



International Park of Commerce Phase 2

Draft Environmental Impact Report

June 19, 2026

Prepared for:
San Joaquin County

Prepared by:
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Table of Contents

EXECUTIVE SUMMARY	ES-1
ES.1 PROJECT LOCATION	ES-1
ES.2 PROJECT DESCRIPTION	ES-1
ES.2.1 Project Objectives	ES-6
ES.2.2 Project Approvals	ES-7
ES.2.3 Responsible and Trustee Agencies	ES-7
ES.3 AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED	ES-8
ES.4 ALTERNATIVES TO THE PROPOSED PROJECT	ES-9
ES.4.1 Alternative 1: No Project Alternative	ES-9
ES.4.2 Alternative 2: Reduced Size Alternative	ES-9
ES.4.3 Alternative 3: Increased Cold Storage Alternative	ES-9
ES.5 SUMMARY OF IMPACTS AND MITIGATION MEASURES	ES-10
ES.6 REVIEW OF THE DRAFT EIR	ES-37
 1.0 INTRODUCTION	 1-1
1.1 THE ENVIRONMENTAL REVIEW PROCESS	1-1
1.1.1 Purpose and Authority	1-2
1.1.2 Type of Environmental Impact Report	1-2
1.1.3 Lead Agency Determination	1-3
1.2 SCOPE OF DRAFT EIR	1-4
1.2.1 Location	1-10
1.2.2 Environmental Issues Determined Not to Be Significant	1-13
1.3 ORGANIZATION OF THE DRAFT EIR	1-13
1.4 REVIEW OF THE DRAFT EIR	1-15
1.4.1 Effectively Commenting on an EIR	1-15
1.4.2 Final EIR	1-16
 2.0 PROJECT DESCRIPTION	 2-1
2.1 PROJECT OVERVIEW	2-1
2.1.1 Purpose of the IPCP2 Specific Plan	2-1
2.1.2 Project Site	2-2
2.1.3 Existing Land Use Designation and Zoning	2-2
2.1.4 Adjacent Planning Areas	2-2
2.1.5 Existing Site Conditions	2-3
2.1.6 Existing Site Conditions	2-4
2.2 IPCP2 SPECIFIC PLAN PROPOSED GENERAL PLAN AMENDMENT AND ZONING ..	2-4
2.2.1 General Plan Amendment	2-4
2.2.2 Zoning	2-5
2.3 IPCP2 SPECIFIC PLAN DEVELOPMENT AND DESIGN GUIDELINES	2-7
2.3.1 Logistics and Warehouse Buildings	2-7
2.3.2 Streets	2-8
2.3.3 Parking	2-14
2.4 IPCP2 SPECIFIC PLAN SUSTAINABILITY	2-14
2.4.1 Energy	2-14
2.4.2 Transportation and Land Use	2-15
2.4.3 Solid Waste	2-15



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

2.4.4	Water	2-15
2.4.5	Biological Resources	2-16
2.4.6	Public Health	2-16
2.5	CONCEPTUAL PROJECT CHARACTERISTICS	2-16
2.5.1	Project Summary	2-16
2.5.2	Conceptual Development Components	2-19
2.5.3	Conceptual Development Construction	2-26
2.6	ANTICIPATED PROJECT APPROVALS AND IMPLEMENTATION	2-30
2.6.1	Standard Development Requirements	2-30
2.6.2	Approvals	2-31
2.7	PROJECT OBJECTIVES	2-33
3.0	ENVIRONMENTAL IMPACT ANALYSIS	3-1
3.1	AESTHETICS	3.1-1
3.1.1	Environmental Setting	3.1-1
3.1.2	Regulatory Setting	3.1-2
3.1.3	Regulatory Setting	3.1-6
3.1.4	Notice of Preparation Comments Related to Aesthetics	3.1-16
3.2	AGRICULTURAL AND FORESTRY RESOURCES	3.2-1
3.2.1	Environmental Setting	3.2-1
3.2.2	Regulatory Setting	3.2-4
3.2.3	Environmental Impacts	3.2-12
3.2.4	Notice of Preparation Comments Related to Agriculture	3.2-18
3.3	AIR QUALITY	3.3-1
3.3.1	Environmental Setting	3.3-1
3.3.2	Regulatory Setting	3.3-25
3.3.3	Environmental Impacts	3.3-35
3.3.4	Notice of Preparation Comments Related to Air Quality	3.3-92
3.4	BIOLOGICAL RESOURCES	3.4-1
3.4.1	Environmental Setting	3.4-1
3.4.2	Regulatory Setting	3.4-18
3.4.3	Environmental Impacts	3.4-26
3.4.4	Notice of Preparation Comments Related to Biological Resources	3.4-35
3.5	CULTURAL RESOURCES	3.5-1
3.5.1	Environmental Setting	3.5-1
3.5.2	Regulatory Setting	3.5-4
3.5.3	Environmental Impacts	3.5-7
3.5.4	Notice of Preparation Comments Related to Cultural Resources	3.5-14
3.6	ENERGY	3.6-1
3.6.1	Environmental Setting	3.6-1
3.6.2	Regulatory Setting	3.6-2
3.6.3	Environmental Impacts	3.6-7
3.6.4	Notice of Preparation Comments Related to Energy	3.6-14
3.7	GEOLOGY AND SOILS	3.7-1
3.7.1	Environmental Setting	3.7-1
3.7.2	Regulatory Setting	3.7-1
3.7.3	Environmental Impacts	3.7-4
3.7.4	Notice of Preparation Comments Related to Geology and Soils	3.7-12
3.8	GREENHOUSE GAS EMISSIONS	3.8-1
3.8.1	Environmental Setting	3.8-1
3.8.2	Regulatory Setting	3.8-4



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

3.8.3	Environmental Impacts.....	3.8-12
3.8.4	Notice of Preparation Comments Related to Greenhouse Gas Emissions.....	3.8-27
3.9	HAZARDS AND HAZARDOUS MATERIALS.....	3.9-1
3.9.1	Environmental Setting	3.9-1
3.9.2	Regulatory Setting.....	3.9-5
3.9.3	Environmental Impacts.....	3.9-11
3.9.4	Notice of Preparation Comments Related to Hazards and Hazardous Materials	3.9-18
3.10	HYDROLOGY AND WATER QUALITY	3.10-1
3.10.1	Environmental Setting	3.10-1
3.10.2	Regulatory Setting.....	3.10-5
3.10.3	Environmental Impacts.....	3.10-11
3.10.4	Notice of Preparation Comments Related to Hydrology.....	3.10-27
3.11	LAND USE AND PLANNING.....	3.11-1
3.11.1	Environmental Setting	3.11-1
3.11.2	Regulatory Setting.....	3.11-2
3.11.3	Environmental Impacts.....	3.11-7
3.11.4	Notice of Preparation Comments Related to Land Use	3.11-12
3.12	NOISE.....	3.12-1
3.12.1	Environmental Setting	3.12-1
3.12.2	Regulatory Setting.....	3.12-9
3.12.3	Environmental Impacts.....	3.12-15
3.12.4	Notice of Preparation Comments Related to Noise and Vibration.....	3.12-35
3.13	POPULATION AND HOUSING	3.13-1
3.13.1	Environmental Setting	3.13-1
3.13.2	Regulatory Setting.....	3.13-4
3.13.3	Environmental Impacts.....	3.13-8
3.13.4	Notice of Preparation Comments Related to Population and Housing ..	3.13-10
3.14	PUBLIC SERVICES	3.14-1
3.14.1	Environmental Setting	3.14-1
3.14.2	Regulatory Setting.....	3.14-3
3.14.3	Environmental Impacts.....	3.14-7
3.14.4	Notice of Preparation Comments Related to Public Services	3.14-15
3.15	RECREATION.....	3.15-1
3.15.1	Environmental Setting	3.15-1
3.15.2	Regulatory Setting.....	3.15-1
3.15.3	Environmental Impacts.....	3.15-3
3.15.4	Notice of Preparation Comments Related to Population and Housing	3.15-5
3.16	TRANSPORTATION	3.16-1
3.16.1	Environmental Setting	3.16-1
3.16.2	Regulatory Setting.....	3.16-5
3.16.3	Environmental Impacts.....	3.16-12
3.16.4	Notice of Preparation Comments Related to Transportation.....	3.16-21
3.17	TRIBAL CULTURAL RESOURCES.....	3.17-1
3.17.1	Environmental Setting	3.17-1
3.17.2	Regulatory Setting.....	3.17-1
3.17.3	Environmental Impacts.....	3.17-4
3.17.4	Notice of Preparation Comments Related to Tribal Cultural Resources..	3.17-6
3.18	UTILITIES AND SERVICE SYSTEMS.....	3.18-1



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

3.18.1	Environmental Setting	3.18-1
3.18.2	Regulatory Setting.....	3.18-4
3.18.3	Environmental Impacts.....	3.18-10
3.18.4	Notice of Preparation Comments Related to Utilities and Service Systems	3.18-20
3.19	WILDFIRE	3.19-1
3.19.1	Environmental Setting	3.19-1
3.19.2	Regulatory Setting.....	3.19-5
3.19.3	Environmental Impacts.....	3.19-12
3.19.4	Notice of Preparation Comments Related to Wildfire.....	3.19-16
4.0	CUMULATIVE EFFECTS	4-1
4.1	INTRODUCTION	4-1
4.2	CUMULATIVE IMPACT SETTING.....	4-1
4.3	GEOGRAPHIC SCOPE.....	4-2
4.4	LIST OF RELATED PLANS AND PROJECTS.....	4-3
4.5	CUMULATIVE IMPACT ANALYSIS.....	4-9
4.5.1	Aesthetics	4-10
4.5.2	Agricultural and Forestry Resources	4-11
4.5.3	Air Quality	4-11
4.5.4	Biological Resources.....	4-13
4.5.5	Cultural Resources.....	4-14
4.5.6	Energy	4-15
4.5.7	Geology and Soils	4-15
4.5.8	Greenhouse Gas Emissions.....	4-16
4.5.9	Hazards and Hazardous Materials	4-17
4.5.10	Hydrology and Water Quality.....	4-18
4.5.11	Land Use and Planning	4-19
4.5.12	Noise.....	4-20
4.5.13	Population and Housing	4-20
4.5.14	Public Services	4-24
4.5.15	Recreation.....	4-26
4.5.16	Transportation	4-26
4.5.17	Tribal Cultural Resources.....	4-27
4.5.18	Utilities and Service Systems	4-28
4.5.19	Wildfire	4-35
5.0	ALTERNATIVES TO THE PROPOSED PROJECT	5-1
5.1	INTRODUCTION.....	5-1
5.2	REQUIREMENTS FOR THE CONSIDERATION OF ALTERNATIVES	5-1
5.2.1	No Project Alternative	5-2
5.2.2	Consistency with Project Objectives.....	5-2
5.2.3	Feasibility	5-3
5.3	METHODOLOGY AND SCREENING CRITERIA	5-3
5.4	ALTERNATIVES CONSIDERED AND REJECTED FROM FURTHER CONSIDERATION	5-4
5.4.1	Alternative Site Location.....	5-4
5.5	ALTERNATIVES CONSIDERED	5-5
5.5.1	No Project Alternative	5-5
5.5.2	Reduced Size Alternative	5-8
5.5.3	Increased Cold Storage Alternative	5-13



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

5.6	ENVIRONMENTALLY SUPERIOR ALTERNATIVE.....	5-18
6.0	OTHER CEQA CONSIDERATIONS	6-1
6.1	GROWTH-INDUCING IMPACTS.....	6-1
6.1.1	Population Growth.....	6-2
6.1.2	Removal of Barrier to Growth	6-3
6.2	SIGNIFICANT AND UNAVOIDABLE IMPACTS	6-3
6.3	SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES	6-4
7.0	EFFECTS FOUND NOT TO BE SIGNIFICANT.....	7-1
8.0	LIST OF PREPARERS AND ORGANIZATIONS CONSULTED	8-1
	LEAD AGENCY	8-1
	REPORT PREPARERS	8-2
9.0	REFERENCES.....	9-1

LIST OF TABLES

Table 1.2-1: Comments Received on the NOP.....	1-5
Table 2.2-1. IPCP2 Specific Plan Principally Permitted Uses	2-5
Table 2.2-2. IPCP2 Specific Plan Ancillary Permitted Uses.....	2-6
Table 2.2-3. IPCP2 Specific Plan Land Use Definitions and Characteristics of Use	2-6
Table 2.5-1. IPC2 Industrial Land Uses Summary.....	2-19
Table 2.5-2. IPC2 Industrial Land Uses Summary.....	2-24
Table 2.5-3. Conceptual Project Construction Schedule	2-29
Table 3.0-1. Environmental Resource Abbreviations.....	3-4
Table 3.1-1. Comments Received on the NOP for Aesthetics	3.1-16
Table 3.2-1. California LESA Model Scoring Thresholds.....	3.2-13
Table 3.2-2. Comments Received on the NOP for Agriculture.....	3.2-18
Table 3.3-1. California and National Ambient Air Quality Standards.....	3.3-5
Table 3.3-2. San Joaquin Valley Air Basin Attainment Status.....	3.3-6
Table 3.3-3. Tracy Airport Monitoring Station Data.....	3.3-7
Table 3.3-4. Existing Almond Orchard Harvesting Equipment.....	3.3-36
Table 3.3-5. Project Land Uses Modeled by Phase.....	3.3-37
Table 3.3-6. Proposed Construction Equipment.....	3.3-39
Table 3.3-7. Industrial Vehicle Trip Rates.....	3.3-42
Table 3.3-8. Fleet Mix	3.3-43
Table 3.3-9. Operational Equipment.....	3.3-44
Table 3.3-10. Health Risk Scenarios Summary	3.3-50
Table 3.3-11. SJVAPCD Significance Thresholds	3.3-53
Table 3.3-12. BAAD Operational Significance Thresholds	3.3-53
Table 3.3-13. SJVAPCD Localized Significance Thresholds	3.3-53
Table 3.3-14. Construction Criteria Pollutant Emissions (Unmitigated).....	3.3-61
Table 3.3-15. Construction Criteria Pollutant Emissions (Mitigated)	3.3-62
Table 3.3-16. Operational Criteria Pollutant Emissions (Unmitigated)	3.3-63
Table 3.3-17. Operational Criteria Pollutant Emissions (Mitigated).....	3.3-64
Table 3.3-18. Project Transportation Criteria Pollutant Emissions.....	3.3-65
Table 3.3-19. Overlapping Criteria Pollutant Emissions (Unmitigated)	3.3-66
Table 3.3-20. Overlapping Criteria Pollutant Emissions (Mitigated).....	3.3-67
Table 3.3-21. Future Year, Project Operational Emissions (Unmitigated).....	3.3-68



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Table 3.3-22. Health Risk from Project Construction (Unmitigated).....	3.3-72
Table 3.3-23. Health Risk from Project Construction (Mitigated)	3.3-73
Table 3.3-24. Localized Emissions of NO _x , CO, PM ₁₀ , and PM _{2.5} for Construction.....	3.3-74
Table 3.3-25. Localized Emissions of NO _x , CO, PM ₁₀ , and PM _{2.5} for Construction (Mitigated)	3.3-75
Table 3.3-26. Construction Ambient Air Quality Analysis for CO	3.3-76
Table 3.3-27. Health Risk under Existing Conditions.....	3.3-77
Table 3.3-28. Health Risk under Future Conditions with No Project	3.3-78
Table 3.3-29. Net Change in Health Risk, Overlapping Emissions compared to Existing Conditions (Unmitigated)	3.3-78
Table 3.3-30. Net Change in Health Risk, Overlapping Emissions compared to Existing Conditions (Mitigated).....	3.3-79
Table 3.3-31. Net Change in Health Risk, Full Project Buildout compared to Future with No Project (Unmitigated).....	3.3-79
Table 3.3-32. Net Change in Health Risk, Full Project Buildout compared to Future with No Project (Mitigated)	3.3-80
Table 3.3-33. Localized Emissions of NO _x , CO, PM ₁₀ , and PM _{2.5} for Operations (Unmitigated).....	3.3-81
Table 3.3-34. Localized Emissions of NO _x , CO, PM ₁₀ , and PM _{2.5} for Operations (Mitigated)	3.3-81
Table 3.3-35. Operational Ambient Air Quality Analysis for CO	3.3-82
Table 3.3-36. CalEnviroScreen Scores	3.3-85
Table 3.3-37. SJVAPCD Screening Distances for Potential Odor Sources.....	3.3-89
Table 3.3-38. Comments Received on the NOP for Air Quality	3.3-92
Table 3.3-39. Project Consistency with CARB's Air Quality Recommendations for Warehouses and Distribution Centers.....	3.3-97
Table 3.3-40. Project Consistency with Attorney General's Air Quality Recommendations.....	3.3-101
Table 3.3-41. Project Consistency with Sierra Club Recommendations	3.3-108
Table 3.4-1. Plant Species Observed in the Project Site	3.4-1
Table 3.4-2. Wildlife Species Observed in the Project Site.....	3.4-3
Table 3.4-3. Special-Status Plant and Wildlife Species Documented or Potentially Occurring in the Project Vicinity	3.4-13
Table 3.5-1. Previously Recorded Resources Within a Half-Mile Radius of the Project Site	3.5-8
Table 3.6-1. Construction On-Road Vehicle Fuel Consumption (10- Year Totals)	3.6-9
Table 3.6-2. Operational Energy Use Summary	3.6-10
Table 3.6-3. Operational Vehicle Fuel Consumption	3.6-11
Table 3.6-4. Comments Received on the NOP for Energy	3.6-15
Table 3.7-1. Comments Received on the NOP for Geologic Resources.....	3.7-12
Table 3.8-1. Construction Greenhouse Gas Emissions	3.8-14
Table 3.8-2. Operational Greenhouse Gas Emissions (Unmitigated)	3.8-15
Table 3.8-3. Operational Greenhouse Gas Emissions (Mitigated).....	3.8-16
Table 3.8-4. Project Consistency with 2022 Scoping Plan Greenhouse Gas Reduction Strategies	3.8-19
Table 3.8-5. Project Consistency with SJCOG RTP/SCS Greenhouse Gas Reduction Strategies	3.8-21
Table 3.8-6. Project Consistency with 2035 General Plan Greenhouse Gas Reduction Strategies	3.8-25
Table 3.8-7. Comments Received on the NOP for Greenhouse Gas.....	3.8-27
Table 3.9-1. Phase I Evaluation Areas	3.9-2



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Table 3.9-2. Comments Received on the NOP for Hazards	3.9-19
Table 3.10-1. Comments Received on the NOP for Hydrology and Water Quality	3.10-27
Table 3.11-1. Summary of Land Uses within Unincorporated San Joaquin County	3.11-1
Table 3.11-2. General Plan Consistency Analysis with the Project and IPCP2 Specific Plan	3.11-8
Table 3.11-3. Comments Received on the NOP for Land Use	3.11-12
Table 3.13-1. San Joaquin County Historic Population Growth	3.13-1
Table 3.13-2. San Joaquin County Historic Housing Units Growth	3.13-2
Table 3.13-3. SJCOG 2023-2031 Regional Housing Need Allocation	3.13-3
Table 3.13-4. General Plan Employment Estimates	3.13-4
Table 3.13-5. Comments Received on the NOP for Population and Housing	3.13-11
Table 3.14-1. Comments Received on the NOP for Public Services	3.14-15
Table 3.16-1. Existing Truck Traffic in Project Vicinity	3.16-4
Table 3.16-2. Project Vehicle Trip Generation Summary	3.16-13
Table 3.16-3. Daily VMT Per Employee (Unmitigated)	3.16-17
Table 3.16-4. Daily VMT Per Employee (Mitigated)	3.16-18
Table 3.16-5. Total Project VMT	3.16-18
Table 3.16-6. Comments Received on the NOP for Transportation	3.16-21
Table 3.17-1. Comments Received on the NOP for Tribal Cultural Resources	3.17-6
Table 3.18-1. Comments Received on the NOP for Utilities	3.18-20
Table 4.3-1. Geographic Scope of Cumulative Impact and Method of Evaluation	4-2
Table 4.4-1. List of Related Projects	4-4
Table 4.5-1. Cumulative Employment Estimates	4-21
Table 4.5-2. Cumulative Solid Waste Estimates	4-30
Table 5.5-1. Reduced Size Alternative	5-9
Table 5.5-2. Increased Cold Storage Alternative	5-13
Table 5.6-1. Project Alternative Impact Comparison	5-19
Table 5.6-2. Project Alternatives Comparison to Project Objectives	5-19

LIST OF FIGURES

Figure 1. Regional Location of the Project	1-11
Figure 2. Specific Plan Area	1-12
Figure 3. Proposed Roadway Locations	2-10
Figure 4. West Schulte Road Configuration	2-11
Figure 5. Pavilion Parkway Configuration	2-12
Figure 6. Promontory Parkway Configuration	2-13
Figure 7. Conceptual Site Plan	2-18
Figure 8. Conceptual Project Utilities	2-21
Figure 9. Conceptual Project Phases	2-28
Figure 10. Drone Imagery	3.1-7
Figure 11. Rendering from Northeast of the Project Site	3.1-11
Figure 12. Rendering from Northwest of the Project Site	3.1-12
Figure 13. Important Farmland	3.2-3
Figure 14. Ozone Season Good and Unhealthy AQI County Days, 2003-2020	3.3-13
Figure 15. Basin Days Over the 1979 1-Hour Ozone Standard, 2000-2020	3.3-14
Figure 16. Basin Days Over the 2015 8-Hour Ozone Standard, 2000-2020	3.3-15
Figure 17. NOx Emissions Reductions, 1980-2021	3.3-16
Figure 18. SOx Emission Reductions in California, 1990-2025	3.3-17
Figure 19. SJVAPCD PM _{2.5} Winter Emissions Inventory Trend, 2000-2015	3.3-18
Figure 20. National Average Air Quality Emissions of Lead, 2010-2022	3.3-19



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Figure 21. California Population, Gross State Product (GSP), Diesel Cancer Risk, Diesel Vehicle Miles Traveled (VMT), 1990-2010	3.3-22
Figure 22. Location of Sensitive Receptors	3.3-24
Figure 23. CalEnviroScreen Results	3.3-87
Figure 24. Wind Rose	3.3-90
Figure 25. Wetlands, North	3.4-7
Figure 26. Wetlands, South.....	3.4-8
Figure 1. Project Area and Ambient Noise Measurement Locations.....	3.12-8
Figure 2. Maximum Truck Traffic Vibration Levels versus Distance.....	3.12-33
Figure 3. Planned Roadways	3.16-2
Figure 4. Wastewater Treatment System	3.18-14
Figure 31. Fire Hazard Severity of San Joaquin County.....	3.19-4

LIST OF APPENDICES

Appendix A: Notice of Preparation/Initial Study and Comments	
Appendix B: 2023 Agricultural Conversion Study and LESA Modeling	
Appendix C: Air Quality, Health Risk Assessment, and Greenhouse Gas Modeling	
Appendix D: SJVAPCD Voluntary Emission Reduction Agreement Letter	
Appendix E: Biological Assessment	
Appendix F: Cultural Resources Inventory and Evaluation Report	
Appendix G: Energy Calculations	
Appendix H: Preliminary Geotechnical Exploration Report	
Appendix I: Phase I and Phase II Environmental Site Assessments	
Appendix J: Water Management Plan	
Appendix K: Stormwater Public Improvement Plan	
Appendix L: Water Supply Assessment	
Appendix M: Title 22 Engineering Report	
Appendix N: Noise Modeling	
Appendix O: Traffic Impact Assessment	
Appendix P: Tribal Cultural Outreach Response	
Appendix Q: Cumulative Projects Memorandum	



Acronyms and Abbreviations

°F	Fahrenheit
µg/m ³	micrograms per cubic meter
A/G	General Agriculture
AG-40	General Agriculture, 40-acre minimum
AB	Assembly Bill
ACEP	Agricultural Conservation Easement Program
ACF	Advanced Clean Fleet
ACT	Advanced Clean Trucks
AFY	acre-feet per year
AIA	Airport Influence Area
AIRFA	American Indian Religious Freedom Act
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
ALUP	Airport Land Use Plan
APN	Assessor's Parcel Number
AXP	post-anoxic
BAAD	Bay Area Air District
BACT	best available control technology
BAU	Business-as-Usual
BCC	Birds of Conservation Concern
BMP	best management practice
BBID	Byron-Bethany Irrigation District
BFFP	California Board of Forestry and Fire Protection
BO	biological opinion
BP	before present day
C ₂ F ₆	perfluoroethane
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
Cal EPA	California Environmental Protection Agency
CAFE	Corporate Average Fuel Economy
CAL FIRE	California Department of Forestry and Fire Protection
CalGEM	California Department of Conservation, Geological Energy Management Division
Cal OES	Governor's Office of Emergency Services
Caltrans	California Department of Transportation
Cal Water Services	California Water Services Company



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCAA	California Clean Air Act
CCIC	Central California Information Center
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDPH	California Department of Public Health
CEC	California Energy Commission
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
CF ₄	perfluoromethane
CFCP	California Farmland Conservancy Program
CFR	Code of Federal Regulations
CH ₄	methane
City	City of Tracy
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO ₂	carbon dioxide
CO _{2e}	carbon dioxide equivalent
CO	carbon monoxide
COBRA	Co-Benefits Risk Assessment Health Impacts Screening and Mapping Tool
COC	constituents of concern
County	County of San Joaquin
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CRSP	Cordes Ranch Specific Plan
CSA	County Service Area
CSD	Mountain House Community Services District
CTPA	California Timberland Productivity Act
CTR	Commuter Trip Reduction
CUPA	Certified Unified Program Agencies
CY	cubic yards
CVFPB	Central Valley Flood Protection Board
CVFPP	Central Valley Flood Protection Plan



INTERNATIONAL PARK OF COMMERCE PHASE 2

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CVFT	Central Valley Farmland Trust
CVP	Central Valley Project
CVWQCB	Central Valley Regional Water Quality Control Board
CWA	Clean Water Act
dB	decibel
dBA	A-weighted sound level
DDW	Division of Drinking Water
Delta	Sacramento-San Joaquin River Delta
DOC	California Department of Conservation
DOF	California Department of Finance
DPM	diesel particulate matter
DPR	Department of Parks and Recreation
Draft EIR	Draft Environmental Impact Report
DRMS	Delta Risk Management Study
DTSC	Department of Toxic Substances Control
EDD	California Employment Development Department
EHD	Environmental Health Department
EIA	United States Energy Information Administration
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act
EMS	Emergency Medical Services
EO	Executive Order
EOP	Emergency Operations Plan
EPA	Environmental Protection Agency
EPCA	Energy Policy and Conservation Act
ESA	Environmental Site Assessment
EV	Electric Vehicle
Farallon	Farallon Consulting, LLC
FCAA	Federal Clean Air Act
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHSZ	fire hazard severity zone
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
FRA	Federal Responsibility Area
FSZ	Farmland Security Zone
FTA	Federal Transit Administration
GAMAQI	Guide for Assessing and Mitigating Air Quality Impacts



