructed in accordance with City standards and with the City's Storm Drainage Ordinance (Escalon Municipal Code Chapter 13.15).

The project would connect to existing electrical and natural gas lines provided by Modesto Irrigation District and Pacific Gas and Electric Company (PG&E), respectively. Street lighting would be installed in accordance with City standards.

Other Project Features

The project proposes the installation of landscaping on the residential lots and along the internal street and the Brennan Avenue project site frontage (Figure 2-4). Landscaping would be installed in the front of the residential lots, with shrubs that provide screening. Street landscaping would consist mainly of street trees planted at specific intervals along both sides of the streets. The parkway area in the north is proposed to be planted with shrubs and low groundcover along with trees. The Brennan Avenue frontage would have a variety of trees, grasses, and low groundcover. Landscape design will be required to comply with the landscape standards set forth in the Escalon Municipal Code.

The park/basin area would consist of mostly grass turf, with smaller trees planted along the proposed loop and larger shade trees within the site. A concrete path and a picnic table area would be installed. A hard court is proposed for installation in the northeast corner of the park.

Tentative Subdivision Map

As part of implementation of the Specific Plan, the project proposes a Tentative Subdivision Map that would subdivide the two parcels into the 72 proposed single-family residential lots and the lot for the park/basin (see Figure 2-1). The map would dedicate nine feet of roadway right-of-way along the Brennan Avenue frontage of the project site for road widening, so that the improved street matches the existing Brennan Avenue roadway configuration south of the project site.

All improvements proposed in the Tentative Subdivision Map will conform to the City of Escalon Improvement Standards. Public utilities would be installed underground in easements. Proposed street lighting will be installed in accordance with City standards.

Project Construction

It is anticipated that project construction would generally be conducted in three stages. The first stage would include the demolition of the existing on-site structures, grading, excavation and site preparation, and installation of utilities. The first stage would be followed by installation of streets, sidewalks, and landscaping. Installation of improvements would be followed by new home construction on individual lots. Types of construction equipment expected to be used at the site include dozers, backhoes, loaders, forklifts, cranes, haul trucks, and graders.

Existing buildings, structures, wells, and septic tanks shall be removed in accordance with the standards of San Joaquin County and the City of Escalon. All encroachment of structures, including fencing, berms, irrigation lines, and power lines, shall be removed unless otherwise conditioned by the City. An existing electrical building owned by the Union Pacific Railroad that is in the northwestern corner of the project site would be relocated within the railroad right-of-way.

2.3 Permits and Approvals

The Specific Plan requires the approval of the Escalon City Council upon recommendation by the Escalon Planning Commission. In accordance with Escalon Municipal Code Section 17.49.080, public hearings on the Specific Plan will be held by both the Planning Commission and the City Council. Should it be approved, the Specific Plan will serve as the implementation tool for the City's General Plan as well as City zoning for the Specific Plan area.

Like the Specific Plan, the Tentative Subdivision Map would be submitted to the Escalon Planning Commission for its review and recommendation to City Council. In accordance with Escalon Municipal Code Section 16.04.080(E), the Planning Commission must find that the proposed subdivision is consistent with the Escalon General Plan, that the site is suitable for the proposed type and density of development, and that the subdivision design and proposed improvements would not substantially damage the environment or cause serious public health issues, among other findings. Also, in accordance with Municipal Code Section 16.04.080(F), a Tentative Subdivision Map shall not be recommended for approval unless the Planning Commission finds that the proposed subdivision complies

with Municipal Code Section 16.02.300, which requires the design of a subdivision to provide, to the extent feasible, for future passive or natural heating or cooling opportunities within the subdivision. Final approval of the map would come from the Escalon City Council.

As noted, the project site is within the unincorporated area of San Joaquin County. For the City to provide services, the project site must be annexed to the City of Escalon. Proposed annexations are submitted to the San Joaquin LAFCo, which must review and decide upon the annexation request including its consistency with state and local LAFCo policies and standards. In determining the appropriateness of a proposed annexation, LAFCo considers whether the project would constitute a logical expansion of a city boundary and whether a proposed annexation area would be provided with public utilities and services in an efficient manner. LAFCo's policies with respect to proposed annexations are specified in its Change of Organization Policies and Procedures, adopted in 2007 and subsequently amended (San Joaquin LAFCo 2012).

As part of the annexation application, the City shall be required to pre-zone the project site. It is expected that the City would pre-zone the project site as PD, Planned Development. The use of this zone would be consistent with Escalon Municipal Code Section 17.24.060(C), which requires all new residential projects over one acre to have a PD zone.

The City of Escalon requires that any project site over five acres shall gain approval of a Specific Plan prior to annexation to the City. As a condition of approval, the applicant is required to enter into a Development Agreement with the city. Also, in accordance with Escalon Municipal Code Chapter 17.50, the project applicant shall enter into an Inclusionary Housing Agreement with the City to provide affordable housing. Section 3.14, Population and Housing, discusses affordable housing requirements in more detail.

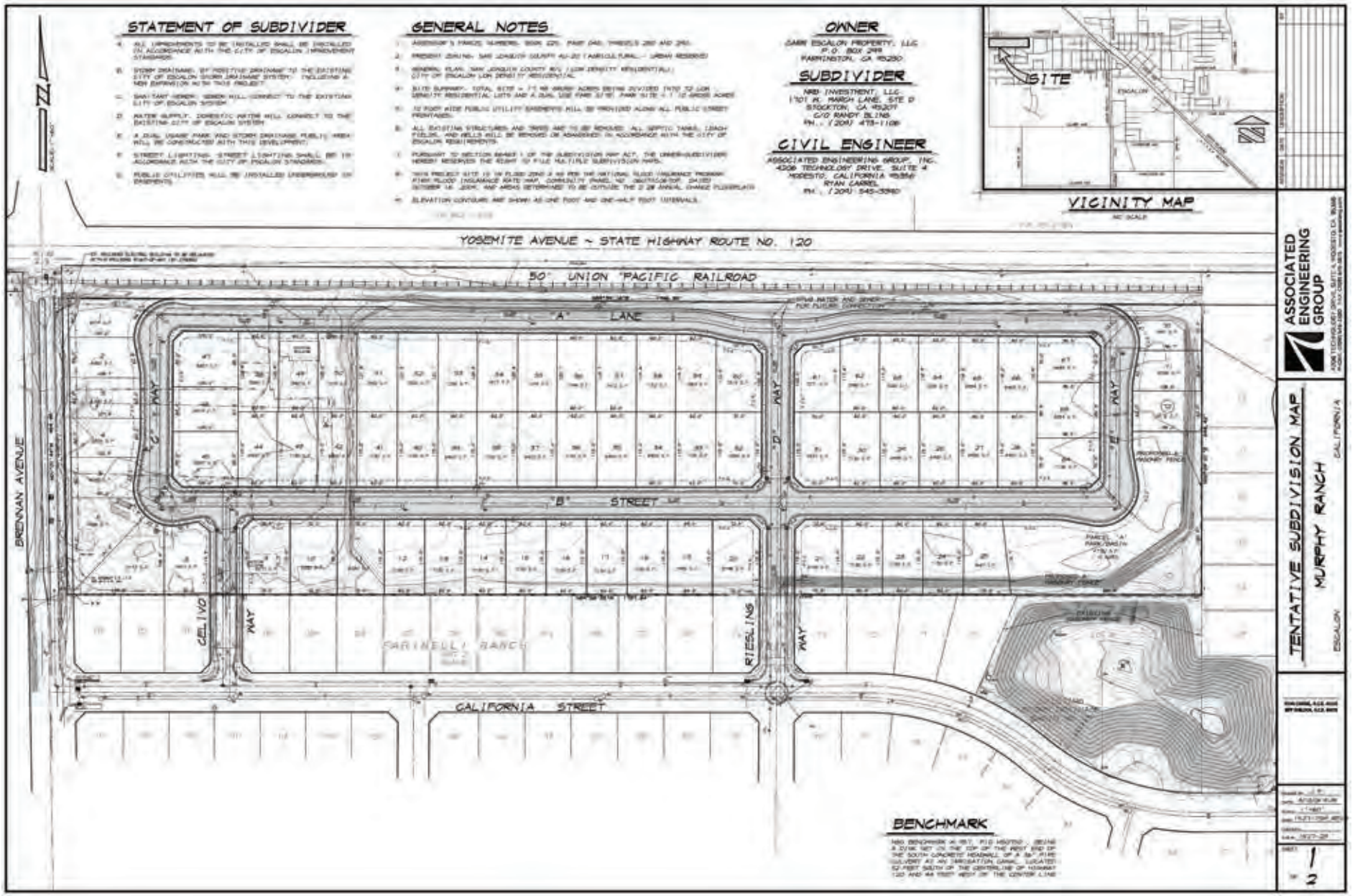


Figure 2-1
PROPOSED TENTATIVE SUBDIVISION MAP

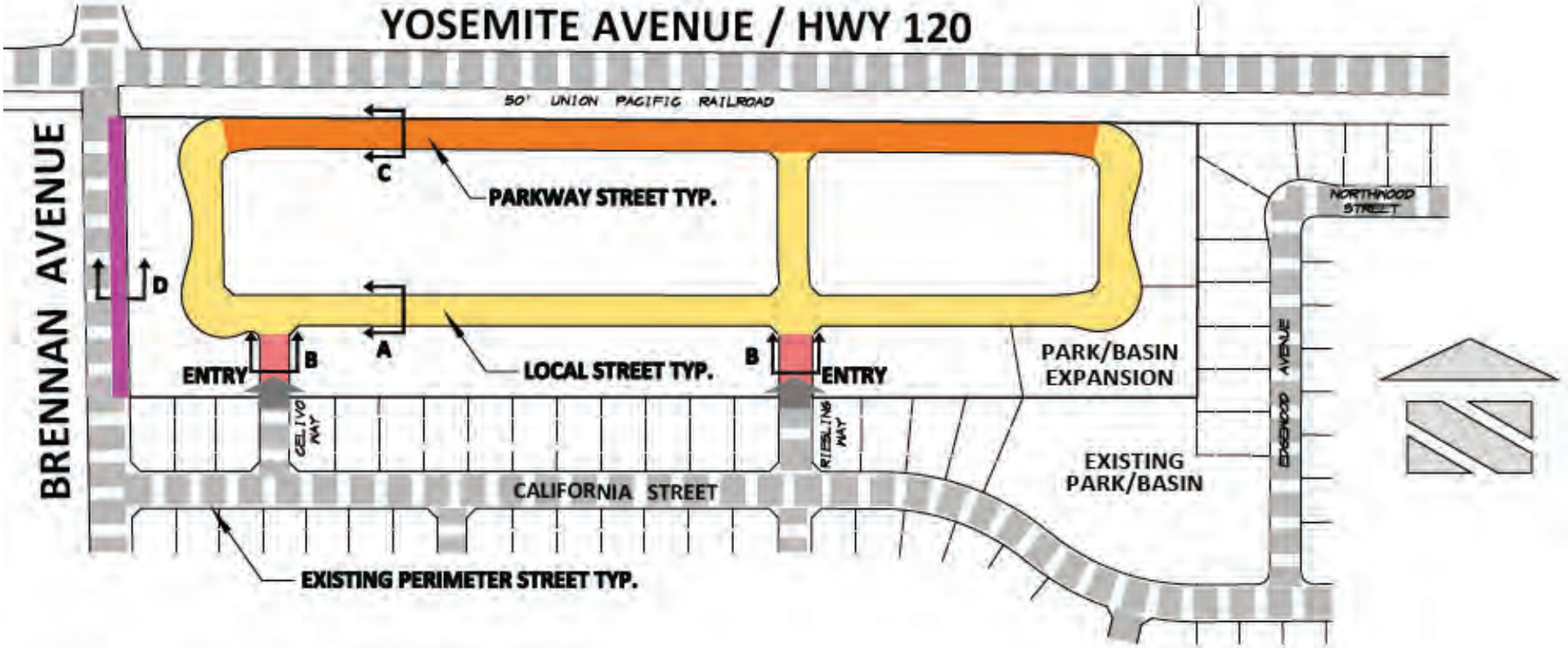
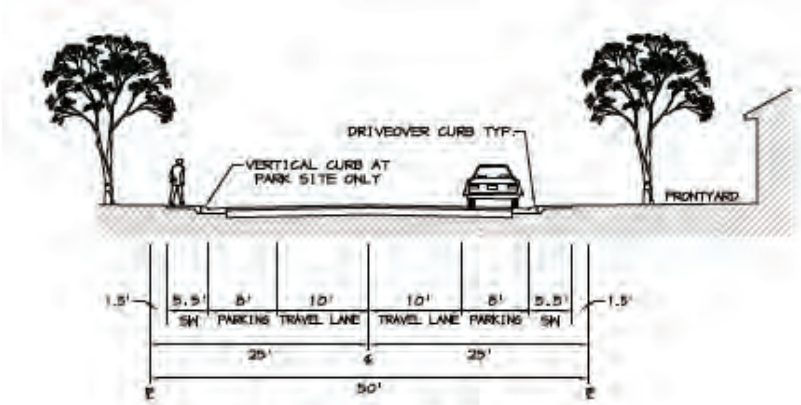


Figure 2-2
CIRCULATION PLAN

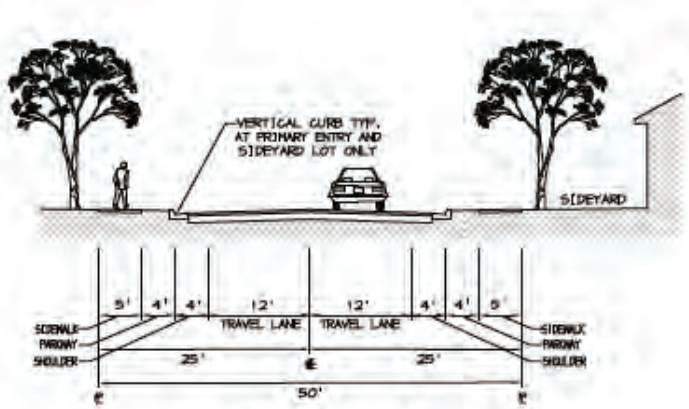


SECTION A-A

TYPICAL 50' STREET SECTION

LOCAL RESIDENTIAL STREET

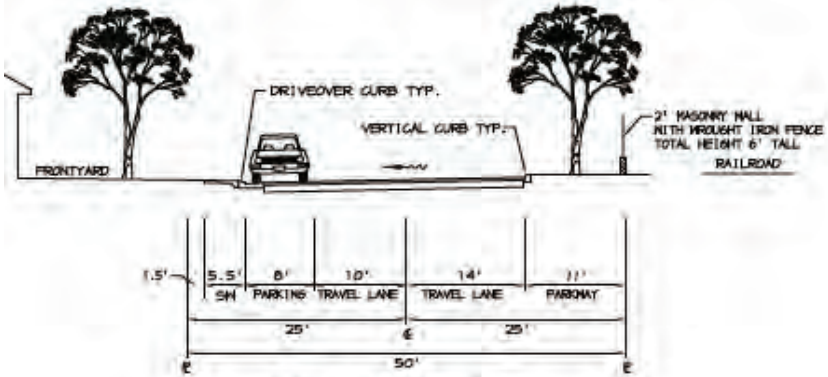
(CITY OF ESCALON STD. DETAIL R8)



SECTION B-B

TYPICAL 50' STREET SECTION

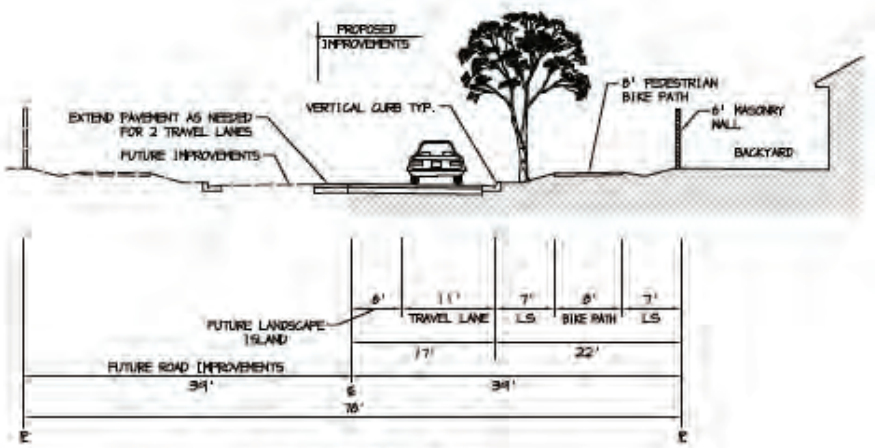
ENTRY RESIDENTIAL STREET



SECTION C-C

TYPICAL 50' STREET SECTION

PARKWAY RESIDENTIAL STREET



SECTION D-D

BRENNAN AVENUE

Figure 2-3
STREET SECTIONS

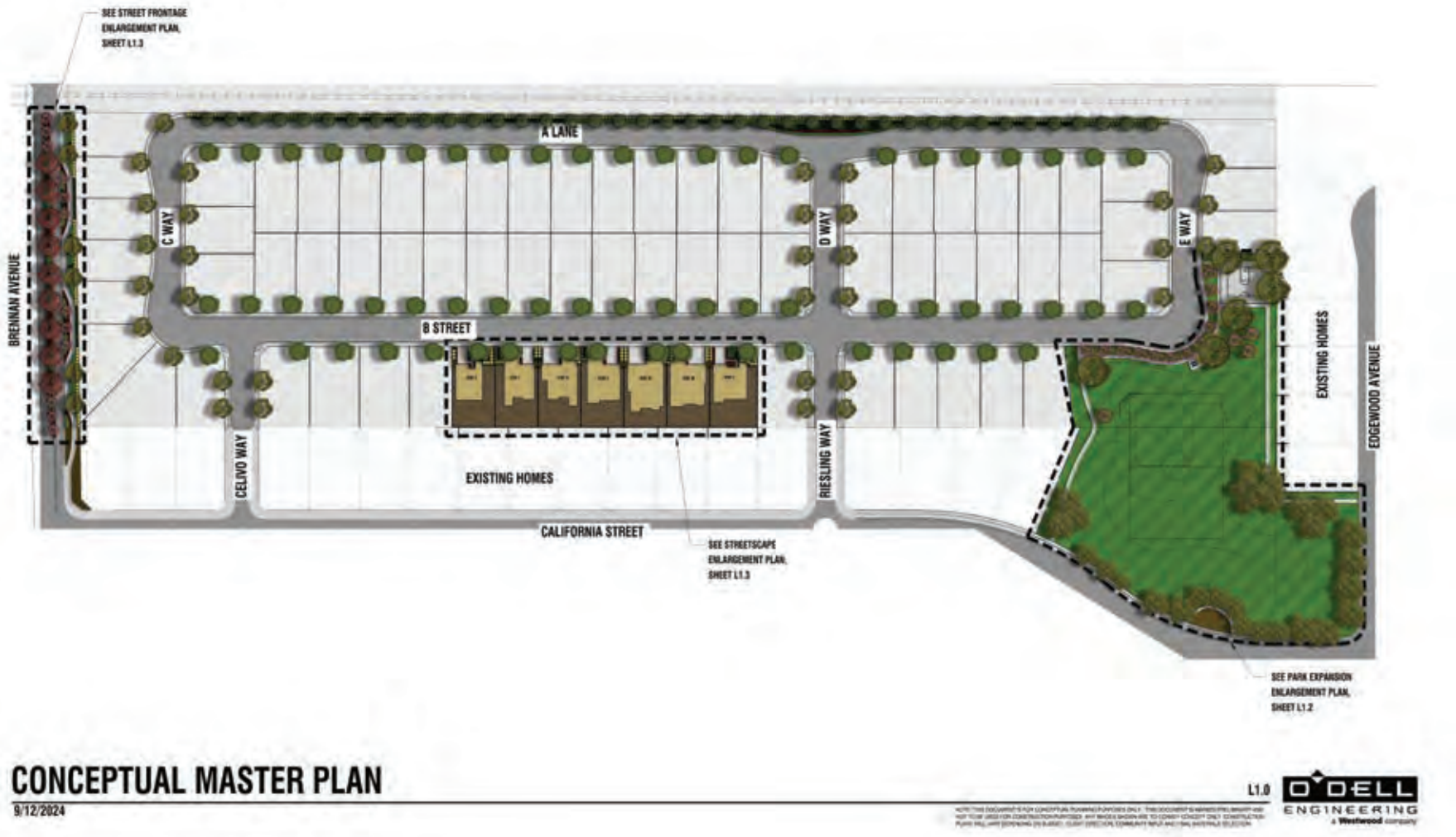


Figure 2-4
OVERALL LANDSCAPE PLAN

3.0 ENVIRONMENTAL CHECKLIST

The following environmental evaluation considers the potential environmental effects of City approval of the proposed project, as described in Chapter 2.0, Project Description. The format of this evaluation is based on the Environmental Checklist presented in CEQA Guidelines Appendix G.