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

General Plan	San Joaquin County 2035 General Plan Update
Geotech report	Preliminary Geotechnical Exploration Report
GHG	greenhouse gas
GLO	Bureau of Land Management's General Land Office
GPA	General Plan Amendment
gpd	gallons per day
gpm	gallons per minute
GSA	groundwater sustainability agencies
GSP	groundwater sustainability plan
GWh	one million kilowatt-hours
GWP	global warming potential
HAP	Hazardous Air Pollutant
HAZWOPER	Hazardous Waste Operations and Emergency Response
HCP	Habitat Conservation Plan
HCVF	Housing Choice Voucher Program
HFCs	hydrofluorocarbons
HFPO-DA(GenX)	hexafluoropropylene oxide-dimer acid
HMTA	Hazardous Materials Transportation Act
HSC	Health and Safety Code
HVAC	Heating, ventilation, and air conditioning
I-5	Interstate 5
I-205	Interstate 205
I-580	Interstate 580
I/G	General Industrial
I-G/SP-1	General Industrial/Specific Plan-1
IBC	International Building Code
IFC	International Fire Code
IPC Phase 1	International Park of Commerce Phase 1
IPCP2	International Park of Commerce Phase 2
IRA	Inflation Reduction Act
IWMP	Integrated Waste Management Plan
LAFCo	Local Area Formation Commission
LCFS	Low Carbon Fuel Standard
L _{dn}	day/night sound level
LE	Land Evaluation
LEED	Leadership in Energy and Environmental Design
LESA	Land Evaluation and Site Assessment (LESA)
L _{eq}	equivalent sound level
LEV	Low-Emission Vehicle



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

LHMP	Local Hazardous Mitigation Plan
LID	Low Impact Development
L_{max}	maximum instantaneous sound level
LOP	Local Oversight Program
LOS	Level of service
LRA	Local Responsibility Area
LUCI	Governor's Office of Land Use and Climate Innovation
LUSD	Lammersville Unified School District
LZ	lighting zone
MBTA	Migratory Bird Treaty Act
MBR	membrane bioreactor
MCLs	Maximum Contaminant Levels
MEISR	maximally exposed school receptor
MEIR	maximally exposed individual resident
mg/m^3	milligrams per cubic meter
MHFP	Multi-Hazard Functional Plan
MLD	most likely descendant
MMT	million metric tons
mph	miles per hour
$MTCO_2e$	metric tons of carbon dioxide equivalent
MWELO	Model Water Efficient Landscape Ordinance
MWh	megawatt hours
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NEHRP	National Earthquake Hazards Reduction Program
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NF_3	nitrogen trifluoride
NFIP	National Flood Insurance Program
NFPA	National Fire Protection Association
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NMFS	National Marine Fisheries Service
NO_2	nitrogen dioxide
NOA	naturally occurring asbestos
NOAA	National Oceanic and Atmospheric Administration
NOI	Notice of Intent
NOP	Notice of Preparation



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

NOx	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
NPDWRs	National Primary Drinking Water Regulations
NPPA	Native Plant Protection Act
NRCS	National Resource Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetland Inventory
NZEV	Near-zero emission vehicles
O ₃	ozone
OEHHA	Office of Environmental Health Hazard Assessment
OES	San Joaquin County Office of Emergency Services
OSSA	Open Space Subvention Act
PA	pre-aeration
PAX	pre-anoxic
Pb	lead
PFAS	per- and polyfluoroalkyl substances
PFBS	perfluorobutanesulfonic acid
PFCs	perfluorocarbons
PFHxS	perfluorohexanesulfonic acid
PFNA	perfluorononanic acid
PFOA	perfluorooctanoic acid
PFOS	perfluorooctanesulfonic acid
PG&E	Pacific Gas and Electric
PHGs	Public Health Goals
Placer County APCD	Placer County Air Pollution Control District
PM	particulate matter
PM _{2.5}	particulate matter (2.5 microns and less in diameter)
PM ₁₀	particulate matter (10 microns and less in diameter)
ppm	parts per million
PRC	Public Resource Code
Project	International Park of Commerce Phase 2 Project
RCMP	Regional Congestion Management Program
RCNM	Roadway Construction Noise Model
RCRA	Resource Conservation and Recovery Act
RFS	renewable fuel standards
RHNA	Regional Housing Needs Allocation
ROG	reactive organic gas
RPS	Renewable Portfolio Standard
RTD	San Joaquin Regional Transit District



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

RTP	Regional Transportation Plan
RWQCB	Central Valley Regional Water Resources Control Board
SA	Site Assessment
SAFE	Safer Affordable Fuel-Efficient
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategy
sec	Seconds
SF ₆	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SIP	State Implementation Plan
SJCEHD	San Joaquin County Environmental Health Department
SJCOG	San Joaquin Council of Governments
SJCSO	San Joaquin County Sheriff's Office
SJFAC	San Joaquin Area Flood Control
SJMSCP	San Joaquin County Multi-Species Habitat Conservation and Open Space Plan
SJVB	San Joaquin Valley Groundwater Basin
SJVAB	San Joaquin Valley Air Basin
SJVAPCD	San Joaquin Valley Air Pollution Control District
SMAQMD	Sacramento Metropolitan Air Quality Management District
SO ₂	sulfur dioxide
SOI	sphere of influence
SPCC	Spill Prevention Countermeasures and Control Program
SPL	sound pressure level
SRA	State Responsibility Area
SSC	California Species of Special Concern
SSJCFA	South San Joaquin County Fire Authority
STAA	Surface Transportation Assistance Act
Stantec	Stantec Services Inc
STC	sound transmission class
SWMP	Stormwater Management Program
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
SWQCCP	Stormwater Quality Control Criteria Plan
TAC	toxic air contaminant
TCM	transportation control measure



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

TCP	Traditional Cultural Property
TCR	tribal cultural resource
TDA	California Transportation Development Act
TDM	Transportation Demand Management
TDS	Total Dissolved Solids
TIA	Traffic Impact Assessment
TPH	total petroleum hydrocarbons
Tpy	Tons per year
TPZ	Timberland Production Zone
TRFD	Tracy Rural Fire District
TRU	Transportation Refrigeration Unit
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USDOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UV	ultraviolet
VERA	Voluntary Emission Reduction Act
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles travelled
VOC	volatile organic compounds
VTR	vehicle trip reduction
WPRR	Western Pacific Railroad
WSA	Water Supply Assessment
WSID	Westside Irrigation District
ZEV	zero emission vehicle



EXECUTIVE SUMMARY

This document is a Draft Environmental Impact Report (Draft EIR or DEIR) for the International Park Commerce Phase 2 Project (Project). This section of the Draft EIR provides a summary of the Project, the anticipated environmental impacts of the Project, the alternatives, and areas of known controversy to be resolved.

ES.1 PROJECT LOCATION

The Project is located 60 miles east of San Francisco on the eastern slope of the Altamont Pass, adjacent to the City of Tracy (City) and outside of its Sphere of Influence (SOI) within an unincorporated area of the County of San Joaquin (County). The San Joaquin County 2035 General Plan Update (General Plan) designates the Project site as General Agriculture (A-G) and the site is zoned General Agriculture, 40-acre minimum (AG-40).

The 284-acre site is bisected by West Schulte Road, east of the proposed extension of Pavilion Parkway to the west, and south of the proposed extension of Promontory Parkway. The site is undeveloped and the West Side Irrigation District (WSID) Upper Main Canal cuts through the northern portion of the development area. It is composed of four parcels (Assessor's Parcel Number [APN] 209-240-36, APN 209-240-37, APN 209-250-10, and APN 209-250-37). APNs 209-240-36 and 209-240-37 comprise the southern portion of the site, south of West Schulte Road, while APNs 209-250-10 and APNs 209-250-37 make up the northern portion of the site. APNs 209-250-10 and 209-250-37 are bisected by the West Stanislaus Irrigation District (WSID) Canal.

There are a variety of land uses and facilities within the vicinity of the Project area. To the north of the Project site is the Westside Specific Plan (formally called the Gateway Specific Plan), a 535-acre development that would construct a variety of commercial, institutional, and residential land uses, located in the City of Tracy. To the west of the Project site lies the International Park of Commerce Phase 1 Specific Plan, which covers approximately 1,780-acres and envisions commercial, office, business park industrial, and park uses, located in the City of Tracy. To the south of the site is land zoned for general agriculture and industrial uses, the Tracy Biomass plant, and the proposed LBA III Industrial Project. The 421-acre Lammersville community (in unincorporated San Joaquin County) is located to the northwest of the Specific Plan Area. To the north of Lammersville is the City of Mountain House, which at buildout would comprise of 16,105 residential units, 275 acres of commercial uses, 441 acres of industrial uses, 760 acres of open space, 285 acres of school, and 500 acres of public facilities. Agricultural lands and residential and urban development uses are located to the east of the Project site.

ES.2 PROJECT DESCRIPTION

The Project involves the development of approximately 284 acres of land with a variety of warehouse and distribution facilities with internal traffic circulation and vehicle, truck, and trailer parking and outdoor storage, as well as on-site water and wastewater treatment facilities. Project implementation would involve the adoption and implementation of a General Plan Amendment (GPA) and the International Park of Commerce Phase 2 (IPCP2) Specific Plan; the approval of a zone reclassification; and development of the area consistent with the IPCP2 Specific Plan (collectively, the "Project"). The IPCP2 Specific Plan contains



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

land use, circulation, sustainability, design, and infrastructure-related development standards and design guidelines to guide investment and development in the Specific Plan Area. The buildout of the Specific Plan Area evaluated within this EIR represents a conceptual buildout only. Individual building plans for entitlements would be submitted and administratively reviewed by the County for consistency with the Specific Plan, Development Agreement, and Major Subdivision for approval.

ES.2.1 Project Objectives

CEQA Guidelines Section 15124(b) requires that an EIR provide a description of the basic objectives of the proposed project and includes the following reasoning:

- (b) A statement of the objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits.

The primary goal of the Project is the development of the subject site with a productive mix of industrial and logistics-based uses. Complementary project objectives include the following:

- Implement a Specific Plan development supporting industrial and logistics-based uses providing a broad range of long-term employment opportunities, which are much closer to County residents than Bay area job centers requiring long commutes and associated environmental impacts.
- Implement industrial and logistics-based uses providing a broad range of additional construction employment opportunities.
- Provide safe and convenient access for trucks in a manner that minimizes any potential disruption to residential areas.
- Provide industrial uses near existing roadways and infrastructure to reduce traffic congestion and air emissions.
- Facilitate goods movement locally and regionally by placing industrial uses in close proximity to Interstate 205 (I-205), which connects with both Interstate 580 (I-580) and Interstate 5 (I-5).
- Provide land uses that are compatible with surrounding land uses.
- Support the General Plan vision for increased urbanization and uses that increase the County tax base in the area of the County where the Project is located, adjacent to the jurisdictional boundaries of the City of Tracy.
- Establish new development that would further the County's near-term and long-range fiscal goal, by significantly increasing property tax to the County, in addition to other financial benefits.
- Improve the regional jobs/housing balance.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

- Redevelop underutilized agricultural land adjacent to other existing and planned industrial, commercial and other urbanized uses.

ES.2.2 Project Approvals

The Project seeks the following entitlements/approvals from San Joaquin County:

- General Plan Amendment
- IPCSP2 Specific Plan
- Zone Reclassification
- Development Agreement
- Major Subdivisions
- Parcel Maps, Tentative and Final Subdivision Maps
- Zoning Compliance Review and Administrative Permits
- Tree Removal Permit
- Encroachment Permits, Grading Permits, and Building Permits

ES.2.3 Responsible and Trustee Agencies

Under the California Environmental Quality Act (CEQA), a responsible agency is a public agency, other than the Lead Agency, which has responsibility to carry out or approve a project (Public Resource Code [PRC] Section 21069). A trustee agency is a state agency that has jurisdiction by law over natural resources that are held in trust for the people of the State of California (PRC Section 21070). Responsible and Trustee Agencies may include, but are not limited to, the following:

- Bethany-Byron Irrigation District (BBID)
- California Department of Transportation (Caltrans)
- Central Valley Regional Water Resources Control Board (RWQCB)
- San Joaquin Council of Governments (SJCOG)
- San Joaquin County Board of Supervisors
- San Joaquin County Assessor
- San Joaquin County Building Division/Plan Check
- San Joaquin County Public Works
- San Joaquin County Environmental Health
- San Joaquin County Sheriff's Office (SJCSO)



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Executive Summary

- San Joaquin Valley Air Pollution Control District (SJVAPCD)
- Southern San Joaquin County Fire Authority (SSJCFA)
- Tracy Rural Fire District (TRFD)
- U.S. Army Corps of Engineers.
- Department of Food and Agriculture

ES.3 AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED

Section 15123(b)(2) of the State CEQA Guidelines requires that a summary of an EIR identify areas of controversy known to the Lead Agency, including issues raised by agencies and the public. The County distributed a Notice of Preparation (NOP) of the Draft EIR for the Project beginning on March 31, 2023. The NOP was circulated for a 30-day public review and comment period, ending on May 1, 2023. Twenty-two commenters submitted written responses to the NOP and Initial Study. Twelve written comments received were from interested individuals, ten were from agencies including the California Department of Transportation (Caltrans), Native American Heritage Commission (NAHC), and California Air Resources Board (CARB), and one was from the City of Tracy. Written comments received are included in Appendix A. Comments in response to the NOP and Initial Study generally identified the following areas of potential concern:

- Increases in air quality emissions (see Section 3.3) and impacts to climate change (see Section 3.8);
- Increased health risks posed to the population (see Section 3.3);
- Concerns related to an increase in heavy duty trucks trips and an increase in vehicle traffic (see Section 3.16);
- Increases in vibration due to heavy duty trucks on city and county roadways (see Section 3.12);
- Access and encroachment on the WSID canal (see Section 3.10);
- Water resources and supply (see Section 3.10 and Section 3.18);
- Stormwater discharge and stormwater basins capacity (see Section 3.10);
- Loss of agricultural lands (see Section 3.1).

This Draft EIR contains substantial evidence to support the conclusions presented herein. It is possible that there will be disagreement among various parties regarding these conclusions, although the County is not aware of any disputed conclusions at the time of this writing. Both the CEQA Guidelines and case law clearly provide the standards for treating disagreement among experts. Where evidence and opinions conflict on an issue concerning the environment, and the Lead Agency knows of these controversies in advance, the EIR must acknowledge the controversies, summarize the conflicting opinions of the experts, and include sufficient information to allow the public and decision-makers to make an informed judgment about the environmental consequences of the Project.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Executive Summary

The major issues to be resolved by San Joaquin County as Lead Agency include the following:

- Whether the Draft EIR adequately describes the environmental impacts of the Proposed Project.
- Whether the recommended mitigation measures are feasible and/or should be modified/adopted.
- If the Project as proposed should be recommended for approval.
- Participation in the San Joaquin County Multi-Species Conservation Plan.
- Details related to proposed agricultural mitigation.
- Provision of public transit to the Project site.

ES.4 ALTERNATIVES TO THE PROPOSED PROJECT

CEQA requires an evaluation of the comparative effects of a reasonable range of alternatives to the Project that would feasibly attain most of the Project's basic objectives and that would avoid or substantially lessen any of the significant impacts of the Project. For purposes of this Draft EIR, three alternatives to the Project were selected for further analysis, including the No Project Alternative. The project alternatives and their potential impacts are discussed in Section 5.0, Alternatives to the Proposed Project, of this Draft EIR. As authorized under CEQA, the alternatives are discussed in less detail than the Project.

ES.4.1 Alternative 1: No Project Alternative

The No Project Alternative assumes that no development would occur on the Project site. Under this alternative, the Project site would remain undeveloped and operate as an almond orchard.

ES.4.2 Alternative 2: Reduced Size Alternative

The Reduced Size Alternative assumes that the proposed build-out would be reduced to 4.02 million square feet of industrial space, an approximate 25 percent reduction in industrial buildout. The Project boundaries, layout (including disturbance), and industrial end uses would remain the same. The Project would continue to buildout Pavilion Parkway and Promontory Parkway and provide roadway improvements on West Schulte Road. Additionally, the Project would continue to develop on-site water and wastewater treatment facilities.

ES.4.3 Alternative 3: Increased Cold Storage Alternative

The Increased Cold Storage Alternative assumes that the maximum buildout of the site would continue to be approximately 5.36 million square feet of industrial space but assumes that 60 percent of the maximum buildout would be cold storage warehousing. The Project boundaries and layout (including disturbance) would remain the same. The Project would continue to buildout Pavilion Parkway and Promontory Parkway and provide roadway improvements on West Schulte Road. Additionally, the Project would continue to develop on-site water and wastewater treatment facilities.



ES.5 SUMMARY OF IMPACTS AND MITIGATION MEASURES

This Draft EIR analyzes the potential environmental effects of the Project. The Initial Study (Appendix A) determined that the following topics would have either no significant impact or impacts that would be reduced to less than significant with mitigation:

- Agricultural and Forestry Resources (CEQA Guidelines, Checklist Question d)
- Mineral Resources

The Initial Study determined that there would be no impacts related to mineral resources or to forestry resources resulting from implementation of the Project. For a complete discussion of potential impacts identified in the Initial Study, please refer to the specific discussion within the resource section of the Initial Study, included in Appendix A of this Draft EIR. Section 7.0, Effects Found Not to be Significant, also includes a summary of each finding for each resource not discussed in this Draft EIR.

The Initial Study identified potential impacts related to aesthetics, agriculture, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gases, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and services systems, and wildfire requiring a more detailed evaluation, which is discussed in Section 3.0, Environmental Impact Analysis, of this Draft EIR.

Table ES-1, Summary of Impacts and Mitigation Measures from the EIR, summarizes the environmental effects of the Project and the mitigation measures from the Initial Study. Table ES-1, Summary of Impacts and Mitigation Measures from the EIR, has been organized to correspond with environmental issues discussed in Section 3.0, Environmental Impact Analysis, of this EIR. Table ES-1 is arranged in four columns: (1) impacts; (2) level of significance without mitigation; (3) mitigation measures; and (4) level of significance with mitigation.

As indicated in Table ES-1 and discussed in detail in Section 3.0, Environmental Impact Analysis, the analysis conducted for this Draft EIR determined that the Project would result the following significant and unavoidable impacts:

- **Conversion of Prime Farmland.** The Project would convert approximately 281 acres of Prime Farmland and 3 acres of Farmland of Local Importance. The Project would be subject to the County's Agricultural Mitigation Ordinance which requires the preservation of farmland at a 1:1 ratio or a payment of in-lieu fees. The payment of in-lieu fees would not be sufficient to reduce the level of impact. Therefore, the significance after mitigation is significant and unavoidable.
- **Consistency with CEQA Guidelines Section 15064.3(b).** The Project's daily vehicle miles traveled (VMT) would exceed the applicable threshold of significance. Mitigation is proposed requiring the implementation of Transportation Demand Management (TDM) strategies, but it would not fully reduce this impact to a level of less than significant. Therefore, the significance after mitigation is significant and unavoidable.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

- **Generate Greenhouse Gas Emissions that have a Significant Impact on the Environment.** The Project's annual GHG emissions would exceed the applicable threshold of significance derived from other air districts. Mitigation is proposed to reduce emissions from construction, transportation, and on-site operational emissions, but it would not fully reduce this impact to a level of less than significant. Therefore, the significance after mitigation is significant and unavoidable.
- **Conflict with an Applicable Plan, Policy, or Regulation for Reducing GHG Emissions.** The Project would exceed Placer County Air Pollution Control District (Placer County APCD) thresholds of 10,000 metric tons of carbon dioxide equivalent per year (MT CO₂e/year). Mitigation is prepared to reduce emissions from construction, transportation, and on-site operational emissions, but it would not fully reduce this impact to a level of less than significant. Therefore, the significance after mitigation is significant and unavoidable.
- **Generate Substantial Temporary Increase in Ambient Noise Levels.** The Project would produce noise from construction that is anticipated to be more than 5 dB(A) above ambient noise levels in the area depending on the construction equipment and activities. Mitigation is prepared to reduce potential construction noise to nearby residences, but noise levels may continue to exceed 5 dB(A) above ambient noise levels. Therefore, the significance after mitigation is significant and unavoidable.

Additionally, CEQA requires public agencies to establish a mitigation monitoring and reporting program for the purpose of ensuring compliance with those mitigation measures identified in an EIR and/or adopted as conditions of approval in order to mitigate or avoid significant environmental impacts identified in an EIR. A mitigation monitoring and reporting program, incorporating the mitigation measures set forth in this document, would be adopted at the time of certification of the Final EIR.

Table ES-1: Summary of Impacts and Mitigation Measures from the EIR

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Aesthetics			
Have a substantial adverse effect on a scenic vista?	LTS	None required.	LTS
Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	LTS	None required.	LTS
In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings. If the Project	LTS	None required.	LTS



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
is in an urbanized area, the potential of the project to conflict with applicable zoning and other regulations governing scenic quality?			
Create a new source of substantial light or glare which would adversely affect day or nighttime views in an area?	LTS	None required.	LTS
Agricultural and Forestry Services			
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?	S	MM AGR-1. Agricultural Mitigation Ordinance. Prior to the conversion of Important Farmland on the Project site, the Project applicant shall comply with the County's Agricultural Mitigation Ordinance by preserving farmland at a 1:1 ratio. The Project applicant shall either directly complete the acquisition of easements or pay in-lieu fees established on a per-acre basis for the loss of Important Farmland. Fees paid toward the County's program shall be used to fund conservation easements on comparable or better agricultural lands to provide compensatory mitigation.	SU
Conflict with existing zoning for agricultural use, or a Williamson Act contract?	LTS	None required.	LTS
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))?	NI	None required.	NI
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?	LTS	None required.	LTS
Air Quality			
Conflict with or obstruct implementation of the applicable air quality plan?	S	MM AQ-1. Minimize Construction Exhaust Emissions. Exhaust emissions shall be minimized during construction activities with the use of off-road	LTS



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		equipment engines that meet or exceed CARB's Tier 4 Final engine emissions standards for off-road equipment exceeding 50 horsepower (hp). At a minimum, all construction equipment shall be certified as compliant with the Tier 4 Final engine emissions standards as provided in CCR, Title 13, section 2423(b)(1)(B). Engines can achieve these standards through the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, or other options as they become available. This requirement shall be included in construction contracts. MM AQ-2. Construction Equipment Recordings. Project contractors shall keep equipment maintenance records and data sheets, including design specifications, emission control tier classifications, and hours of use. Records shall be kept on-site and be made available to the County or other regulators upon request. This requirement shall be included in construction contracts. MM AQ-3. Electric Hand Tools, Forklifts, and Pressure Washers. Project contractors shall only use electric hand tools, forklifts, pressure washers, and any other off-road equipment with a power rating below 19 kilowatt. This requirement shall be included in construction contracts. MM AQ-4. Designated Construction Charging Area. During construction, an area of the site shall be designated for electric power vehicle and equipment charging. This requirement shall be included in construction contracts. MM AQ-5. Heavy Duty Construction Trucks. During construction, all heavy duty trucks entering the construction site during the grading and building construction phases are required to be model year 2014 or later. This requirement shall be included in construction contracts. MM AQ-6. On-Site Food Options. During construction and operation, the Project Applicant, contractors, and tenants shall allow food trucks on the property in accordance with the allowable hours within the jurisdiction. MM AQ-7. Leadership in Energy and Environmental Design (LEED) Silver Compliance. Prior to the issuance of building permits, the applicant/developer shall demonstrate (e.g., provide building plans) that the proposed buildings are designed to meet the standards of LEED Silver as established by the U.S. Green Building Council. MM AQ-8. Solar Roof Design. Prior to the issuance of building permits, the County shall verify that the	



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		roof structure is designed to support the installation of solar panels. MM AQ-98. On-Site Solar. Prior to the issuance of building permits, the applicant/development shall demonstrate (e.g., provide building plans) that the proposed building rooftops includes enough solar paneling to power the industrial office space. MM AQ-10. Architectural Coatings. Owners, operators, and tenants shall be required to use architectural and industrial maintenance coatings (e.g., paints) applied on the Project site with a maximum VOC content of less than 10 grams per liter (g/L). MM AQ-11. Yard Sweeping. During Project operation, owners, operators, and tenants shall provide periodic yard and parking areas sweeping to minimize dust generation. MM AQ-12. Zero Emission Forklifts and Yard Trucks During Operation. Owners, operators, and tenants shall require all forklifts, yard trucks, and other equipment used for on-site movement of trucks, trailers, and warehoused goods to be electrically powered or zero-emission. The owner, operator, or tenant shall provide on-site electrical charging facilities to adequately service electric vehicles and equipment. MM AQ-13. Truck Idling Restrictions. Owners, operators, or tenants shall be required to make their best effort to restrict truck idling on-site to a maximum of three minutes, subject to exceptions defined by CARB in 13 CCR § 2485. Idling restrictions shall be enforced by highly-visible posting at the site entry, posting at other on-site locations frequented by truck drivers, conspicuous inclusion in employee training and guidance material, and owners, operators, and tenants direct action as required. MM AQ-14. Truck Idling Training. Owners, operators, and tenants shall train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks. MM AQ-15 Heavy Duty Trucks. Owners, operators, and tenants shall ensure that all heavy-duty trucks (Class 7 and 8) domiciled on site are model year 2014 or later from the start of operations. Owners, operators, and tenants shall keep truck maintenance records and data sheets, including model year. Records shall be kept on-site and be made available to the County or other regulators upon request. Domiciled on site vehicles is any vehicle either (i) parked or kept overnight at the qualifying facility(ies) more than 70% of the calendar year or (ii) dedicated to the qualifying facility(ies) site (defined as more	



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		than 70% of the truck routes during the calendar year that start at the qualifying facility(ies) site even if parked or kept elsewhere). The tenant/operator of the qualifying facility(ies) shall not be responsible to meet "clean fleet" requirements for vehicles used by common carriers operating under their own authority that provide delivery services to or from the qualifying facility(ies) site. Lease agreements will require owners, operators, and tenants to comply with this measure. MM AQ-16. Truck Routing Signage. Owners, operators, and tenants shall post signage at every truck exit driveway providing directional information to the truck route. MM AQ-17. Electric Truck Charging. At all times during Project operation, owners, operators, and tenants shall be required to provide electric charging facilities on the Project site sufficient to charge all electric trucks domiciled on the site and such facilities shall be made available for all electric trucks that use the project site. MM AQ-18. Electric Docking Plugs at Cold Storage Facilities. Construction plans shall require electric plugs for electric transportation refrigeration units (TRUs) at every dock door and require truck operators with TRUs to use the electric plugs when loading docks. MM AQ-19. Transportation Refrigeration Units. Owners, operators, and tenants are required to only use plug-in capable TRU trucks on-site. Lease agreements will require owners, operators, and tenants to comply with this measure. MM AQ-20. Diesel Generators. Owners, operators, and tenants shall prohibit the use of diesel generators, except in emergency situations, in which case such generators shall have Best Available Control Technology (BACT) that meets the CARB's Tier 4 emission standards. MM AQ-21. Employee Transit Route Information. Owners, operators, and tenants shall provide employees transit route and schedule information on systems serving the Project area and coordinate ridesharing amongst employees. MM AQ-22. Electric Water Pumps. All water pumps installed on the Project site for the water treatment system are required to be 100% electric. MM AQ-23. Low to Zero VOC Cleaning Products. Owners, operators, and tenants shall only be permitted to use cleaning products rated as low to zero Volatile Organic Compound (VOC) content. Examples of products meeting this standard include cleaning products labeled with the USEPA's Safer Choice Standard label. Under the Safer Choice Standard label products would be restricted to VOC	