3.1 AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	✓	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	✓	☐
c) 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 publicly accessible vantage points.) 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 daytime or nighttime views in the area?	☐	☐	✓	☐

Environmental Setting

The project site is mostly vacant, but a single-family residence and other structures are on the site. Vegetation, including trees, is found along the Brennan Avenue frontage. As described in Chapter 1.0, Introduction, residential development that is part of the City is east and south of the project site, while agricultural lands are to the north and west. Lands to the north are separated from the project site by State Route 120 and the railroad tracks. Existing lighting in the project vicinity consists of street lighting along nearby residential streets and outdoor lighting from nearby residences.

The recently revised Appendix G of the CEQA Guidelines mentions California Public Resources Code Section 21099, which states that the aesthetic and parking impacts of residential, mixed-use residential, or employment center projects on an infill site within a transit priority area shall not be considered significant effects under CEQA. While the project proposes residential development, it is not considered an infill project and is not in a transit priority area. Therefore, Public Resources Code Section 21099 does not apply.

Environmental Impacts and Mitigation Measures

a) Scenic Vistas.

Scenic vistas have been defined as vantage points with a broad and expansive view of a significant landscape feature, such as a mountain range or coastline. The project proposes residential development, structures associated with which have the potential to partially obstruct distance views. However, given their location, they would not substantially obstruct views of mountain ranges to the west and east. Project impacts on scenic vistas would be less than significant.

b) Scenic Resources.

The project site is mostly a grazing field. It has no trees or other outstanding scenic resources. According to the California Department of Transportation (Caltrans) list of designated scenic highways under the California Scenic Highway Program, there are only two officially designated state scenic highways within San Joaquin County: Interstate 5 from the Stanislaus County line to Interstate 580, and Interstate 580 from Interstate 5 to the Alameda County line (Caltrans 2019). The project site is not on either of these State Scenic Highways. Neither the San Joaquin County General Plan nor the Escalon General Plan has designated any roadways in the project vicinity as scenic. Project impacts on scenic resources would be less than significant.

c) Visual Character and Quality.

As viewed from public streets and highways near the project site - Brennan Avenue and State Route 120 - the current visual quality of the project site is generally poor. The site contains mostly grasses and weeds, with some structures in the western portion. There are trees and shrubs near the western boundary of the project site with some scenic value; however, this vegetation is ornamental and not unique to the area. The project would allow for the development of new single-family residences with landscaping and a park area. The overall result may be considered a visual improvement of the project site as viewed from the nearby streets and highways.

Development on the project site would be required to comply with the design standards of the Specific Plan, which incorporates applicable provisions of Escalon Municipal Code Chapter 17.41. As discussed in Chapter 2.0, Project Description, the proposed Specific Plan sets forth general requirements for development, including building heights; fences, hedges, and walls; lighting; and landscapes. Compliance with the design guidelines of the Specific Plan would ensure that proposed development would be consistent in height and design with the existing residential development to the south and east. Project impacts on visual quality would be less than significant.

d) Light and Glare.

The project would add lighting to a site that currently has no lights, except for limited lighting from the existing residence. As noted, there is existing street lighting and security lighting from surrounding development. Lighting associated with proposed development would be similar to that of existing residential development in the area. However, project lighting would result in substantial changes in ground level night views for residences along the project site.

Escalon Municipal Code Section 17.41.065 provides guidelines on lighting. These guidelines include that lighting fixtures located on any property in or adjacent to any residential zone shall be arranged and shielded so that the light will not shine directly on land in such residential zone, nor shall the light shine on the public roadway. Compliance with Section 17.41.065 would reduce project impacts on light and glare to a level that would be less than significant.

3.2 AGRICULTURE AND FORESTRY RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	✓	☐
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	✓	☐
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	✓
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	✓
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use, or conversion of forest land to non-forest use?	☐	☐	☐	✓

Environmental Setting

According to topographic maps and aerial photographs, the project site was predominantly in agricultural use for vineyard, orchard tree, and row crop farming prior to 1993. Row crop farming appeared to begin prior to 1937 and continued until sometime between 1968 and 1975. Orchard tree farming appeared to begin prior to 1957 and continued until the

mid-1990s (Baez Geotechnical Group 2023a). The undeveloped portion of the project site is currently being used for cattle grazing.

As noted, agricultural fields are located north and west of the project site. However, the project site is surrounded by urban development to the south and east. Also, as noted, the project site is separated from agricultural land to the north by State Route 120 and the railroad tracks, and from agricultural lands to the west by Brennan Avenue.

The Important Farmland Maps, prepared by the California Department of Conservation as part of its Farmland Mapping and Monitoring Program, designate the viability of lands for farmland use, based on the physical and chemical properties of the soils and other factors. The maps categorize farmland, in decreasing order of soil quality, as "Prime Farmland," "Unique Farmland," and "Farmland of Statewide Importance." Collectively, these categories are referred to as “Farmland” in the CEQA Checklist in Appendix G of the CEQA Guidelines and in this document. There are also designations for grazing land and for urban/built-up areas, among others. According to the 2018 Important Farmland Map of San Joaquin County, the most recent map available, the project site is designated mostly as Prime Farmland, with a small portion designated as Farmland of Statewide Importance (California Department of Conservation FMMP 2018).

In processing annexation applications, the LAFCo evaluates potential impacts on prime agricultural land as defined in the Cortese-Knox-Hertzberg Act, which sets forth procedures for annexations. The Cortese-Knox-Hertzberg Act provides several definitions of “prime agricultural land”, including land that qualifies for 80 through 100 Storie Index rating and land that qualifies, if irrigated, for rating as class I or class II in the USDA Natural Resources Conservation Service land use capability classification. Under these criteria, two soil types on the project would qualify as prime agricultural land: Honcut sandy loam and Veritas fine sandy loam (see Section 3.7, Geology and Soils). These two soil types cover approximately 95% of the project site.

Environmental Impacts and Mitigation Measures

a) Farmland Conversion.

As noted, the project site has land designated as Prime Farmland and Farmland of Statewide Importance, both of which are Farmland as defined by CEQA Guidelines Appendix G definition of Farmland. Development of the project site would convert this Farmland to non-agricultural use. In addition, the project would convert a project site that consists mostly of prime agricultural land, as defined by the Cortese-Knox-Hertzberg Act, to a non-agricultural use.

The Escalon General Plan EIR analyzed potential environmental impacts of development under the General Plan. This analysis encompassed the Planning Area of the General Plan, which included the project site. The General Plan EIR concluded that conversion of Farmland was a significant and unavoidable impact of General Plan implementation, and no feasible mitigation to reduce this impact to a less-than-significant level was identified (City of Escalon 2005). A Statement of Overriding Considerations for this impact was adopted by the Escalon City Council in conjunction with adoption of the General Plan.

According to CEQA Guidelines Section 15152(d), where an EIR has been prepared and certified for a plan, any lead agency for a later project pursuant to or consistent with the plan should limit the project EIR or negative declaration to effects which were not examined as significant effects on the environment in the prior EIR, or are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means. The project impacts on agricultural resources were already examined as significant impacts in the General Plan EIR, and the project would not have any new or more severe impacts than those described in the General Plan EIR. The project impacts are not susceptible to substantial reduction or avoidance – the same determination made about agricultural resource impacts in the General Plan EIR.

The project site has been designated for residential development under the current Escalon General Plan as well as under the previous General Plan adopted in 2005, and it has been located within the 2025 growth area designated on the General Plan map. Project development would be consistent with adjacent urban development to the south and east. While the project site is currently used for grazing, its long-term viability for agriculture is questionable, given its size, proximity to residential development, and isolation from other agricultural fields. Given all this, project impacts on Farmland conversion are considered less than significant.

b) Agricultural Zoning and Williamson Act.

As noted, the project site is zoned AU-20, which is an agricultural zone, but one that acknowledges the probability of future urban development. Proposed development would be consistent with this understanding of the AU-20 zone.

The Williamson Act is State legislation that seeks to preserve farmland by offering property tax breaks to farmers who sign a contract pledging to keep their land in agricultural use. Neither parcel within the project site is under a Williamson Act contract. Project impacts related to agricultural zoning and Williamson Act contracts are less than significant.

c, d) Forest Land Conversion and Zoning.

The project is in a developed urban area; there are no forest lands on the project site or in the vicinity. No land in the project vicinity is zoned as forest land or timberland. The project would have no impact on forest lands.

e) Indirect Conversion of Farmland and Forest Land.

The project site is adjacent to urban development to the south and east. Agricultural land to the north is separated from the project site by railroad tracks and State Route 120, and land to the west is separated by Brennan Avenue. The project would use existing infrastructure in the vicinity; no new infrastructure would be installed that could encourage future development on agricultural lands to the north and west. As previously noted, there are no forest lands in the vicinity. The project would have no impact on indirect conversion of Farmland or forest land.

3.3 AIR QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable Air Quality Attainment Plan?	☐	☐	✓	☐
b) 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?	☐	☐	☐	✓

Environmental Setting

Air Quality Status

The project site is within the San Joaquin Valley Air Basin. The San Joaquin Valley Air Pollution Control District (SJVAPCD), which includes Escalon, has jurisdiction over most air quality matters in the Air Basin. The SJVAPCD is tasked with implementing programs and regulations required by both the federal and California Clean Air Acts. Under their respective Clean Air Acts, both the State of California and the federal government have established ambient air quality standards for six criteria air pollutants: ozone, particulate matter, carbon monoxide, nitrogen dioxide, sulfur dioxide, and lead. California has four additional criteria pollutants under its Clean Air Act.

Table 3-1 shows the current attainment status of the Air Basin relative to the federal and State ambient air quality standards for criteria pollutants. Except for ozone and particulate matter, which are discussed below, the Air Basin is in attainment of, or unclassified for, all federal and State ambient air quality standards.

Air Pollutants of Concern

The San Joaquin Valley Air Basin is designated a non-attainment area for ozone. Ozone is not emitted directly into the air. It is formed when reactive organic gases (ROG) and nitrogen oxides (NO_x), referred to as "ozone precursors," react in the atmosphere in the presence of sunlight. Ozone is a respiratory irritant and an oxidant that increases susceptibility to respiratory infections and can cause substantial damage to vegetation and other materials. To attain federal ambient air quality standards for ozone, the SJVAPCD currently has a 2022 Plan for the 2015 8-Hour Ozone Standard and the 2023 Maintenance Plan and Redesignation Request for the Revoked 1-Hour Ozone Standard.

The Air Basin is also designated a non-attainment area for respirable particulate matter, a mixture of solid and liquid particles suspended in air, including dust, pollen, soot, smoke, and liquid droplets. Health concerns associated with suspended particulate matter focus on those particles small enough to reach the lungs when inhaled; consequently, both the federal and state air quality standards for particulate matter apply to particulates 10 micrometers or less in diameter (PM_{10}) and to particulates less than 2.5 micrometers in diameter ($PM_{2.5}$), which are carried deeper into the lungs. Acute and chronic health effects associated with high particulate levels include the aggravation of chronic respiratory diseases, heart and lung disease, coughing, bronchitis, and respiratory illnesses in children. The SJVAPCD currently has a 2018 Plan for the 1997, 2006, and 2012 PM2.5 Standards to attain federal ambient air quality standards for $PM_{2.5}$ and the 2007 PM10 Maintenance Plan to maintain its current PM_{10} attainment status.

TABLE 3-1
SAN JOAQUIN VALLEY AIR BASIN ATTAINMENT STATUS

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

Source: SJVAPCD 2023.

Carbon monoxide (CO) is an odorless, colorless gas that is highly toxic. It is formed by the incomplete combustion of fuels and is emitted directly into the air, unlike ozone. The main source of CO in the San Joaquin Valley is on-road motor vehicles (SJVAPCD 2015). The San Joaquin Valley Air Basin is in attainment/unclassified status for CO; as such, the

SJVAPCD has no CO attainment plans. High CO concentrations may occur in areas of limited geographic size, sometimes referred to as "hot spots," which are ordinarily associated with areas of highly congested traffic.

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

Air Quality Rules and Regulations

As previously noted, the SJVAPCD has jurisdiction over most air quality matters in the Air Basin. It implements the federal and California Clean Air Acts, and the applicable attainment and maintenance plans, through local regulations. The SJVAPCD has developed plans to attain State and federal standards for ozone and particulate matter, which include emissions inventories to measure the sources of air pollutants and the use of computer modeling to estimate future levels of pollution and make sure that the Valley will meet air quality goals (SJVAPCD 2015). A State Implementation Plan for carbon monoxide has been adopted by the ARB for the entire state.

The SJVAPCD regulations that would be applicable to the project are summarized below.

Regulation VIII (Fugitive Dust PM10 Prohibitions)

Rules 8011-8081 are designed to reduce PM_{10} emissions generated by human activity, including construction and demolition activities, road construction, bulk materials storage, paved and unpaved roads, carryout and track out, landfill operations, etc.

Rule 4101 (Visible Emissions)

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

Rule 9510 (Indirect Source Review)

Rule 9510, also known as the Indirect Source Rule, is intended to reduce or mitigate construction and operational emissions of NO_x and PM_{10} generated by new development, either directly and/or by payment of off-site mitigation fees. Construction emissions of NO_x and PM_{10} exhaust must be reduced by 20% and 45%, respectively. Operational emissions of NO_x and PM_{10} must be reduced by 33.3% and 50%, respectively. All projects subject to Rule 9510 are required to submit an Air Impact Assessment to the SJVAPCD. Rule 9510 applies to residential development projects of at least 50 units, so project development would be subject to Rule 9510.

For some projects, particularly large projects, a project proponent and the SJVAPCD may agree to and implement a Voluntary Emission Reduction Agreement (VERA), which is a voluntary contractual agreement between a developer and SJVAPCD to mitigate a development project's impact on air quality, going beyond reductions achieved by compliance with Rule 9510. Under a VERA, the developer provides funds to SJVAPCD to administer the implementation of the VERA. The SJVAPCD then identifies emission reduction projects, funds those projects, and verifies that the specified emission reductions have been successfully achieved. Given that project emissions are less than significant (see below), the project is not pursuing a VERA.

Environmental Impacts and Mitigation Measures

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

TABLE 3-2
SJVAPCD SIGNIFICANCE THRESHOLDS AND
PROJECT AIR POLLUTANT EMISSIONS

	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Significance Thresholds[1]	**10**	**10**	**100**	**27**	**15**	**15**
Construction Emissions[2]	0.45	1.41	1.86	<0.01	0.28	0.15
Exceeds Threshold?	*No*	*No*	*No*	*No*	*No*	*No*
Operational Emissions[3]	1.11	0.67	4.61	0.01	0.98	0.26
Exceeds Threshold?	*No*	*No*	*No*	*No*	*No*	*No*

Note: All figures are in tons per year.
[1] Applies to both construction and operational emissions.
[2] Maximum unmitigated emissions in a calendar year.
[3] Annual unmitigated emissions.
Sources: CalEEMod Version 2022.4.0, SJVAPCD 2015.

a) Air Quality Plan Consistency.

The California Emissions Estimator Model (CalEEMod) was used to estimate both construction and operational emissions associated with the development proposed under the Specific Plan. The CalEEMod results are shown in Appendix A of this document, and Table 3-2 shows the maximum project construction emissions in a calendar year and the annual operational emissions based on the CalEEMod run. As indicated in Table 3-2, project construction and operational emissions would not exceed the applicable SJVAPCD

significance thresholds, including those for ozone precursors, particulate matter, and CO. Because of this, project impacts related to air quality plans would be less than significant.

While project construction emissions would not be significant, the project would still be required to comply with applicable SJVAPCD rules and regulations that would reduce emissions. As noted, SJVAPCD Regulation VIII contains measures to reduce fugitive dust emissions during construction. Dust control provisions are also routinely included in site improvement plans and specifications, along with construction contracts. Implementation of Rule 9510 would reduce both construction and operational project emissions of NO_x and PM_{10}. These rules and regulations would further reduce project impacts related to air quality plans that are already less than significant.

b) Cumulative Emissions.