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		limits prescribed by the Ozone Transport Commission and CARB. MM AQ-24. Zero Emission Landscaping Equipment. Owners, operators, and tenants shall provide zero emission landscaping equipment or hire from landscaping services that only use zero emission equipment for all landscaping on the Project site. MM AQ-25. Ride Share. Owners, operators, and tenants shall be required to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking. MM AQ-26. Emissions Reductions Programs. The Project Applicant shall provide owners, operators, and tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets. MM AQ-27. Reduction of Remaining Emissions. The Project will be developed over a long-period of time, with future tenants and operators of the contemplated buildings being unknown. Accordingly, due to emerging technologies that come on-line during buildout, emissions are anticipated to reduce in future years, meaning that when the Project or portions thereof are built in the future, emissions may be less than significant when compared to San Joaquin Valley Air Pollution Control District (SJVAPCD) threshold levels ("District Threshold Levels"), and require no additional mitigation measures outside of MM AQ-1 through MM AQ-26 at that time. In order to accurately analyze the Project's air quality emissions as the Project is developed over time to determine whether additional mitigation is needed, the Project Applicant and/or the future owner/operator of a portion of the Project will work with the County, prior to the County's issuance of a final permit needed to install tenant improvements within a particular building for a future operator within the Project (the "Development"), to evaluate the potential criteria air pollutant emissions that may come from the Project at that time (including any potential reductions in assumed emissions that may result from the advent of cleaner technologies to be used in both the construction and operation phases), and compare the Project-wide estimated emissions at that time to the District Threshold Levels ("Updated Emissions Analysis"). The County shall perform an Updated Emissions Analyses in connection with each future Development within the Project until the County has determined that the Project's specific and cumulative air quality impacts either do not require further mitigation because the	



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		Project's emissions meet or fall below the District's Threshold Levels, or have been mitigated to a less than significant impact. If, after an Updated Emissions Analysis, the County determines that the Project would comply with the District's Threshold levels, and thus result in a less than significant impact, no additional mitigation is needed in connection with the Project at that time. Alternatively, if the Updated Emissions Analysis demonstrates that the Project at that time exceeds the District's Threshold Levels, the tenant, lessee, or other operating party has the option of implementing one or all of the following measures: enrollment in USEPA SmartWay program, using zero emission light and medium duty vehicles, requiring domiciled trucks to be Model Year 2020 or newer, and/or best available control technology at the time. If the County determines that the implementation of these measures would result in a reduction of the Project's relevant emissions, and render them less than significant (i.e. the Project's emissions do fall below or meet the District's Threshold Levels), and those mitigation measures are complied with, no additional mitigation is needed. In addition to, or as an alternative to, these potential mitigation measures, prior to the County's issuance of the first permit needed to install tenant improvements within a particular building for a the first operator within the Project , the Project Applicant and/or the relevant owner of the Project at that time shall enter into a Voluntary Emissions Reductions Agreement (VERA) with San Joaquin Valley Air Pollution Control District (SJVAPCD) applicable to the entire Project area, the terms of which are described below. The VERA is an air quality mitigation measure by which a developer can voluntarily enter into a contractual agreement with the SJVAPCD to mitigate a development project's impact on air quality. The VERA shall ensure that the Project's emissions of ROG, NOx, and PM10 either meet or remain below the District's Threshold Levels. Under the agreement, the Project Applicant or its successors-in-interest/assigns shall provide funds to the SJVAPCD to administer the implementation of the VERA. The SJVAPCD then identifies emissions reductions projects, funds those projects, and verifies that the specified emission reductions have been successfully achieved. The SJVAPCD considers implementation of a VERA to be a feasible mitigation measure under CEQA, effectively achieving the emission reductions necessary to reduce impacts to a less than significant level. Due to the fact that the Project contemplates multiple phases of development, along with a variety	



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		of different potential operators when the Project is built, the VERA will require the assessment of the Project's air quality impacts on an iterative basis as Developments are proposed to provide an accurate accounting and assessment of the Project's air quality impacts. Further, to accommodate future Development, fees (when necessary) required to be paid pursuant to the VERA will be imposed on a Development by Development basis. The VERA will require the payment of fees to SJVAPCD solely where the County determines that the Project (at the time a particular Development is proposed) would result in air quality impacts that exceed the District Threshold Levels that have not been sufficiently mitigated as each Development within the Project is brought forward. In such a case, the VERA will only require the payment of funds needed to address the additional emissions caused by the Development as well as any cumulative impacts tied to the Development that were not sufficiently mitigated, and resulted in an exceedance of SJVAPCD's thresholds. These payments will only be due immediately prior to the issuance of the final permit needed for the installation and/or construction of tenant improvements for a particular Development. In this way, the VERA will ensure that each Development pays the required fees to offset each Development's pro rata share of impacts and to otherwise offset its share of any cumulative impacts as the Project is developed. Accordingly, when the Project is completed, the Project's specific and cumulative air quality impacts will have been sufficiently mitigated through the Developments' payment of the requisite fees over time. If the County determines at any time that the Project's specific and cumulative air quality impacts have been sufficiently mitigated to remain below SJVAPCD's thresholds at any time, either because mitigation was not required, or because the County has determined that the Project's specific and cumulative impacts have been reduced to a less than significant level (either through the adoption of mitigation measures and/or implementation of the VERA), then no further mitigation is needed. For the purposes of this condition the "District Threshold Levels," shall mean and refer to the District's CEQA significance threshold of 10 tons per year of NO_x, 10 tons per year of VOC/ROG, and 15 tons per year of PM₁₀. This condition herein will ensure that the Project's overall air quality impacts will fall below these District Threshold Levels. MM TRANS-1 and MM TRANS-2 are required.	



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
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?	S	Implement Mitigation Measures AQ-1, AQ-2, AQ-3, AQ-4, AQ-5, AQ-6, AQ-7, AQ-8, AQ-9, AQ-10, AQ-11, AQ-12, AQ-13, AQ-14, AQ-15, AQ-16, AQ-17, AQ-18, AQ-19, AQ-20, AQ-21, AQ-22, AQ-23, AQ-24, AQ-25, AQ-26, AQ-27, TRANS-1 and TRANS-2.	LTS
Expose sensitive receptors to substantial pollutant concentrations?	S	Implement Mitigation Measures AQ-1, AQ-2, AQ-3, AQ-4, AQ-5, AQ-6, AQ-7, AQ-8, AQ-9, AQ-10, AQ-11, AQ-12, AQ-13, AQ-14, AQ-15, AQ-16, AQ-17, AQ-18, AQ-19, AQ-20, AQ-21, AQ-22, AQ-23, AQ-24, AQ-25, AQ-26, AQ-27, TRANS-1 and TRANS-2.	LTS
Results in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	S	MM AQ-28. Designated Smoking Areas. Owners, operators, or tenants shall ensure that any outdoor areas allowing smoking are at least 25 feet from the nearest Project site boundary.	LTS
Biological Resources			
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 regulated by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	S	MM BIO-1 Swainson's Hawk Avoidance. The Project will participate and comply with the requirements of the SJMSCP, which involves the payment of fees and compliance with standard Incidental Take Minimization Measures that would be issued for the Project. Pursuant to the SJMSCP, if construction is scheduled to commence during the nesting season (i.e., between March 1 through August 31) and Swainson's hawks are nesting in or near the Project site, a construction setback of twice the diameter of the drip-line of the nest tree (as measured from under the nest) shall be required until nesting is complete. The Project will implement Standard Take Avoidance Measures for Swainson's hawk: • Perform pre-construction surveys for nesting Swainson's hawks within 14 days prior to the commencement of construction, for construction activities occurring between March 1 and September 15. • In the event a nest is found, then all construction activities shall remain a distance of twice the diameter of the drip-line of the nest tree (as measured from under the nest) until nesting is complete. • If a nest tree becomes occupied during construction activities, then all construction activities shall remain a distance of twice the diameter of the drip-line of the nest tree (as measured from under the nest) until nesting is complete. • Any nest tree removal must occur between September 1 and February 15, when the nests are unoccupied.	LTS



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		MM BIO-2 Burrowing Owl Avoidance. Pursuant to the requirements of the SJMSCP, if construction is scheduled to commence outside of the nesting season (i.e., if construction starts between September 1 and January 31) and burrowing owls are present on the Project site, they shall be passively relocated. In the event that construction commences during the nesting season and burrowing owls are present on the Project site, a 250-foot construction setback from the natal burrow (the burrow where owls lay eggs and raise their young) shall be required until nesting is complete. The Project will implement Standard Take Avoidance Measures for burrowing owl: • Perform pre-construction surveys for burrowing owls within 14 days prior to the commencement of construction. The survey area shall include the Project site and accessible and visible areas within 250 feet of the site. If project activities are delayed or suspended for more than 15 days during the breeding season (February 1 through August 31) an updated survey shall be performed. • In the event that active nests are found during the breeding season (February 1 through August 31), establish a 75-meter no construction setback around each occupied burrow. The setback shall remain in place until a biologist confirms that either egg laying has not commenced, or the young are capable of foraging independently and are capable of independent survival. • If the owls remain on-site after nesting is complete, they may be passively relocated. Prior to relocation, a Burrowing Owl Exclusion Plan (BOEP) shall be prepared and submitted to the SJCOG Habitat Technical Advisory Committee (HTAC) for review and approval. • In the event that owls are found during the non-breeding season (September 1 and January 31), they may be passively relocated. Prior to relocation, a BOEP shall be prepared and submitted to the HTAC for review and approval.	
Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	LTS	None required.	LTS



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
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?	LTS	None required.	LTS
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?	S	MM BIO-3. Pre-Construction Surveys during Nesting Season. If vegetation removal or construction commences during the general avian nesting season (March 1 through July 31), a pre-construction survey for all species of nesting birds shall be required. In the event active nests are found, work in the vicinity of the nests shall be delayed until the young fledge. The distance between the nest and work would depend on the type of nest found. Distances shall be consistent with the recommendations under the SJMSCP or a qualified biologist. Implement Mitigation Measures BIO-1 and BIO-2.	LTS
Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	LTS	None required.	LTS
Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	LTS	None required.	LTS
Cultural Resources			
Have a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	LTS	None required.	LTS
Have a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	S	MM CUL-1 Archaeological Resources. Should buried, unforeseen archaeological deposits be encountered during any Project construction activity, work shall cease within a 50-foot radius of the discovery. The County, and the Project component shall ensure that a qualified professional archaeologist who meets the federal Secretary of the Interior's Standards in archaeology is retained to assess the significance of the find and recommend avoidance or treatment measures. Ground-disturbing work shall not resume within the 50-foot	LTS



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		area until appropriate treatment has been completed.	
Disturb any human remains, including those interred outside of formal cemeteries?	S	MM CUL-2. Unknown Buried Resources. In the event that human remains, or any associated funerary artifacts are discovered during Project construction, all ground-disturbing work within 50 feet of the discovery shall cease and, in accordance with requirements of the PRC Section 15064.5(e), PRC Section 5097.98, and the California Health and Safety Code (Section 7050.5), the San Joaquin County Sheriff/Coroner shall be contacted immediately. If the remains are deemed to be of Native American origin, the Sheriff/Coroner will notify the NAHC, which will in turn appoint an MLD to act as a tribal representative. The MLD will work with the Project proponent and a qualified archaeologist to develop a plan for the proper treatment of the human remains and any associated funerary objects. Ground-disturbing activities shall not resume within 50 feet of the discovery until treatment has been completed.	LTS
Energy			
Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?	LTS	Implement Mitigation Measures AQ-7, AQ-8, AQ-9, AQ-12, AQ-24, TRANS-1, and TRANS-2.	LTS
Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	LTS	Implement Mitigation Measures AQ-7, AQ-8, AQ-9, AQ-12, AQ-13, AQ-24, AQ-25, TRANS-1, and TRANS-2.	LTS
Geology			
Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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?	NI	None required.	NI
Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or	S	MM GEO-1 Implement Geotechnical Design Recommendations. Prior to the issuance of grading permits, the Applicant shall incorporate all design specifications and recommendations contained within the Preliminary Geotechnical Exploration Report prepared for the Project by	LTS



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
death involving strong seismic ground shaking?		ENGEO into relevant projects plans and specifications. These specifications pertain to but are not limited expansive soils, building foundations, foundation drainage, and backfill of excavations. The Applicant shall comply with all recommendations identified in the Preliminary Geotechnical Exploration Report. The Project site plans shall include any geotechnical design specification and recommendations required within the Preliminary Geotechnical Exploration Report and be submitted to the County and reviewed as part of the building permit review process.	
Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?	S	Implement Mitigation Measure GEO-1.	LTS
Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?	LTS	None required.	LTS
Result in substantial soil erosion or the loss of topsoil?	LTS	None required.	LTS
Located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	S	Implement Mitigation Measure GEO-1.	LTS
Located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	S	Implement Mitigation Measure GEO-1.	LTS
Located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	S	Implement Mitigation Measure GEO-1.	LTS
Have soils incapable of adequately supporting the use of septic tanks or	LTS	None required.	LTS



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?			
Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	S	MM GEO-2 Procedures of Inadvertent Discovery of Paleontological Resources. In the event that unknown paleontological resources are discovered during earth-moving activities, the construction crew shall immediately cease work in the vicinity of the find and notify the County. Work shall be halted until a qualified paleontologist can evaluate the find and make recommendations. If the deposits of paleontological materials cannot be avoided by project activities, the County shall confirm that the Project Applicant has retained a qualified paleontologist to evaluate the potential historic significance of the resource. If the deposits are determined to be non-significant by a qualified paleontologist, avoidance is not necessary. If the deposits are determined to be potentially significant, the resource shall be avoided if feasible. If avoidance is not feasible, the qualified paleontologist shall make recommendations and prepare a recovery plan. The recovery plan may include, but is not limited to, a field survey, construction monitoring, sampling and data recovery procedures, museum curation for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the County to be necessary would be implemented before construction activities can resume at the site where the paleontological resources were discovered.	LTS
Greenhouse Gas Emissions			
Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	S	Implement Mitigation Measures AQ-1, AQ-2, AQ-3, AQ-4, AQ-5, AQ-6, AQ-7, AQ-8, AQ-9, AQ-10, AQ-11, AQ-12, AQ-13, AQ-14, AQ-15, AQ-16, AQ-17, AQ-18, AQ-19, AQ-20, AQ-21, AQ-22, AQ-23, AQ-24, AQ-25, AQ-26, AQ-27, TRANS-1 and TRANS-2.	SU
Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	S	Implement Mitigation Measures AQ-1, AQ-2, AQ-3, AQ-4, AQ-5, AQ-6, AQ-7, AQ-8, AQ-9, AQ-10, AQ-11, AQ-12, AQ-13, AQ-14, AQ-15, AQ-16, AQ-17, AQ-18, AQ-19, AQ-20, AQ-21, AQ-22, AQ-23, AQ-24, AQ-25, AQ-26, AQ-27, TRANS-1 and TRANS-2.	SU
Hazards			
Create a significant hazard to the public or the environment through the routine transport, use, or	S	MM HAZ-1 Soil Management Plan. Prior to the issuance of any construction of any construction permits, the Applicant shall prepare a Soil Management Plan for the site to address the	LTS



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
disposal of hazardous materials?		handling of any planned excavation within the out-of-use Shell pipeline easement to ensure proper adherence to the 2019 Soil Management Plan. The Soil Management Plan shall outline protocol for ensuring the proper handling and/or disposal of impacted soil and/or subsurface features of concern that may be encountered during excavation activities on the out-of-use Shell pipeline easement area. The Soil Management Plan shall be implemented during all construction activities within the Shell pipeline easement area. MM HAZ-2 Dry Well Re-abandonment. Prior to any grading work within 300-feet of the identified well on APN 2009-250-37, the Applicant shall work with the California Department of Conservation, Geologic Energy Management Division (CalGEM) to ensure that the dry well has been properly abandoned per CalGEM standards. MM HAZ-3 Hazardous Materials Management Plan. Prior to building occupancy, in the event that building operations would store or handle hazardous materials, the owner, operator, or tenant shall prepare a Hazardous Materials Business Plan (HMMP) and ensure that the plan is implemented prior to the start of operational activities. The HMMP shall include a map and inventory of all hazardous materials located at the site and contain contingency plans for accidents, designate an individual or individuals as emergency coordinator(s), and ensure that all employees understand the potential for accidents and the appropriate response. The HMMP shall be prepared in accordance with federal, state, and local laws pertaining to hazardous materials and waste. The HMMP shall be updated and revised as needed to reflect changes in Project occupancy or activities by Project occupants. Implement Mitigation Measure HYD-1.	
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?	S	Implement Mitigation Measures HAZ-1, HAZ-2, HAZ-3, and HYD-1	LTS
Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter	NI	None required.	NI



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
mile of an existing or proposed school?			
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?	LTS	None required.	LTS
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?	LTS	None required.	LTS
Impair implementation of or physical interfere with an adopted emergency response plan or emergency evacuation plan?	LTS	None required.	LTS
Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	LTS	None required.	LTS
Hydrology and Water Quality			
Violate water quality standards or waste discharge requirements or otherwise substantially degrade surface of groundwater quality?	S	MM HYD-1 Prepare and Implement a SWPPP. Prior to the issuance of any construction-related permits, the applicant shall prepare and submit a Notice of Intent (NOI) to the SWRCB and prepare a SWPPP in compliance with the NPDES General Construction Permit. The SWPPP shall include a detailed, site-specific listing of the potential sources of stormwater pollution; pollution prevention measures (erosion and sediment control measures and measures to control non-stormwater discharges and hazardous); description of the type and location of erosion and sediment control BMPs to be implemented at the project site; and a BMP monitoring and maintenance schedule to determine the amount of pollutants leaving the project site. A copy of the SWPPP must be current and remain on-site. Water quality BMPs identified in the SWPPP could include but are not limited to the following:	LTS



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		• Surface water runoff shall be controlled by directing flowing water away from critical areas and by reducing runoff velocity. Diversion structures, such as terraces, dikes, and ditches, shall collect and direct runoff water around vulnerable areas to prepared drainage outlets. • Surface roughening, berms, check dams, hay bales, or similar devices shall be used to reduce runoff velocity and erosion. • Sediment shall be contained when conditions are too extreme for treatment by surface protection. Temporary sediment traps, filter fabric fences, inlet protectors, vegetative filters and buffers, or settling basins shall be used to detain runoff water long enough for sediment particles to settle out. Construction materials, including topsoil and chemicals, shall be stored, covered, and isolated to prevent runoff losses and contamination of groundwater. • Topsoil removed during construction shall be carefully stored and treated as an important resource. Berms shall be placed around topsoil stockpiles to prevent runoff during storm events. • Fuel and vehicle maintenance areas shall be established away from all drainage courses, and these areas shall be designed to control runoff. • Temporary erosion control measures, such as silt fences, staked straw bales, and temporary revegetation, shall be employed for disturbed areas. No disturbed surfaces will be left without erosion control measures in place during the winter and spring months. • A spill prevention and countermeasure plan shall be developed to identify proper storage, collection, and disposal measures for potential pollutants (such as fuel, fertilizers, pesticides, etc.) used on-site. The plan will also require the proper storage, handling, use, and disposal of petroleum products. • Construction activities shall be scheduled to reduce land disturbance during peak runoff periods and to the immediate area required for construction. Soil conservation practices shall be completed during the fall or late winter to reduce erosion during spring runoff. Existing vegetation will be retained where possible. To the extent feasible, grading activities shall be limited to the immediate area required for construction.	



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		The Applicant shall implement all BMPs and comply with any other conditions identified in the approved SWPPP. MM HYD-2 Obtain Industrial General Permit. Per the requirements of the State Water Resources Control Board, industrial activities involving vehicle maintenance, cleaning equipment, mechanical repairs, painting, or fueling shall obtain coverage under the NPDES Industrial General Permit (Order No. 2014-0057-DWQ). The Applicant and individual tenants shall prepare and implement an operational SWPPP, eliminate unauthorized non-stormwater discharges. The post-operational SWPPP shall also include a spill prevention and countermeasure plan that identifies the proper storage, collection, and disposal measures for potential pollutants used onsite. Implement Mitigation Measure HAZ-3.	
Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	LTS	None required.	LTS
Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- of off-site?	S	Implement Mitigation Measures HYD-1 and HYD-2.	LTS
Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	LTS	None required.	LTS



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would 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?	S	Implement Mitigation Measures HYD-1 and HYD-2.	LTS
Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flows?	LTS	None required.	LTS
Risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones?	NI	None required.	NI
Conflict with or obstruct implementation of water quality control plan or sustainable groundwater management plan?	S	Implement Mitigation Measures HYD-1 and HYD-2.	LTS
Land Use and Planning			
Physically divide an established community?	LTS	None required.	LTS
Conflict with applicable land use plans, policies or regulations adopted to avoid or mitigate an environmental effect?	LTS	None required.	LTS
Noise			
Result in the generation of substantial temporary or permanent increase in ambient noise levels in the	S	MM NOI-1: Construction Activity. All construction activity shall follow the hours restrictions listed in the San Joaquin County Development Title Update Document. The following construction noise	SU



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
vicinity of the project in excess of standards established in local general plan or noise ordinance, or other applicable standard of other agencies?		reduction measures listed in Section 12.1.3 "Mitigation of Construction Noise" in the Transit Noise and Vibration Impact Assessment document shall also be incorporated to reduce the noise impact to the community: Design Considerations and Project Layout - Construct noise barriers, such as temporary walls or piles of excavated material, between noisy activities and noise-sensitive receptors. - Re-route truck traffic away from residential streets. Select streets with the fewest homes if no alternatives are available. - Site equipment on the construction lot as far away from noise-sensitive sites as possible. - Construct walled enclosures around especially noisy activities or clusters of noisy equipment. Sequence of Operations - Combine noisy operations to occur in the same time period. The total noise level produced will not be substantially greater than the level produced if the operations were performed separately. - Again, avoid nighttime activities (as stated in the San Joaquin County Development Title Update Document). Sensitivity to noise increases during the nighttime hours in residential neighborhoods. Alternative Construction Methods - Use specially quieted equipment, such as quieted and enclosed air compressors and properly working mufflers on all engines. Mitigation Plan - Describe and commit to a mitigation plan that will be developed later when the information is available to make final decisions (not often available during the project development phase) on all specific mitigation measures. The objective of the plan should be to minimize construction noise using all reasonable (e.g., cost vs. benefit) and feasible (e.g., possible to construct) means available, including the measures listed above. The mitigation plan will be submitted as part of the building permit process. - Designate a "disturbance coordinator" who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem be implemented. Visibly post a	



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.	
Result in the generation of excess groundborne vibration or groundborne noise levels?	LTS	None required.	LTS
Expose people residing or working in the project area to excessive noise levels, as the Project is not 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?	LTS	None required.	LTS
Population and Housing			
Include 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)?	LTS	None required.	LTS
Displace substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere?	NI	None required.	NI
Public Services			
Result in substantial adverse physical impacts associated with the provision of new or physical altered governmental facilities, need for new or physical 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	LTS	None required.	LTS



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
related to fire and emergency services?			
Result in substantial adverse physical impacts associated with the provision of 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 related to police services?	LTS	None required.	LTS
Result in substantial adverse physical impacts associated with the provision of 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 related to schools?	LTS	None required.	LTS
Result in substantial adverse physical impacts associated with the provision of 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 related to parks.	LTS	None required.	LTS
Result in substantial adverse physical impacts associated with the provision of new or physical altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause	LTS	None required.	LTS



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives related to other public services?			
Recreation			
Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	LTS	None required.	LTS
Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	LTS	None required.	LTS
Transportation			
Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	S	MM TRANS-1. Bus Service. The Project Applicant will ensure that the Project's internal transportation facilities are designed to accommodate future bus service in accordance with San Joaquin RTD's standards. Appropriate internal provisions, including bus pullouts and shelters in accordance with San Joaquin RTD's standards will be provided. The Project Applicant shall coordinate with San Joaquin RTD and TRACER to ensure that the Project is designed to serve the extension of fixed-route bus service to the Project site in accordance with the S RTP.	SU
Conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision(b)?	S	MM TRANS-2. Transportation Demand Management Strategies. The Project Applicant shall develop a TDM Plan for the Project, including any anticipated phasing, and shall submit the TDM Plan to the County for review and approval. The TDM Plan shall identify trip reduction strategies as well as mechanisms for funding and overseeing the delivery of trip reduction programs and strategies. The TDM Plan shall be designed to achieve the maximum feasible trip reduction. The TDM Plan shall describe which measures apply to the entire site and which, if any, apply on a parcel-by-parcel basis. The TDM plan shall indicate the estimated vehicle trip reduction (VTR) for each strategy proposed based on published research or guidelines. For TDM measures containing ongoing operational VTR	SU



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		strategies, the Plan shall include an ongoing monitoring and enforcement program to ensure the Plan is implemented on an ongoing basis during project operation. For VTR strategies involving physical improvements, the project shall obtain the necessary permits/approvals from the County and install the improvements prior to the completion of the applicable Phase of the project. Applicant will resubmit the TDM Plan if there is a material change in the expected travel characteristics (i.e. number of employees, commute distance) resulting from a deviation from the permitted uses (i.e., unit count, use type, phasing).	
Substantially increase hazards due to geometric design feature (e.g., sharp curves or dangerous intersection(s) or incompatible uses (e.g., farm equipment))?	LTS	None required.	LTS
Result in inadequate emergency access?	S	MM TRANS-3. Fire Requirements. In accordance with South San Joaquin County Fire Authority requirements and design standards, provide even surface pavement, appropriate signage, delineation, and other features at all emergency access points and internal roadways to accommodate emergency vehicles. As part of the Project's final design and permitting process seek and obtain approval of the South San Joaquin County Fire Authority.	LTS
Tribal			
Cause a substantial adverse change in the significance of a TCR, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe?	NI	None required.	NI
Utilities and Service Systems			
Require or result in the location of construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas,	LTS	Implement Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, CUL-1, GEO-1, GEO-2, HAZ-1, HAZ-2, HAZ-3, AQ-1, AQ-2, AQ-3, AQ-4, and AQ-5.	LTS



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
or telecommunications facilities, the construction or relocation of which would cause significant environmental effects?			
Have sufficient water supply available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?	LTS	None required.	LTS
Result in a determination by the wastewater treatment provider which serves or may serve the Project that it does not have adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?	NI	None required.	NI
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?	LTS	None required.	LTS
Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	LTS	None required.	LTS
Wildfire			
Substantially impair an adopted emergency response plan or emergency evacuation plan?	LTS	None required.	LTS
Exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, due to slope, prevailing winds, and other factors?	NI	None required.	NI
Require the installation or maintenance of associated	NI	None required.	NI



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
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?			
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?	NI	None required.	NI

Notes:

LTS = less than significant; S = significant; SU = significant and unavailable; NI = no impact



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Executive Summary

ES.6 REVIEW OF THE DRAFT EIR

The Draft EIR will be available for public review for the statutory 45-day review period and will circulate from June 19, 2026 to August 3, 2026. The Draft EIR is available electronically on San Joaquin County's project webpage: sjgov.org/departments/cdd/planning/prologis.

This Draft EIR is available for a 45-day public review and comment period from June 19, 2026 to August 3, 2026. Agencies, organizations, and individuals are invited to comment on the information presented in the Draft EIR during this period. Specifically, comments are requested on the scope and adequacy of the environmental analysis presented herein. All comments on the Draft EIR should be sent to the following County contact:

Brian Millar, Contract Planner
San Joaquin County, Community Development Department
1810 E. Hazelton Avenue
Stockton, CA 95205
209-953-7509
bmillar@sjgov.org



1.0 INTRODUCTION

This Draft Environmental Impact Report (Draft EIR or DEIR) is prepared in accordance with the California Environmental Quality Act (CEQA) to evaluate the potential environmental impacts associated with the International Park of Commerce Phase 2 (IPCP2) Specific Plan Project (Project) proposed in San Joaquin County (County), west of the City of Tracy. This document is prepared in conformance with CEQA (California Public Resources Code [PRC] Section 21000, *et seq.*) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Section 15000, *et seq.*). This Draft EIR is intended to serve as an informational document for the public agency decision makers and the public regarding the Project.