As described above, the project would not generate operational emissions above SJVAPCD significance thresholds. The significance thresholds are applied to evaluate regional impacts of project-specific emissions of air pollutants. Regional impacts of a project can be characterized in terms of total annual emissions of criteria pollutants and their impact on SJVAPCD's ability to attain criteria pollutant standards. On that basis, the proposed project would not result in a considerable contribution to a significant cumulative air quality impact in the Air Basin. Project impacts related to cumulative emissions would be less than significant.

c) Exposure of Sensitive Receptors to Pollutants.

As defined in GAMAQI, sensitive receptors include residences, schools, parks and playgrounds, day care centers, nursing homes, and hospitals (SJVAPCD 2015). The project site is adjacent to residential areas to the east, south, and west. As noted, project construction and operational emissions would be below SJVAPCD significance thresholds for criteria pollutants. Implementation of applicable SJVAPCD rules and regulations, especially Regulation VIII, would further reduce emissions, making them less likely to reach these sensitive land uses.

A CO hotspot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. CO hotspots have the potential to expose receptors to emissions that violate state and/or federal CO standards even if the broader Basin is in attainment for federal and state levels. The GAMAQI indicates that a project would create no violations of the CO standards if neither of the following criteria are met (SJVAPCD 2015):

- A traffic study for the project indicates that the Level of Service (LOS) on one or more streets or at one or more intersections in the project vicinity will be reduced to LOS E or F; or
- A traffic study indicates that the project will substantially worsen an already existing LOS F on one or more streets or at one or more intersections in the project vicinity (See Section 3.17, Transportation, for an explanation of LOS).

As noted in Section 3.17, Transportation, LOS at the SR 120/Brennan Avenue intersection would experience LOS levels of E or F without or with the project. However, Caltrans is currently preparing an Intersection Control Evaluation for the SR 120/Brennan Road intersection, which will evaluate various control options and identify the most appropriate control option and lane configurations for the intersection. Also, funding has been identified for improvements to this intersection (SJCOG 2022a). It is expected that implementation of the recommended option would improve LOS at this intersection to a level above E, as the minimally acceptable LOS for Caltrans facilities is D. Therefore, the project would have no adverse impact related to CO emissions.

Overall, the pollutant emissions estimated to be generated by the project are unlikely to reach nearby sensitive receptors at levels that would have an adverse impact. The potential exposure of sensitive receptors to pollutant emissions would be less than significant.

d) Odors and Other Emissions.

Residential development does not generate substantial odors that would affect nearby land uses. It also would not generate other significant emissions of TACs, which are generally associated with industrial operations. The one exception is diesel particulate matter, which is generated mainly by diesel engine combustion. The project would not generate any significant traffic that would use diesel engines, such as heavy-duty trucks. The project would have no impact related to odors or other emissions.

3.4 BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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, or regulations or by the California Department of Fish and Wildlife 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 Conservation Community Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	✓

Environmental Setting

The project site is currently vacant except for a single-family residence and abandoned structures in the southwestern corner and some outbuildings in the northwestern corner. As noted in Section 3.2, Agriculture and Forestry Resources, the project site has been used for agricultural production, and a portion is currently in use for cattle grazing. Outside of the developed area, the predominant vegetation on the project site is mostly grasses and weeds, although a tree and shrub were identified near the southeastern corner of the project site. Within the developed area are trees and shrubs, especially along Brennan Avenue. These trees and shrubs are ornamental in character and do not appear to be native to the project site. The project site has been disturbed by previous agricultural and development activities.

The southern and eastern sides of the project site are adjacent to development with high levels of activity and nearby roads with vehicle traffic, particularly State Route 120. A very limited variety of mammals and reptiles are likely to occur in the project site due to these surrounding land uses. No bodies of water or streams were seen on the project site, so fish and amphibians are unlikely to occur. While no birds were observed during a site visit, the existing trees are considered potential nesting sites.

Special-Status Species

Special-status species are plant or wildlife species that are in one or more of the following categories:

- Legally protected under the federal Endangered Species Act, the California Endangered Species Act, or other regulations.
- Designated rare, threatened, or endangered species and candidate species for listing by the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW).
- Considered rare enough by the scientific community and trustee agencies to warrant special consideration, particularly with regard to protection of isolated populations, nesting or denning locations, communal roosts, and other essential habitat.
- Considered rare or endangered under the conditions of CEQA Guidelines Section 15380, such as species identified on Lists 1A, 1B and 2 in the Inventory of Rare and Endangered Vascular Plants of California by the California Native Plant Society, and species that are considered sensitive or of special concern due to

limited distribution or lack of adequate information to permit listing or rejection for state or federal status, such as those included on List 3 in the California Native Plant Society Inventory.

A search was conducted of the USFWS IPaC database, and the California Natural Diversity Database maintained by the CDFW to determine the presence of special-status species in the vicinity of the project site. The results of these searches are available in Appendix B of this IS/MND.

Environmental Impacts and Mitigation Measures

a) Special-Status Species.

The IPaC search indicated the presence of five species listed under the federal Endangered Species Act in the project vicinity. The species and their likelihood of occurring on the project site are described below:

- California tiger salamander (Threatened) – Unlikely: habitat is grasslands and low foothills with pools or ponds, which are not available on the project site.
- Monarch butterfly (Candidate) – Unlikely: found in channels and sloughs of the Sacramento-San Joaquin Delta. The project site is not on or near any channels or sloughs.
- Valley elderberry longhorn beetle (Threatened) – Unlikely: requires elderberry shrubs, which are not found on the project site. Project site is not within identified critical habitat area.
- Vernal pool fairy shrimp (Threatened) – Unlikely: requires vernal pools, which are not found on the project site.
- Vernal pool tadpole shrimp (Endangered) – Unlikely: requires vernal pools, which are not found on the project site.

The California Natural Diversity Database identified 14 special-status species as potentially occurring in the project vicinity. One of these, the California tiger salamander, was also identified in the IPaC database and was considered unlikely to occur. Seven special-status species were fish species unlikely to occur, as there are no streams or bodies of water on or near the project site. The other special-status species included the following:

- Swainson's hawk (State Threatened) – Potentially could occur.
- Burrowing owl (State Species of Special Concern) – Potentially could occur.
- Western bumble bee (State Candidate Endangered) – Potentially could occur, but unlikely.
- American bumble bee (no status identified) – Unlikely; range is in the eastern United States.

- Valley elderberry longhorn beetle (federal Threatened) – Unlikely; no blue elderberry shrubs exist on the project site.

- Northern California legless lizard (State Species of Special Concern) – Unlikely; prefers oak-annual grass association and lupine-stable dune association, neither of which exists on the project site.

Two special-status species have been identified as potentially occurring on the project site. Swainson's hawk, a bird species listed as threatened under the California Endangered Species Act, requires suitable foraging habitats such as grasslands or alfalfa fields supporting rodents. The project site does contain potential foraging habitat, albeit marginal, and trees on the project site could potentially provide nesting habitat. Burrowing owl, a State Species of Special Concern, typically requires burrows made by ground squirrels for nesting. No ground squirrels or burrows were observed on the project site; however, it is possible both could occur there. In addition, there is grassland that would provide potential burrowing owl habitat, albeit marginal.

As discussed below, the project would be required to participate in the San Joaquin County Multi-Species Open Space and Habitat Conservation Plan (SJMSCP), a comprehensive plan for assessing and mitigating the biological impacts of converting open space or biologically sensitive lands to urban development in San Joaquin County and its incorporated cities. The SJMSCP contains Incidental Take Minimization Measures for both Swainson's hawk and burrowing owl, which are designed to reduce potential take of these species. Implementation of the applicable Incidental Take Minimization Measures, which are determined by the SJCOG, would reduce project impacts on these two special-status species to a level that would be less than significant.

A third species, western bumblebee, could find floral resources on the project site that could provide nectar and pollen, mainly along the western boundary. However, more such resources are available in nearby agricultural fields, so the potential loss of onsite floral resources would not significantly affect western bumblebee. In addition, western bumblebee requires nesting habitat that occurs primarily in underground cavities such as old squirrel or other animal nests, which were not observed on the project site. Therefore, western bumblebee is considered unlikely to occur on the project site.

Overall, project impacts on special-status species would be less than significant, with implementation of the applicable SJMSCP Incidental Take Minimization Measures.

b) Riparian and Other Sensitive Habitats.

As noted, there are no streams on the project site; therefore, no riparian habitat exists. No potential vernal pools or other sensitive habitats were observed and are considered unlikely to occur, given past activities on the site. The project would have no impact on riparian and other sensitive habitats.

c) State and Federal Jurisdictional Wetlands.

Waters of the U.S., including wetlands, are broadly defined under 33 Code of Federal Regulations 328 to include navigable waterways, their tributaries, and adjacent wetlands.

"Waters of the State", subject to oversight by the State Water Resources Control Board (SWRCB) and by the Regional Water Quality Control Board (RWQCB) with jurisdiction over the affected water, include isolated wetlands not covered by federal regulations.

As noted, no waters were observed on the site. A search of the National Wetlands Inventory indicated only one potential Water of the U.S. in the vicinity – a ditch along the railroad tracks. The project would not disturb this ditch, as it is within the railroad right-of-way. Project impacts on State or federal jurisdictional wetlands would be less than significant.

d) Fish and Wildlife Movement.

There are no streams either on or adjacent to the project site, so no fish movements would be affected by the project. Due to the presence of large trees near the site and potential foraging habitat (i.e., open fields) on and near the site, it is possible one or more pairs of raptors and smaller birds, such as songbirds, could potentially nest within the project site. Some of these birds may be migratory birds protected by the Migratory Bird Treaty Act. Development of the project could lead to a loss of nesting and foraging habitat of these protected migratory birds and could potentially disrupt their nesting activities. This is a potentially significant impact. As with potential project impacts on special-status species as discussed above, potential impacts on migratory birds would be reduced to a less than significant level with the required implementation of the applicable SJMSCP Incidental Take Minimization Measures.

Level of Significance: Less than significant

Mitigation Measures: None required

e) Local Biological Requirements.

Chapter 12.12 of the Escalon Municipal Code, also known as the Tree Ordinance, sets forth procedures designed to preserve, maintain, and protect mature trees. However, this ordinance applies only to street trees. Therefore, this ordinance would not cover the existing trees on the project site. No other local biological requirements have been enacted by the City. The project would have no impact on local biological requirements.

f) Conflict with Habitat Conservation Plans.

As noted in a) above, the SJMSCP is a comprehensive plan for assessing and mitigating the biological impacts of converting open space or biologically sensitive lands to urban development in San Joaquin County and its incorporated cities. For the conversion of open space to non-open space uses that affect covered plant, fish, and wildlife species, the SJMSCP provides three compensation methods: preservation of existing sensitive lands, creation of new comparable habitat on the project site, or payment of fees that would be used to secure preserve lands outside the project site. In addition to fee payments, the SJMSCP identifies Incidental Take Minimization Measures - protection measures that avoid direct impacts of development on special-status species - with which projects are required to comply (SJCOG 2000). The SJCOG implements the SJMSCP on a project-by-project basis.

The City participates in the SJMSCP, as set forth in Escalon Municipal Code Chapter 15.50, which states that new development in general will pay approximately 60 percent of total SJMSCP costs. As such, the project would be required to comply with applicable provisions and measures of the SJMSCP, as determined by SJCOG. No other habitat conservation plans apply to the project site. The project would have no impact related to conflict with habitat conservation plans.

3.5 CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	☐	✓	☐	☐
b) Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to Section 15064.5?	☐	✓	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	✓	☐

Environmental Setting

The project site, along with the City of Escalon, lies within the traditional territory of the Northern Valley Yokuts, whose lands once extended from the San Joaquin River near Mendota north to the confluence of the San Joaquin and Calaveras Rivers. Section 3.18, Tribal Cultural Resources, discusses the Yokuts and potential tribal cultural resources in more detail.

The first Euro-American known to have settled in what would become Escalon was John Wheeler Jones. Jones and his family arrived in California in 1852 and in 1855, Jones settled on what was then government land close to the well-traveled French Camp Road which at the time was a major transportation route to the foothill mines. He took up farming and began expanding his land holdings and raising livestock, eventually owning up to 40,000 acres, 4,000 acres of which were in the Escalon area. In 1894, the son of John Wheeler Jones, James Wesley Jones, learned that the Valley Railroad planned to build a rail line across his land, so he hired a surveyor and laid out a town. He named the town Escalon, a Spanish word for “stepping stone”. The town grew throughout the late 19th and early 20th centuries and eventually incorporated in 1957.

The Central California Information Center conducted a search of its records for any prehistoric or historic resources recorded on the project site. The results of the search, available in Appendix C, found no record of any on-site resources. No prehistoric or historic resources in the immediate vicinity of the project site have been reported to the Central California Information Center (CCIC 2023).

a) Historical Resources.

As noted, a records search conducted by the Central California Information Center found no documented historic resources on the project site. However, a check of the USGS Avena topographic map from 1952 indicated the presence of two buildings on the project site. Further research on the County assessor website indicates that a residence was built on APN 225-040-28 in 1957. The Central California Information Center defines a historical resource is defined as a building or structure over 45 years old (CCIC 2023). Given the apparent date the residence was constructed, it is a potential historical resource that would be directly affected by the project. Mitigation described below would require review of the existing buildings by an architectural historian to determine their historical value and actions to be taken if the structures are historically significant. Implementation of this mitigation measure would reduce project impacts on historical resources to a level that would be less than significant.

Level of Significance: Potentially significant

Mitigation Measures:

CULT-1: Prior to final site plan approval, a qualified architectural historian shall review the two existing structures on the project site and provide a report on their historical significance. If one or both structures are determined to be a significant historical resource, then the architectural historian shall provide in the report recommendations on the disposition of the identified resource, which shall be incorporated within the final site plans or made conditions of approval for the project.

Significance after Mitigation: Less than significant

b) Archaeological Resources.

The records search conducted by the Central California Information Center found no documented archaeological resources on or in the immediate vicinity of the project site. However, it is conceivable that ground disturbances associated with project construction could unearth archaeological materials of significance that are currently unknown. Procedures to address archaeological discoveries if they should occur are set forth in the mitigation measure below. Implementation of this mitigation would reduce potential impacts to a level that would be less than significant.

Level of Significance: Potentially significant

Mitigation Measures:

CULT-2: If any subsurface cultural resources are encountered during project construction, all construction activities within 50 feet of the encounter shall be halted until a qualified archaeologist can examine these materials, determine their significance, and, if significant, recommend

mitigation measures that would reduce potential effects to a level that is less than significant. Recommended measures could include, but are not limited to, 1) preservation in place, or 2) excavation, recovery, and curation by qualified professionals. The City of Escalon Community Development Department shall be notified, and the project developer shall be responsible for retaining qualified professionals, implementing recommended mitigation measures, and documenting mitigation efforts in a written report to the City's Community Development Department, consistent with the requirements of the CEQA Guidelines. If burial resources or tribal cultural resources are discovered, the City shall notify the appropriate tribal representative, who may examine the materials with the archaeologist and advise the City as to their significance and disposition.

Significance after Mitigation: Less than significant

c) Human Burials.

As with other cultural resources, it is not expected that any human burials, particularly those of Native Americans, would be uncovered by construction on the project site, given its extensive disturbance and distant location from probable Native American settlements. However, it is conceivable that excavation associated with the project could uncover a previously unknown burial.

CEQA Guidelines Section 15064.5(e) describes the procedure to be followed when human remains are uncovered in a location outside a dedicated cemetery. All work in the vicinity of the find shall be halted, and the County Coroner shall be notified to determine if an investigation of the death is required, in accordance with California Health and Safety Code Section 7050.5. If it is determined that the remains are Native American in origin, then the County Coroner must contact the Native American Heritage Commission within 24 hours. The Native American Heritage Commission shall identify the most likely descendants of the deceased Native American, and the most likely descendants may make recommendations on the disposition of the remains and any associated grave goods with appropriate dignity. If a most likely descendant cannot be identified, the descendant fails to make a recommendation, or the landowner rejects the recommendations of the most likely descendant, then the landowner shall rebury the remains and associated grave goods with appropriate dignity on the property in a location not subject to further disturbance.

Compliance with the provisions of CEQA Guidelines Section 15064.5(e) would ensure that any human remains and associated grave goods encountered during project construction would be treated with appropriate dignity. Project impacts on human remains would be less than significant.

3.6 ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impacts 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?	☐	☐	✓	☐

Environmental Setting

Electricity and natural gas are major energy sources for residences and businesses in California. In San Joaquin County, electricity consumption in 2022 totaled approximately 5,608 million kilowatt-hours, of which approximately 3,483 million kilowatt hours were consumed by non-residential uses and the remainder by residential uses (CEC 2023a). In San Joaquin County, natural gas consumption in 2022 totaled approximately 186 million therms, of which approximately 96 million therms were consumed by non-residential uses and the remainder by residential uses (CEC 2023b). Motor vehicle trips also account for substantial energy usage. The SJCOG estimated countywide daily vehicle miles traveled (VMT) was approximately 17 million miles in 2016, which led to the consumption of approximately 471 million gallons of gasoline and diesel fuel (SJCOG 2022b).

The State of California has adopted comprehensive energy efficiency standards as part of its Building Standards Code, California Code of Regulations, Title 24. The State has also adopted the California Green Building Standards Code (CALGreen). CALGreen sets forth mandatory measures, applicable to new residential and nonresidential structures as well as additions and alterations, on water efficiency and conservation, building material conservation, and interior environmental quality. It also mentions energy efficiency, although CALGreen defers to Title 24 for implementation measures. The City has adopted the 2022 version of CALGreen.

Environmental Impacts and Mitigation Measures

a) Project Energy Consumption.

Project construction would involve fuel consumption and use of other non-renewable resources. Construction equipment used for such improvements typically runs on diesel fuel or gasoline. The same fuels typically are used for vehicles that transport equipment and workers to and from a construction site. However, construction-related fuel consumption would be finite, short-term and consistent with construction activities of a similar character. This energy use would not be considered wasteful, inefficient, or unnecessary.

Electricity may be used for equipment operation during construction activities. It is expected that more electrical construction equipment would be used in the future, as it would generate fewer air pollutant emissions. This electrical consumption would be consistent with construction activities of a similar character; therefore, the use of electricity in construction activities would not be considered wasteful, inefficient, or unnecessary, especially since fossil fuel consumption would be reduced. Moreover, under California's Renewables Portfolio Standard, a greater share of electricity would be provided from renewable energy sources over time, so less fossil fuel consumption to generate electricity would occur. Section 3.8, Greenhouse Gas Emissions, discusses the Renewables Portfolio Standard in detail.