This Draft EIR evaluates potential environmental impacts resulting from the approval and implementation of the IPCP2 Specific Plan Project (Project). The IPC2 Specific Plan Project consists of the following proposed development entitlements:

- Adoption and implementation of a General Plan Amendment (GPA) from General Agriculture to the General Industrial within the 2035 San Joaquin County General Plan (General Plan)
- Adoption of a Zone Reclassification and Development Title Text Amendment to allow for the IPC2 Specific Plan
- Adoption of the IPCP2 Specific Plan
- Approval of a development agreement
- Major Subdivision (Tentative Map).

Implementation of these components is collectively referred to as the “Project.” The IPCP2 Specific Plan contains land use, circulation, sustainability, design, and infrastructure-related development standards and design guidelines to guide investment and development in the Specific Plan Area. The analysis included herein is based these on conceptual development components that are feasible under the IPCP2 Specific Plan. This conceptual buildout proposes the development of 284-acres of land with 5.36 million square feet (sf) of warehouse and distribution facilities. The Project would also include vehicle, truck, and trailer parking and outdoor storage, on-site water and wastewater treatment facilities, and off-site improvements West Schulte Road and the extension of Promontory Parkway and Pavilion Parkway to the Project site. The Project site is currently in agricultural use, with almond orchards planted across the site. Approximately 36,270 almond trees would be removed as part of the Project.

1.1 THE ENVIRONMENTAL REVIEW PROCESS

CEQA requires public agencies to identify, disclose, and consider the potential environmental impacts of proposed discretionary actions that lead agencies are considering for approval. A project that may have a significant impact on the environment cannot be approved unless the Lead Agency makes the approval contingent upon the implementation of mitigation measures that would reduce or avoid that impact to the extent feasible. When a project may have significant environmental impacts, the Lead Agency must prepare an EIR before it considers whether to approve the project.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Introduction

San Joaquin County, as the Lead Agency for the Project, has prepared this Draft EIR for public review and comment. As discussed below, this Draft EIR will be available for review and comment by public agencies and the general public for a period of 45 days. Prior to considering the Project, the County will prepare a Final EIR that includes the Draft EIR, the comments received on the Draft EIR, written responses to those comments, a list of commenters, and any revisions being made to the Draft EIR in response to the comments. The Final EIR will be considered by the City's discretionary bodies when taking action on the Project.

1.1.1 Purpose and Authority

This Draft EIR has been prepared pursuant to the State CEQA Guidelines (CCR Title 14, Section 15000, *et seq.*). CEQA requires that state and local government agencies consider the environmental consequences of projects over which they have discretionary authority before acting on those projects (PRC 21000 *et seq.*).

According to CEQA Guidelines Section 15064(f)(1), preparation of an EIR is required whenever a project may result in a significant adverse environmental impact. The purpose of this Draft EIR is to analyze the potential environmental impacts of the Project, to indicate ways to reduce or avoid potential environmental impacts associated with the Project, and to identify alternatives to the Project that reduce or avoid significant environmental impacts. CEQA requires that each public agency mitigate or avoid the significant environmental effects of projects it approves or implements whenever feasible.

An EIR is an informational document used in state, regional, and local planning and decision-making processes to meet the requirements of CEQA. The purpose of the EIR is not to recommend approval or denial of a project. However, the County's decision whether to approve or to deny the project must take into consideration the information provided by the EIR. A public agency may approve a project even if it would result in significant and unavoidable environmental impacts, provided the agency adopts a statement of overriding considerations.

The Draft EIR must disclose the following: the Project's environmental effects, including those that cannot be avoided; the Project's growth inducing effects; the Project-related effects found not to be significant; and cumulative impacts.

1.1.2 Type of Environmental Impact Report

In accordance with CEQA Guidelines Section 15161, this document is a programmatic EIR that examines the environmental impacts of a specific project.

The programmatic level of analysis for IPCP2 has been prepared pursuant to CEQA Guidelines Section 15168. Under Section 15168(c), "[l]ater activities in the program must be examined in the light of [a] program EIR to determine whether an additional environmental document must be prepared." Two general outcomes are possible: the later activity may be found to be "within the scope of the project covered by the program EIR," in which case "no new environmental document would be required;" or such a finding cannot be made and a new project-specific Mitigated Negative Declaration or EIR would be required, depending on the severity of the effects of the later activity.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Introduction

Section 15168(c)(4) directs that “[w]here the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR.”

Section 15168(c)(2) provides that “[i]f the agency finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the Lead Agency determines based on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.”

For any later activity covered in whole or in part in the program EIR, “[a]n agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program” (CEQA Guidelines Section 15168(c)(2)). This document addresses the potentially significant adverse environmental impacts (both project level and programmatic) that may be associated with the planning, construction, or operation of the proposed project. It also identifies appropriate and feasible mitigation measures and alternatives that may be adopted to significantly reduce or avoid these impacts.

CEQA requires that an EIR contain, at a minimum, certain specific elements. These elements are contained in this Draft EIR and include:

- Table of Contents
- Executive Summary
- Introduction
- Project Description
- Environmental Setting, Significant Environmental Impacts, and Mitigation Measures
- Cumulative Impacts
- Significant Unavoidable Adverse Impacts
- Alternatives to the Proposed Project
- Growth-Inducing Impacts (Addressed in Chapter 6, Other CEQA Considerations) Areas of Known Controversy

Additional resource specific studies and modeling, including air quality, cultural resources, noise, and traffic, have been prepared for this programmatic EIR to provide detailed information about the Project’s potential impacts on the environment.

1.1.3 Lead Agency Determination

The County is designated as the Lead Agency for the Project. CEQA Guidelines Section 15367 defines the Lead Agency as, “...the public agency, which has the principal responsibility for carrying out or approving a project.” Other public agencies may use this document in their decision making or permit processes (e.g., Department of Water Resources, Bay Area Air District [BAAD], California Department of Transportation [Caltrans], Local Agency Formation Commission [LAFCO] etc.).



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Introduction

This Draft EIR was prepared by the County with technical assistance provided by Stantec Consulting Services Inc. (Stantec), an environmental consultant. Prior to public review, this Draft EIR was extensively reviewed and evaluated by the County staff and, as such, the Draft EIR reflects the independent judgment and analysis of the County, as required by CEQA. Lists of organizations and persons consulted and the report preparation personnel are provided in Section 8.0, List of Preparers, of this Draft EIR.

1.2 SCOPE OF DRAFT EIR

Pursuant to CEQA and the CEQA Guidelines, a Lead Agency shall focus an EIR discussion on potentially significant environmental effects and may limit discussion on other effects to brief explanations about why they are not significant (PRC Section 21002.1, CEQA Guidelines Section 15128). Stantec Consulting Services Inc prepared an Initial Study for the Project in September 2022. The Initial Study included a determination of which impacts would be potentially significant, comments received as part of the public scoping process (Appendix A), and an analysis of relevant Project data obtained during preparation of this Draft EIR. The County distributed a Notice of Preparation (NOP) of a Draft EIR for the Project beginning on March 31, 2023. The NOP was distributed for a 30-day comment period that ended on May 1, 2023. The Public Scoping Meeting on the Draft EIR for the Project was held on April 10, 2023. The comments received on the NOP and during the Public Scoping Meeting were considered in the preparation of this Draft EIR. The scope of this Draft EIR includes the potential impacts identified in the NOP and issues raised by agencies and the public in response to the NOP.

Within the IS, environmental issues and resource topics determined not to be significant were analyzed. The County has determined that the Project did not have the potential to result in significant impacts to Mineral Resources or the loss of forest land and the impacts were scoped out the Draft EIR evaluation (see Section 1.2.2, Environmental Issues Determined Not to Be Significant). The Initial Study concluded that the Project has the potential to result in significant environmental impacts on the following resources, which are addressed in detail in this Draft EIR.

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use
- Noise
- Population Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Introduction

- Wildfire

The environmental issues and resource topics with the potential to result in significant environmental impacts were evaluated further in this EIR.

Table 1.2.1 lists the comments received during the Project scoping period. Comments received prior to or during the Project scoping period and how they were addressed within the EIR are discussed in greater detail in each resource chapter of the document.

Table 1.2-1: Comments Received on the NOP

Affiliation	Signatory	Date	Comment Description	CEQA Document Section Where Comment is Addressed
Private Parties – Written Comments Received				
Central Valley Regional Water Quality Control Board	Peter Minkel	May 2, 2023	Requests adherence with Basin plan, including list of standard permitting and compliance measures.	• EIR Section 3.10, Hydrology and Water Quality
California Department of Transportation	Tom Dumas	May 1, 2023	Recommends complete street approach and accommodation for alternate modes of transportation.	• EIR Section 3.16, Transportation
California Air Resources Board	Robert Krieger	April 28, 2023	Concern related to the potential cumulative health impacts, including a list of recommended construction measures for warehouse and distribution center projects.	• EIR Section 3.3, Air Quality • EIR Section 3.6, Energy • EIR Section 3.8, Greenhouse Gas Emissions • EIR Section 3.16, Transportation
San Joaquin County Environmental Health Department	Aldara Salinas	May 1, 2023	No comment.	
Interested Individual	Dale and Patricia Brandes	April 24, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related to traffic, crime, air pollution, water drainage, toxic runoff, and vibration impacts of proposed Project.	• EIR Section 3.3, Air Quality • EIR Section 3.8, Greenhouse Gas Emissions • EIR Section 3.9; Hazards and Hazardous Materials • EIR Section 3.10, Hydrology and Water Quality • Section 3.12, Noise



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Introduction

Affiliation	Signatory	Date	Comment Description	CEQA Document Section Where Comment is Addressed
				- Section 3.14, Public Services - Section 3.16, Transportation
California Department of Justice	Christie Vosburg	April 11, 2023	Recommendation to use Attorney General's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document, to reduce impacts to sensitive receptors.	- EIR Section 3.3, Air Quality - EIR Section 3.6, Energy - EIR Section 3.8, Greenhouse Gas Emissions - Section 3.16, Transportation
San Joaquin Farm Bureau Federation	Andrew Watkins	May 1, 2023	Concerns related to impacts to prime agricultural land and zone reclassification to industrial uses.	- EIR Section 3.2, Agriculture and Forestry Resources - EIR Section 3.11, Land Use and Planning
Hazen Brown, on behalf of Byron-Bethany Irrigation District	Adam Brown	May 1, 2023	Concerns related to undergrounding of utilities, stormwater detention basins, site utilities, traffic circulation, and water resources and supplies.	- EIR Section 3.6, Energy - EIR Section 3.7, Geology and Soils - EIR Section 3.10, Hydrology and Water Quality - EIR Section 3.16, Transportation - EIR Section 3.18, Utilities and Service Systems
Mitchell Tsai, on behalf of Nor Cal Carpenters	Mitchell Tsai	May 1, 2023	Commenter seeks to require the use of a local workforce, as well as air quality. Energy, greenhouse gas emissions and transportation.	- EIR Section 3.3, Air Quality - EIR Section 3.6, Energy - EIR Section 3.8, Greenhouse Gas Emissions - EIR Section 3.17, Transportation
Native American Heritage Commission	Priscilla Torres-Fuentes	April 3, 2023	Referral response and restatement of AB 52 and SB 18 requirements.	EIR Section 3.17, Tribal Cultural Resources
San Joaquin County Mosquito and	John Fritz	April 6, 2023	Requirement to incorporate mosquito prevention best management practices.	EIR Section 3.10, Hydrology and Water Quality



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Introduction

Affiliation	Signatory	Date	Comment Description	CEQA Document Section Where Comment is Addressed
Vector Control District				
Interested Individual	Patricia Moore	April 27, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related transportation.	EIR Section 3.16, Transportation
Sierra Club	Margo Praus	May 1, 2023	List of conditions of approval including measures related to air quality, greenhouse gas emissions and project setbacks, as well as the Attorney General's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document.	- EIR Section 3.3, Air Quality - EIR Section 3.6, Energy - EIR Section 3.8, Greenhouse Gas Emissions - EIR Section 3.11, Land Use and Planning - EIR Section 3.17, Transportation
San Joaquin Valley Air Pollution Control District	Brian Clements	May 1, 2023	Restatement of Air District's standard requirements and rules that must be complied with, as well as recommendation to enter into a Voluntary Emissions Reduction Agreement.	- EIR Section 3.3, Air Quality - EIR Section 3.6, Energy - EIR Section 3.8, Greenhouse Gas Emissions - EIR Section 3.17, Transportation
Interested Individual	Vannie Dart	April 30, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related to traffic, water drainage, illegal dumping of motor oil runoff, and vibration impacts of proposed Project.	3.9; Hazards and Hazardous Materials - EIR Section 3.10, Hydrology and Water Quality - Section 3.12, Noise - Section 3.16, Transportation
Interested Individual	Wendy Tocchini	April 30, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related to traffic, air pollution, light, and noise impacts of proposed Project.	- EIR Section 3.1, Aesthetics - EIR Section 3.3, Air Quality - EIR Section 3.8, Greenhouse Gas Emissions - Section 3.12, Noise - Section 3.16, Transportation



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Introduction

Affiliation	Signatory	Date	Comment Description	CEQA Document Section Where Comment is Addressed
City of Tracy	Kris Balaji	September 14, 2023	Concerns related to utility (waste, water, stormwater, and fire) infrastructure, traffic impacts, toxic air contaminants, agricultural land, population and housing growth, and land use compatibility.	• EIR Section 3.2, Agricultural and Forestry Impacts • EIR Section 3.3, Air Quality • EIR Section 3.10, Hydrology and Water Quality • EIR Section 3.11, Land Use and Planning • EIR Section 3.13, Population and Housing • EIR Section 3.14, Public Services • EIR Section 3.16, Transportation • EIR Section 3.18, Utilities and Service Systems
Private Parties – Comment Cards at Scoping Meeting				
Interested Individual	Dale and Patricia Brandes	April 10, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related to traffic, crime, air pollution, water drainage, greenhouse gas emissions, and noise impacts of proposed Project.	• EIR Section 3.3, Air Quality • EIR Section 3.8, Greenhouse Gas Emissions • EIR Section 3.10, Hydrology and Water Quality • Section 3.12, Noise • Section 3.14, Public Services • Section 3.16, Transportation
Interested Individual	Dotty Nygard	April 10, 2023	Request to follow Attorney General's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document.	• EIR Section 3.3, Air Quality • EIR Section 3.6, Energy • EIR Section 3.8, Greenhouse Gas Emissions • EIR Section 3.11, Land Use and Planning



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Introduction

Affiliation	Signatory	Date	Comment Description	CEQA Document Section Where Comment is Addressed
				EIR Section 3.17, Transportation
Interested Individual	Keith Vanderveen	April 10, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related to traffic, air quality, noise, groundwater impacts, community impacts, school impacts, and water drainage.	- EIR Section 3.3, Air Quality - EIR Section 3.8, Greenhouse Gas Emissions - EIR Section 3.10, Hydrology and Water Quality - Section 3.12, Noise - Section 3.14, Public Services - Section 3.16, Transportation - EIR Section 3.18, Utilities and Service Systems
Interested Individual	Shawn Strickland	April 10, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related to traffic and illegal dumping of oil and chemicals.	3.9; Hazards and Hazardous Materials - EIR Section 3.10, Hydrology and Water Quality - Section 3.16, Transportation
Interested Individual	Vannie Dart	April 10, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related to community notifications and communication.	- EIR Section 1.0, Introduction - EIR Section 2.0, Project Description
Interested Individual	Wendy Tocchini	April 10, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related to community notifications and communication. Other concerns noted related to traffic, drainage and runoff.	- EIR Section 1.0, Introduction - EIR Section 2.0, Project Description - EIR Section 3.10, Hydrology and Water Quality - EIR Section 3.16, Transportation - EIR Section 3.18, Utilities and Service Systems

Informal oral comments from several participants at the April 10, 2023, Scoping Meeting were also noted. The comments raised primary focused on concerns regarding traffic operations from the Cordes Ranch



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Introduction

Project on Hanson Road, including issues with diesel trucks, traffic noise and air quality. Some individuals expressed concern about the notification radius and felt that adjacent residential communities should be included in Project notifications. Other concerns were raised related to potential impacts to the local high school district and services. Health impacts related to air quality in the San Joaquin Valley were also raised. Participants requested that the transportation evaluations account for the existing baseline of truck traffic, to ensure that impacts are properly evaluated. Incidents of unsafe and speeding trucks along small local streets and illegal dumping of oil, associated with current trucking operations, were also reported.

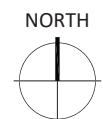
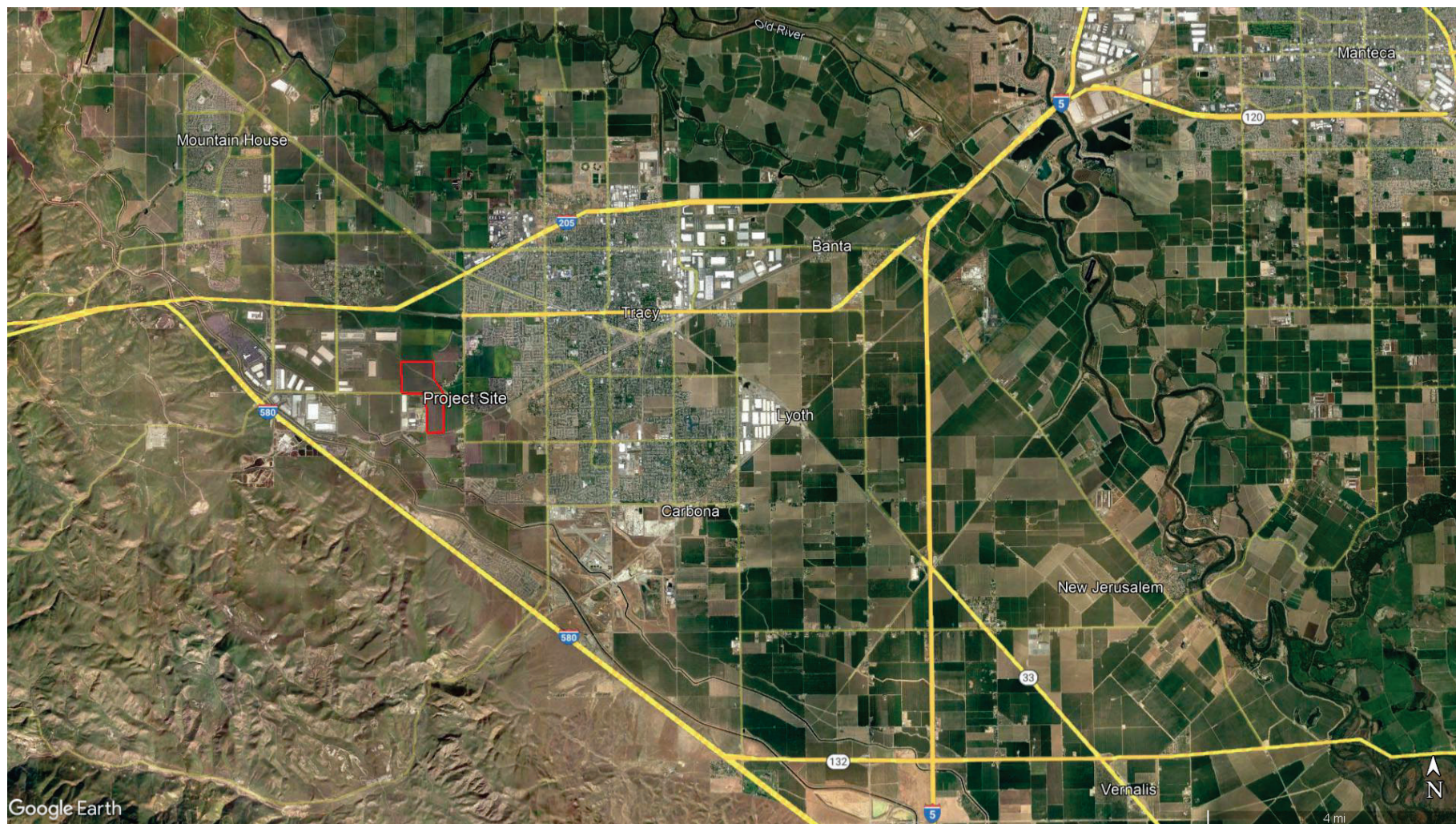
1.2.1 Location

The Project is located approximately 70 miles south of Sacramento and approximately 60 miles east of San Francisco on the eastern slope of the Altamont Pass, adjacent to the City of Tracy and outside of its Sphere of Influence (SOI) within an unincorporated area of the County, see Figure 1. The County's General Plan designates the Project site as General Agriculture (A-G) and the site is zoned A-G 40.

The Project site itself is currently in agricultural use, with almond orchards planted across the site. The 284-acre area is bisected by West Schulte Road, east of the proposed extension of Pavilion Parkway to the west, and south of the proposed extension of Promontory Parkway. The site is undeveloped and the West Side Irrigation District (WSID) Upper Main Canal cuts through the northern portion of the development area. It is composed of four parcels (Assessor's Parcel Number [APN] 209-240-36, APN 209-240-37, APN 209-250-10, and APN 209-250-37). APNs 209-240-36 and 209-240-37 comprise the southern portion of the site, south of West Schulte Road, while APNs 209-250-10 and APNs 209-250-37 make up the northern portion of the site. APNs 209-250-10 and 209-250-37 are bisected by the WSID Canal, see Figures 1 and Figure 2.

Throughout the document, the location of the Project may be referred to the Project site, Project area, or Project vicinity. The Project site is made up of the 284 acres of land where the Project would be developed. The Project area refers to the Project site as well as any off-site improvements. Off-site improvements include the expansion of Pavilion Parkway and Promontory Parkway. The Project vicinity includes the parcels surrounding the Project site.



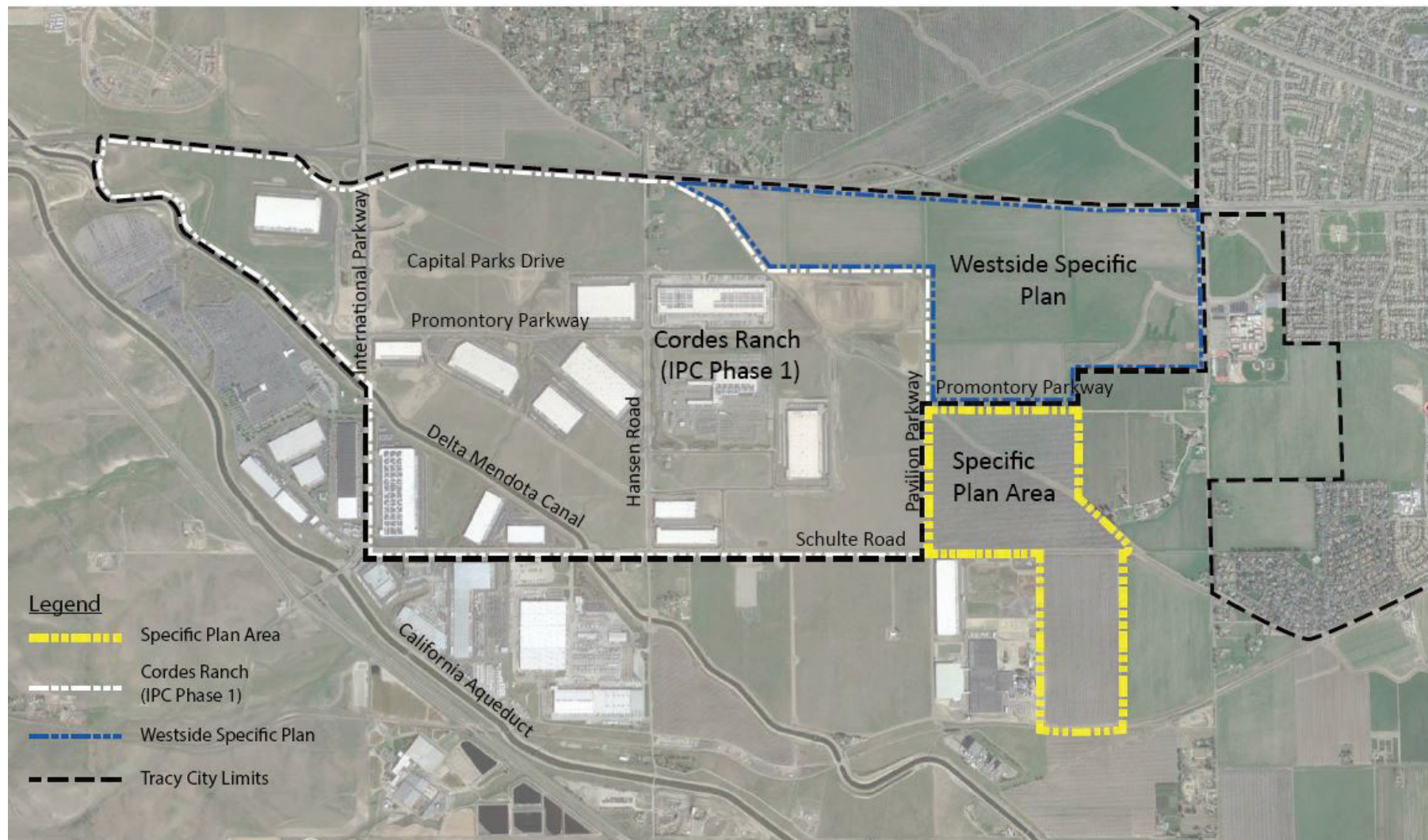


Project Location
San Joaquin County

Project
International Park of Commerce Specific Plan
Phase 2

Figure No.
1
Title

Regional Project Location



Project Location
San Joaquin County

Project
International Park of Commerce Specific Plan
Phase 2

Figure No.
2

Title

Specific Plan Area

1.2.2 Environmental Issues Determined Not to Be Significant

Pursuant to CEQA, the discussion of the potential effects on the physical environment is focused on those impacts that may be significant or potentially significant. CEQA allows a Lead Agency to limit the details of discussion of the environmental effects that are not considered potentially significant (PRC Section 21100, CEQA Guidelines Sections 15126.2[a] and 15128). CEQA requires that the discussion of any significant effects on the environment be limited to substantial or potentially substantial adverse changes in physical conditions that exist within the affected area, as defined in PRC Section 21060.5 (Statutory definition of “environment”). Effects dismissed in an analysis as clearly insignificant and unlikely to occur need not be discussed further in the Draft EIR unless the Lead Agency subsequently receives information inconsistent with the finding (CEQA Guidelines Section 15143).

Based on a review of the Project information provided in the NOP (Appendix A) and comments received as part of the public scoping process (Appendix A), as well as additional research and analysis of relevant project data obtained during preparation of this Draft EIR, the following were identified as resources that would not experience any significant environmental impacts from the Project. Accordingly, these resources are not addressed further in this Draft EIR but are identified below. A brief explanation as to why impacts to each resource are not anticipated, as required by CEQA is provided in Section 7.0, Effects Found Not to Be Significant.

- Agricultural and Forestry Resources (CEQA Guidelines, Checklist Question d)
- Mineral Resources

1.3 ORGANIZATION OF THE DRAFT EIR

This Draft EIR is arranged into the following sections, which contain the contents of an EIR as required by CEQA Guidelines Section 15120 through 15132.

Section ES: Executive Summary. The Executive Summary provides a summary of the Project and the Project alternatives, including a summary of Project impacts, recommended mitigation measures, and the level of significance after mitigation for each environmental issue.

Section 1.0: Introduction. The Introduction provides an overview of the Project and the CEQA process and describes the purpose, scope, and components of this Draft EIR.

Section 2.0: Project Description. The Project Description provides a detailed description of the Project, including the location and Project characteristics. The intended uses of this Draft EIR, Project background, Project objectives, and required Project approvals are also addressed.

Section 3.0: Environmental Impact Analysis. The Environmental Impact Analysis analyzes the environmental effects of the Project. Impacts are organized into major environmental topic areas. Each topic area includes a description of the regulatory setting, environmental setting, significance criteria, Project impacts, mitigation measures, and level of significance after mitigation. The specific environmental topic areas that are addressed in Section 3.0 include the following:



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Introduction

- Section 3.1: Aesthetics
- Section 3.2: Agriculture and Forestry Resources
- Section 3.3: Air Quality
- Section 3.4: Biological Resources
- Section 3.5: Cultural Resources
- Section 3.6: Energy
- Section 3.7: Geology and Soils
- Section 3.8: Greenhouse Gas Emissions
- Section 3.9: Hazards and Hazardous Materials
- Section 3.10: Hydrology and Water Quality
- Section 3.11: Land Use and Planning
- Section 3.12: Noise
- Section 3.13: Population and Housing
- Section 3.14: Public Services
- Section 3.15: Recreation
- Section 3.16: Transportation
- Section 3.17: Tribal Cultural Resources
- Section 3.18: Utilities and Service Systems
- Section 3.19: Wildfire

Section 4.0: Cumulative Effects. Section 15130 of the CEQA Guidelines requires an EIR to discuss cumulative impacts of a project when the Project's incremental effect is cumulatively considerable. A cumulative impact consists of an impact created because of the combination of the Project evaluated in the EIR together with other reasonably foreseeable projects causing related impact.

Section 5.0: Alternatives to the Project. Describes and compares the proposed project alternatives to the Project.

Section 6.0: Other CEQA Considerations. The Other CEQA Considerations section provides a summary of significant environmental effects, including unavoidable, irreversible, and growth-inducing impacts.

Section 7.0: Effects Found Not to Be Significant. This section provides a summary of Project impacts that have been determined, through preparation of the NOP, to result in a less than significant or no impact.

Section 8.0: List of Preparers and Organizations Consulted. The List of Preparers and Organizations Consulted section provides a list of the organizations and persons consulted, and the various individuals who contributed to the preparation of this Draft EIR. This section also includes a list of the Lead Agency personnel and technical consultants used to prepare this Draft EIR.

Section 9.0: References. This section provides a list of the technical studies and other documents used to prepare this Draft EIR.

Appendices. The appendices contain the Initial Study, NOP (including comments) and technical studies prepared to support the analyses and conclusions in this Draft EIR.



1.4 REVIEW OF THE DRAFT EIR

CEQA does not require formal hearings at any stage of the environmental review process (CEQA Guidelines Section 15202[a]). However, it does encourage, “wide public involvement, formal and informal, in order to receive and evaluate public reactions to environmental issues” (CEQA Guidelines Section 15201). The County distributed an NOP of a Draft EIR for the Project beginning on March 31, 2023. The NOP was distributed for a 30-day comment period that ended on May 1, 2023. The comments received on the NOP and during the Public Scoping Meeting on April 10, 2023 were considered in the preparation of this Draft EIR. Letters/comments received from agencies and the public during the scoping period are provided in Appendix A.

The County has filed a Notice of Completion (NOC) with Governor’s Office of Land Use and Climate Innovation (LUCI) to begin the public review period (PRC, Section 21161). Concurrent with the NOC, this Draft EIR has been distributed to responsible and trustee agencies, other affected agencies, surrounding cities, and interested parties, as well as to all parties requesting a copy of the Draft EIR in accordance with PRC Section 21092(b)(3). During the public review period, the Draft EIR, including the technical appendices, are available for review online via the San Joaquin County website using the following link: sigov.org/departments/cdd/planning/prologis..

This Draft EIR is available for a 45-day public review and comment period from June 19, 2026 to August 3, 2026. Agencies, organizations, and individuals are invited to comment on the information presented in the Draft EIR during this period. Specifically, comments are requested on the scope and adequacy of the environmental analysis presented herein. All comments on the Draft EIR should be sent to the following County contact:

Brian Millar, Contract Planner
San Joaquin County, Community Development Department
1810 E. Hazelton Avenue
Stockton, CA 95205
205-953-7509
bmillar@sjgov.org

Upon completion of the public review period, written responses to all environmental issues raised will be prepared and made available for review by the commenting agencies at least 10 days prior to any public hearing on the Project at which the certification of the Final EIR will be considered. Comments received and the responses to comments will be included as part of the record for consideration by decision-makers for the Project.

1.4.1 Effectively Commenting on an EIR

Readers are invited to review and comment on the adequacy and completeness of this Draft EIR in describing the potential impacts of the proposed project, the level of severity of each impact, the mitigation measures being proposed to reduce or avoid those impacts, and the project alternatives being considered. The most effective comments are those that focus on the adequacy and completeness of the environmental analysis and that are supported by factual evidence. Comments that focus on whether the Project should be approved or denied are not comments on the adequacy of this Draft EIR.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Introduction

1.4.2 Final EIR

After the end of the review period, the County will review the comments received, prepare written responses to those comments, make any related revisions to the Draft EIR, and, if recirculation is not required, publish the Final EIR, which will include the Draft EIR, comments on the Draft EIR, responses to comments and any revisions to the Draft EIR.

The Final EIR will be considered by the County's Planning Commission when taking action on the Project. The Project's GPA will be considered by the County's Board of Supervisors for approval. If the Project is approved, CEQA requires the County to adopt findings describing how each of the significant impacts identified in the EIR is being mitigated. The findings are required to describe the reasons why significant unavoidable impacts, if any, cannot be mitigated; in this case, all significant effects of the project would be mitigated to less than significant levels by the adoption of feasible mitigation measures. The findings will also describe the project alternatives analyzed in the EIR and explain whether or not any alternative or portion of an alternative has been adopted. The County will adopt a mitigation monitoring and reporting plan that describes how it will ensure the mitigation measures being required of the Project will be carried out.



2.0 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

This Draft Environmental Impact Report (Draft EIR or EIR) is prepared in accordance with the California Environmental Quality Act (CEQA) to evaluate the potential environmental impacts associated with the International Park of Commerce Phase 2 (IPCP2) Specific Plan Project (Project) proposed in San Joaquin County (County), west of the City of Tracy. This document is prepared in conformance with CEQA (California Public Resources Code [PRC] Section 21000, *et seq.*) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Section 15000, *et seq.*). This Draft EIR is intended to serve as an informational document for the public agency decision makers and the public regarding the Project.

This Draft EIR evaluates potential environmental impacts resulting from the approval and implementation of the IPCP2 Specific Plan Project (Project). The IPC2 Specific Plan Project consists of the following components:

- Adoption and implementation of a General Plan Amendment (GPA) from General Agriculture to the General Industrial within the 2035 San Joaquin County General Plan (General Plan)
- Adoption of a Zone Reclassification to allow for the IPC2 Specific Plan
- Adoption of the IPCP2 Specific Plan
- Approval of a development agreement
- Development of the area consistent with the IPCP2 Specific Plan and Major Subdivisions.

Implementation of these components is collectively referred to as the “Project.” The IPCP2 Specific Plan contains land use, circulation, sustainability, design, and infrastructure-related development standards and design guidelines to guide investment and development in the Specific Plan Area. The analysis included herein is based on these conceptual development components that are feasible under the IPCP2 Specific Plan. This conceptual buildout proposes the development of 284-acres of land with 5.36 million sf of warehouse and distribution facilities. The Project would also include vehicle, truck, and trailer parking and outdoor storage, on-site water and wastewater treatment facilities, and off-site improvements West Schulte Road and the extension of Promontory Parkway and Pavilion Parkway to the Project site. The Project site is currently in agricultural use, with almond orchards planted across the site. Approximately 36,270 almond trees would be removed as part of the Project.

2.1.1 Purpose of the IPCP2 Specific Plan

The Project seeks to create land use policies and standards supportive of high-quality development that is specifically intended to encourage a variety of industrial and warehouse uses within the County. The purpose of the IPCP2 Specific Plan is to provide architects, urban planners, landscape architects, and developers with the necessary tools to design functional and sustainable development that furthers the priorities and interests of the County. The County will then have a framework from which to evaluate subsequent development proposals for consistency with the goals, objectives, design and development



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

standards, and guidelines within the IPCP2 Specific Plan, streamlining the process for making the required findings for individual project approval.

2.1.2 Project Site

The Project is located 60 miles east of San Francisco on the eastern slope of the Altamont Pass, adjacent to the City of Tracy limits and outside of its Sphere of Influence (SOI) within an unincorporated area of the County. The City lies 70 miles south of Sacramento and 60 miles east of San Francisco. The regional location of the Project is shown in Figure 1, and the Project area is shown in Figure 2.

The 284-acre Project area is bisected by West Schulte Road, east of the proposed extension of Pavilion Parkway to the west, and south of the proposed extension of Promontory Parkway. The Project site is undeveloped and the WSID Upper Main Canal (WSID Canal) cuts through the northern portion of the development area. The Project site is composed of four parcels (Assessor's Parcel Number [APN] 209-240-36, APN 209-240-37, APN 209-250-10, and APN 209-250-37). APNs 209-240-36 and 209-240-37 comprise the southern portion of the Project site, south of West Schulte Road, while APNs 209-250-10 and APNs 209-250-37 make up the northern portion of the Project site. APNs 209-250-10 and 209-250-37 are bisected by the WSID Canal.

2.1.3 Existing Land Use Designation and Zoning

The County's General Plan Land Use Map designates the Project site as General Agriculture (A/G). The County's 2035 General Plan defines these land uses as:

General Agriculture. This designation provides for large-scale agricultural production and associated processing, sales, and support uses. The A/G designation generally applies to area outside areas planned for urban development where soils are capable of producing a wide variety of crops and/or support grazing. Typical building types include low-intensity structures associated with farming and agricultural processing and sales (San Joaquin County 2016).

The County Zoning Map categorizes the parcels within the Project site as General Agriculture 40-acres Zoning District (AG-40). The purpose of the General Agriculture 40-acres Zoning District is to identify agricultural lands for the continuation of commercial agricultural enterprises, as long as such operations are feasible. Minimum parcel sizes within the AG Zone are 20, 40, 80, and 160 acres. The Project site is currently zoned for 40-acre minimum parcels.

2.1.4 Adjacent Planning Areas

The Project site is located adjacent to other specific plans created to increase industrial, commercial, institutional, and residential land use within the City of Tracy.

City of Tracy and Sphere of Influence

IPCP2 is located adjacent to the City of Tracy limits, outside the City SOI. The City of Tracy begins on the northern boundary of the IPCP2 and the western boundary north of West Schulte Road. The City's SOI begins south of West Schulte Road and west of the southern portion of IPCP2. Unincorporated County lies immediately east and south of the Project site. However, the City of Tracy and its SOI begin again east of South Lammers Road.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

Cordes Ranch Specific Plan

IPCP2 is located east and adjacent to the 1,780-acre Cordes Ranch Specific Plan (CRSP), also referred to as International Park of Commerce Phase 1 (IPC Phase 1), which was approved by the City of Tracy in 2013 and amended in 2018. CRSP established the framework of roads, infrastructure, parks, and pedestrian and bicycle connectivity and land use for the development of approximately 31 million square feet of commercial, office, and business park industrial uses. The Cordes Ranch Specific Plan lies within the City of Tracy.

Westside Specific Plan

IPCP2 is located south and adjacent to the proposed Westside Specific Plan (formally called the Gateway Specific Plan), currently under review by the City of Tracy. The Westside Specific Plan has been designed to create the entrance to the City of Tracy from eastbound Interstate-205 (I-205). The 535-acre Westside Specific Plan envisions a broad variety of commercial, institutional, and residential (both age-restricted [seniors] and non-age-restricted) land uses. The Westside Specific Plan lies within the City of Tracy.

Airport Plan

The Tracy Municipal Airport is located approximately 3.7 miles southeast of the IPCP2 boundary. The June 2009 San Joaquin County Airport Land Use Compatibility Plan depicts the Airport Influence Area extending to approximately the intersection of South Lammers Road and Valpico Road, approximately 1.2 miles southeast of the Project. IPCP2 does not conflict with the plan since the Project lies outside the Airport Influence Area.

2.1.5 Existing Site Conditions

The Project site is located within an area of the County that is used for both industrial and agricultural uses. The area surrounding the Project site is transitioning to more urban development, with existing or planned industrial uses to the south, west, and north of the Project site.

Existing Operations

The Project site is currently in agricultural use, with almond orchards planted across the Project site. There are approximately 36,270 almond trees that would be removed as part of the Project. Most of the Project site is unpaved, with the exception of West Schulte Road. Additionally, the WSID Canal, an earthen-lined canal operated by the Byron Bethany Irrigation District (BBID), bisects the northern portion of the Project site. There are no buildings or structures on the Project site.

Existing Topography

The Project site is relatively flat and slopes from an elevation of 149 feet above mean sea level at the southwest corner of the Project area to an elevation of 95 feet above mean sea level at the northeast corner. The historic groundwater level at the Project site is approximately 75 feet below ground surface (bgs).



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

2.1.6 Existing Site Conditions

The Specific Plan Area lies near the junction of two major transportation corridors, I-205 and Interstate 580 (I-580). There are a variety of land uses and facilities within the vicinity of the Project area, including:

North

To the north of the Project area is the Westside Specific Plan, a 535-acre development that would construct a variety of commercial, institutional, and residential land uses.

The 421-acre Lammersville community (in unincorporated San Joaquin County) is located approximately 2.2 miles northwest of the Project area. As identified in the San Joaquin County General Plan, Lammersville is comprised mostly of rural residential housing with a population of approximately 982 (San Joaquin County 2016). There are no schools within the Lammersville community boundary. To the north of Lammersville is the City of Mountain House, which at buildout would include 16,105 residential units, approximately 275 acres of commercial uses, 441 acres of industrial uses, 760 acres of open space, 285 acres of school, and 500 acres of public facilities.

West

To the west of the Project site lies IPC Phase 1, which covers approximately 1,780-acres and envisions commercial, office, business park industrial, and park uses. Immediately west of the Project site, south of West Schulte Road, is the Owens Brockway Glass Container Manufacturing Facility, the proposed LBA III Industrial Project, and the proposed 14800 West Schulte Road Logistics Center.

South

To the south of the Project site is the Western Pacific Railroad tracks and an almond orchard.

East

Agricultural lands and residential and urban development uses are located to the east of the Project area. The closest homes and businesses are off South Lammers Road on APN 209-240-04.

2.2 IPCP2 SPECIFIC PLAN PROPOSED GENERAL PLAN AMENDMENT AND ZONING

2.2.1 General Plan Amendment

The IPCP2 Specific Plan establishes a set of regulations, development standards, guidelines, and processes for development of the Project that constitute the General Plan standards for development for the Project Area. The Specific Plan is incorporated into the General Plan and the General Plan serves as the principal regulations for all properties within the Project site. The Project site has a General Plan land use designation of A/G. The Specific Plan would request a General Plan Amendment (GPA) to amend the General Plan land use from A/G to General Industrial (I/G).



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

According to the General Plan, the I/G designation provides for manufacturing, warehousing, distribution, corporation yards, wholesale uses and accessory business office, industrial and employee supporting retail and service uses, and compatible public, quasi-public, and special uses.

2.2.2 Zoning

Additionally, the Specific Plan would require a rezoning classification of the property from AG-40 to General Industrial/Specific Plan-1 (I-G/SP-1). The I-G/SP-1 zoning is intended to allow for flexibility in development, and the uses set forth in the Specific Plan will govern the permitted uses on the Project site, as described in more detail herein. The General Industrial zoning district provides for a variety of industrial uses, such as manufacturing, distribution, and storage uses. Permitted uses within general industrial zoning include wholesale and distribution/logistics uses, utility services, retail sales and services, and administrative services. The permitted uses are provided in Table 2.2-1. The ancillary permitted uses are provided in Table 2.2-2.

Table 2.2-1. IPCP2 Specific Plan Principally Permitted Uses

Land Use Types (I-G/SP-1 Zoning)
<i>Automotive Related Services</i>
Automotive Repairs, Limited
Parking (with Charging) and Storage
Autonomous Vehicle Storage
Building Maintenance Services
<i>Truck Related Services</i>
Parking (with Charging) and Storage
Mobility Hub (Non Petroleum)
Repairs
Truck and Trailer Storage Yard
<i>Utility Services</i>
Minor
Major
Water Storage
<i>Industrial, Warehouse, and Distribution</i>
General Warehousing
High-Cube Warehouse
Cold Storage Warehouse
Fulfillment Center
Parcel Hub
Automated Sorting Center
Distribution and Logistics Facility
Transload Facility
General Manufacturing



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

Land Use Types (I-G/SP-1 Zoning)

Note: All permitted uses listed require a Zoning Compliance Review approval.

Table 2.2-2. IPCP2 Specific Plan Ancillary Permitted Uses

Land Use Types (I-G/SP-1 Zoning)
<i>Truck Related Services</i>
Washing
Repairs
Sales and Rental
<i>Industrial, Warehouse, & Distribution</i>
Office

The land use types listed in Table 2.2-1 are permitted uses within the I-G/SP-1 Zoning and the land use types listed in Table 2.2-2 are ancillary permitted uses. The land use types included within Table 2.2-1 and Table 2.2-2 are generally consistent with County's Development Title. Land use types including building maintenance services, parking (with charging) and storage, mobility hub (non petroleum), water storage, and the industrial warehouse, and distribution land uses are permitted uses further defined in Table 2.2-3, below.

Table 2.2-2. IPCP2 Specific Plan Land Use Definitions and Characteristics of Use

Land Uses	Definition/Characteristics of Use
<i>Automotive Related Services</i>	
Building Maintenance Services	Allows for general maintenance, repair, and custodial services for other on-site land uses.
<i>Truck Related Services</i>	
Parking (with Charging) and Storage	A commercial operation that would allow for the short-term and long-term parking of trucks and trailers, including trucks equipped with cleaner, emerging technologies.
Mobility Hub (Non Petroleum)	A mobility hub/autonomous vehicle storage would allow for parking, storage, or fueling of zero emission vehicles (ZEV). A ZEV fueling facility may contain technology including but not limited to electric vehicles (EV), charging infrastructure, hydrogen fueling, and other emerging green technologies. The facility may contain on-site generation technology for the purpose of generating energy to be consumed on property (not exported to the grid). Access to the site may be public or private access-controlled.
<i>Utility Services</i>	
Water Storage	A water storage area allows for water tanks to hold potable or nonpotable water.
<i>Industrial, Warehouse, and Distribution</i>	
General Warehousing	Products stored on-site for more than a month.
High Cube Warehouse	A high-cube warehouse is a building that typically has at least 200,000 gross square feet of floor area, has a ceiling height of 24 feet or more, and is used primarily for the storage and/or consolidation of manufacturing goods (and to a lesser extent, raw materials) prior to their distribution to retail locations or other warehouses. A typical high-cube warehouse has a high level of on-site automation and logistics management. The automation and logistics enable highly-efficient processing of goods through the high-cube warehouse.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

Land Uses	Definition/Characteristics of Use
Cold Storage Warehouse	Temperature controlled for frozen and perishable products, building construction includes substantial insulation in the roof, walls, and foundation/floors.
Fulfillment Center	Storage and direct distribution of e-commerce product to end users, shipping of smaller packages and quantities, often includes multiple mezzanine levels for product storage and picking.
Parcel Hub	Regional and local freight-forwarder facility, time sensitive shipments using air freight and ground. Site development may include truck maintenance, vehicle wash, and fueling facility.
Automated Sorting Center	Consolidation and distribution of pallet loads (or larger) of manufacturers, wholesalers, or retailers. Short storage duration, high throughput, and merchandise movements is performed in part or in full by machines or robotics.
Distribution and Logistics Facility	Storage facility where small shipments are combined into larger and more economical delivery trucks bound for similar destinations.
Transload Facility	Consolidation and distribution of pallet loads (or larger) of manufactures, wholesalers, or retailers. Short storage duration with high throughput and high efficiency.
General Manufacturing	Uses tend to have moderate to high nuisance characteristics, such as noise, heat, glare, odor, and vibration, requiring segregation from other land uses, and/or may require extensive outside storage areas.

2.3 IPCP2 SPECIFIC PLAN DEVELOPMENT AND DESIGN GUIDELINES

The IPCP2 Specific Plan contains development standards and design guidelines that establish criteria for site design, architecture, landscaping, parking, and circulation that would apply to the development of the Project, in addition to setting forth the permitted uses. These guidelines apply to site design, landscaping, building materials, and architecture, among other things. The IPCP2 Specific Plan would be consistent with the majority of the County's development and design guidelines for general industrial zones. However, the Project also aims to continue the design elements of IPC Phase 1, which lies immediately west of the Project site, and approved within the CRSP, to create a unifying design and landscaping between the sites. Therefore, some design elements may differ from County's regulations and would require approval by the County's Zoning Administrator prior to Project Development.

2.3.1 Logistics and Warehouse Buildings

The Specific Plan has set architectural design guidelines to provide direction of the site and to create a visually cohesive development. The guidelines set a base level of quality of architecture consistent with the vision and goals of the Specific Plan. Buildings on the site are not intended to match, but instead utilize similar architectural elements, colors, and material, or styles so there is not an aesthetic disconnect between buildings on the site. Generally, development at the site would consist of large parcels with buildings designed to face office functions and entries towards street frontages and provide landscape screening of truck and trailer parking, loading docks, and service doors with landscaping and berming.

The architectural design guidelines require building base materials to generally be concrete tilt-up panels or other sustainable materials such as cross laminated timber. The buildings would be designed to substantially screen any roof-mounted equipment such as heating, ventilation and air conditioning (HVAC) units, vents, and sky lights from the public right-of-way. The windows would be daylight or clerestory to bring natural light into the building during daylight hours and reduce energy consumption.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

Building facades would be articulated to add visual variety and distinctiveness by adding breaks in long building facades every 200 feet in the form of score lines, varying roof height, and/or color variations. Entries to each building would be constructed with concentrated windows and enhanced colors or materials.

2.3.2 Streets

Public and private streetscapes would reinforce roadway hierarchies, emphasize key intersections, and create pedestrian and bicycle circulation. Streets must be designed with thematic site furnishings and fixtures including benches, public transit shelters, trash receptacles, lighting, and signage that would further support the design character of the Specific Plan. All roads must include a landscape strip on each side planted with street trees. Roadways on the site include West Schulte Road, Pavilion Parkway, and Promontory Parkway, see Figure 3. These roadways would be constructed to allow Surface Transportation Assistance Act (STAA) trucks.

West Schulte Road

West Schulte Road is classified as a four-lane parkway. The north side of the roadway includes a 7-foot landscape strip at the street edge planted with grasses and street trees, a 12-foot Class I Bikeway, and a 3-foot landscape strip within the right of way. The opposite side has an 8-foot landscape strip, 5-foot sidewalk and 4-foot landscape strip within the right of way. Beyond the right-of-way, an additional 30-foot landscape setback is required on both sides to provide additional screening of parking and large buildings. The road includes a 16 foot median/turn lane strip. Medians are planted with grasses, evergreen shrubs, and trees. The Class I Bikeway is on the north side of West Schulte Road.

The Project would reconstruct both the east and west bound lanes of West Schulte Road from Quality Road to the eastern Project boundary. However, the Project would only construct the western bound lanes (northern side) of West Schulte Road from Pavilion Parkway to Quality Road, see Figure 4.

Pavilion Parkway

Pavilion Parkway is a four-lane major arterial with medians. On the east side they have 12-foot Class I Bikeways with 7-foot landscape strips at the street edge and 3-foot landscape strips at the back of walk within the right of way. On the west side they will have 8-foot landscape strips at the street edge, 5-foot sidewalk and 4-foot landscape strips within the right-of-way. Additional 25-foot landscape setbacks are provided on both sides. Setbacks are planted with a variety of grasses and screen trees and bermed or sloped where appropriate to minimize the perceived scale of building facades. Sixteen-foot medians are planted with grasses, evergreen shrubs, and flowering trees. The eastern side of Pavilion Parkway would be constructed as part of the Project. The western side would be constructed as part of another development, see Figure 5.

Promontory Parkway

Promontory Parkway is a six-lane arterial with the north side containing a 7-foot landscape strip at the street edge, a 12-foot Class I Bikeway, another 3-foot landscape strip, and a 30-foot landscape setback beyond the right of way. The southern side has an 8-foot landscape strip at street edge planted with grasses and street trees, and a 5-foot sidewalk and 4-foot landscape strips within the right-of way. An



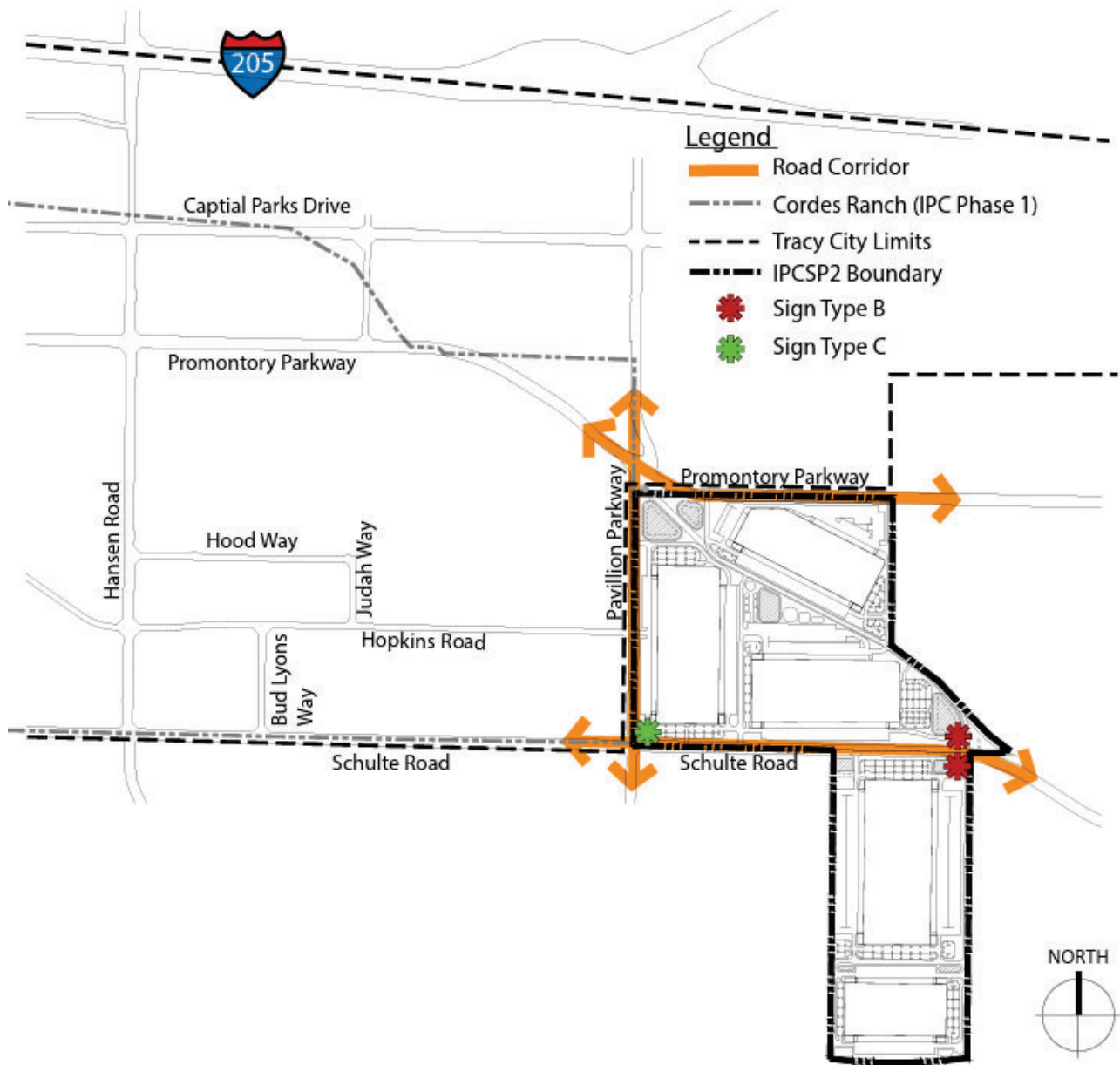
INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

additional 25-foot landscape setback is located outside of the right of way. Landscape setbacks are planted with grasses and screen trees to soften the view of larger buildings and will be bermed or sloped, as needed. See Figure 5.7 for the Promontory Parkway location and Figure 5.8 for the 6-lane major arterial conceptual roadway design. The southern side of Promontory Parkway would be constructed as part of the Project. The northern side would be constructed as part of another development, see Figure 6.