The most recent Residential Energy Consumption Survey by the U.S. Energy Information Administration found that average annual energy consumption by single-family residences located in the western United States was 10,330 kilowatt-hours of electricity per household and 527 hundred cubic feet of natural gas per household (EIA 2018). Based on these factors, proposed development on the project site would consume approximately 743,760 kilowatt-hours of electricity and 37,944 hundred cubic feet of natural gas annually.

The project would be required to comply with applicable provisions of Title 24 and the adopted CALGreen in effect at the time of project approval. The provisions of these codes are intended to increase energy efficiency of buildings, thereby reducing energy consumption. Compliance with these standards would reduce energy consumption of the proposed residences. Overall, project construction and operations would not consume energy resources in a manner considered wasteful, inefficient, or unnecessary. Project impacts related to energy consumption would be less than significant.

b) Consistency with Energy Plans.

The City has not adopted any renewable energy or energy efficiency plans. However, the City has adopted the 2022 version of CALGreen, which contains provisions that promote energy efficiency. The project would be required to comply with the applicable requirements of CALGreen and Title 24, which are designed to improve energy efficiency of structure, thereby forwarding State energy conservation goals. Project impacts related to energy plans would be less than significant.

3.7 GEOLOGY AND SOILS

Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based	☐	☐	☐	✓

on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)				
ii) Strong seismic ground shaking?	☐	☐	✓	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	✓	☐
iv) Landslides?	☐	☐	☐	✓
b) Result in substantial soil erosion or the loss of topsoil?	☐	✓	☐	☐
c) Be located on strata or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	✓	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☐	✓
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	✓
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	✓	☐	☐

Environmental Setting

Topography and Geology

The project site lies in the San Joaquin Valley in central California. The San Joaquin Valley is the southern portion of the Great Valley Geomorphic Province, which is a topographically flat, northwest-trending, structural trough about 50 miles wide and 450 miles long. The San Joaquin Valley is filled with thick sedimentary rock sequences that were deposited as much as 130 million years ago. The Geologic Map of the San Francisco – San Jose Quadrangle (Wagner et al. 1991) designates the underlying geology of the project site as the Modesto Formation, consisting of geologically recent sediments.

Project Site Soils

Most of the soils in the San Joaquin Valley consist of sand, silt, loamy clay alluvium, peat, and other organic sediments. These soils are the result of long-term natural soil deposition and the decomposition of marshland vegetation. According to a custom soil survey for the project site, there are three soil types on the project site (SCS 1992, NRCS 2023):

- Delhi loamy sand, 0 to 2 percent slopes (identified as 142 in Figure 3-1). This is a very deep, somewhat excessively drained, nearly level soil formed in wind-modified alluvium derived from granitic rock sources. The permeability of Delhi soil is rapid, and runoff is slow. The water erosion hazard is slight, but the hazard of wind erosion is severe. The expansive (shrink-swell) potential of this soil is low.

Delhi soil is found along a portion of land adjacent to the southern boundary of the project site. The soil has a land capability classification of III when irrigated and of IV when not irrigated, and the Storie Index rating is 65 (see Section 3.2, Agriculture and Forestry Resources, for relevant discussion).

- Honcut sandy loam, 0 to 2 percent slopes (identified as 175 in Figure 3-1). This is a very deep, well-drained, nearly level soil formed in alluvium from granitic rock sources. The permeability of Honcut soil is moderately rapid, and runoff is slow. Water erosion hazard is slight, and the hazard of wind erosion is moderate. The expansive potential of this soil is low. Honcut soil is also found along a portion of land adjacent to the southern boundary of the project site. The soil has a land capability classification of I when irrigated and of IV when not irrigated, and the Storie Index rating is 95.

- Veritas fine sandy loam, 0 to 2 percent slopes (identified as 266 in Figure 3-1). This is a moderately well-drained soil, nearly level that is deep to a hardpan. It formed in alluvium derived from mixed rock sources. The permeability of Veritas soil is rapid, and runoff is slow. Water erosion hazard is slight, and the hazard of wind erosion is moderate. The expansive potential of this soil is low. This is the predominant soil type on the project site. The soil has a land capability classification of II when irrigated and of IV when not irrigated, and the Storie Index rating is 57.

Seismic and Geologic Hazards

No faults have been mapped in or near the City of Escalon. Outside the County are several faults that are known to be active. The San Andreas system is the most widely known, comprising several individually named fault zones in the San Francisco Bay area, the principal ones being the San Andreas, Hayward, and Calaveras Faults. Information indicates that ground shaking along these faults can produce damage within the County that reaches varying intensities. East of San Joaquin County, the Melones Fault and the Bear Mountain Fault have been identified. These are not judged to pose a seismic threat to the County (City of Escalon 2004).



SOURCE: USDA NRCS

BaseCamp Environmental

Figure 3-1
Soil Types

When coarse sediments are saturated and compact during an earthquake, soils may lose strength and become fluid, a process called liquefaction. Water from voids may be forced to the ground surface, where it emerges in the form of mud spouts or sand boils. The Escalon General Plan states that the City is not within any areas identified by the California Geological Survey as having a high liquefaction potential (City of Escalon 2019a).

Paleontological Resources

Paleontological resources are fossils or groups of fossils that are unique, unusual, rare, uncommon, or important, and that add to an existing body of knowledge in specific areas. Surface examination of a study or project area often does not reveal whether paleontological resources are present. A record search of the Museum of Paleontology at the University of California in Berkeley indicated that 97 paleontological finds have been made in the County (UCMP 2020). Most specimens from the County have been found in rock formations in the foothills of the Diablo Mountain Range. However, remains of extinct animals, such as mammoth, could be found virtually anywhere in the County, especially along watercourses such as the San Joaquin River and its tributaries (San Joaquin County 2016).

Environmental Impacts and Mitigation Measures

a-i) Fault Rupture Hazards.

No faults, including active or potentially active faults, have been mapped in the Escalon area. The project site is not in an area designated as an Alquist-Priolo Earthquake Fault Zone (California Geological Survey 2023). The closest designated active fault is the Ortigalita fault, which is a Holocene fault approximately 29 miles to the west of the project site. The project would have no impact related to a fault rupture hazard.

a-ii, iii) Seismic Hazards.

As noted above, the project site is potentially subject to ground shaking from nearby fault systems, which represent a hazard to buildings and infrastructure. All new buildings in Escalon are required to be built in accordance with the most recent version of the California Building Code adopted by the City, which as of the date of release of this IS/MND is the 2022 version. The California Building Code includes provisions related to seismic safety, compliance with which requires buildings, based on occupancy type, to be constructed to withstand anticipated ground shaking.

A geotechnical report conducted for the project, available in Appendix D of this document, indicated that groundwater levels in the project vicinity are more than 50 feet below the ground surface (Baez Geotechnical Group 2023b) Liquefaction occurs in areas with relatively shallow depths to groundwater. Given the depth to the groundwater table at the project site plus information provided in the Escalon General Plan, liquefaction is unlikely to occur at the project site. Project impacts related to seismic hazards are considered less than significant.

a-iv) Landslides.

The topography of the project area and surrounding area is flat; therefore, landslides would not occur. The project would have no impact related to this issue.

b) Soil Erosion.

As noted above, all soil types on the project site have a low potential for water erosion. However, the potential of all three soils for wind erosion ranges from moderate to severe. Construction activities would loosen these soils, making them more susceptible to wind erosion, as well as potential water erosion.

For all projects that disturb one acre of land or more, a Construction General Permit is required from the SWRCB. The permit requirements include preparation of a Storm Water Pollution Prevention Plan (SWPPP) by a Qualified SWPPP Developer to address potential water quality issues. A SWPPP specifies the Best Management Practices (BMPs) needed to avoid or minimize adverse water quality impacts. Construction BMPs fall within the general categories of Temporary Soil Stabilization, Temporary Sediment Control, Wind Erosion Control, Tracking Control, Non-Storm Water Management, and Waste Management and Materials Pollution Control. BMPs applicable to the project are incorporated in the SWPPP as required. BMPs are incorporated into project improvement plans and specifications, subject to the approval of the City Engineer. BMP function and effectiveness are monitored and reported, and remediation is required to address pollution occurrence. The project would be required to obtain a Construction General Permit from the SWRCB and to comply with its provisions, including preparation of a SWPPP, which is required by the mitigation measure below.

In addition, the City requires the preparation of a site grading and drainage plan that shall be reviewed by the City Engineer, along with an erosion control plan to be reviewed and approved by the City. Compliance with these requirements and with the mitigation measure would minimize the amount of sediment that leaves the construction site and potential construction water quality effects. In addition, compliance with SJVAPCD rules and regulations, especially Regulation VIII that addresses fugitive dust control, would minimize the potential wind erosion impacts of project construction. Project impacts related to soil erosion would be less than significant with implementation of mitigation and compliance with regulations.

Level of Significance: Potentially significant

Mitigation Measures:

GEO-1: Prior to commencement of construction activity, the developer shall prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) for the project and file a Notice of Intent with the State Water Resources Control Board (SWRCB) in compliance with the Construction General Permit and City of Escalon storm water requirements. The SWPPP shall be available on the construction site at all times. The developer shall incorporate an Erosion Control Plan consistent with all applicable provisions of the SWPPP within the site

improvement and building plans. The developer also shall submit the SWRCB Waste Discharger's Identification Number to the City prior to approval of development or grading plans.

Significance after Mitigation: Less than significant

c) Geologic Instability.

The geotechnical report prepared for the project concluded that the proposed development can generally be constructed as planned, provided that the conclusions and recommendations contained in the report are incorporated into the project design and during construction. The predominant geotechnical consideration for the project is the presence of loose soil in the upper two feet below ground surface. This material would need to be reworked as engineered fill in building pad and fill areas (Baez Geotechnical Group 2023b). Mitigation described below would incorporate the recommendations of the geotechnical report into project design and construction, including those related to site preparation and grading that would address the potential soil instability. Project impacts related to geologic instability would be less than significant with mitigation.

Level of Significance: Potentially significant

Mitigation Measures:

GEO-2: The project shall incorporate into its design and construction the recommendations of the geotechnical report *Geotechnical Investigation, Murphy Ranch Residential Subdivision, 18092 & 18112 Brennan Road, Escalon, California,* prepared by Baez Geotechnical Group on August 31, 2023. The design and construction plans shall be reviewed by the City for consistency with the recommendations in the geotechnical report and shall be approved prior to final subdivision map approval.

Significance after Mitigation: Less than significant

d) Expansive Soils.

As noted, the soils identified on the project site have a low expansive potential. As such, they are not expected to shrink and swell such that buildings or infrastructure installed on the project site would be adversely affected. The project would have no impact related to expansive soil.

e) Adequacy of Soils for Sewage Disposal.

The project would be connected to the City's sewer system. It would not use, and does not propose to install, any septic systems or alternative disposal systems. The project would have no impact related to soil adequacy for sewage disposal.

f) Paleontological Resources and Unique Geological Features.

The project site is flat and contains no geological features that may be considered unique. The project site is underlain by the Modesto Formation, which has been a source of paleontological finds. Given past agricultural activities on the project site, it is unlikely that any intact paleontological resources would be encountered. However, it is conceivable that currently unknown resources may be uncovered during project construction activities. Procedures to address paleontological discoveries if they should occur are set forth in the mitigation measure below. Implementation of this mitigation would reduce potential impacts to a level that would be less than significant.

Level of Significance: Potentially significant

Mitigation Measures:

GEO-3: If any subsurface paleontological resources are encountered during construction of the project, all construction activities within 50 feet of the encounter shall be halted until a qualified paleontologist can examine these materials, determine their significance and, if significant, recommend further mitigation measures that would reduce potential effects to a level that is less than significant. Recommended measures may include, but are not limited to, 1) preservation in place, or 2) excavation, recovery, and curation by qualified professionals. The City of Escalon Community Development Department and the HACSJ shall be notified, and the project developer shall be responsible for retaining qualified professionals, implementing recommended mitigation measures, and documenting mitigation efforts in a written report to the City's Community Development Department, consistent with the requirements of the CEQA Guidelines.

Significance after Mitigation: Less than significant

3.8 GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	✓	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	✓	☐

Environmental Setting

GHG Background

Greenhouse gases (GHGs) are gases that absorb and emit radiation within the thermal infrared range, trapping heat in the earth's atmosphere. GHGs are both naturally occurring and are emitted by human activity. Increased atmospheric concentrations of GHGs are considered a primary contributor to global climate change, which is a subject of concern for the State of California. Potential climate change impacts occurring in the San Joaquin Valley include higher temperatures, longer and more severe droughts, more intense precipitation events, and more frequent and extensive wildfires (Fernandez-Bou et al. 2021).

GHG emissions in California in 2021, the most recent year for which data are available, were estimated at approximately 381.3 million metric tons carbon dioxide equivalent (CO_2e) – a decrease of approximately 21.5% from the peak level in 2004 but an increase of approximately 3 % from the 2020 emissions. Transportation was the largest contributor to GHG emissions in California, with 39% of total emissions. Other significant sources include industrial activities, with approximately 22% of total emissions, and electric power generation, both in-state and imported, with approximately 16% of total emissions (ARB 2023).No data on GHG emissions in Escalon are available.

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

GHG Emission Reduction Plans

The State of California has implemented GHG emission reduction strategies and legislation in recent years. Most recently, in 2016, Senate Bill (SB) 32 was enacted. SB 32 mandates statewide reductions in GHG emissions to levels that are 40% below 1990 levels by the year 2030. The State adopted a Scoping Plan in 2017 that sets forth strategies for achieving the SB 32 target. The updated Scoping Plan continues many of the programs that were part of the previous Scoping Plans, including the cap-and-trade program, low-carbon fuel standards, renewable energy, and methane reduction strategies. It also addresses, for the first time, GHG emissions from the natural and working lands of California, including the agriculture and forestry sectors (ARB 2017).

In 2022, ARB adopted the 2022 Scoping Plan, which assesses progress towards achieving the SB 32 2030 reduction target and lays out a path to achieve carbon neutrality no later than 2045. Proposed strategies to achieve these reductions include rapid movement to zero-emission transportation, phasing out fossil fuel use for heating homes and buildings, restricting use of chemicals and refrigerants that are thousands of times more powerful at

trapping heat than carbon dioxide, expanded development of renewable energy sources, increased use of natural and working lands for incorporating and storing carbon, and greater employment of carbon removal technology (ARB 2022).

Cities and counties throughout California have prepared Climate Action Plans that outline how the local government will reduce GHG emissions, which are typically related to the 2020 emission reduction target set in the State's Climate Change Scoping Plan. The City currently has no Climate Action Plan or other GHG reduction plan. However, the City has several policies and implementation strategies in its General Plan that pertain to GHG emissions. These include (City of Escalon 2019a):

- Coordinate with other local and regional jurisdictions, including the SJVAPCD, SJCOG, and the ARB, in the development and implementation of regional and county plans, programs, and mitigation measures that address cross-jurisdictional and regional air quality impacts, including transportation and climate change impacts, and incorporate the relevant provisions of those plans into City planning and project review procedures.

- Continue to implement broad-scale General Plan strategies to decrease the generation of air pollution and greenhouse gas emissions through the reduction of vehicle miles traveled, excessive vehicle traffic congestion, and excessive engine idling by providing public transportation options and making land use planning decisions that encourage pedestrian, bicycle, and transit trips rather than private passenger vehicle trips.

- Review development and land use projects to ensure that measures are incorporated to reduce air pollutants, including particulate matter emissions, and greenhouse gases associated with project design, site preparation, grading, and construction as conditions of approval for all development projects, subdivision maps, site plans, and grading permits.

California also has adopted a Renewables Portfolio Standard, the intent of which in part is to reduce the use of fossil fuels, a main source of GHG emissions. The Renewables Portfolio Standard requires electricity retailers in the state to generate 33% of electricity they sell from renewable energy sources (i.e., solar, wind, geothermal, hydroelectric from small generators, etc.) by the end of 2020. Almost of the electricity retail sellers reported meeting the 2020 compliance target (CPUC 2022). In 2018, SB 100 was signed into law, which increased the electricity generation requirement from renewable sources to 60% by 2030 and requires all the state's electricity to come from carbon-free resources by 2045.

Environmental Impacts and Mitigation Measures

a, b) Project GHG Emissions and Consistency with GHG Reduction Plans.

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

laws, rules, and regulations, along with inclusion of project features that reduce GHG emissions. These include the following:

- SB X7-7 in 2009 sets an overall goal of reducing per capita urban water use by 20% by December 31, 2020. The California Green Building Code mandates a 20% reduction in indoor water use.

TABLE 3-3
GHG EMISSIONS FROM PROJECT

GHG Emission Type	Unmitigated Emissions (metric tons CO_2e)	Mitigated Emissions (metric tons CO_2e)
Construction[1]	664	664
Operational[2]	1,318	1,315

[1] Total emissions for construction period.
[2] Annual emissions.
Sources: California Emissions Estimator Model v. 2022.4.0.

Neither the City nor SJVAPCD has established quantitative significance thresholds for GHG emissions. However, the nearby Sacramento Metropolitan Air Quality Management District has established a quantitative threshold of 1,100 metric tons CO_2e to determine significance of project GHG emissions for CEQA purposes (SMAQMD 2021). This threshold applies to both construction and operational emissions. CEQA Guidelines Section 15064.7 allows for the use of significance thresholds established by other agencies.

The GHG construction emissions of the proposed project are below the threshold of 1,100 metric tons CO_2e. Based on this, project GHG construction emissions are considered less than significant. In any event, GHG construction emissions would be limited due to the length of time of construction activity, and these emissions would cease once work is completed. However, project operational GHG emissions, both unmitigated and mitigated, would not be below this significance threshold. Therefore, further analysis of operational GHG emissions is required.

As noted, there are no data on GHG emissions generated in Escalon. The Escalon General Plan EIR did not analyze GHG impacts. However, the proposed development is consistent with the land use designation under the Escalon General Plan. It is expected that development under the Escalon General Plan would generate a certain amount of GHG emissions. As the project would be consistent with the General Plan designation for the project site, it is not expected to introduce new GHG impacts, nor would it increase the severity of the anticipated GHG impacts from General Plan development.

As noted in Section 3.6, Energy, the project would be required to comply with applicable provisions of Title 24 and the adopted CALGreen in effect at the time of project approval. The provisions of these codes are intended to increase energy efficiency of buildings, thereby reducing energy consumption along with GHG emissions associated with energy

production. As noted, California has adopted a Renewables Standard Portfolio that seeks to reduce and eventually eliminate the amount of electricity production from fossil fuels, the combustion of which produces GHGs.