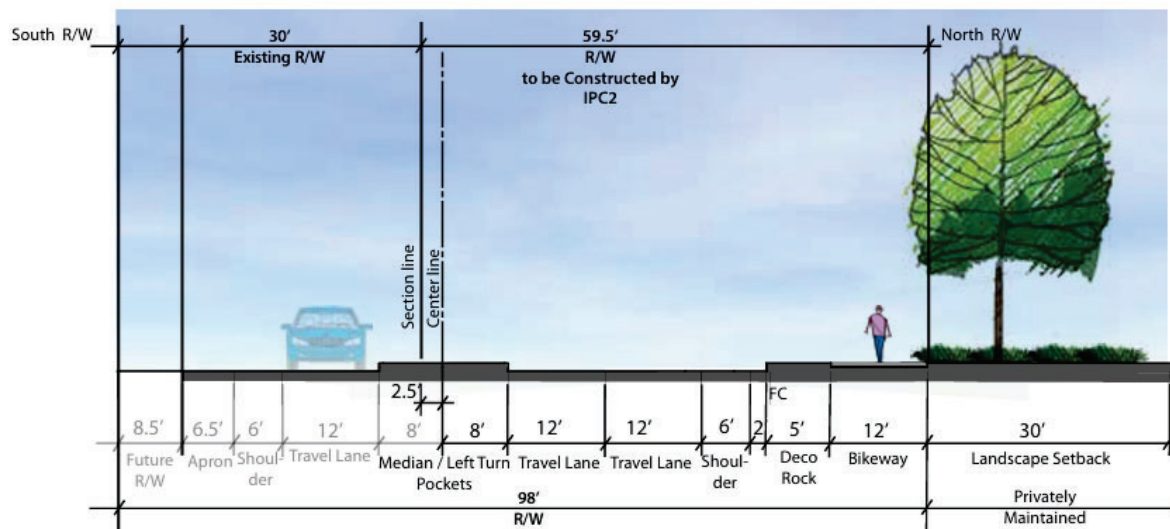


Project Location
San Joaquin County

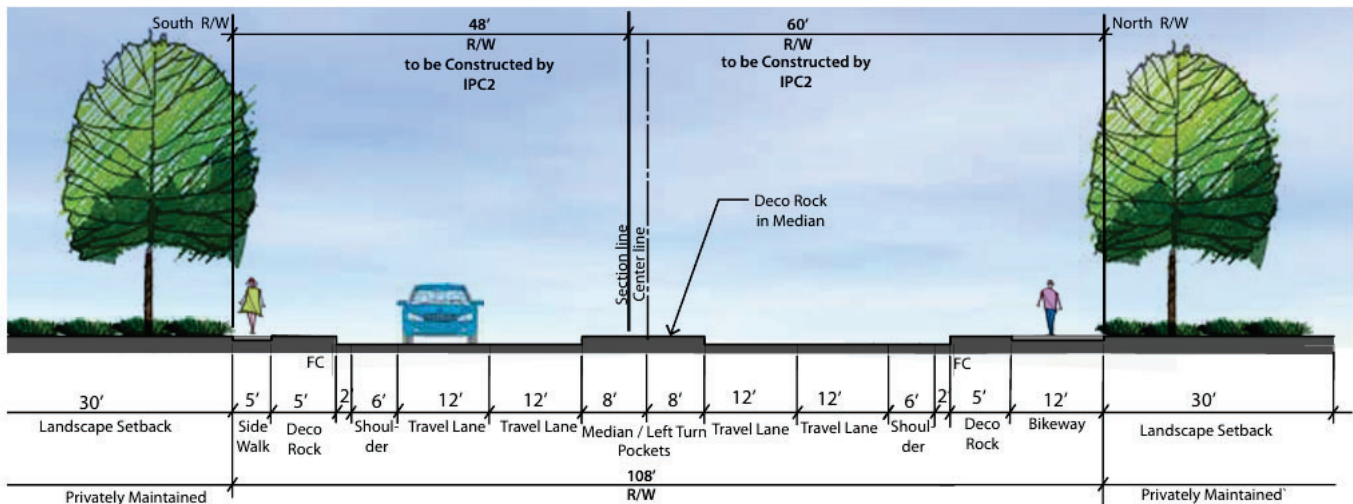
Client/Project
International Park of Commerce Specific Plan
Phase 2

Figure No.
3

Title
Proposed Roadway Locations



Proposed roadway construction of West Schulte Road from Pavilion Parkway to Quality Road.



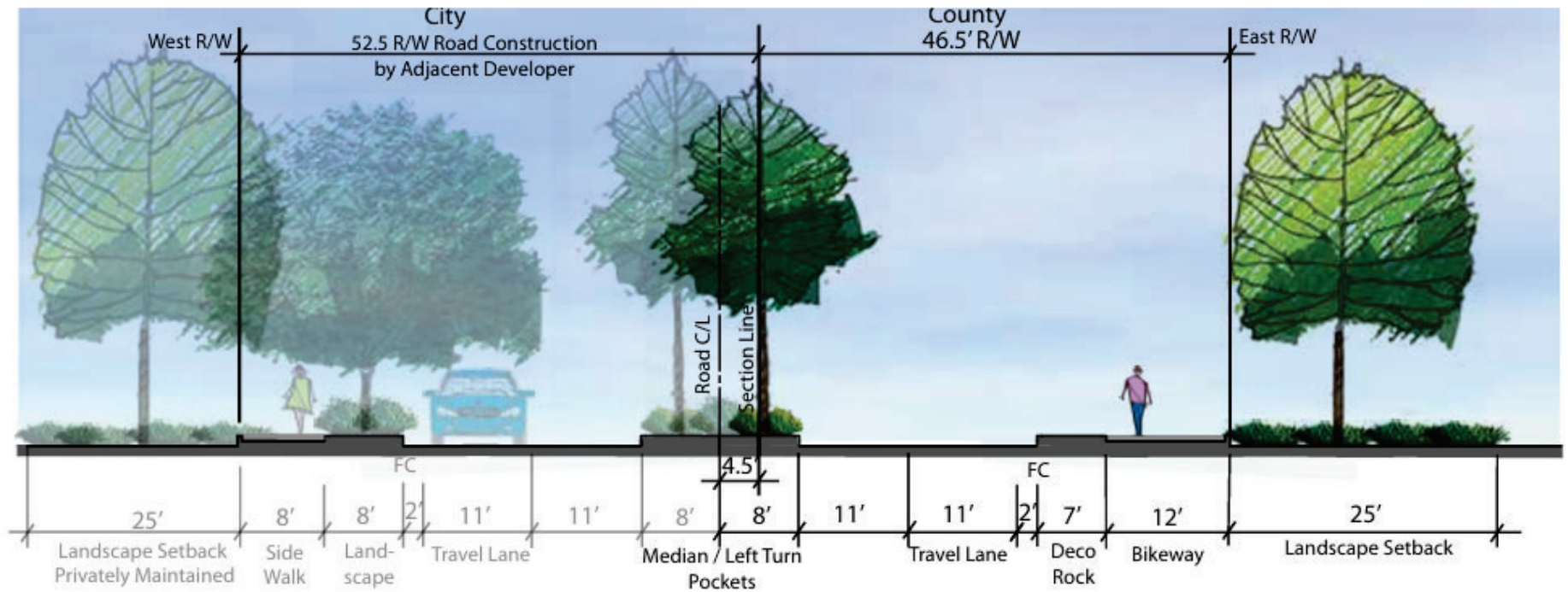
Proposed roadway construction of West Schulte Road from Quality Road to the eastern Project boundary.

Project Location
San Joaquin County

Client/Project
International Park of Commerce Specific Plan
Phase 2

Figure No.
4

Title
West Schulte Road Configuration



Project Location
San Joaquin County

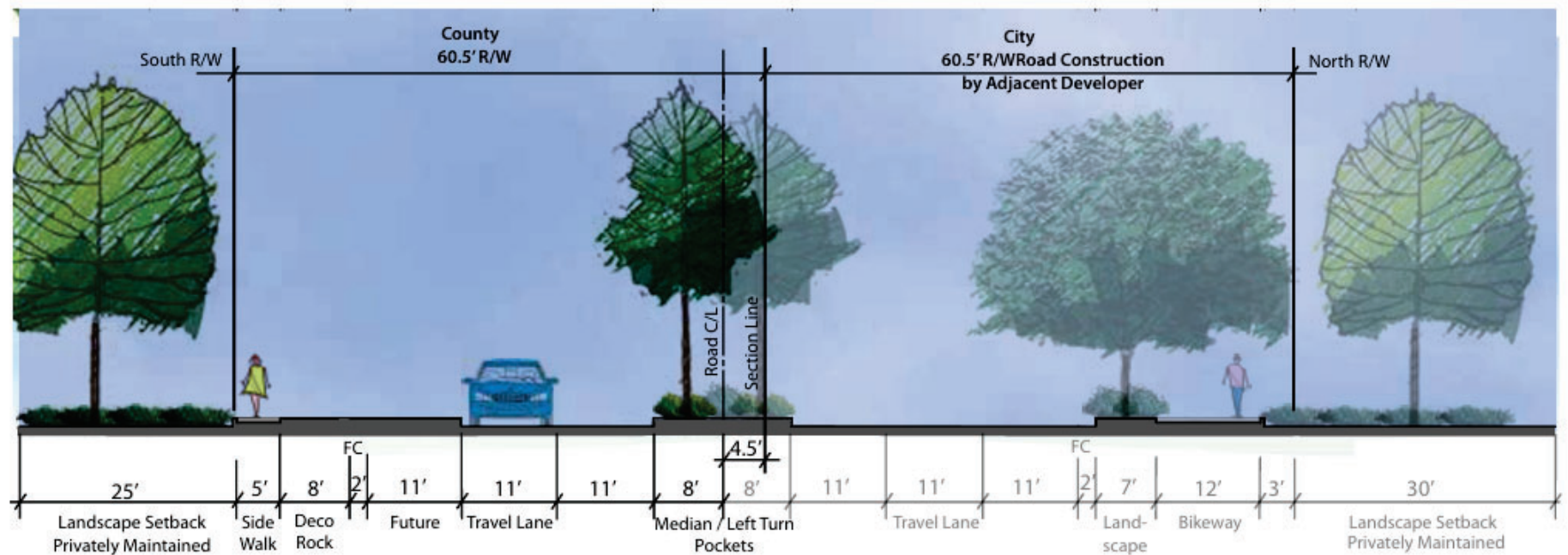
Project
International Park of Commerce Specific Plan
Phase 2

Figure No.

5

Title

Pavilion Parkway Configuration



Project Location
San Joaquin County

Project
International Park of Commerce Specific Plan
Phase 2

Figure No.

6

Title

Promontory Parkway Configuration

INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

2.3.3 Parking

Vehicles, truck, and trailer parking would be constructed at each of the industrial buildings. Parking areas would be required to include one tree for every 5 parking stalls, spaced evenly throughout the Project site and areas with more than 20 stalls would be required to have a minimum of five percent of the perimeter of the area landscaped. Parking area pavements would be required to achieve 50 percent shading consistent with CALGreen standards. The Specific Plan would differ by County design standards by constructing truck parking stalls measuring 10 feet x 53 feet.

2.4 IPCP2 SPECIFIC PLAN SUSTAINABILITY

The Project would include design elements to increase sustainability and lower greenhouse gas emissions through reduced water and energy consumption and decreased impacts related to construction activities and waste generation. Specific sustainability measures and design elements identified in the Specific Plan include, but are not limited to, the following:

2.4.1 Energy

Specific Energy sustainability measures and design elements may include, but are not limited to, the following:

- Large warehouse and logistic buildings would utilize sloped floors that better conform to the existing topography to reduce the amount of grading and earth movement.
- Energy efficient lighting and control systems utilized as integral part of lighting systems in all buildings.
- Encourage the use of daylight of clerestory windows to provide natural light and reducing the need for lighting during daylight hours.
- Light colored “cool” roofs required for all new buildings.
- Tree species would be chosen based on their large canopy characteristics at maturity and would be strategically placed on the west and east portions of the site to shade paving areas and building elevations to minimize heat gain.
- Canopies, awnings, and architectural shade structures are encouraged as part of the design guidelines, strategically sized to shade paved areas and building elevations, and to minimize heat gain.
- High efficiency lighting, such as LED, would be utilized for traffic, street, and other outdoor lighting.
- Lighting levels for outdoor illumination must meet the minimum standards required for safety. All exterior lighting would be required to be controlled by timers, and unless otherwise enforced, only nighttime lighting required for parking lot security and safety would be provided.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

- Building construction within the Project shall meet applicable standards for energy efficiency such as energy efficient heating and cooling systems, appliances, equipment, and HVAC control systems.

2.4.2 Transportation and Land Use

Specific Transportation and Land Use sustainability measures and design elements may include, but are not limited to, the following:

- Individual, site-specific development projects that have 50 or more employees (equivalent to a 40,000-sf warehouse building) would be required to prepare an employee commute trip reduction program (CTR) in conformance with San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 9410. The CTR program would include incentives for alternative modes of transportation including ride-matching assistance, preferential carpool parking, car-sharing program, and bicycle end-trip facilities.
- Preferential parking space locations be provided for electric and other clean air vehicles in all parking lots. Individual development projects with over 200 spaces shall designate a minimum of two percent of total parking spaces for carpool and/or ridesharing vehicles.
- Individual projects located along existing and planned transit routes would be required to coordinate with the San Joaquin Regional Transit District or other agencies to ensure that bus pads and shelter are incorporated.

2.4.3 Solid Waste

Specific Solid Waste sustainability measures and design elements may include, but are not limited to, the following:

- Individual developers of projects would be encouraged to reuse and recycle construction and demolition waste, including soil, vegetation (green waste), concrete, lumber, metal, and cardboard, to the extent feasible.
- Individual developers of projects would be encouraged to locate interior and exterior storage bins for recyclables and green waste and adequate recycling containers in public areas.

2.4.4 Water

Specific Water sustainability measures and design elements may include, but are not limited to, the following:

- Landscaping would consist of plant species and materials common to the region.
- Turf would be discouraged and minimized throughout the Project.
- Irrigation systems and devices would be water efficient and include satellite soil moisture-based irrigation controls and systems.
- A purple pipe system would be constructed as part of the infrastructure for the Project. Reclaimed water would be utilized for landscape irrigation of public and private landscaped areas.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

- Watering of non-vegetated surfaces and practices for cleaning outdoor surfaces and vehicles would be discouraged.
- Low-impact development practices would be implemented to the extent feasible to maintain the existing hydrologic character of the drainage and manage and treat stormwater to protect the environment.
- Buildings would be designed to be water-efficient and would include water-efficient fixtures and appliances.

2.4.5 Biological Resources

Specific Biological Resources sustainability measures and design elements may include, but are not limited to, the following:

- The landscape palette would include many climate-adapted species to optimize biodiversity, sequester carbon, create habitat to minimize resource use (water, fertilizers, and pesticides/herbicides).
- Stormwater BMPs including vegetated bioswales, vegetated detention basins and pervious paving would be encouraged and incorporated to the extent feasible into individual development sites and along streets.

2.4.6 Public Health

Specific Public Health sustainability measures and design elements may include, but are not limited to, the following:

- Open space as well as passive and active recreational opportunities exist in proximity to the Specific Plan Area. Pedestrian and bicycle connections would be extended to the Project and would consist of Class 1 bike and pedestrian sidewalk to promote connectivity.
- Sidewalks would be included on both sides of all public streets. These proposed improvements make the Project walkable and would provide connections to adjacent development.

2.5 CONCEPTUAL PROJECT CHARACTERISTICS

The Project is defined as the GPA, zoning change, and buildout of the Project Site. The analysis herein evaluates a conceptual buildout of IPCP2 Specific Plan Area.

2.5.1 Project Summary

The Project applicant, Prologis, Inc., is proposing to construct a new industrial development with approximately 5.36 million square feet of industrial development, including new water and wastewater treatment facilities covering approximately 4 acres of the Project site. In addition, the Project would construct extensions to planned roadways, Promontory Parkway and Pavilion Parkway, which would be continuations from proposed development west of the site, at IPC Phase 1. The Project would also include provide upgrades to West Schulte Road.



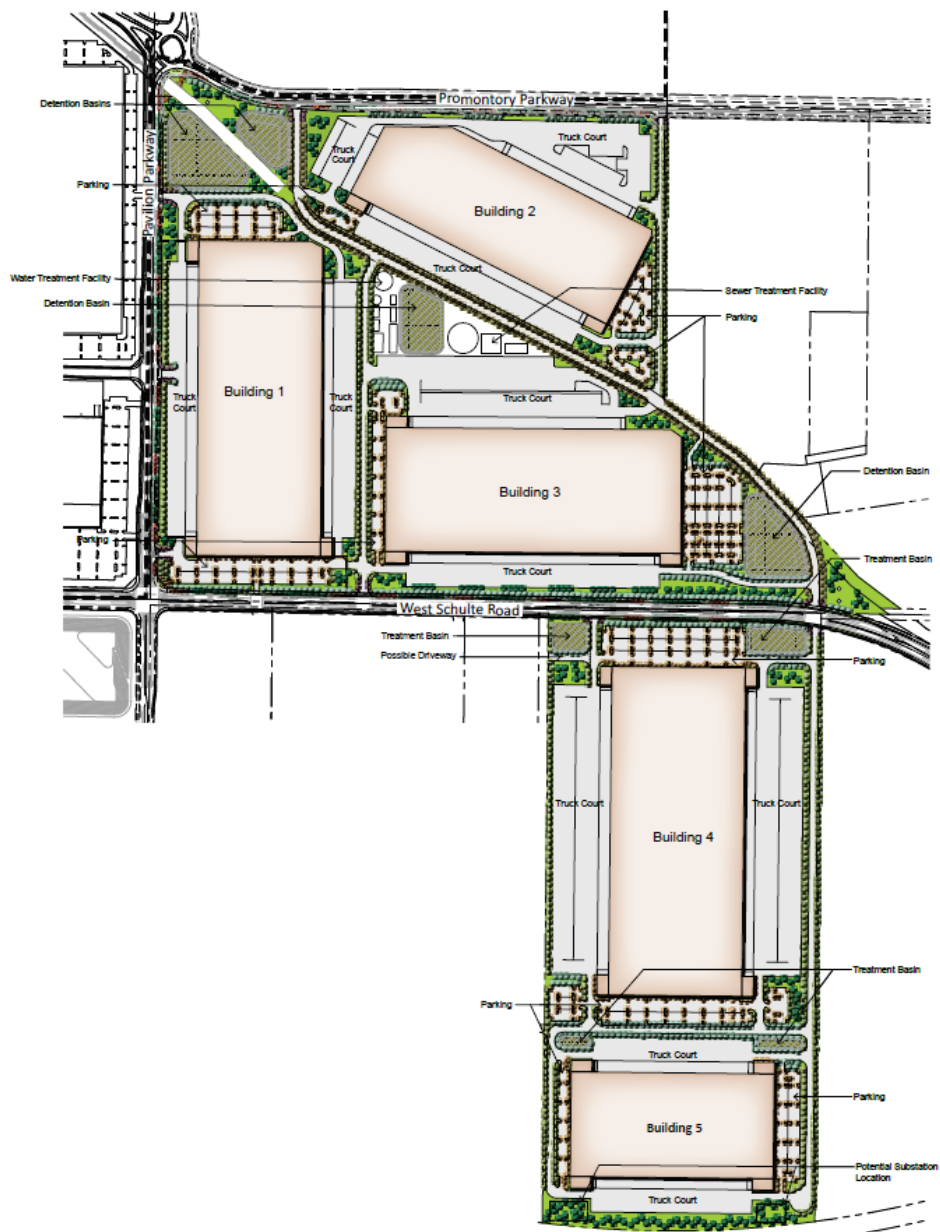
INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

The Project would attract a variety of businesses that would generate jobs and tax revenue as well as provide for business development needs within San Joaquin County. The Project proposes to construct approximately 264 acres of industrial land uses, 10 acres of dedicated roadway, water treatment facilities on a 2-acre parcel, and wastewater treatment facilities on a 2-acre parcel, as well as underground the WSID canal that covers approximately 6 acres of the Project site, as shown in Figure 7.





Project Location
San Joaquin County

Client/Project
International Park of Commerce Specific Plan
Phase 2

Figure No.
7

Title
Conceptual Site Plan

INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

2.5.2 Conceptual Development Components

The Project is anticipated to construction a maximum of 5.36 million square feet of industrial building space as well as roadway improvements, parking, water and wastewater treatment plant, stormwater drainage basins, and landscaping. Individual Project components are summarized below. It should be noted that this is a conceptual buildout plan to evaluate a maximum buildout scenario assuming a mix of high intensity industrial, warehouse, and distribution uses. The Project may construct and operate the other land uses (automotive related services, truck related services, and utility services) listed in Table 2.2-1 and Table 2.2-2. The automotive related services, truck related services, and utility services land uses listed within Table 2.2-1 and Table 2.2-2 would be less intensive than the industrial, warehouse, and distribution uses evaluated as the conceptual Project within this EIR. Therefore, in the event the automotive related services, truck related services, and utility services are constructed and operated in lieu of the industrial, warehouse, and distribution uses, the actual impact would be similar or less than what is disclosed and evaluated within the EIR.

Industrial Buildings

The Project proposes to construct five industrial buildings across the Project site with a maximum industrial buildout of 5.36 million square feet. Buildings 1 through 3 would be constructed on the northern portion of the Project site and Buildings 4 and 5 would be constructed on the southern portion of the Project site, see Figure 7. Industrial buildings would include warehousing space, industrial space, and manufacturing. Table 2.0-3 includes a breakdown of a potential buildout of industrial uses and sizes. This land use summary is an example of a conceptual buildout generated by the Transportation Impact Assessment (TIA) in an attempt to create a conservative trip envelope that the Project site may generate. The EIR uses these conceptual land uses and land use sizes consistently throughout the document to analyze the environmental impacts of the Project. As such, actual buildout of the Project site may be different than what is presented in Table 2.5-1, however the Project would not be constructed to exceed the maximum industrial buildout analyzed (5.36 million square feet).

Table 2.5-1. IPC2 Industrial Land Uses Summary

Proposed Industrial Buildings	Size (SF)
High-Cube Transload and Short-Term Storage Warehouse	536,000
High-Cube Fulfillment Center Warehouse – Sort	268,000
Manufacturing	268,000
High-Cube Parcel Hub Warehouse	536,000
High-Cube Cold Storage Warehouse	536,000
Warehousing	1,340,000
High-Cube Fulfillment Center Warehouse – Non-sort	1,340,000
General Light Industrial	536,000
Total Industrial Square Footage	5,360,000

SF= square feet

Note: These ratios are a conceptual buildout generated by the TIA in an attempt to create a conservative estimate of the trips that may be generated during full Project buildout. These land uses and land use sizes are consistently used throughout the



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

document to evaluate the environmental impacts of IPCP2 however may not reflect the exact land uses and land uses sizes constructed.

Roadways

The Project would include the construction or expansion of West Schulte Road, Pavilion Parkway, and Promontory Parkway. Roadway buildout is described in Section 2.4.2. The Project would also require intersection improvements for each of these roadways. Roadway and intersection improvements would be constructed in five parts that are triggered by the construction of each industrial building. In total, the Project is anticipated to construct approximately 10 acres of roadways.

Parking

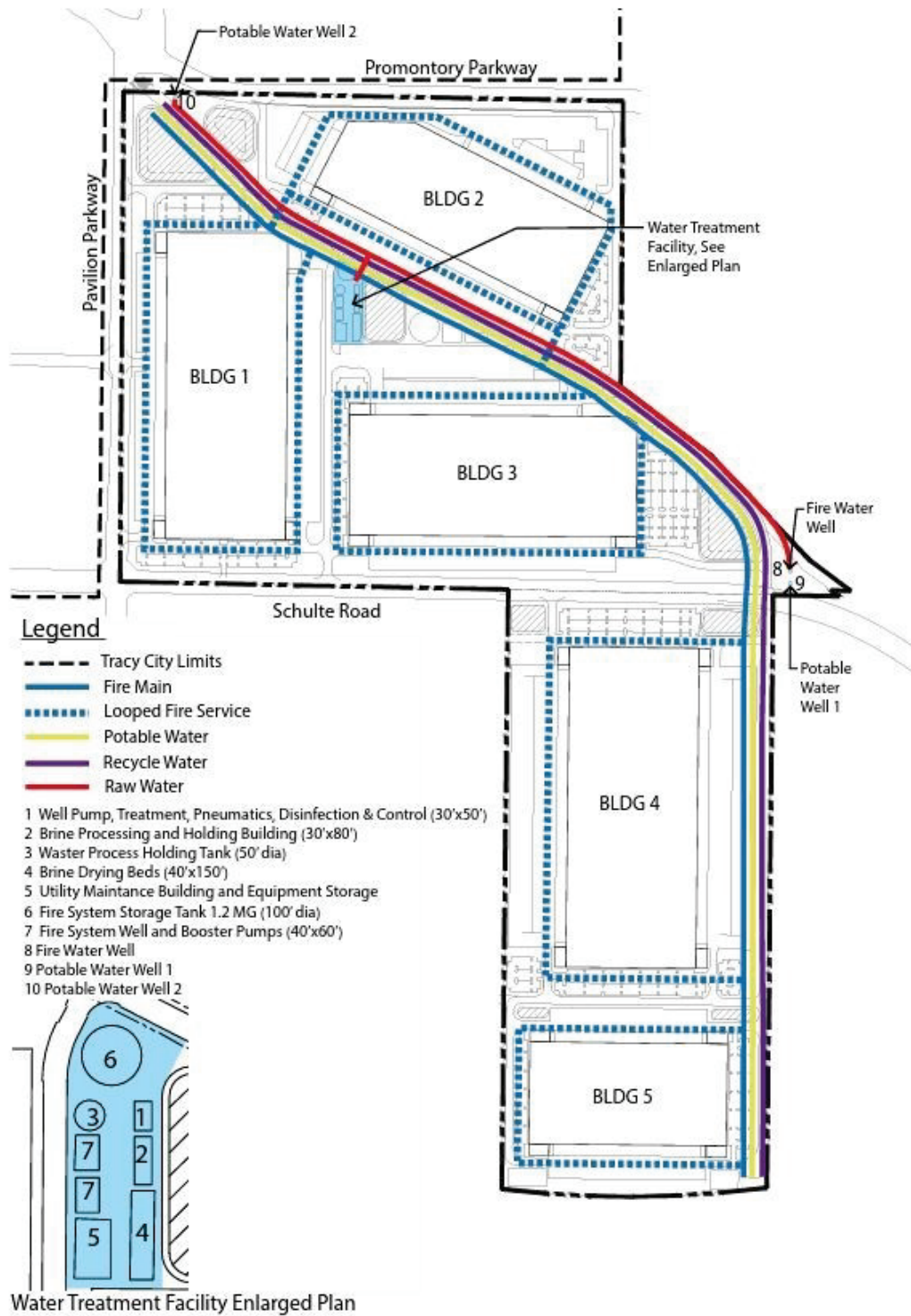
The construction of the Project would include surface parking lots for employee, truck, and trailer parking, see Figure 7. The total amount of employee parking would exceed the County's Zoning Code requirements. The amount of employee, truck, and trailer parking would ultimately be based on the buildout of the Specific Plan. However, the conceptual buildout evaluated within this document assumed up to 2,673 employee parking spaces. Of those proposed employee parking spaces 54 would be designated for ADA and 936 for clean air vehicles, including 802 equipped with electric vehicle (EV) chargers.

Utilities

In addition to the five buildings, the Project would also construct water and wastewater treatment plants, (raw water facilities, treated water facilities, wastewater facilities, recycled water facilities), fire facilities, underground the WSID canal, and stormwater basins. Water and wastewater treatment facilities would be constructed on approximately 4 acres of the Project site. The water and wastewater treatment facilities would be centrally located on the northern portion of the Project site, but the water and fire wells would be constructed on the eastern side of the Project site, immediately north of West Schulte Road, see Figure 8. The elements of the water and wastewater plants are described in detail below.

The Project site is not currently served by an existing public water system and is outside the service area of any existing public water system. As a result, the Project proposes to supply all on-site domestic and irrigation water demands from three on-site groundwater wells that would pump from the Tracy Subbasin, along with recycled water from the Project. The Project is within the Byron-Bethany Irrigation District (BBID) service area and proposes to contract with BBID for supplemental irrigation water for Project landscaping, as needed, when recycled water from the Project is insufficient to meet irrigation demand. The Project would create an independent, non-transient non-community water system to serve future Project site end users. The water system would be operated by the Project owner pursuant to the California Health & Safety Code, under a permit issued by the San Joaquin County Environmental Health Department (EHD). The State Water Resources Control Board, Division of Drinking Water (DDW) has directed that if the Project site were ever annexed into the City of Tracy, the Project would be required to connect to the City of Tracy's water system. It is not known whether the City would elect to serve the Project from the City's available water supplies, or whether the City would choose to maintain service from the on-site groundwater wells developed by the Project. Determinations about future service would be made by Tracy in connection with any future annexation proceedings and would be subject to review under CEQA by Tracy, the San Joaquin County Local Agency Formation Commission (LAFCo) and DDW.





NORTH



Project Location
San Joaquin County

Client/Project
International Park of Commerce Specific Plan
Phase 2

Figure No.
8

Title
Conceptual Project Utilities

INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

Raw Water Facilities

The raw water facilities would include the construction of two potable water wells and pipelines to transport water to the potable water treatment plant. One water well would be located on the northwestern portion of the Project site. The other water well would be located on the eastern portion of the Project site, immediately north of West Schulte Road and adjacent to the proposed fire well, see Figure 8. Both wells would be 520 feet deep with 20-inch bores that have 10-inch casing pipe, 5 inches of gravel pack, and a sanitary seal 250 feet deep. Each well would be capable of meeting the entire Project's potable water demand. Production rates would be approximately 150 gallons per minute to meet the max day plus supply supplemental flows to the irrigation system if needed. Average day daily demands are estimated at 50 gallons per minute (gpm) at buildout.

The potable water wells would be permitted through EHD.

Treated Water Facilities

The treated water facilities include the potable water treatment system, water storage tanks, and potable water distribution system. The treated water facilities would be located on the northern portion of the site between Buildings 1, 2, and 3, see Figure 8.

The potable water treatment system is expected to be an ion exchange system¹. There would be a chemical holding tank for the regeneration fluid as well as a holding tank for brine produced from the regeneration process. The brine from the treatment system would be processed using a combination of mechanical drying or concentrating and evaporation. Once the brine is adequately dewatered, it can be hauled off-site to a disposal site. Approximately 100 cubic yards of brine waste are expected to be produced every year. The brine waste would be regulated by EHD and would be hauled off-site to a Class 1 or a Class 2 landfill.

The average daily demand for the potable water system would be 50 gpm at buildout and can be as high as 150 gpm during maximum daily demands. The water system would discharge water into a 100,000-gallon welded steel tank. The water from the tank would be pumped into the potable water distribution system using a combination of service pumps to meet the range of system demands. The distribution system would also have a hydropneumatics tank to maintain system pressures. The pressures within the system would be between 40 and 80 psi. The potable water distribution system would be made up of 6-inch pipes. There is expected to be approximately 6,700 feet of potable water piping constructed to reach each of the five proposed buildings. The distribution system construction would coincide with the buildout of the Project.

Wastewater Facilities

The wastewater facilities would be located on the northern portion of the Project site, between Buildings 1, 2, and 3, see Figure 8. The wastewater facilities would include an equalization basin, wastewater treatment system, and sludge drying facilities. Wastewater would be pumped from all over the site to a buried, concrete equalization tank with a capacity of 75,000 gallons, equal to approximately one and a half days' worth of wastewater. The equalization tank regulates the flow of wastewater before it is

¹ An ion exchange water treatment system is a specialized technology used in wastewater treatment to remove dissolved ions and contaminants from water.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

pumped from the tank to the treatment system. The equalization tank creates an output flow rate of 62,000 gallons a day. The wastewater from the equalization tank would flow to wastewater treatment. The wastewater treatment process would generate solids that would flow into a solids handling facility. The solids would be dewatered with the produced water flowing back to the headworks of the wastewater treatment system. The remaining solids, anticipated to be approximately 12 cubic yards per year at Project buildout, would be of a quality that can be disposed of on-site as fertilizer for the landscaping.

Recycled Water

The recycled water system would be used to dispose of the treated wastewater and would provide irrigation to all of the landscaping within the Project site and on street improvements. The recycled water system includes a recycled water storage tank, pump station and distribution system.

The discharge from the wastewater treatment system would be stored in a recycled water tank that has been tentatively sized to store 50 days of wastewater production, approximately 2.3 million gallons. The tank would tend to fill during the non-irrigation season (winter) and drain when irrigation demands go up in the summer months. The tank volumes would be monitored by floats and pressure sensors which would trigger the addition of irrigation supplies to the tank during irrigation season as needed. A recycled water pump station would pull water from the storage tank to the recycled water distribution system and maintain a minimum pressure of 60 psi. The pump station would be located adjacent to the recycled water storage tank in a separate building for the pump station and controls.

During peak irrigation periods, the recycled water alone would not be enough to meet irrigation demands. Supplemental irrigation water would be provided by the BBID, recycled stormwater, fire water, and raw well water. Water from the stormwater basins would be pumped into the recycled water tank which would dilute the recycled wastewater that would have high concentrations of salts and nitrates.

Fire Facilities

Fire facilities would be constructed on the northern portion of the Project site and include a well, a fire storage tank, a pump station, and the initial fire distribution system. The fire distribution system would be expanded as Buildings 1 through 5 are constructed.

The fire well would be located immediately north of West Schulte Road, on the eastern side of the Project site, see Figure 8. The well would be approximately 710 feet deep and have a bore hole with a 28-inch diameter that includes an 18-inch casing, 5-inches of gravel pack, and a 250-foot deep sanitary seal. The well would discharge into a 1 million gallon storage tank made of welded steel or concrete. The tank would be above-ground and would be approximately 76-feet in diameter and 30-feet tall. The tank would be located in the water treatment facility that would sit in between Buildings 1, 2, and 3 on the northern side of the Project site, see Figure 8. The fire pumps would be constructed adjacent to the fire storage tank and would pull water from the tank and discharge the water into the fire water distribution system. The fire water distribution system would be constructed of 13,000 linear feet of 12-inch pipes to each building and to fire hydrants on West Schulte Road, Promontory Parkway, and Pavilion Parkway. The fire pump would provide between 50-80 psi of static pressure at each hydrant throughout the fire system. Fire services at the site would be provided by the Tracy Rural Fire District (TRFD) and South San Joaquin County Fire Authority (SSJCFA). TRFD Station 94 is located at 16502 West Schulte Road. There is the existing SSJCFA Fire Station 94/California Department of Forestry and Fire Protection (CAL FIRE)



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

Station 26, located at the southwest corner of Hansen Road and West Schulte Road, located approximately one mile west of the Project site.

Stormwater Basins

Detention basins are proposed to serve new development on the Project site. The primary need for detention basins is due to limitations in downstream outfalls and discharge capacities and to provide significant stormwater quality enhancement at the Project site. The proposed detention basins would attenuate peak flows to meter downstream releases of stormwater to reduced rates for discharge into the WSID canal. All proposed detention basins would be sized to accommodate the 100-year 24-hour storm under build-out conditions

Storm drainage for the Project would consist of a system of inlets, piping, and bio-treatment and detention ponds that would provide for stormwater conveyance and treatment as well as transport to the recycled water tank as necessary. Four detention basins would be constructed on the northern side of the Project site, and an additional four treatment basins would be constructed on the southern side of the Project site, see Figure 7.

In the event stormwater cannot be discharged off-site into the WSID canal, the Project Applicant has prepared a stormwater optionality design that would size up the detention basins to fully capture and contain two consecutive 10-year, 48-hour storms for infiltration and treatment. The proposed detention basins on the northern side of the Project site under this stormwater optionality would remain in the same locations, see Figure 7, but would be sized up to account for the two 10-year, 48-hour storm events. The increase in size of detention basins 1 through 3 would not impact the site. The increase in size of detention basin 4 would result in the removal of a portion of the surface parking on the eastern side of the site adjacent to Building 3. The stormwater optionality would not change any of the proposed building sizes. Additionally, the water treatment basins under this option would be constructed deeper than the clay soils found within the upper five feet of the Project site, allowing for on-site percolation. Table 2.5-2 below summarizes the difference in basin sizes under the Project and the stormwater optionality.

Table 2.5-2. IPC2 Industrial Land Uses Summary

Basin	Project (AF)	Stormwater Optionality (AF)
Basin 1	7.4	11.5
Basin 2	9.5	14
Basin 3	11	12
Basin 4	16	31.6

AF = acre-feet

Source: Appendix K.

Best Management Practices (BMPs) in the Storm Water Quality Control (SWQC) Manual would be implemented in the design of the Project, as appropriate, to reduce the directly connected impervious areas and to promote a higher level of stormwater quality.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

WSID Canal

The WSID canal is an earthen canal that bisects the northern portion of the Project site, traversing approximately 6 acres of the Project site. The WSID canal is managed by BBID and is in operation during the irrigation season from April through October. The existing canal would be undergrounded and replaced with two 42-inch pipelines in order to allow for on-site traffic circulation.

Electricity, Gas and Telecommunications

Electrical and gas services to the Project site would be provided by Pacific Gas & Electric (PG&E). All public electric transmission, gas, and distribution utilities on and in proximity of the Project site are owned and maintained by PG&E. A proposed joint trench system would include telephone, cable TV, possible ancillary fiber system conduits (dark fiber), conduits and conductors for street lighting and traffic signals, and such other equipment and facilities as determined by the County.

Landscaping

In addition to site-specific landscaping standards which are set forth in Chapter 3 of the Specific Plan, the Project is also subject to a Master Landscape Plan set forth in Chapter 5 of the Specific Plan. The Master Landscape Plan provides for major landscape treatments at key locations throughout the Project site. The overall concept for the Master Landscape Plan would be in keeping with the agricultural heritage of the area.

Landscaping elements would be included in the streetscape design of roadways, intersections and pedestrian and bicycle facilities. All roadways would include a landscape strips ranging from 3 to 7 feet within the right of way planted with street trees as well as landscape setbacks of 25 to 30 feet adjacent to the right of way, see Figures 4 through 6. Landscape setbacks beyond the right-of-way, would range from 25 to 30 feet to provide a buffer between roadway and the parking or buildings. The site would include ample landscaping and berming to reduce views of the loading docks, truck trailer parking, and service doors from public streets. The streetscape design supports the Model Water Efficient Landscape Ordinance (MWELO) to reduce water use for landscape irrigation, simplify maintenance, and create a more sustainable landscape.

Within the Project site, landscaping and trees would also be planted within the parking lots. All parking areas greater than 20 stalls require a minimum of 5 percent of landscaping within the parking area permitter. Moreover, the Project would be required to plant one tree per every five vehicle parking spaces. As such, the Project would plant between 535 trees in the proposed parking lots across the Project site.

Proposed Circulation

Vehicular Access

The Project has been designed to comply with and help implement the County's Regional Transportation Plan (RTP). The Project would extend planned roadways Promontory Parkway and Pavilion Parkway along the Project frontage as well as providing roadway improvements along West Schulte Road and constructing new on-site access roadways. The main access to the Project site would be from Pavilion Parkway, Promontory Parkway, and West Schulte Road. Access roads would also be constructed on the southern portion of the Project site.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

Trucks and other vehicles would access the Project vicinity from both I-580 and I-205 at Mountain House/International Parkway. Mountain House Parkway, West Schulte Road, proposed Pavilion Parkway, and proposed Promontory Parkway would be designated as the main truck routes to access Project uses. Truck route intersections would be designed to meet Surface Transportation Assistance Act (STAA) standards to accommodate the large truck and trailer turning movements. Hansen Road runs north to south from the Union Pacific Railroad tracks to West Byron Road, through the Cordes Ranch Specific Plan area south of I-205 and Lammersville community north of I-205. Hansen Road, north of I-205, would not be included as an allowable truck route in order to limit traffic through the Lammersville community. In 2025, the City of Tracy permanently closed Hansen Road access across I-210 through the use of a closed gate.

Alternative Transportation

Bicycle and pedestrian paths are included in roadways and as separate facilities as part of the Project as a means to increase mobility options to and throughout the Project area, and to connect the Project site to the community. The closest public transit routes are provided by the City's TRACER bus routes, with bus stops for Route 26 at 11th Street/South Lammers Road (by John C. Kimball High School) and Route 32 at Mabel Josephine Drive/West Schulte Road (by Kelly Elementary School), located approximately 0.6 mile and one mile from the Project site, respectively. County Regional Transit District's Route 90 provides regional service to the City from Stockton, with Route 150 providing a connection to the City of Dublin Bay Area Rapid Transit station. These facilities would provide employees and other Project users an alternative to vehicle travel throughout the Project area.

The Project would comply with and help implement the County's RTP and would include additional Class I bikeways along Pavilion Parkway, Promontory Parkway, and West Schulte Road that would allow for increased linages and to provide additional safety for bicyclists by separating them from motor vehicles. The proposed roadways would have separated, five-foot wide pedestrian sidewalks on both sides of Pavilion Parkway, Promontory Parkway, and West Schulte Road to provide for safe and efficient pedestrian circulation within the Project area. The Project's roadway system would also facilitate the use of public transportation facilities by providing bus pull outs and passenger shelters in the event of rerouting public bus lines.

2.5.3 Conceptual Development Construction

The Project would be constructed in multiple phases over a period of ten years. Construction would include grading the Project site, undergrounding the WSID canal, construction of the utility systems and industrial buildings, and paving the roadways and parking areas.

Phasing

For the purpose of this analysis, the conceptual buildout of the Project site was assumed to occur in three phases, see Figure 9. During actual Project buildout, construction phasing may change. However, the overall grading, undergrounding, and facility construction would likely remain the same. Each phase of the conceptual Project buildout is detailed below.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

Phase 1

Phase 1 of the Project's conceptual construction buildout would include the facilities associated with the fire system, undergrounding the WSID canal, the raw water, treated water, wastewater, and recycled water facilities. Construction of Phase 1 would take place north of West Schulte Road.

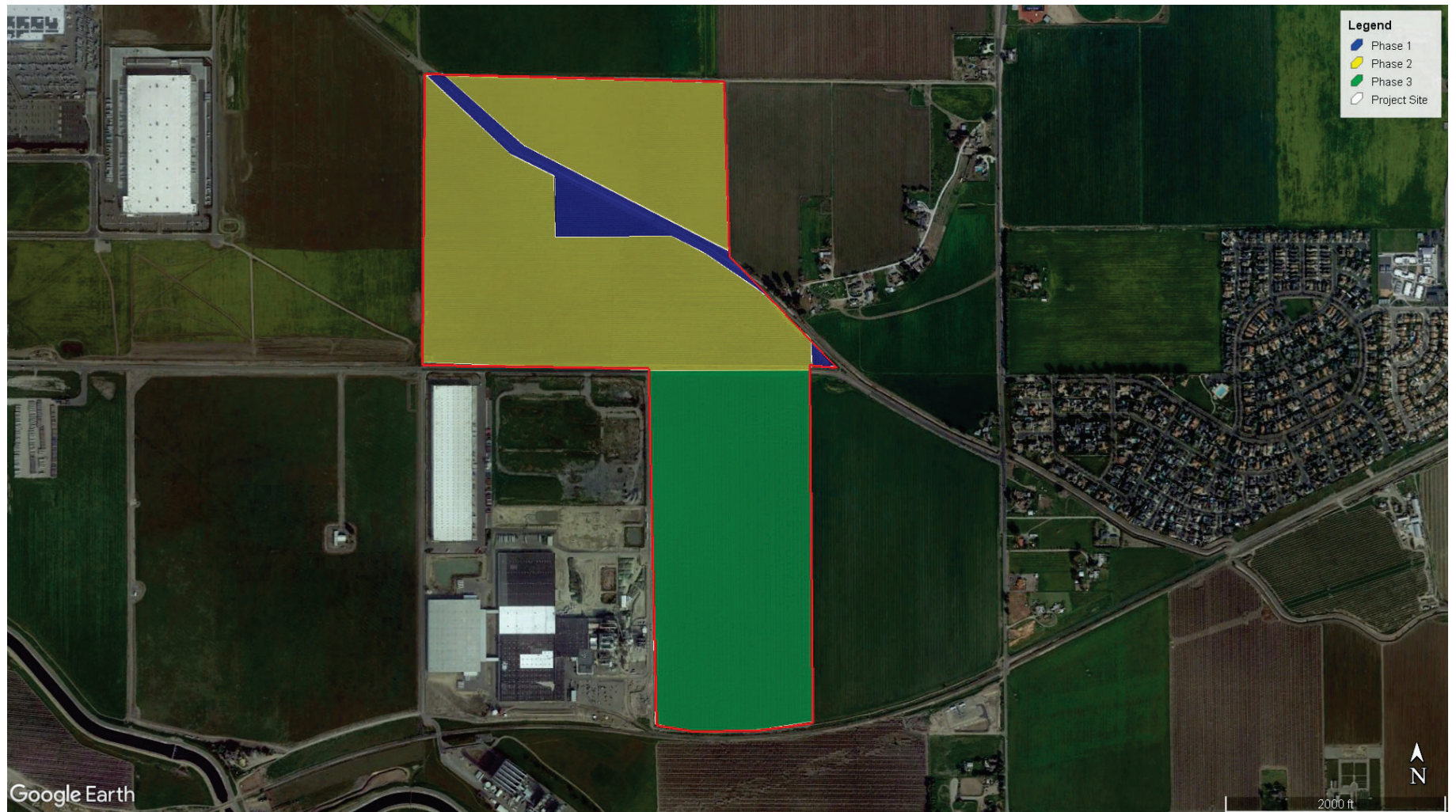
Phase 2

Phase 2 of Project's conceptual construction buildout would include the construction of the three industrial buildings to the north of West Schulte Road (Buildings 1, 2, and 3) as well as the drainage and street improvements needed to support these facilities. Building 1 parallels West Schulte Road on the north side of the road, Building 2 parallels Pavilion Parkway on the east side of the road and Building 3 is located north of the WSID canal on the south side of Promontory Parkway, see Figure 6. Construction of the buildings would occur in order, i.e., Building 1 would be constructed first followed by Building 2 then Building 3.

Phase 3

Phase 3 of the Project's conceptual construction buildout includes construction of Buildings 4 and 5 and the associated infrastructure to support both buildings. Phase 3 would take place south of West Schulte Road and includes improvements of the eastbound lanes of West Schulte Road between Quality Road and the eastern boundary of the Project site as well as the extension of access roads and utilities to serve the two buildings. Construction of the buildings would occur in order, i.e., Building 4 would be constructed first followed by Building 5.





Project Location
San Joaquin County

Project
International Park of Commerce Specific Plan
Phase 2

Figure No.

9

Title

Conceptual Project Phases

INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

Conceptual Construction Schedule

Construction of the Project may take place over a ten year period. Given current and foreseeable market conditions, for the conceptual Project buildout it is assumed that Phases 1 and 2 would take place concurrently over a period of 5 years. Phase 3 would take place immediately following completion of Phases 1 and 2 and would be constructed over an additional 5 years. Each phase would include site preparation, grading, building construction/utilities, architectural coatings, and paving. Actual development of the Project site would be based on the approval of applications for tentative subdivision maps and individual, site-specific development projects to facilitate and implement development of the Project area consistent with the County's goals and policies.

The construction schedule used for this analysis is provided in Table 2.53.

Table 2.5-3. Conceptual Project Construction Schedule

Activity	Start Date	End Date	Working Days
Phases 1 and 2			
Site Preparation	11/26/2026	1/20/2027	40
Grading/Undergrounding Canal	1/21/2027	6/16/2027	105
Building Construction/Utilities	6/17/2027	5/7/2031	1,015
Paving	5/8/2031	8/16/2031	72
Architectural Coatings	8/17/2031	11/25/2031	72
Phase 3			
Site Preparation	11/26/2031	1/20/2032	40
Grading	1/21/2032	6/15/2032	105
Building Construction/Utilities	6/16/2032	5/6/2036	1,015
Paving	5/7/2036	8/15/2036	72
Architectural Coatings	8/16/2036	11/24/2036	72

Construction activities would occur during the work week, Monday through Friday, between 7 AM and 7 PM and, if necessary, between 8 AM and 8 PM Saturday and Sunday consistent with the San Joaquin County Development Title. Any work outside of the County's construction hours would require special permits.

Access and Staging

Travel routes for construction workers, soils export, and material import would be determined in consultation with the County's Transportation Engineering Division and included in the construction traffic management plan to be developed in accordance with the County's standard conditions of approval. All construction materials would be stored on-site. Construction of the Project and any utility work would require the closure of selected sidewalks which would be furnished with temporary signage and alternate routing and would be identified in the construction traffic management plan.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

Trucks and other vehicles would access the Project vicinity from both I-580 and I-205 at Mountain House/International Parkway, Mountain House Parkway, West Schulte Road, proposed Pavilion Parkway, and proposed Promontory Parkway would be designated as the main truck routes to access Project uses.

Conceptual Grading, Excavation, Demolition, and Tree Removal

The Project site is currently used as an almond orchard and Project construction would involve removing approximately 36,270 almond trees from the Project site. There are no existing buildings, and no demolition is required. Almond trees removed during each of the phases would be chipped and hauled to a facility approximately 25 miles from the Project site. Grading would be required to bury the WSID canal and even out the Project site. Soil would be balanced on the northern and southern portions of the Project site. For the purpose of this analysis, the conceptual grading and tree removal that may be required for each conceptual phase described below:

Phase 1

Phase 1 grading operations include the WSID canal work, the storm drainage basin between the water and wastewater treatment facilities, and the water and wastewater facilities sites. This grading may be segmented depending on the timing of construction of the fire system and burying of the canal. Approximately 50,000 cubic yards of earth would be moved and balanced on the Project site.

Phase 2

Phase 2 grading would include leveling Industrial Buildings 1 through 3 footprints, creating the storm basins that support the construction of these buildings and grading of West Schulte Road and Pavilion Parkway. Phase 2 grading would cover approximately 170 acres and result in the movement of approximately 800,000 cubic yards of earth that would be balanced on the northern portion of the Project site. Phase 1 and 2 grading would include the removal of all almond trees on the northern portion of the Project site.

Phase 3

Phase 3 grading would include grading the southern portion of the site including Buildings 4 and 5 and their associated stormwater basins. Phase 3 would cover 110 acres and move approximately 600,000 cubic yards of earthwork that would be balanced on the Project site. Phase 3 grading would include the removal of all almond trees on the southern portion of the Project site.

2.6 ANTICIPATED PROJECT APPROVALS AND IMPLEMENTATION

2.6.1 Standard Development Requirements

This Draft EIR is being prepared by the County of San Joaquin to assess the potential environmental impacts that may arise in connection with actions related to implementation of the Project. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15367, the County of San Joaquin is the Lead Agency for the Project and has discretionary authority over the Project and Project approvals. The Draft EIR is intended to address all future development and infrastructure improvements that are within the parameters of the Project.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

This Draft EIR is a program EIR. The Draft EIR provides a programmatic analysis for a conceptual project.

The programmatic level of analysis for the Project has been prepared pursuant to CEQA Guidelines Section 15168. Under Section 15168(c), “[l]ater activities in the program must be examined in the light of [a] program EIR to determine whether an additional environmental document must be prepared.” Two general outcomes are possible: the later activity may be found to be “within the scope of the project covered by the program EIR,” in which case “no new environmental document would be required;” or such a finding cannot be made, and a new project-specific Mitigated Negative Declaration or EIR would be required, depending on the severity of the effects of the later activity. Section 15168(c)(4) directs that “[w]here the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR.”

Section 15168(c)(2) provides that “[i]f the agency finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the Lead Agency determines based on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.”

For any later activity covered in whole or in part in the program EIR, “[a]n agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program” (CEQA Guidelines § 15168(c)(3)).

2.6.2 Approvals

Discretionary and Ministerial Actions

The Draft EIR would be used by the County of San Joaquin and other responsible and trustee agencies in their consideration of the various Project approvals within their respective jurisdictions in order to identify and evaluate the Project’s significant environment impacts. Specific Plan approvals being sought may include, but are not limited to, the following:

- General Plan Amendment
- IPCP2 Specific Plan
- Zone Reclassification
- Development Agreement
- Parcel Maps, Tentative and Final Subdivision Maps
- Zoning Compliance Review and Administrative Use Permits
- Tree Removal Permit



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Project Description

- Encroachment Permits, Grading Permits, and Building Permits

As mandated by CEQA Guidelines Section 15124(d), this section contains a list of agencies that are expected to use this Draft EIR in their decision-making, and list of the action (both discretionary and ministerial) for which this Draft EIR would be used. These agencies include:

- Central Valley Regional Water Quality Control Board (CVRWQCB)
- San Joaquin Council of Governments (SJCOG)
- San Joaquin County Environmental Health Department (EHD)
- San Joaquin Valley Air Pollution Control Board (SJVAPCD)
- State Water Resources Control Board, Division of Drinking Water (DDW).