In summary, project operational GHG emissions would be consistent with emission generation anticipated with development under the Escalon General Plan, and the project would contain features that would reduce GHG emissions from its operations. Therefore, impacts related to GHG emissions and GHG reduction plans would be less than significant.

3.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	✓	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	✓	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	✓
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	✓	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard 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?	☐	☐	☐	✓

Environmental Setting

This section focuses on hazards associated with hazardous materials, proximity to airports, and wildfires. Geologic and soil hazards are addressed in Section 3.7, Geology and Soils,

and potential flooding hazards are addressed in Section 3.10, Hydrology and Water Quality.

A Phase I Environmental Site Assessment (ESA) of the project site was conducted by Baez Geotechnical Group. Appendix E contains a copy of this ESA. The project site was evaluated for potential hazardous material contamination, based on a review of the prior-use history of the property; a review of neighboring properties based on reasonably ascertainable environmental databases; a visual reconnaissance for hazardous materials contamination; a preliminary screening for asbestos-containing building materials, lead-based paint, drinking water quality, and radon; and a search for aboveground and underground storage tanks and for equipment containing polychlorinated biphenyls.

Data on recorded hazardous material sites are kept in the GeoTracker database, maintained by the SWRCB, and in the EnviroStor database, maintained by the California Department of Toxic Substances Control (DTSC). Both GeoTracker and EnviroStor provide the names and addresses of documented hazardous material sites, along with their cleanup status.

There are no public airports in the Escalon area. The nearest public airports are Modesto City-County Airport to the south and Oakdale Airport to the east. Both airports are approximately 11.5 miles away from the project site.

Wildland fires, resulting from both man-made and natural causes, can occur in brush or grasslands, primarily in sparsely developed or existing open space lands. Structures and urban development may be threatened or destroyed in the area of wildland fires (City of Escalon 2004).

Environmental Impacts and Mitigation Measures

a) Hazardous Material Transport, Use, and Storage.

Hazardous materials that are likely to be used and stored on the project site would include cleaning products and landscaping chemicals such as pesticides, herbicides, and fertilizers. The amount of these potential hazardous materials that would be stored would likely be below that required for the preparation of a Hazardous Material Business Plan that would be submitted to the County Environmental Health Department. Such a plan must be prepared by any facility that handles a hazardous material or mixture containing a hazardous material that has a quantity at any one time during the reporting year equal to or greater than 55 gallons for liquids, 500 pounds for solids, or 200 cubic feet for a compressed gas. None of the anticipated hazardous materials to be used by the project would be stored in such quantities. Project impacts related to transport, use, or storage of hazardous materials would be less than significant.

b) Release of Hazardous Materials.

As noted in a) above, the project implementation would not involve the transport, use, or storage of hazardous materials in substantial quantities. These materials are not expected to be in quantities large enough to pose a threat to human health and the environment if released.

Construction activities on the project site may involve the use of hazardous materials such as fuels and solvents, and thus create a potential for hazardous material spills. Construction and maintenance vehicles would transport and use fuels in ordinary quantities. Fuel spills, if any occur, would be minimal and would not typically have significant adverse effects. Potential hazardous materials spills during construction are addressed in the required SWPPP, described in Section 3.7, Geology and Soils. In accordance with SWPPP requirements, contractors have absorbent materials at construction sites to clean up minor spills. Other substances used in the construction process would be stored in approved containers and used in relatively small quantities, in accordance with the manufacturers' recommendations and/or applicable regulations.

County Assessor records indicate that the single-family residence on the project site was constructed in 1957. Although not explicitly documented, it is probable that the other constructed structure on the site is approximately the same age. The age of the onsite structures, which would be demolished as part of the project, may indicate the presence of asbestos-containing building materials. Demolition could release these substances into the local environment. The age of the structures may also indicate the presence of lead-based paints, which could also be released into the local environment with demolition.

The Phase I ESA recommended screening for asbestos-containing building materials and lead-based paints in and around the residences and the barn prior to their demolition (Baez Geotechnical Group 2023a). This recommendation is incorporated by the two mitigation measures presented below, which also specify procedures to be followed should these substances be found. Implementation of these mitigation measures would minimize the potential release of these substances into the environment, thereby reducing potential impacts to a level that would be less than significant.

Level of Significance: Potentially significant

Mitigation Measures:

HAZ-1: Prior to the start of demolition of the residences and the barn, the contractor shall screen for the presence of asbestos-containing building materials in and around these structures. If asbestos-containing building materials are found, then a demolition permit from the City shall include a Demolition Permit Release Form from the SJVAPCD prior to its issuance. The Demolition Permit Release Form certifies that the proposed demolition complies with the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP), which govern asbestos removal, and with SJVAPCD Rule 4002. All of the regulated asbestos abatement shall be completed by a state-certified asbestos abatement contractor prior to the start of demolition.

HAZ-2: Prior to the start of demolition of the residences and the barn, the contractor shall screen for the presence of lead-based paints in and around these structures. If lead-based paints are found, then they shall be removed in accordance with the California Code of Regulations, Title 17, Division 1, Chapter 8, Sections 35001-36100. This requires

that work on any structure built before January 1, 1978 must use lead-safe work practices, including containment and cleaning the work area after the project is completed. The regulations also cover accreditation of training providers and certification of individuals to perform lead abatement and set work practice standards for lead hazard evaluations and the abatement of lead hazards. The lead-based paint abatement shall be completed prior to the start of demolition.

Significance After Mitigation: Less than significant

c) Hazardous Materials Releases near Schools.

There are no schools within one-quarter mile of the project site. The nearest school is El Portal Middle School, approximately 0.40 miles to the southeast. As noted in b) above, project construction and operations would not require the handling or transport of acutely hazardous materials or waste that would endanger schools or the public. The use of small quantities of hazardous materials during project construction would be limited to the project site. The project would not produce hazardous emissions. The project would have no impact on schools within one-quarter mile of the project site.

d) Hazardous Materials Sites.

A search of both GeoTracker and EnviroStor databases indicated no record of any active hazardous material site on or within one-half mile of the project site (SWRCB 2023, DTSC 2023). A list of solid waste disposal sites identified by SWRCB with waste constituents above hazardous waste levels outside the waste management unit did not show any locations at the project site or vicinity (CalEPA 2016a). Likewise, a list by SWRCB containing sites under Cease and Desist Orders and Cleanup and Abatement Orders showed no locations (CalEPA 2016b).

As noted, the Phase I ESA evaluated the project site for potential hazardous material contamination. The ESA did not find evidence that current use of the property or activity at neighboring properties would indicate the likelihood of significant environmental impairment to the subject property. In addition, no visual evidence was observed of hazardous material contamination, indications of improper hazardous materials storage or disposal, or significant concerns relating to PCBs, storage tanks, or radon. However, an aboveground storage tank containing propane was identified near the residence at 18112 Brennan Avenue. The ESA recommended removal of the storage tank with proper handling and documentation (Baez Geotechnical Group 2023a). It is expected that removal and disposal of the storage tank would occur in accordance with the requirements of the San Joaquin County Environmental Health Department. Project impacts related to hazardous material sites would be less than significant.

e) Public Airport Operations.

As noted, there are no airports in Escalon or in its vicinity. The project would have no impact related to potential airport hazards.

f) Emergency Response and Evacuations.

The project would not obstruct adjacent streets once construction work is completed. Project construction work would mostly occur on the project site. However, the adjacent segment of Brennan Avenue would be improved. While construction work would be temporary and would cease once work is completed, it could have the potential of restricting lanes such that emergency response or emergency evacuation could be affected. Mitigation presented below would ensure that access would be maintained during construction activities within adjacent streets, thereby reducing impacts to a level that would be less than significant.

Level of Significance: Potentially significant

Mitigation Measures:

HAZ-3: Prior to the start of project construction, the developer shall prepare and implement a Traffic Control Plan, which shall include such items as traffic control requirements, resident notification of access closure, and daily access restoration. The contractor shall specify dates and times of road closures or restrictions, if any, and shall ensure that adequate access will be provided for emergency vehicles. The Traffic Control Plan shall be reviewed and approved by the City Department of Public Works and shall be coordinated with the Escalon Police Department and the Escalon Consolidated Fire Protection District if construction will require road closures or lane restrictions.

Significance After Mitigation: Less than significant

g) Wildland Fire Hazards.

The project site is not in an area susceptible to wildland fires; land is either agricultural or developed. The project site, in its current mostly undeveloped condition, presents the greatest wildland fire risk. The project would eliminate the existing wildland fire hazard by replacing the grasses and weeds with a paved and developed area. The project would have no impact related to wildland fire hazards. Section 3.20, Wildfire, provides a more detailed analysis of wildfire impacts.

3.10 HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	✓	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project	☐	☐	✓	☐

may impede sustainable groundwater management of the basin?				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river runoff 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 off-site?	☐	☐	✓	☐
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?	☐	☐	✓	☐
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?	☐	☐	☐	✓

Environmental Setting

Surface Waters

There are no natural streams on or near the project site. Surface water quality in the Escalon area is maintained through the City's Storm Water Management Program (SWMP), developed in compliance with the federal National Pollutant Discharge Elimination System (NPDES) program and with the SWRCB's Municipal Separate Storm Sewer Systems (MS4) General Permit. The program includes control measures and defines BMPs designed to protect surface water quality associated with land development during both construction and post-construction periods.

In accordance with its MS4 General Permit, the City has adopted a Post-Construction Standards Plan that provides guidance to developers in meeting the SWRCB's requirements for mitigating the negative impact of increases in storm water runoff caused by new development through the incorporation of Low Impact Development (LID) standards and hydromodification management techniques. LID mitigates excessive runoff by control measures that utilize evapotranspiration, infiltration, capture/reuse, and biotreatment to mimic the runoff of a natural environment. Hydromodification techniques are used to design development sites so that post-construction runoff flow rates do not exceed those of the pre-construction conditions (City of Escalon 2014).

Groundwater

The project site is within the Eastern San Joaquin County Groundwater Subbasin of the San Joaquin Valley Groundwater Basin. As noted in Section 3.7, Geology and Soils, groundwater at the project site is more than 50 feet below ground surface (Baez Geotechnical Group 2023b). The City obtains its drinking water from three groundwater wells (see Section 3.19, Utilities and Service Systems for more information). Natural recharge of local aquifers in the Escalon area appears to be by percolation of rainfall and unused irrigation water, with some minor infiltration from streams (City of Escalon 2004).

In 2014, the State enacted the Sustainable Groundwater Management Act. This act requires the formation of local groundwater sustainability agencies that must assess conditions in their local water basins and adopt locally based Groundwater Sustainability Plans for sustainable use of groundwater and avoidance of overdraft. Plans for "critically overdrafted" basins must be completed and adopted by January 31, 2020, while plans for high- and medium-priority basins have an adoption deadline of January 31, 2022. The Eastern San Joaquin Subbasin has been designated a critically overdrafted basin.

The City is a member of the South San Joaquin Groundwater Sustainability Agency. This agency, in collaboration with other agencies, prepared a Groundwater Sustainability Plan for the Subbasin and submitted it to the Department of Water Resources on January 29, 2020. To achieve sustainability in the Subbasin, projects and management actions were identified. These include water supply projects that either replace groundwater use or supplement groundwater supplies to attain the current estimated pumping offset and/or recharge need. A final list of 23 potential projects is included in the Groundwater Sustainability Plan, representing a variety of project types, including direct and in-lieu recharge, intra-basin water transfers, demand conservation, water recycling, and stormwater reuse (ESJGA 2019).

Flooding Hazard

A Flood Insurance Rate Map prepared by the Federal Emergency Management Agency (FEMA) indicates that the project area is designated Zone X. Zone X is considered an area of minimal flood hazard. It is outside a delineated 100-year floodplain – the floodplain commonly used to assess potential flooding impacts and considered a Special Flood Hazard Area (FEMA 2009). The project site is within the potential dam failure inundation area for the New Melones Dam along the Stanislaus River (San Joaquin County 2016).

In 2007, the State of California approved SB 5 and a series of related Senate and Assembly bills intended to set new flood protection standards for urban areas in the Central Valley. This group of bills, referred to collectively in this document as "SB 5," establish the State standard for flood protection in these areas as protection from the 200-year frequency flood. Under SB 5, urban and urbanizing areas must be provided with 200-year flood protection no later than 2025. Preliminary maps drafted by the California Department of Water Resources do not show the project site within a 200-year floodplain (DWR 2023).

Environmental Impacts and Mitigation Measures

a) Surface Water Quality.

The project would not directly affect surface waters, as there are none on or near the project site. As noted in Section 3.7, Geology and Soils, construction activities would disturb soils and soil materials, which could be transported off site by runoff and could eventually enter surface waters. Project development and operation would lead to contamination of storm run-off with fuels, oils, metals, and other substances associated with motor vehicles. These discharges could eventually enter surface waters. This is considered a potentially significant impact.

The Phase II MS4 Permit and the City of Escalon require project proponents to incorporate post-construction measures that reduce the volume of runoff and mitigate pollutants in runoff into its design and completed development. The project proponent shall select design measures that are appropriate for the project and will adequately meet the goals of this Post-Construction Standards Plan. The tasks shall include the following (City of Escalon 2014):

- Selecting, sizing, and engineering site design measures, source control measures, and hydromodification management techniques that are adequate in meeting the requirements of this plan.
- Providing the required submittal package to the municipal plan checker, including supporting information, maps, drawings, and calculations; including plans and calculations that have been stamped by a certified and/or licensed professional.
- Providing an Operation and Maintenance Plan and a signed Certificate of Responsibility to the plan checker for the on-going maintenance of the constructed post-construction design measures.
- Providing any additional requested information to the plan checker.
- Verifying that approved site design measures and source control measures are constructed as specified on the approved plans.

Compliance with the requirements of the City's Post-Construction Standards Plan would minimize water quality impacts of the project after construction work is completed. In addition, implementation of Mitigation Measure GEO-1, described in Section 3.7, Geology and Soils, would minimize water quality impacts from construction activities. Project impacts on surface waters and their quality would be less than significant.

b) Groundwater Supplies and Recharge.

As noted, the City relies on groundwater for its primary source of water. The project would not draw directly from the underlying aquifer, but it would be connected to the City's water system that draws upon groundwater supplies. An adequate water supply exists to accommodate this demand. Section 3.19, Utilities and Service Systems, discusses this in detail.

The project would replace existing parcels of mostly grasses and weeds with urban development and pavement. This would substantially reduce the amount of precipitation that would percolate into the ground, thereby reducing groundwater recharge. Given the relatively small acreage of the project site and the extent of other lands available for recharge surrounding the City, the project is not expected to interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Project impacts on groundwater are considered less than significant.

c-i, ii, iii) Drainage Patterns and Runoff.

The project would alter existing storm drainage patterns, due to site grading and the installation of pavement and storm drainage facilities. In addition, proposed improvements on the project site would result in the generation of additional runoff due to the introduction of impervious surfaces. The project would connect to the City's storm drainage system, designing its onsite facilities in accordance with City standards and specifications, including the MS4 Post-Construction Standards Plan, and with the design criteria in the City's Storm Drain Master Plan. The storm drainage system is expected to have adequate capacity to accommodate onsite runoff.

Runoff would be likely to collect pollutants, mainly deposits from motor vehicles. However, as noted, the project would be required to adhere to post-construction measures to be agreed upon between the project applicant and the City. In addition, any disposal of water that will ultimately discharge into South San Joaquin Irrigation District (SSJID) facilities shall conform to the SSJID's currently policy relative to storm drainage. Most collected storm drainage in Escalon is discharged into SSJID facilities (see Section 3.19, Utilities and Service Systems). These measures are expected to minimize the amount of polluted runoff that would enter the City's storm drainage system. Drainage plans would be submitted for City approval prior to construction. Project impacts on drainage and runoff are considered less than significant.

c-iv) Flood Flows.

As noted, the project area is in a minimal flood hazard area. It is not within a 100-year floodplain as indicated by the FEMA map for the area, nor is it within a 200-year floodplain as defined by the California Department of Water Resources. Because of this, the project would be unlikely to impede or redirect any flood flows. The project would have no impact related to flood flows.

d) Other Flooding Hazards.

As noted, the project site is within the potential inundation zone of New Melones Dam were it to fail. Dams are evaluated regularly by the California Division of Safety of Dams to verify their structural integrity, including their resistance to stresses that could result from local or regional earthquakes. Adherence to Division requirements, which can include seismic upgrades in cases where seismic vulnerability is identified, minimizes the potential for catastrophic failure (San Joaquin County 2016).

There are no levees in the Escalon area. The project area is in a topographically flat region away from the coast, with no large bodies of water in the vicinity. Therefore, the project would not be affected by seiche, or tsunamis. Project impacts related to other flooding hazards would be less than significant.

e) Conflict with Water Quality or Groundwater Plans.

As described above, the project would be required to comply with the requirements of the City's Post-Construction Standards Plan, which is designed to maintain local water quality. The Groundwater Sustainability Plan for the Eastern San Joaquin Subbasin has been adopted. While the provisions of this plan are not directly applicable to the project, the project would not interfere with its implementation. The project would have no impact related to water quality or groundwater plans.

3.11 LAND USE AND PLANNING

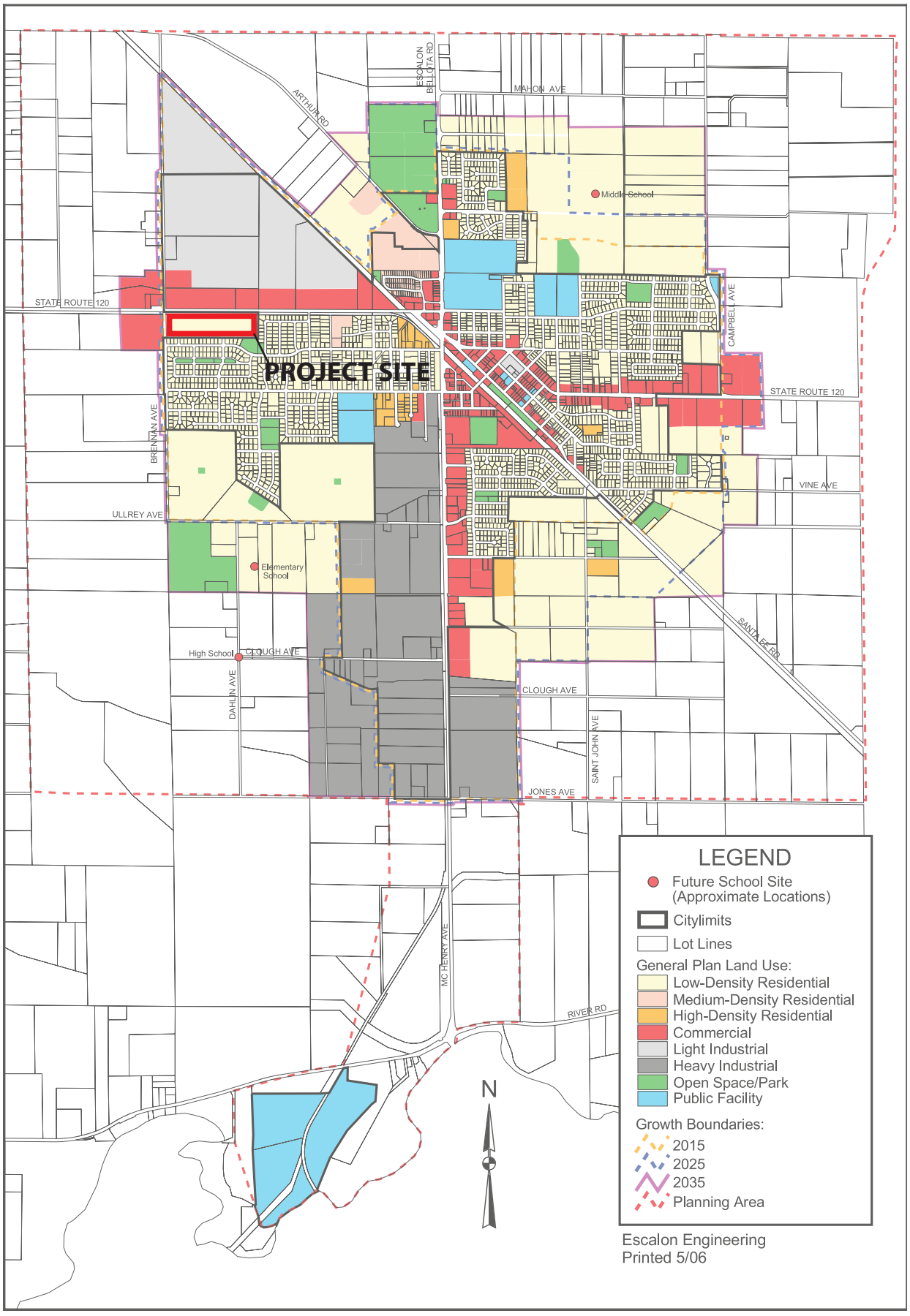
Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	✓
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	✓	☐

Environmental Setting

As noted in Chapter 1.0, Introduction, the project site currently contains two residences, a barn, and several dilapidated sheds and shade structures, but is otherwise mostly vacant. As discussed in Section 3.2, Agricultural Resources, the project site was predominantly in agricultural use until 1993, and the vacant portion of the site is currently used for cattle grazing. A dog kennel/training facility operated on the project site beginning around 1995, but the dog kennel is no longer in operation (Baez Geotechnical Group 2023a).

As has been noted, the current City of Escalon and San Joaquin County General Plan designations for the project site are Low Density Residential, while the current County zoning is AU-20, Agriculture-Urban Reserve, 20-acre minimum (see Chapter 1.0, Introduction, for a description of the AU-20 zone).

The project site is adjacent to developed residential areas of western Escalon. Single-family residences have been constructed east and south of the site. All lands east and south of the project site have been designated Low Density Residential by the Escalon General Plan and have been zoned R-1, Low Density Residential, except for Shadowood Park which is designated and zoned OS, Open Space/Park. North of the project site, across the railroad tracks and SR 120, are lands mostly used for agriculture, with limited residential and commercial development.



BaseCamp Environmental

Figure 3-2
GENERAL PLAN MAP

The nearby agricultural fields are within the Escalon City limits, and land along SR 120 has been designated by the Escalon General Plan for Commercial development.

Lands west of Brennan Avenue are used for agriculture. These lands are under the jurisdiction of San Joaquin County. The County General Plan has designated the area west of Brennan Avenue as General Agricultural. County zoning for these lands is AG-40, General Agriculture, 40-acre minimum.

Environmental Impacts and Mitigation Measures

a) Division of Established Communities.

The project site is a part of a planned residential area that would provide additional housing units in the City, consistent with the Escalon General Plan. The project would not divide existing residential communities in the area, which are located adjacent to and east and south of the project site. The project would have no impact on the division of established communities.

b) Conflicts with Plans, Policies and Regulations Mitigating Environmental Effects.

The Specific Plan and subsequent development would be consistent with existing City and County General Plan designations, both of which allow for the proposed low-density residential development. The Escalon General Plan was prepared to balance City growth and development with environmental protection to the extent practical. In accordance with Escalon Municipal Code Section 17.49.100, the Specific Plan shall be consistent with the City General Plan. Therefore, the project is not expected to conflict with the City General Plan provisions designed to avoid or minimize environmental effects. Moreover, as noted in Chapter 2.0, Project Description, the project site would be pre-zoned to PD, which would be consistent with Escalon Municipal Code Section 17.24.060(C).

This IS/MND analyzes the potential environmental impacts of the proposed project. For all environmental issues, the project would have no environmental impact, an impact that would be less than significant, or an impact that can be mitigated to a level that would be less than significant. This includes issues for which there are land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. These are discussed under the applicable environmental issue. No potential conflicts have been identified in these other issue sections. Project impacts regarding conflicts with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant.

3.12 MINERAL RESOURCES

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

Environmental Setting

San Joaquin County has several mineral resources including natural gas, borates, sand and gravel, limestone, clay, building stone, and pumice. However, Escalon has no significant mineral resources or mining operations (City of Escalon 2004). The Escalon area has no oil or natural gas fields; the nearest such field is the Lone Tree Creek Gas Field approximately 6.5 miles northwest of the project site (DOGGR 2023).

Environmental Impacts and Mitigation Measures

a, b) Availability of Mineral Resources.

There are no identified mineral resources areas on the project site or in Escalon. The project would have no effect on the availability of or access to locally designated or known mineral resources. The project would have no impact on mineral resources.

3.13 NOISE

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

Environmental Setting

Assessment of noise impacts focuses on the “ambient" noise level, which is the general noise level in a project area. The existing ambient noise environment at the project site is defined primarily by traffic on SR 120 and Brennan Avenue, and by intermittent railroad activity on the adjacent railroad line to the north. A noise study for the project, available in Appendix F of this document, quantified the existing ambient noise level on the project site by conducting a long-term (96-hour) noise level survey from a location at the northwest corner of the project site and from one further to the east. The results of the survey indicated that the day-night average noise level was 69 A-weighted decibels (dBA) at the northwest corner and 62 dBA at the other location. Noise level data indicated that only one heavy rail train pass-by was observed during the noise survey period; therefore, the ambient noise level data were primarily driven by roadway traffic (Bollard Acoustical Consultants 2023).

City standards and policies established in the Noise Element of the Escalon General Plan are designed to protect community residents from noise impacts and to establish criteria to mitigate noise-generating land uses and development. Noise standards are based on the Day-Night Average Level (L_{dn}) and the Community Noise Equivalent Level (CNEL). The L_{dn} is based upon the average hourly L_{eq} over a 24-hour day, with a 10-decibel (dB) weighting applied to noise during the hours between 10:00 p.m. and 7:00 a.m. to account for greater sensitivity during that period. The CNEL is the same as the L_{dn}, with an additional 5-dB weighting applied to noise during the hours from 7:00 p.m. to 10:00 p.m.

According to the City’s Noise Element, areas shall be recognized as noise-impacted if existing or projected future noise levels at the exterior of buildings exceed 65 dB L_{dn} or CNEL. However, noise that exceeds 65 dB L_{dn} would be conditionally acceptable if mitigation is provided that would ensure interior noise levels do not exceed 45 dB CNEL. The noise study indicates that the average noise level measured at the northwest corner of the project site was less than the 65-dBA standard, but the average noise level at the other location exceeded this standard.

The City’s Noise Ordinance, Chapter 8.16.030 of the Escalon Municipal Code, also contains provisions addressing noise. Among other provisions, the Noise Ordinance prohibits construction activities and the operation of construction equipment before 7:00 a.m. or after 9:00 p.m. daily. On Saturday and Sunday and state or federal holidays, the prohibited time is before 8:00 a.m. and after 9:00 p.m.

Environmental Impacts and Mitigation Measures

a) Generation of Noise Exceeding Local Standards.

Project Operations

The project would result in a permanent increase in ambient noise levels over existing conditions, as the site is mostly vacant and new single-family residences would be constructed. It is anticipated that the main source of noise associated with the project would be traffic generated by the proposed residential development. Noise from this source would

be confined to the main roadways in the area – SR 120 and Brennan Avenue. The noise study conservatively assumed that future traffic volumes on SR 120 and Brennan Avenue would increase by 100%, resulting in a 3-dB increase in traffic noise levels relative to measured noise levels. Future traffic and railroad noise levels were projected to the nearest proposed backyards and building facades of the development, based on a 4.5-dB decrease per doubling of distance from the noise source.

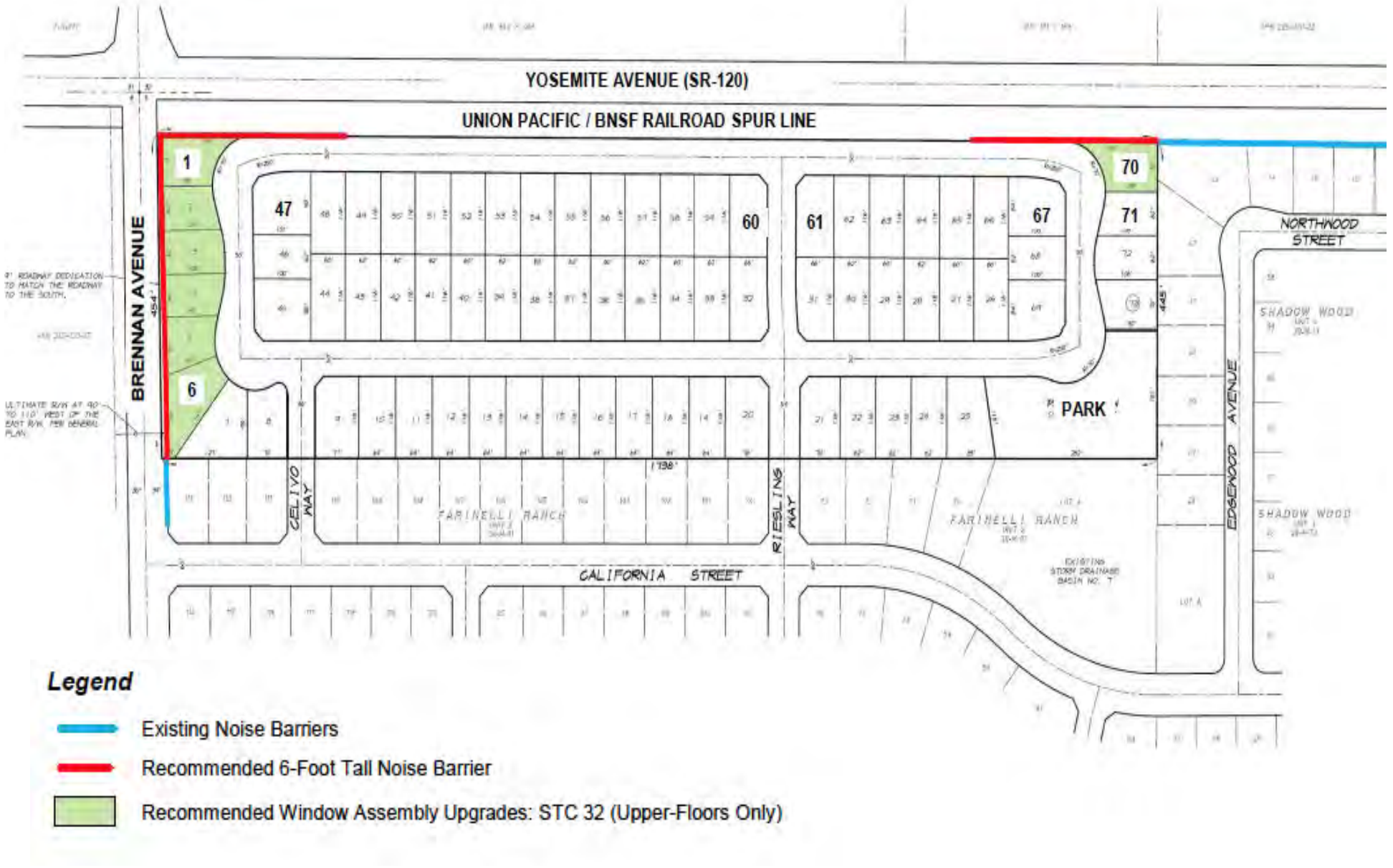
According to the noise study, future traffic and railroad noise levels are predicted to exceed the 65-dB exterior noise level standard at the backyards of Lots 1-6 and Lot 70 (Figure 3-2). As a result, consideration of exterior noise mitigation measures is warranted (Bollard Acoustical Consultants 2023). The noise study concluded that a minimum 6-foot-tall noise barrier is required for the nearest lots along Yosemite Avenue and Brennan Avenue. Figure 3-2 shows the location of the required noise barriers. This recommendation is incorporated as a mitigation measure below.

The noise study also concluded that future traffic noise levels at the first-floor building interiors proposed nearest to the roadways are predicted to meet City interior noise standards with standard residential construction. However, noise levels at the second-floor building interiors may exceed City interior noise standards at the lots indicated on Figure 3-2. The noise study recommended window and door assembly modifications for the upper floors of residential structures that are incorporated as a mitigation measure below. Implementation of these mitigation measures would ensure that exterior and interior noise levels would comply with City noise standards, thereby reducing impacts to a level that would be less than significant.

Level of Significance: Potentially significant

Mitigation Measures:

NOISE-1: The project shall install a noise barrier at the locations identified in Figure 2 in the report *Environmental Noise Assessment, Murphy Ranch Residential Development Escalon, California,* prepared by Bollard Acoustical Consultants September 8, 2023. The noise barriers could take the form of masonry wall, earthen berm, or a combination of the two. A wood or wood composite fence would also be a sufficient noise barrier, provided that the fence slats overlap by a minimum of two inches and are screwed to the framing rather than nailed.



SOURCE: Bollard Acoustical Consultants, Inc.

Figure 3-3
RECOMMENDED NOISE MITIGATION MEASURES

NOISE-2: For the lots identified in green in Figure 2 in the report *Environmental Noise Assessment, Murphy Ranch Residential Development Escalon, California,* prepared by Bollard Acoustical Consultants September 8, 2023, the project shall install window and door assembly upgrades of Sound Transmission Class (STC) 32 for any upper floors of residences. At the first-floor building facades and at second-floor building facades further removed from roadway and railroad without an annotated STC rating recommendation on Figure 2, standard STC 27 window and door assemblies would be adequate.

Significance After Mitigation: Less than significant

Project Construction

Project construction would involve temporary increases in ambient noise levels, due to the use of construction equipment and vehicle traffic to and from the construction site. Table 3-4 shows noise levels that could be generated by construction equipment. Although project construction noise would cease once construction work is completed, this is considered a potentially significant short-term impact, as the project site is adjacent to existing residential development to the east and south, which could be exposed to exterior noise levels that exceed standards set in the City's Noise Element.

TABLE 3-4
CONSTRUCTION EQUIPMENT NOISE

Type of Equipment	Maximum Level, dB at 50 feet
Backhoe	78
Compactor	83
Compressor (air)	78
Concrete Saw	90
Dozer	82
Dump Truck	76
Excavator	81
Generator	81
Jackhammer	89
Pneumatic Tools	85

Source: FHWA 2006.

Temporary noise impacts resulting from project construction shall be minimized by implementation of mitigation, described below, that would require the use of mufflers on construction equipment. Also, as noted, the City's Noise Ordinance limits construction to

hours outside nighttime hours when people would be most sensitive to noise. Implementation of the mitigation measure and Noise Ordinance provisions would reduce construction noise impacts to a level that would be less than significant.

Level of Significance: Potentially significant

Mitigation Measures:

NOISE-3: All equipment used on the construction site during all project phases shall be fitted with mufflers in accordance with manufacturers' specifications. Mufflers shall be installed on construction equipment at all times on the construction site.

Significance After Mitigation: Less than significant

b) Generation of Groundborne Vibration or Noise.

Groundborne vibration is not a common environmental problem. Some sources of groundborne vibration are trains, buses on rough roads, and construction activities such as blasting, pile driving, and operating heavy earth-moving equipment. Caltrans has prescribed a methodology for evaluating groundborne vibration impacts from construction related to potential damage to structures, based on transient sources (e.g., blasting, drop balls) or continuous/frequent intermittent sources such as impact and vibratory pile drivers, vibratory compaction equipment (Caltrans 2013). Measurements of groundborne vibrations are presented in peak particle velocity, with the unit of measure being inches per second. Table 3-5 presents thresholds for impacts related to groundborne vibration, based on the Caltrans methodology.

TABLE 3-5
GROUNDBORNE VIBRATION THRESHOLDS

	Maximum Peak Particle Velocity (in/sec)	
Guidelines for:	**Transient Sources**	**Continuous/Frequent Intermittent Sources**
Structure and Condition		
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5
Human Response		
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.9	0.1
Severe	2.0	0.4

Source: Caltrans 2013.

The only potential source of groundborne vibrations from the project would be from equipment used in construction activities. Using the methodology prescribed by Caltrans, the ground vibration produced by a large bulldozer - the most likely construction equipment listed in Table 3-4 that would be used - would have a peak particle velocity of approximately 0.089 inches per second at the residences. The predicted peak particle velocity is above the "Barely Perceptible" threshold peak particle velocity of 0.04 inches per second, but it is below the "Distinctly Perceptible" threshold of 0.25 inches per second (see Table 3-5). It is also below the threshold of potential damage to newer residential structures, which is 1.0 inches per second. Potential vibration impacts would be intermittent and short-term. On this basis, project impacts related to groundborne vibration would be less than significant.

c) Public Airport and Private Airstrip Noise.

As discussed in Section 3.9, Hazards and Hazardous Materials, there are no public airports in the vicinity of Escalon. There are also no private airstrips in the project vicinity. The project would have no impact associated with noise from airport or airstrip operations.

3.14 POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	✓	☐

Environmental Setting

According to the 2020 U.S. Census, the population of Escalon was 7,472, an increase from its 2010 U.S. Census population of 7,132. The California Department of Finance estimated a total of 2,732 housing units in Escalon in 2023. Of that total, 2,343 were single-family detached units (typical houses), approximately 85.8% of the total (California Department of Finance 2023).

The Regional Housing Needs Allocation (RHNA) is a part of State Housing Element law that determines the projected and existing housing needs for each local jurisdiction in California. State housing law requires each jurisdiction's Housing Element to demonstrate that the jurisdiction has sufficient land zoned for housing and plans to meet it RHNA. The SJCOG conducts the RHNA process for jurisdictions in San Joaquin County every eight years, as required by the HCD. As discussed in Chapter 1.0, Introduction, the HCD

approved the Regional Housing Needs Plan, which included the RHNA, submitted by SJCOG for the 6th Cycle Housing Element, 2023-2031.

Escalon Municipal Code Chapter 17.50 sets forth requirements for the provision of affordable housing, as defined in California Health and Safety Code Section 50052.5. All developers engaging in a residential project shall be required to provide affordable housing, dedicate land, or pay in-lieu fees. For all residential projects that require a tentative and final map or a parcel map, the developer shall enter into an inclusionary housing agreement and provide affordable housing units pursuant to Chapter 17.50, unless the City Council makes a finding of infeasibility. Section 17.50.060(A)(1) states that 10 to 15 percent of all new for-sale units in any residential project shall be available to very low-, lower-, and moderate-income households at an affordable housing cost.

Environmental Impacts and Mitigation Measures

a) Unplanned Population Growth.

The project would involve a subdivision of 17.98 acres of land into lots that would provide 72 new single-family residences. Based on 2.73 persons per household in Escalon (California Department of Finance 2023), the project would house 197 residents. The proposed development would be consistent with the Escalon General Plan, which already designates the project site for low-density residential development. The increase in residents resulting from the project would be consistent with the population growth anticipated by the Escalon General Plan.

The proposed units constructed by the project are expected to be above-moderate units as defined for RHNA purposes. However, the project is also subject to Municipal Code Chapter 17.50, which requires that at least 10 percent of housing units be affordable. Based on this percentage, it is expected that the project would provide 7 housing units for very low-, lower-, and moderate-income households. These units would assist the City of Escalon in achieving its RHNA allocation of 212 very low-, low-, and moderate-income households. The remaining 65 units would assist the City in achieving its RHNA allocation of 155 above-moderate units for the 6th Cycle.

As noted in Chapter 2.0, Project Description, the proposed Specific Plan, in accordance with State law and Escalon Municipal Code Section 17.41.140, allows for the construction of ADUs and JADUs. Since an ADU is not mandatory for a residential property, and since it is not known how many single-family residences would choose to have an ADU, the number of residents in ADUs on the project site is considered speculative and is not further analyzed in this document. Any ADUs/JADUs that are constructed could conceivably apply to the RHNA targets for lower-income housing.

The project would provide employment opportunities in Escalon during its construction, which sometimes may bring people into the Escalon area. However, these opportunities would be limited in number and can be expected to be met from the existing population in nearby areas of San Joaquin and Stanislaus Counties. No additional population is expected to be generated by project employment, which would cease when construction work is completed. Project impacts on unplanned population growth would be less than significant.

b) Displacement of Housing or People.

The project site is mostly vacant. There is one single-family residence on the site. The project proposes to replace the residence with 72 single-family residences, so the housing stock in Escalon would actually increase. It is expected that housing units in the Escalon area would be available for sale or rent to any residents currently in the residence that would be removed. Project impact on displacement of people or housing would be less than significant.

3.15 PUBLIC SERVICES

Would the project:

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

Environmental Setting

Fire protection and emergency medical services are provided by the Escalon Consolidated Fire Protection District. The Fire District provides fire suppression and rescue operations around the clock to an area covering 65 square miles of primarily agricultural land but also includes the City of Escalon. The Fire District's main station and offices are located at 1749 Coley Avenue in Escalon. When fully staffed, the Fire District consists of a Fire Chief, three Battalion Chiefs, and three Firefighter Engineers. Support personnel consist of one part-time Administrative Assistant, ten reserve officers, and six volunteers. The Fire District currently has five engines of varying types, one rescue vehicle, and two water tenders for fire protection and emergency response equipment. Between January of 2019 and December 2019 there were 1,342 calls for assistance. The average time from dispatch to on scene for calls within the City limits is 5 minutes 32 seconds (San Joaquin LAFCo 2022).

Law enforcement services in the City are provided by the Escalon Police Department. The Department is stationed at 2040 McHenry Avenue, approximately 0.75 miles southeast of the project site. The Escalon Police Department has a staff of 12 full-time sworn officers, seven part-time sworn reserve officers, and two support staff. The average response time

is three minutes or less for priority calls (i.e., life-threatening situations) and seven minutes or less for non-priority calls (San Joaquin LAFCo 2022). Law enforcement in the unincorporated area is the responsibility of the San Joaquin County Sheriff's Department. The California Highway Patrol handles all traffic-related incidents on State Route 120 and in the unincorporated county area.

The project site is within the boundaries of the Escalon Unified School District, which encompasses 75 square miles and had an enrollment of 2,906 students from kindergarten to 12th grade in the 2021-22 school year (California Department of Education et al. 2023). The School District consists of four elementary schools, one middle school, one high school, one continuation high school, and one charter school.

The Escalon Parks and Recreation Department manages nine community parks, one open space area, and two sports fields that offer a variety of recreational opportunities. Section 3.16, Recreation, discusses these opportunities in more detail. Other public services in Escalon include a branch of the Stockton-San Joaquin County Public Library.

Environmental Impacts and Mitigation Measures

a-i) Fire Protection.

The project would add residential units, which would likely increase demand for fire protection. Continued growth within the City's Sphere of Influence will increase the overall demand on fire protection services in the City due to the increase in development. All the land within the Sphere of Influence is also within the Fire District boundary, so no expansion of service area is necessary to accommodate the expansion (San Joaquin LAFCo 2022).

The Fire District receives a Fire Facility Fee of $0.16 cents per square foot on all buildings built within the District. The fee can be used to build and equip the fire stations, but it cannot be used for operating expenses such as staffing or additional firefighters. The Fire District also has an override tax of $0.05 cents per square foot on buildings within the District that is added to the property tax bill. This money is used to hire additional full-time personnel. Additional facilities, personnel, equipment, and materials costs will be offset through these fees, along with the expanded property tax base (San Joaquin LAFCo 2022). Given the location of the project adjacent to existing development, it is expected that additional demands of project development for fire protection would be offset by payment of these fees and of property tax assessments on new development.

In addition, all new development must comply with the provisions of the California Fire Code, the 2022 version of which has been adopted by the City. Among other issues, the California Fire Code addresses fire protection systems, fire-resistant materials, and fire flow requirements. Compliance with the California Fire Code, along with payment of applicable fees and taxes, would reduce project impacts on fire protection services to a level that would be less than significant.

a-ii) Police Protection.

The project is expected to generate a demand for police protection services, as the project site is currently vacant. The project would be required to pay development impact fees to the City for future construction of Police Department facilities, as needed. A Municipal Service Review conducted for the City concluded that the City will be able to pay for the additional law enforcement operational needs through the expanded tax base generated by new development. Capital costs for facilities and equipment will be funded through development fees collected from these new developments (San Joaquin LAFCo 2022). Therefore, project impacts related to police protection services are considered less than significant.

a-iii) Schools.

The project would increase demands on the Escalon Unified School District for educational services. Based on a student generation rate used in a District analysis (EUSD 2014), the project is estimated to generate approximately 51 students. The project site is within the boundaries of Van Allen Elementary School, and all School District students would attend El Portal Middle School and Escalon High School. As of 2020, all three schools are reported to have excess capacity by local standards, although much of this capacity is primarily in portable classrooms. Under State standards, Van Allen and El Portal Schools have student enrollment that exceeds capacity (EUSD 2020).

The project would be required to pay Level I developer fees of $3.36 per square foot that are imposed on residential development by the Escalon Unified School District. The fees would be used for future construction of school facilities, as needed. Under State law, the payment of development impact fees is considered adequate mitigation for residential development impacts on schools. Because the project would pay development impact fees to the Escalon Unified School District, project impacts on schools are considered less than significant.

a-iv, v) Parks and Other Public Facilities.

The project could result in additional demands on parks and library facilities. As discussed in Section 3.14, Population and Housing, the population increase resulting from the project is not unplanned nor substantial. Therefore, additional demands on parks and other public facilities such as libraries are expected to be incremental, and no new or expanded facilities would be required. While new facilities would not likely be required as a result of the project, the project would be required to pay development fees to the City for future construction of park and library facilities, as needed. Project impacts would be less than significant.

3.16 RECREATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	☐	☐	✓	☐
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	✓	☐

Environmental Setting

As noted in Section 3.15, Public Services, the Escalon Parks and Recreation Department manages nine community parks, one open space area, and two sports fields that offer a variety of recreational opportunities. The closest park to the project site is Shadowood Park, an approximately two-acre park adjacent to the southeast corner of the site. Shadowood Park provides a play area and a grass area, as well as a basin for storm drainage.

The Parks and Recreation Department also operates the Escalon Community Center at 1055 Escalon Avenue. Aside from providing space available to the public for functions, the Community Center also hosts activities oriented towards senior citizens.

Environmental Impacts and Mitigation Measures

a, b) Recreational Facilities.

As noted in Section 3.14, Population and Housing, the project is expected to generate 197 residents, who would generate a demand for park and recreational facilities and services. In particular, the adjacent Shadowood Park may experience greater use as a result of the project.

Existing parks and recreational facilities are expected to accommodate the additional residents without causing a substantial physical deterioration of these facilities. As noted in Chapter 2.0, Project Description, the project would include a 1.10-acre area that would serve as a park, as well as a drainage basin. This park is expected to be use most frequently by residents on the project site. Also, as noted in Section 3.15, Public Services, the project would be required to pay development fees to the City for future construction of park facilities, as needed. Project impacts on recreational facilities are considered less than significant.

3.17 TRANSPORTATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	✓	☐
b) Conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	✓	☐
c) Substantially increase hazards 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?	☐	☐	✓	☐

Environmental Setting

Transportation Facilities and Services

The project site is just south of SR 120, which extends from Interstate 5 in Lathrop to U.S. Highway 395 in Mono County. SR 120 passes through Escalon as a surface street; at the project site, SR 120 is a two-lane road at the Brennan Avenue intersection. Brennan Avenue is a two-lane road adjacent to and west of the project site. It extends north to Mariposa Road and south to East River Road. Two existing local streets, Celivo Way and Riesling Way, currently end at the southern boundary of the project site. Both roads currently connect to California Street, which provides access to Brennan Road to the west and ultimately SR 120. No direct access from the project site to Brennan Road or SR 120 is proposed.

Two agencies provide public transit services to Escalon. One agency is eTrans, the City's transit system operated by Modesto Area Express. eTrans makes several stops within Escalon and connects passengers to Modesto. eTrans also provides door-to-door, dial-a-ride service on weekdays within the Escalon City limits. The other agency is the San Joaquin Regional Transit District, which operates a bus route to Escalon that provides connections to Manteca and Stockton. There are no designated bicycle routes in the project vicinity. No sidewalks exist along the project site frontage on Brennan Avenue.

A railroad track managed by the Union Pacific Railroad is adjacent to and north of the project site. This track eventually runs in a north-south direction along McHenry Avenue south of SR 120. In 2004, the most recent year information is available, the railroad operated five days per week in the morning and early afternoon. Approximately two trains per day entered and exited the City. Service provided by the Union Pacific Railroad to the City was dependent upon the number of businesses with the need and capabilities to utilize the railroad service (City of Escalon 2004).

Transportation Plans and Guidelines

As the designated metropolitan planning organization representing San Joaquin County, SJCOG is required by both federal and State law to prepare a long-range transportation planning document known as a Regional Transportation Plan (RTP). The most recent RTP was adopted in 2022. It sets forth how the SJCOG region will meet its transportation needs to 2046, considering existing and projected land use patterns and forecasted population and job growth. It identifies and prioritizes expenditures of anticipated funding for transportation projects of all transportation modes, as well as transportation demand management measures and transportation systems management. Among the projects identified in the RTP are improvements to the intersection of SR 120 and Brennan Avenue (SJCOG 2022a).

The Circulation Element of the Escalon General Plan sets forth policies and implementation strategies related to transportation and circulation including streets and highways, transportation corridors, public transit, railroads, bicycle and pedestrian facilities, and commercial, general, and military airports (City of Escalon 2019a). The Circulation Element states that the City shall maintain LOS D or better on the City's street system. However, LOS is no longer used to determine the environmental impacts of projects, as explained in the following paragraph.

The State of California has recently added Section 15064.3 to the CEQA Guidelines, which is meant to incorporate SB 743 into CEQA analysis. SB 743 was enacted in 2013 with the intent to balance congestion management needs and the mitigation of the environmental impacts of traffic with statewide GHG emission reduction goals, mainly by developing an alternative mechanism for evaluating transportation impacts. Section 15064.3 states that VMT is the preferred method for evaluating transportation impacts, rather than LOS. The VMT metric measures the total miles traveled as a result of a given project. VMT accounts for the total environmental impact of transportation associated with a project, including use of non-vehicle travel modes.

Impacts of the project on traffic operations and on VMT were analyzed by transportation consultants Fehr and Peers, in an initial 2023 technical memorandum. The results of their analysis were updated and presented in a 2025 technical memorandum, which is shown in Appendix G of this document.

Environmental Impacts and Mitigation Measures

a) Conflict with Transportation Plans, Ordinances and Policies.

Development of the project would generate new vehicle trips and potentially affect traffic operations at nearby intersections, particularly the SR 120/Brennan Avenue intersection. The Fehr and Peers 2025 memorandum reported a traffic operations analysis on the SR 120/Brennan Avenue intersection, which examined operations under existing and cumulative conditions, both without and with the project. Results under cumulative conditions are discussed in Section 3.21, Mandatory Findings of Significance.

Under existing conditions, the overall intersection operates deficiently at LOS A under AM and PM peak hour conditions. However, the northbound approach (worst-case movement) experiences significant delay under both AM and PM peak hour conditions resulting in an unacceptable LOS F for the side-street approach. The project would add 24 trips to the intersection during the AM peak hour and 26 trips during the PM peak hour, which would exacerbate the side-street intersection worst-case movement delay. Under existing plus project conditions, the overall intersection delay would increase by approximately 15 seconds maintaining LOS F under AM peak hour conditions, and would increase by approximately eight seconds, maintaining LOS F under PM peak hour conditions.

Caltrans has completed a Conceptual Report for improvements at the SR 120/Brennan Road intersection as a prelude to preparing an Intersection Control Evaluation, which will evaluate various control options and identify the most appropriate control option and lane configurations for the intersection. The Intersection Control Evaluation process has not yet started. Because the Intersection Control Evaluation will identify the appropriate control option and lane configurations, the Fehr and Peers memorandum did not identify recommended improvements options for deficient operations.

The proposed project would result in minimal changes to delay at the other study intersections and all other intersections would operate at LOS D or better during the AM and PM peak hours. It is noted that delay for the northbound approach at SR 120/Walnut Avenue is at the LOS D/E threshold of 35 seconds during the AM peak hour and near this threshold during the PM peak hour. This delay is experienced by motorists making the northbound left turn onto SR 120; the northbound right turn delay would increase from approximately 15 to 18 seconds with the addition of project trips. The proposed project would not add any trips to the northbound left turn movement at this intersection and as a result, this delay does not change with the addition of project trips.

With the addition of project trips, volumes on California Street would increase to between approximately 1,000 to 1,100 ADT and volumes on Brennan Avenue would increase to approximately 1,600 ADT. The City of Escalon General Plan includes a goal of maintaining a roadway LOS of D or better on local streets, Minor Collectors, Collector and Arterial Streets but does not include specific LOS D thresholds. Based on the Highway Capacity Manual's generalized daily service volume thresholds for two-lane urban streets, California Street and Brennan Avenue would operate at LOS D or better with the addition of project trips.

No other potential deficiencies related to road and intersection facilities were identified with the project. Therefore, the project would not conflict with transportation plans that seek to maintain traffic flow at acceptable levels, such as the Circulation Element.

The project could result in an increase in demand for public transit service. The frequency and proximity of future transit service is not known at this time and, as a result, demand for transit cannot be quantified. However, it is expected that eTrans can accommodate the additional passengers the project would generate, as well as the San Joaquin Regional Transit District. This would be consistent with the goals of the RTP, which encourage further use of public transit. Project impacts on transportation plans, ordinances, and policies would be less than significant.

b) Conflict with CEQA Guidelines Section 15064.3(b).

CEQA Guidelines Section 15064.3(b) sets forth criteria that may be used analyze transportation impacts using VMT. Section 15064.3(b)(1) states that for land use projects, VMT exceeding an applicable threshold of significance may indicate a significant impact.

The City of Escalon has not adopted VMT impact thresholds for general use, so a project-specific threshold was developed by Fehr and Peers based on direction from City staff. Appendix G provides a detailed description of the VMT methodology. The City of Escalon has determined that a significant impact would occur if the proposed project's home-based VMT per capita would exceed the existing Citywide average home-based VMT per capita. The Citywide average home-based VMT per capita was determined to be 26.4 (Fehr and Peers 2025).

The Fehr and Peers memorandum determined project VMT through calculating the home-based VMT for the U.S. Census block group within which the proposed project is located. The results of the assessment indicated that the project home-based VMT per capita would be 25.2, which is less than the Citywide average home-based VMT per capita was determined to be 26.4. Based on this result, project impacts on VMT are considered less than significant. Additionally, detail on the VMT analysis can be found in Appendix G.

c) Traffic Hazards.

The project site is located along Brennan Avenue, which has no improvements along the site frontage. The Brennan Avenue frontage would be improved with sidewalk in accordance with City standards and specifications. This would reduce potential hazards to pedestrian traffic that could be generated by project generated traffic.

The project would generate an estimated 722 vehicle trips daily (Fehr and Peers 2023). This is considered a relatively low volume of traffic for residential development; plus the type of vehicle traffic associated with the project would be the same as traffic in the surrounding residential areas. Project impacts related to traffic hazards would overall be less than significant.

Fehr & Peers reviewed collision data at SR 120/Brennan Avenue for the most recent five years available to determine what, if any, collision patterns exist under existing conditions. During the study time period, there were 15 reported collisions at the intersection. As shown, one fatal, five "severe" injury, six "other visible" injury, and three property damage only (PDO) collisions occurred during the study time period. The following collision types were the most prevalent:

- Broadside: 53% (8 collisions)
- Rear End: 20% (3 collisions)
- Sideswipe: 13% (2 collisions)

Five of the six KSI collisions were broadside collisions which occurred as a result of motorists on Brennan Avenue failing to yield to oncoming traffic on SR 120.

Fehr and Peers reviewed and identified Proven Safety Countermeasures to reduce fatal and severe injury collisions for the crash types listed above and could be considered by Caltrans and/or the City for near-term implementation as discussed in Appendix G.

Fehr & Peers (2025) completed a queuing impact analysis to determine how the addition of project traffic during peak hours would impact queueing at the State Route (SR) 120/Brennan Avenue and SR 120/Walnut Avenue and other related intersections; these off-highway queues are presented for informational purposes only. Caltrans requests queueing impact analysis related to the state highway system for CEQA review purposes while the City of Escalon does not.

Based on guidance provided by Caltrans, the project would result in a significant queuing impact if it would cause available queue storage to exceed available storage capacity more than 95% of the time. The following intersections were selected for the vehicle queueing analysis based on the comment letter provided by Caltrans on December 17, 2024.

1) SR 120/Brennan Avenue

2) Brennan Avenue/California Street

3) California Street/Walnut Avenue

4) SR 120/Walnut Avenue

Additional discussion of queuing analysis methodology is provided in Appendix G. The analysis was completed for the following scenarios: 1) Existing Conditions and 2) Existing Plus Proposed Project Conditions. Fehr & Peers (2025) Table 3 displays existing and existing plus project AM and PM peak hour 95th percentile queue lengths at the queuing study intersections. As shown in Table 3, the 95th percentile queue would not exceed the available storage at any of the study intersections under existing or existing plus project conditions. Therefore, the proposed project would result in a less than significant queuing impact.

d) Emergency Access.

As described in Chapter 2.0, Project Description, the project would have two entryways, Celivo Way and Riesling Way, both of which would be extended to the project site. These local streets would provide adequate access to the project site for emergency vehicles. Project impacts related to emergency access would be less than significant.

3.18 TRIBAL CULTURAL RESOURCES

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	✓	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	✓	☐	☐

Environmental Setting

As noted, in Section 3.5, Cultural Resources, the project site lies within the traditional territory of the Northern Valley Yokuts, whose lands extended from the San Joaquin River near Mendota north to the confluence of the San Joaquin and Calaveras Rivers. Yokuts groups lived in small seasonal camps or in larger settlements on perennial water sources such as the San Joaquin River. Dwellings in the larger villages consisted of circular tule covered structures and more elaborate semi-subterranean pit houses. Ceremonial sweat houses and assembly chambers were often constructed within the more substantial villages. These larger settlements might include approximately 200 inhabitants constituting a small sub-tribe of the Yokuts. A headman, while not necessarily possessing absolute powers, served as an advisor to these self-contained communities.

The Yokuts were severely impacted by Euro-American settlement. Missionization and exposure to disease decimated the population. The influx of Europeans during the Gold Rush era further reduced the population because of disease and violent encounters with the miners. Because of this, the Northern Valley Yokuts are generally not well documented in the ethnographic record. Despite this, the Yokuts tribe continues to exist today; the Nototomne/North Valley Yokut Tribe, Inc., represents the Northern Valley Yokuts in the region.

In 2014, the California Legislature enacted Assembly Bill (AB) 52, which focuses on consultation with Native American tribes on land use issues potentially affecting the tribes. The intent of this consultation is to avoid or mitigate potential impacts on "tribal cultural resources," which are defined as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe." Under AB 52, when a tribe requests consultation with a CEQA lead agency on projects within its traditionally and culturally affiliated geographical area, the lead agency must provide the tribe with notice of a proposed project within 14 days of a project application being deemed complete or when the lead agency decides to undertake the project if it is the agency's own project. The tribe has up to 30 days to respond to the notice and request consultation; if consultation is requested, then the local agency has up to 30 days to initiate consultation.

AB 52 notification letters were distributed to representatives of eight potentially interested tribes on April 26, 2024: Buena Vista Rancheria, California Valley Miwok Tribe, Sheep Rancheria of Me-Wuk Indians, Ione Band of Miwok Indians, Northern Valley Yokuts, Tule River Indian Tribe, Wilton Rancheria, and Wuksachi Indian Tribe/Eshom Valley Band. Only one of the tribes responded – the California Valley Miwok, who stated that it had no comments or concerns related to the project. None of the other contacted tribes responded to the letters; therefore, it is concluded that the tribes chose not to consult on the project. The City considers the AB 52 consultation process complete.

Environmental Impacts and Mitigation Measures

a, b) Tribal Cultural Resources.

As noted in Section 3.5, Cultural Resources, no archaeological resources have been recorded on the project site, and contacted tribes provided no information on potential tribal cultural resources. However, project construction could potentially uncover previously unknown archaeological resources, which could include those of Native American origin. Mitigation Measure CULT-1 would require construction work to stop at an uncovered resource site under an archaeologist can evaluate the resource and give recommendations for its disposition. If potential tribal cultural resources or burials are encountered, the appropriate tribal representative would be contacted to evaluate the find and make recommendations on its disposition, per CEQA Guidelines Section 15064.5(e) and as described in Section 3.5. Implementation of Mitigation Measure CULT-1 would reduce potential impacts on tribal cultural resources to a level that would be less than significant.

Level of Significance: Potentially significant

Mitigation Measures: Implementation of Mitigation Measure CULT-1.

Significance after Mitigation: Less than significant

3.19 UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	✓	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	✓	☐

c) Result in a determination by the wastewater treatment provider that would 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?	☐	☐	✓	☐

Environmental Setting

Domestic water service is currently provided within the City limits by the City of Escalon from three existing groundwater wells with a current total pumping capacity of 3,200 gallons per minute (gpm). A fourth well, Well No. 1, has been deactivated, but a replacement well will be drilled at the Well No. 1 site when funding becomes available. In 2020, average daily water use was 1.42 million gallons per day (mgd), and maximum daily water use was 2.27 mgd (City of Escalon 2023). Water is delivered through a distribution system consisting of approximately 33 miles of pipelines, ranging in diameter from 3 to 16 inches. A 10-inch diameter water line is beneath California Street, with a 10-inch diameter stub along Riesling Way and an 8-inch stub along Celivo Way (City of Escalon 2007a).

The City of Escalon provides wastewater treatment and collection services to residential, commercial, and industrial land uses within the City limits. The City operates two wastewater treatment facilities – a domestic facility for residential, commercial, and small industrial sources, and the other for industrial sources. The domestic wastewater facility currently treats on average about 0.5 mgd, with a permitted capacity of 0.9 mgd (City of Escalon 2023). Wastewater collection lines are located throughout the City, ranging in size from 6 to 14 inches in diameter. An 8-inch diameter sewer line is beneath California Street, with 8-inch diameter stubs along Riesling Way and Celivo Way (City of Escalon 2007b).

The City maintains a network of storm drains and detention basins that collect storm water runoff from the urbanized areas. Most of the collected storm drainage is discharged to SSJID canals in the area; a small amount is conveyed to the industrial treatment ponds of the City's wastewater plant. An existing storm drain line is beneath California Street, and a retention basin and pump station are in Shadowood Park adjacent to the southeastern corner of the project site (City of Escalon 2007c). As noted in Section 3.10, Hydrology and Water Quality, the City operates under the MS4 General Permit, in accordance with which the City has adopted a Post-Construction Standards Plan that provides guidance to developers in meeting the SWRCB's requirements for mitigating impacts associated with storm drainage.

Solid waste collection services in Escalon are provided by Gilton Solid Waste Management, which operates under a City franchise. Solid waste from the City is taken to the McClure Transfer Station in Modesto, which in turn is sent to the Fink Road Sanitary Landfill in southwestern Stanislaus County. The Fink Road Landfill has a maximum

permitted capacity of 14,640,000 cubic yards. As of March 1, 2017, the landfill had a remaining capacity of 7,184,701 cubic yards (CalRecycle 2023).

Electricity is provided to Escalon by PG&E and the Modesto Irrigation District; the City is within a "joint electric distribution service area" where both utilities may compete for customers. Both PG&E and MID have electrical facilities in the project vicinity; existing overhead electrical lines are along Brennan Avenue. Natural gas services are provided by PG&E. Local telephone service is provided by AT&T, and Comcast provides cable television services.

Environmental Impacts and Mitigation Measures

a) Relocation or Construction of New Facilities.

The project would connect to existing water, sewer, storm drainage, and electrical lines in the project vicinity. Extension of water and sewer lines from existing stubs along Riesling way and Celivo Way is anticipated, and onsite service lines would be installed for residential development. Otherwise, no new lines or facilities would need to be constructed by the utilities. Relocation of existing utility lines in the vicinity is not anticipated. Project impacts related to relocation or construction of new facilities would be less than significant.

b) Water Systems and Supply.

The project would place additional demand on the City's water supplies. The City's Water Master Plan indicates a water demand factor for residential development similar to the project of 540 gallons per day per water meter connection (City of Escalon 2007a). Assuming each unit has a separate meter, the total water demand of the anticipated residential development would be 38,880 gallons per day on average, or approximately 0.04 mgd.

As noted above, the City's water system has approximately 3,200 gpm of available water supply and a maximum of 1,591 gpm daily use. The City's water capacity will be increased in the future with the replacement of deactivated Well No. 1. The City's Water Master Plan recommends that all new wells have a capacity of at least 1,200 gpm (City of Escalon 2007a), so the new Well No. 1 is expected to have at least that much capacity.

In addition, the City, in association with the SSJID and other cities in southern San Joaquin County, has contracted for additional water supply as a part of the South County Surface Water Project. Under this project, water would be provided from SSJID's Woodward Reservoir. The City has been allotted up to 2,799 acre-feet from this source (City of Escalon 2023). The City has not yet activated this source, but surface water is expected to supplement the City's water supplies in the future.

In summary, the City would have adequate capacity to accommodate the water demands of the project without the need for new or expanded entitlements (City of Escalon 2023). It also should be noted that the project would be required to comply with the City's Model

Water Efficient Landscape Ordinance, which would make landscape irrigation more water-efficient. Project impacts on water supplies would be less than significant.

c) Wastewater Treatment Capacity.

The project would place additional demand on the City's wastewater collection and treatment system. The City's Sewer Master Plan indicates a sewer demand factor for residential development similar to the project of 250 gallons per day per unit (City of Escalon 2007b). Based on this factor, the project would generate 18,250 gallons of wastewater per day, or approximately 0.02 mgd. As indicated above, the City's wastewater treatment plant currently has available capacity of approximately 0.4 mgd based on current average use. Thus, the plant would have adequate capacity to accommodate wastewater generated by the project. The project would pay sewer connection fees, which would be used for future expansion of the City's wastewater system as needed. Project impacts on wastewater services would be less than significant.

d, e) Solid Waste Services.

The project would generate solid waste materials consistent with residential land uses. The project is not anticipated to create a significant amount of solid waste. All solid waste generated during construction and operations would be removed in accordance with federal, state, and local regulations. These include the 2022 CALGreen, which requires projects to divert 65% of all construction and demolition debris excluding inert and organic material and 90% of inert and organic materials from landfills through reuse and recycling. As of 2017, the Fink Road Landfill had approximately half of its maximum capacity available; as such, the land fill could accommodate project-generated solid waste. Project impacts would be less than significant.

3.20 WILDFIRE

If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	✓

Environmental Setting

The Environmental Checklist in CEQA Guidelines Appendix G has been revised to include a section addressing the potential impacts of a project as it relates to wildfire. As noted in Section 3.9, Hazards and Hazardous Materials, the project site is not in an area susceptible to wildland fires; land is either agricultural or developed.

The California Department of Forestry and Fire Protection's Fire and Resource Assessment Program identifies fire threat based on a combination of two factors: 1) fire frequency, or the likelihood of a given area burning, and 2) potential fire behavior (hazard). These two factors are combined in determining the following Fire Hazard Severity Zones: Moderate, High, Very High, Extreme. These zones apply to areas designated as State Responsibility Areas – areas in which the State has primary firefighting responsibility. The project site is not within a State Responsibility Area and therefore has not been placed in a Fire Hazard Severity Zone for such areas (Cal Fire 2007a). Both the project site and surrounding area are in a Local Responsibility Area, where primary firefighting responsibility is by a local fire district or department, in this case the Escalon Consolidated Fire Protection District. Neither are in any designated fire hazard severity zones for Local Responsibility Areas (Cal Fire 2007b).

Environmental Impacts and Mitigation Measures

a) Emergency Response Plans and Emergency Evacuation Plans.

As discussed in Section 3.9, Hazards and Hazardous Materials, project construction is not expected to substantially obstruct emergency vehicles or any evacuations that may occur in the area with implementation of Mitigation Measure HAZ-1. The project would not obstruct any roadways once construction work is completed. Project impacts related to wildfire emergency response plans or emergency evacuation plans would be less than significant with mitigation.

Level of Significance: Potentially significant

Mitigation Measures: Implementation of Mitigation Measure HAZ-1.

Significance after Mitigation: Less than significant

b) Exposure of Project Occupants to Wildfire Hazards.

The project site is not part of a State Responsibility Area, and Cal Fire maps indicate the site is not designated within a Very High Fire Hazard Severity Zone or a zone of higher severity for Local Responsibility Areas. The project site is adjacent to a predominantly residential area, which is not prone to wildfires. The project would reduce the existing fire hazard on the project site by replacing vacant land covered by grasses and weeds with

residences and landscaping. The project would have no impact related to exposure of project occupants to wildfire hazards.

c) Installation and Maintenance of Infrastructure.

The project proposes the installation of roads and parking areas and the extension of utilities. The installation of these facilities is not expected to exacerbate the wildfire risk on the project site, which is minimal as explained in b) above. The project would have no impact related to exacerbation of wildfire hazards by infrastructure improvements.

d) Risks from Runoff, Post-Fire Slope Instability, or Drainage Changes.

The project site is in a topographically flat area. There are no streams or other channels that cross the site. As such, it is not expected that people or structures would be exposed to significant risks from changes resulting from fires in steeper areas, including downslope or downstream flooding or landslides. The project would have no impact related to risks from runoff, post-fire slope instability, or drainage changes.

3.21 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?	☐	☐	☑	☐

a) Findings on Biological and Cultural Resources.

The project's potential biological, cultural, and tribal cultural resource impacts were described in Sections 3.4, 3.5, and 3.18, respectively. Potentially significant environmental

impacts were identified in these issue areas, but these impacts would be reduced to levels that would be less than significant with implementation of identified mitigation measures.

b) Findings on Individually Limited but Cumulatively Considerable Impacts.

The project site is across State Route 120 from the Liberty Business Park Specific Plan area. Adopted by the City in 2007, the Specific Plan covers 178.4 acres and proposes an industrial park development with a mix of industrial, industrial/business-professional, office, and commercial uses. No development of the Specific Plan area has occurred to date. No other major development projects have been approved recently by the City.

The potential cumulative impacts of development of the project site and the Liberty Business Park area were accounted for in the Escalon General Plan EIR. The EIR evaluated the potential environmental impacts of development under the 2005 General Plan, with which this project is consistent. Potentially significant impacts were identified, but most of these impacts could be mitigated to a level that would be less than significant (City of Escalon 2005). However, the General Plan EIR identified two impacts that were considered significant and unavoidable: direct and indirect conversion of Farmland, and potential violation of air quality standards. Project impacts that contribute to these two significant and unavoidable impacts may be cumulatively considerable.

As discussed in Section 3.2, Agriculture and Forestry Resources, the project would directly convert Farmland to non-agricultural use. However, in its analysis, the General Plan EIR considered potential development on the project site. The conversion of Farmland would not have a new or a more severe impact than that described in the General Plan EIR. As such, project impacts on Farmland are not considered to be cumulatively considerable.

As discussed in Section 3.3, Air Quality, while the project would contribute air pollutant emissions, the project emissions would be below SJVAPCD significance thresholds, which were developed in part to determine if a project would interfere with the attainment of air quality standards. Therefore, the project would not make a cumulatively considerable contribution to air quality impacts.

Impacts of the project on traffic operations at the SR 120/Brennan Avenue intersection under cumulative conditions without and with the project were analyzed by Fehr and Peers. The results of their analysis are available in Appendix G. Cumulative conditions were defined as traffic conditions in the year 2045; by this time, the intersection is expected to be improved such that no cumulative queuing impact would be expected.

As noted, Caltrans has completed a draft Conceptual Report for improvements at the SR 120/Brennan Road intersection as a prelude to preparing an Intersection Control Evaluation. The Intersection Control Evaluation process has not yet started.

As described in this IS/MND, the potential environmental effects of the project would either be less than significant or would have no impact at all. Where the project involves potentially significant effects, these effects would be avoided or reduced to a level that is less than significant with proposed mitigation measures and/or compliance with applicable regulations and conditions of required permits. Given this, the potential environmental impacts of the project would not be cumulatively considerable.

c) Findings on Adverse Effects on Human Beings.

Potential adverse effects on human beings were discussed in Section 3.7, Geology and Soils (seismic hazards); Section 3.9, Hazards and Hazardous Materials; Section 3.10, Hydrology and Water Quality (flooding); Section 3.17, Transportation (traffic hazards); and Section 3.20, Wildfire. All potential adverse effects on human beings identified in those sections would be reduced to levels that are less than significant through mitigation measures or through compliance with applicable laws, regulations, and ordinances.

4.0 REFERENCES

4.1 DOCUMENT PREPARERS

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

City of Escalon Planning Department

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4.3 PERSONS CONSULTED

Morris, Dan. Escalon Consolidated Fire Protection District.

Romo, Dominique. City Planner, City of Escalon.

5.0 NOTES RELATED TO EVALUATION OF ENVIRONMENTAL IMPACTS

The following notes are included in the Environmental Information Checklist shown in Appendix G of the State CEQA guidelines. The notes provide guidance as to the proper use of the form.

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.

    b) Impacts Adequately Addressed: Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier

document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

c) Mitigation Measures: For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures, which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

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

9) The explanation of each issue should identify:

a) the significance criteria or threshold, if any, used to evaluate each question; and

b) the mitigation measure identified, if any, to reduce the impact to less than significance.