Responsible and Trustee Agencies

Several other agencies, in addition to the County of San Joaquin, would serve as responsible and trustee agencies, pursuant to CEQA Guidelines Section 15381 and Section 15386, respectively. This Draft EIR would provide environmental information to these agencies and other public agencies, which may be required to grant approvals or coordinate with other agencies, as part of Project implementation. These agencies may include, but are not limited to, the following:

- Bethany-Byron Irrigation District (BBID)
- California Department of Transportation (Caltrans)
- Central Valley Regional Water Resources Control Board (RWQCB)
- San Joaquin County
 - Assessor
 - Board of Supervisors
 - Community Development
 - Building Division/Plan Check
 - Public Works
 - Sheriff's Office (SJCSO)
- San Joaquin Valley Air Pollution Control District (SJVAPCD)
- Southern San Joaquin County Fire Authority (SSJCFA)
- Tracy Rural Fire District (TRFD)
- U.S. Army Corps of Engineers



2.7 PROJECT OBJECTIVES

The primary goal of the Project is the development of the subject site with a productive mix of industrial and logistics-based uses; adopt and implement a GPA and IPCP2 Specific Plan; and approve a zoning change. Complementary Project Objectives include the following:

- Implement a Specific Plan development supporting industrial and logistics-based uses maximizing and providing a broad range of long-term employment opportunities, which are much closer to County residents than Bay area job centers requiring long commutes and associated environmental impacts.
- Implement industrial and logistics-based uses providing a broad range of additional construction employment opportunities.
- Provide safe and convenient access for trucks in a manner that minimizes any potential disruption to residential areas.
- Provide industrial uses near existing roadways and infrastructure to reduce traffic congestion and air emissions.
- Facilitate goods movement locally and regionally by placing industrial uses in close proximity to I-205, which connects with both I-580 and Interstate 5 (I-5).
- Provide land uses that are compatible with surrounding land uses.
- Support the General Plan vision for increased urbanization and uses that increase the County's tax base in the area of the County where the Project is located, adjacent to the jurisdictional boundaries of the City of Tracy.
- Establish new development that would further the County's near-term and long-range fiscal goal, by significantly increasing property tax to the County, in addition to other financial benefits.
- Improve the regional jobs/housing balance.
- Redevelop underutilized agricultural land adjacent to other existing and planned industrial, commercial, and other urbanized uses.



3.0 ENVIRONMENTAL IMPACT ANALYSIS

Approach to Environmental Analysis

In accordance with CEQA Guidelines Section 15126.2, this Draft EIR identified and focuses on the significant direct and indirect environmental effects of the Project, giving due consideration to both its short- and long-term effects. Short-term effects are generally those associated with construction of the Project, while long-term effects are generally those associated with operation of Project components. As described in Section 1.0, Introduction, this analysis focuses on environmental resources that were identified as having a potential significant environmental impact. Environmental issues and resource topics determined not to be significant were analyzed within the Initial Study that accompanied the NOP (Appendix A). The County determined within the Initial Study that the Project did not have the potential to result in significant impacts to Mineral Resources or the loss of forest land and the impacts were scoped out of this Draft EIR. Sections 3.1 through 3.19 of this Draft EIR contain discussions of the potential environmental impacts related to the construction and operation of the Project.

Environmental Resource Topics

The potential environmental effects associated with the implementation of the proposed Project are evaluated in the following environmental resource areas:

- Aesthetics
- Agriculture and Forestry 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
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

Organization of Environmental Resource Section

Each environmental resource section contains the following:

Regulatory Setting presents the laws, regulations, plans, and policies that are relevant to each resource topic. Regulations originating from the federal, state, and/or local levels are each discussed as appropriate.

Environmental Setting presents the existing environmental conditions on the project site and within the surrounding area as appropriate, in accordance with CEQA Guidelines Section 15125. The extent of the environmental setting area evaluated (the project study area) differs among resources, depending on the



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Environmental Impact Analysis

locations where impacts would be expected. For example, air quality impacts are assessed for the air basin (macro-scale), as well as the site vicinity (micro-scale), whereas aesthetic impacts are assessed for the project vicinity only.

In determining the level of significance of environmental impacts associated with the Project, the analysis in this Draft EIR assumes that the proposed project would comply with relevant federal and state laws and regulations, and General Plan policies, ordinances, and other adopted County documents, unless otherwise noted. Therefore, such mandatory policies, ordinances, and standards are not identified as mitigation measures, but rather are discussed as part of the “regulatory setting” governing the proposed project.

Thresholds of Significance identifies the thresholds of significance used to determine the level of significance of the environmental impacts for each resource topic, in accordance with CEQA Guidelines Sections 15126, 15126.2, and 15143. The thresholds of significance used in this Draft EIR are based on the checklist presented in Appendix G of the CEQA Guidelines; best available data; and regulatory standards of federal, state, and local agencies.

Project Impacts identify the level of each environmental impact by comparing the effects of the proposed project to the environmental setting. Key methods and assumptions used to frame and conduct the impact analysis, as well as issues or potential impacts not discussed further (i.e., such issues for which the project would have no impact), are also described.

Project impacts are organized numerically in each subsection (e.g., Impact AES-1, Impact AES-2, Impact AES-3). A bold-font environmental impact statement precedes the discussion of each impact while its level of significance succeeds the discussion of each impact. The discussion that follows the impact summary includes the substantial evidence supporting the impact significance conclusion.

Mitigation Measures describe any feasible measures that could avoid, minimize, rectify, reduce, or compensate for significant adverse impacts, with measures having to be fully enforceable through incorporation into the project (PRC Section 21081.6[b]). Mitigation measures are not required for environmental impacts that are found to be less than significant. Where feasible mitigation for a significant environmental impact is available, it is described following the impact. Where sufficient feasible mitigation is not available to reduce environmental impacts to a less than significant level, or where the Lead Agency lacks the authority to ensure that the mitigation is implemented when needed, the impacts are identified as significant and unavoidable.

Level of Significance After Mitigation describes the level of impact significance remaining after mitigation measures are implemented.

Notice of Preparation Comments Related to Resource Topic identifies the comments made by individuals and agencies during the NOP scoping period relevant to each environmental resource. The commenter, representative agency, specific comment related to the resource topic, date, and a summary of how the comment was addressed within the EIR are provided in a table.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Environmental Impact Analysis

Level of Significance

Determining the severity of project impacts is fundamental to achieving the objectives of CEQA. CEQA Guidelines Section 15091 requires that decision makers avoid or substantially lessen the significant impacts identified in the Final EIR, if feasible. If the EIR identifies any significant unmitigated impacts, CEQA Guidelines Section 15093 requires decision-makers to adopt a statement of overriding considerations that explains why the benefits of the project outweigh the adverse environmental consequences identified in the EIR.

The level of significance for each impact examined in this Draft EIR is determined by considering the predicted magnitude of the impact against the applicable threshold. Thresholds were developed using criteria from the CEQA Guidelines and Appendix G Checklist; federal, state, and local regulatory schemes; regional and local plans and ordinances; accepted practice; consultation with recognized experts; and other professional opinions.

Format Used for Impact Analysis and Mitigation Measures

The format adopted in this Draft EIR to present the evaluation of environmental impacts is described and illustrated below.

Summary Heading of Impact

Impact AIR-1	An impact summary heading appears immediately preceding the impact description (Summary Heading of Impact in this example). The impact abbreviation identifies the section of the report (AIR for Air Quality in this example) and the sequential order of the impact (1 in this example) within that section. To the right of the impact number is the impact statement, which identifies the potential impact.

Impact Analysis

A narrative analysis follows the impact statement.

Level of Significance Before Mitigation

This section identifies the level of significance of the impact before any mitigation is proposed.

Mitigation Measures

In some cases, following the impact discussion, reference is made to federal and state regulations and agency policies that would fully or partially mitigate the impact. In addition, policies and programs from applicable local land use plans that partially or fully mitigate the impact may be cited.

Project-specific mitigation measures, beyond those contained in other documents, are set off with a summary heading and described using the format presented below:

MM AIR-1	Project-specific mitigation is identified that would reduce the impact to the lowest degree feasible. The mitigation number links the particular mitigation to the impact with which it is associated (AIR-1 in this example).

Abbreviations used in the mitigation measure numbering are shown in Table 3.0-1.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Environmental Impact Analysis

Table 3.0-1. Environmental Resource Abbreviations

Code	Environmental Resource Topic
AES	Aesthetics
AGR	Agriculture and Forestry Resources
AIR	Air Quality
BIO	Biological Resources
CUL	Cultural Resources
ENG	Energy
GEO	Geology and Soils
GHG	Greenhouse Gas Emissions
HAZ	Hazards and Hazardous Materials
HYD	Hydrology and Water Quality
LU	Land Use and Planning
NOI	Noise
POP	Population and Housing
PUB	Public Services
REC	Recreation
TRANS	Transportation
TCR	Tribal Cultural Resources
UTIL	Utilities and Service Systems
WF	Wildfire

Level of Significance After Mitigation

This section identifies the resulting level of significance of the impact following mitigation.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

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3.1 AESTHETICS

This section describes the environmental setting for aesthetics, including the existing site conditions, regulatory setting, and potential impacts that would result from the Project, and, if significant impacts are identified, the mitigation measures that would reduce these impacts.

3.1.1 Environmental Setting

Regional Visual Character

The County is located in the expansive San Joaquin Valley, bordered by the Sacramento-San Joaquin River Delta (Delta) and vast stretches of flat agricultural lands and urban development. It is flanked by the foothills of the Diablo Range to the west and the Sierra Nevada foothills to the east. The foothills of the Diablo Range act as a natural barrier, separating the County from Alameda County and Contra Costa County to the west. The primary transportation route between these counties is Interstate 205 (I-205), which passes through the Altamont Pass.

On the eastern side, the County shares its rolling terrain with Amador County and Calaveras County, all nestled within the Sierra Nevada foothills. To the south, the Stanislaus River serves as a boundary between the County and Stanislaus County. Notable rivers that flow through the County include the San Joaquin River, the Calaveras River, the Mokelumne River, and Dry Creek.

Within the County, approximately 83 percent of the unincorporated lands are dedicated to agricultural purposes, while urban developments are concentrated in the seven incorporated cities within the County (San Joaquin County 2014).

The County has an extensive transportation network that includes major freeways, transcontinental railroads, and airports. Two officially designated scenic highways, namely I-580 and I-5, traverse the County diagonally in the southwestern quadrant. Furthermore, the County has identified several other roads as local scenic routes. The County also includes a series of scenic geographic features including the Delta, agricultural lands across the Central Valley, the Diablo Range, and the Sierra Nevada foothills (San Joaquin County 2014).

Project Site Visual Character

The Project site is situated adjacent to the city limits of the City of Tracy but falls outside of its Sphere of Influence, within an unincorporated area of the County. Covering an area of 284 acres, the site is intersected by West Schulte Road. It is located east of the proposed extension of Pavilion Parkway to the west and south of the proposed extension of Promontory Parkway. The site is covered in an existing almond orchard; and features the presence of the Westside Irrigation District (WSID) Upper Main Canal, which cuts through its northern portion.

In the vicinity of the site, there is a diverse range of land uses and facilities. North of the Project site is the Westside Specific Plan, previously known as the Gateway Specific Plan, encompassing a planned 535-acre

INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Aesthetics

development. This plan aims to construct a mix of commercial, institutional, and residential land uses. To the west of the Project site, the International Park of Commerce Phase 1 Specific Plan occupies an approximate area of 1,780 acres and includes existing and planned development of commercial, office, business park industrial, and park uses. Additionally, to the immediate west of the site, on the southern side of West Schulte Road, is the Owens Brockway Glass Container Manufacturing Facility. South of the Project site, there is land zoned for general agriculture purposes, along with the presence of the Tracy Biomass plant and the proposed LBA III Industrial Project. The 421-acre Lammersville community (in unincorporated San Joaquin County) is located to the northwest of the Project site. To the north of Lammersville is the Mountain House Community, which at buildout would comprise of 16,105 residential units, 275 acres of commercial uses, 441 acres of industrial uses, 759.5 acres of open space, 285 acres of school, and 499.5 acres of public facilities. Agricultural lands and residential and urban development uses are located to the east of the site.

Lands surrounding the Project site primarily consist of agricultural and industrial uses. Industrial developments are located generally to the east of the Project site and residential development are located to the west of the Project site. The site is also surrounded by agricultural lands. The Project site is located approximately 1.4 miles northeast of a portion of Interstate 580 that is officially designated as a State scenic highway. This portion of I-580 is also identified as a local scenic route (San Joaquin County 2014). There are some views of ridgelines located in the distance to the south and west of the Project site.

Light and Glare Conditions

As indicated in the General Plan Natural Resources Element, approximately 86 percent of the County is considered as open space lands, consisting of farmland, grazing lands, and natural watershed areas including a variety of low intensity uses (San Joaquin County 2016a). The Project site and surrounding vicinity can be characterized as industrial and agricultural in nature. The Project site does not currently contain any lighting sources, as it is currently used for agricultural production as almond orchards. Existing light and glare sources surrounding the site include lighting from surrounding industrial and commercial buildings, residential uses, and from vehicles on the surrounding roadways.

3.1.2 Regulatory Setting

Federal

No federal regulations related to aesthetics are relevant to the Project.

State

California Scenic Highway Program

Many state highways are located in areas of outstanding natural beauty. California's Scenic Highway Program was created by the Legislature in 1963 to preserve and protect scenic highway corridors from change that would diminish the aesthetic value of lands adjacent to highways. The state laws governing the Scenic Highway Program are found in the Streets and Highways Code, Section 260 *et seq.* The State Scenic Highway System includes a list of highways that are either eligible for designation as scenic



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Aesthetics

highways or are currently designated. These highways are identified in Section 263 of the Streets and Highways Code.

A highway may be designated scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. When a city or county nominates an eligible scenic highway for official designation, it must identify and define the scenic corridor of the highway. Because a scenic corridor is the land generally adjacent to and visible from the highway, it is identified using a motorist's line of vision. A reasonable boundary is selected when the view extends to the distant horizon.

The corridor protection program does not preclude development but seeks to encourage quality development that does not degrade the scenic value of the corridor. Jurisdictional boundaries of the nominating agency are also considered. The agency must also adopt ordinances to preserve the scenic quality of the corridor or document such regulations that already exist in various portions of local codes. These ordinances make up the scenic corridor protection program.

In San Joaquin County, the only designated scenic highways are the 0.7-mile-long stretch of Interstate 5 (I-5) from the Stanislaus County line to Interstate 580 (I-580) and all of I-580 to where it joins I-205. This stretch of I-580 parallels portions of the Delta-Mendota Canal and the California Aqueduct, as well as rangelands and rolling hills (Caltrans 2025). The 0.7-mile-long stretch of I-5 is located approximately 11.7 miles southeast of the Project site and the portion of I-580 which intersects with I-205 is located approximately 1.4 miles southwest of the Project site.

Title 24 Outdoor Lighting Zones

In 2001, the California Legislature passed a bill requiring the California Energy Commission (CEC) to adopt energy efficient standards for outdoor lighting for both public and private sectors. In November 2003, the California Energy Commission adopted changes to the Building Energy Efficiency Standards within Title 24. These standards became effective on October 1, 2005, and specify outdoor lighting requirements for residential and nonresidential development. The intent of the new standards is to improve the quality of outdoor lighting and help reduce the impacts of light pollution, light trespass, and glare. The standards regulate lighting characteristics, such as maximum power and brightness, shielding, and sensor controls to turn lighting on and off. Different lighting standards are set by classifying areas by lighting zone (LZ). The classification is based on population figures in the 2020 Census and the areas can be designated as LZ1 (dark), LZ2 (low), LZ3 (medium), or LZ4 (high). Lighting requirements for dark and rural areas are stricter in order to protect the areas from new sources of light pollution and light trespass. According to the CEC, the default for rural areas, as defined by the U.S. Census Bureau, is LZ1; however, local jurisdictions may designate certain rural areas with a higher LZ if ambient lighting is greater than typical for a rural area (CEC 2025). As such, the Project site is classified as LZ1.



Local

San Joaquin County General Plan

The County's General Plan presents a vision for the County's future, looking ahead to 2035. This long-range planning document includes a comprehensive framework for the County's physical, economic, and social development and environmental resources preservation, as well as policies to guide day-to-day decisions. The County's General Plan emphasizes that future development must occur in a way that makes the most of existing infrastructure and public facilities, minimizes impacts to natural resources, expands opportunities for job growth, restores and revitalizes unincorporated communities, and provides greater opportunities to all County residents.

The County's General Plan includes the following goals and policies related to aesthetics that are applicable to the Project (San Joaquin County 2016b):

Goal NCR-7: To protect and enhance the unique scenic features of San Joaquin County.

- **Policy NCR-7.1: Scenic Roadways.** The County shall protect the visual character of designated scenic roadways.
- **Policy NCR-7.2: Views from Public Lands and Roadways.** The County shall ensure that views of waterways, hilltops, and oak groves from public land and public roadways are protected and public access is provided to them whenever possible.
- **Policy NCR-7.3: Designate Scenic Routes.** The County shall preserve scenic views from roadways by designating scenic routes based on the following criteria:
 - leads to a recreational area; • provides a representative sampling of the scenic diversity within the County;
 - exhibits unusual natural or man-made features of interest;
 - provides opportunities to view activities outside the normal routine of most people;
 - provides a route for people to view the Delta waterways; and
 - links two scenic routes or connects with scenic routes of cities or other counties.
- **Policy NCR-7.4: Visually Complementary Development.** The County shall require new development adjacent to scenic resources to be sited and designed to visually complement those resources, except in MR-Z designated areas.
- **Policy NCR-7.5: Require Landscape Plans.** The County shall require landscape plans for new development along State- or County-designated scenic routes.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Aesthetics

- **Policy NCR-7.7: Reducing Light Pollution.** The County shall encourage project designs, lighting configurations, and operational practices that reduce light pollution and preserve views of the night sky.
- **Policy NCR-7.8: Underground Utility Lines.** The County shall require all new electric and communication distribution facilities adjacent to scenic routes to be placed underground, whenever feasible. Where overhead utility lines are unavoidable, every effort should be made to reduce the visual impact through elements of design.

Goal LU-3: Preserve and enhance the character and scale of San Joaquin County's communities and rural areas, including their architectural heritage and historic character.

- **Policy LU-3.1: Contextual and Compatible Design.** The County shall ensure that new development respects San Joaquin County's heritage by requiring that new development respond to its context, be compatible with the traditions and character of each community, and develop in an orderly fashion which is compatible with the scale of surrounding structures.
- **Policy LU-3.3: Transitions in Scale.** The County shall encourage a balance of the scale and massing of new development to the physical and visual character of adjoining uses to provide appropriate transitions in building height and bulk that are sensitive to the physical and visual character of adjoining neighborhoods.
- **Policy LU-3.10: Visual Access.** The County shall encourage new development to maintain views of hillsides, creeks, and other distinctive natural areas by regulating building orientation, height, and bulk.

San Joaquin County Development Title

The County Municipal Development Title includes Chapter 9-403, Lighting and Illumination, related to all outdoor lighting, as follows:

- (a) **Efficient Use.** All outdoor lighting in non-residential development must be turned off during daylight hours and during any hours when the building is not in use and the lighting is not required for security. Time clocks or photo-sensor systems may be required as a conditions of approval of a discretionary permit.
- (b) **Entrances to Non-Residential Buildings.** All exterior doors shall be illuminated with a minimum of 0.5 foot-candles of light during hours of darkness.
- (c) **Shielding.** All nonexempt outdoor lighting fixtures shall have shielding so as not to be directly visible from a public street or an adjacent lot.



3.1.3 Regulatory Setting

This section analyzes the Project's potential to result in significant impacts on aesthetics. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid impacts.

Methodology

Analysis for the Project's visual impacts is based on an evaluation of the changes to the existing visual resources that would result from implementation of the Project. In determining the extent and implications of visual changes, consideration was given to: the existing visual quality of the affected environment; specific changes in the visual character and quality of the affected environment; the extent to which the affected environment contains places, features that provide unique visual experiences or that have been designated on plans or policies for protection or special consideration; visibility from off-site vantage points; and the sensitivity of viewers and their activities and the extent of which these activities are related to the aesthetic qualities affected by the Project. The Project site plan (see Figure 7) and available satellite imagery were reviewed. A site visit was conducted in April 2023, and photos were taken to document the existing conditions, see Figure 10. Applicable sections of the General Plan were also considered.





View of the northern portion of the Project site from the southeast.



View of the southern portion of the Project site from the northeast.



View of the Project site from the southeast.



View of the Project site from the south.



View of the southern portion Project site from the south.



View of the northern Portion of the Project site from the northwest.

Project Location
San Joaquin County

Client/Project
International Park of Commerce Specific Plan
Phase 2

Figure No.
10

Title
Drone Imagery

Thresholds of Significance

The significance criteria used to identify aesthetic impacts is from Appendix G of the CEQA Guidelines. For the purposes of this EIR, implementation of the Project would cause a significant impact on aesthetic resources if it would do the following:

- 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, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public Views are those that are experienced from a publicly accessible vantage point). If the Project is in an urbanized area, the potential of the project to conflict with applicable zoning and other regulations governing scenic quality?
- d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Project Impacts and Mitigation Measures

Scenic Vistas

Impact AES-1	The Project would not have a substantial adverse effect on a scenic vista.

Impact Analysis

In accordance with the General Plan EIR, the region's major scenic vistas are offered by the east-west travel corridors that afford views of the Sierra Nevada foothills when driving eastward and views of the Diablo Range when driving westward. Furthermore, "close-in" scenic vistas can be enjoyed while driving on two-lane roads through rural parts of the County, where agricultural production, vineyards, and orchards are visible (San Joaquin County 2014).

A scenic vista is defined as a viewing point that provides expansive views of a highly valued landscape available to the general public. Scenic resources are defined as those landscape patterns and features that are visually or aesthetically pleasing and that, therefore, contribute positively and define a distinct community or region. The General Plan does not identify the Project site as a scenic vista or scenic resource.

West Schulte Road, which runs through the Project site, provides westerly views of the Diablo Range; however, these views of scenic resources along West Schulte Road are partially obstructed and limited due to existing adjacent and nearby industrial developments. While the Project site does not contain any scenic vistas or features associated with scenic vistas (e.g., ridgelines, peaks, overlooks), it does contain those views of the existing almond orchard that can be enjoyed when driving by the site. The development of the Project would lead to increased obstruction of scenic resources and could potentially have a significant adverse impact on a scenic vista.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Aesthetics

Construction

Project construction would involve the removal of agricultural operations on the site (almond trees), site preparation and grading, and building construction, including water and wastewater treatment facilities. The high-cube warehouse buildings would be of Type V-B construction, site cast, tilted concrete panels with a variety of architectural enhancements. The International Building Code (IBC) includes a variety of construction types including Type V-B. Building types set the building material as well as the maximum size and height that new buildings can be based on the end user (International Code Council 2025). Type V-B construction is typical for industrial developments and single-family homes.

The typical wall panels would be enhanced with reveals and a textured elastomeric, multicolored coating system. The roof would support mechanical equipment for the heating, ventilation, and air conditioning (HVAC) system screened with a roof parapet and/or with roof screens equal in height to the mechanical equipment. The areas around the building entries would also be enhanced with tinted glazing in aluminum frames with overhead steel-framed painted canopies. The placement of these enhancements would be focused at those locations most visible from the public roadways. Construction within the Project area is expected to occur in three phases. Phase 1 and Phase 2 area development is expected to occur within 5 years, while full build out of the Project would be completed within 10 years, depending on market conditions, demand, and other relevant factors. Construction activities would occur Monday through Friday, between 7 AM and 7 PM and, if necessary, between 8 AM and 8 PM on Saturday and Sunday, consistent with the San Joaquin County Development Title. During construction, equipment, vehicles, and staging areas would be present and introduce new features to the Project site that could obstruct scenic resources. These features would be mostly visible from the adjacent roadways and the surrounding agricultural, industrial/commercial and residential uses located east of the Project site (across from the WWID Canal). However, visibility of these features would be temporary as all equipment, vehicles, and staging areas would be removed from the Project site once construction is complete. Therefore, Project construction activities would not have a substantial effect on a scenic vistas, impacts would be less than significant.

Operation

The Project would be required to comply with General Plan Policy LU-3.10 which requires new developments to maintain views of scenic vistas and Policy NCR-7.4 which requires new development adjacent to scenic resources to be sited and designed to visually complement these resources. The proposed IPCP2 Specific Plan contains detailed development standards and design guidelines that establish criteria for site design, architecture, landscaping, parking, and circulation that has been developed to ensure compliance with County regulations and standards for development. The IPCP2 Specific Plan would include development standards to ensure visual buffers, setbacks, and appropriately scaled development are provided to reduce potential impacts to scenic resources. Additionally, the Project's structures would be designed and constructed to be similar in height and scale to the adjacent and nearby industrial developments and would not result in substantial changes to the existing scale of development in the area. Figure 11 is a rendering of the Project from the proposed park at IPC Phase 1, which is located northeast of the Project site. Figure 12 is a rendering of the Project from the northwest along Promontory Parkway. These renderings are a visual image of what the Project could look like based on the IPC2



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Aesthetics

Specific Plan design guidelines. The proposed industrial buildings would carryover the design elements of IPC Phase 1 that lies immediately west of the Project site. The Project's proposed wastewater treatment facilities would be located on the interior of the site and would not pose a significant impact to a scenic vista. Several of the proposed detention basins would be located along the periphery of the Project site; however, these will be located at or below grade and shielded from view by a vegetated buffer. The Project's site planning and design would consider view corridors from the public streets for the placement of signage and structures as identified in the IPCP2 Specific Plan. Though development of the Project would result in changes to the existing views of scenic resources from the Project area, the Project site is not visible from park and recreation areas or community gathering facilities, nor would it have the potential to obstruct views from high vantage points or sensitive County viewpoints. Therefore, impacts to scenic vistas, impacts would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.





Project Location
San Joaquin County

Project
International Park of Commerce Specific Plan
Phase 2

Figure No.

11

Title

**Rendering from Northeast of the
Project Site**



Project Location
San Joaquin County

Project
International Park of Commerce Specific Plan
Phase 2

Figure No.

12

Title

**Rendering from Northwest of
the Project Site**

INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Aesthetics

Scenic Resources within Scenic Highways

Impact AES-2	The Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.

Impact Analysis

The Project site is not located within a designated or eligible scenic highway. The closest officially State-designated scenic highway is a portion of I-580 before it intersects with I-205, located approximately 1.4 miles southwest of the Project site (Caltrans 2025). Due to the distance from the State designated scenic highway and existing developments and hillsides, the Project site is not visible from the State-designated scenic highway. Although there are trees on the Project site, associated with the current agricultural uses, there are no rock outcroppings or historic buildings on the Project site. The trees are not in a forested setting and are limited to rows of trees in agricultural production and not located within a State scenic highway. Additionally, adjacent roadways to the Project site are not State- or County-designated scenic routes. Development of the Project would not result in substantial changes to views of scenic resources visible from the State-designated scenic highway, nor would development of the Project would result in damage to scenic resources. As the Project site is not located within a State-designated scenic highway, the Project would not substantially damage scenic resources within a State scenic highway, and impacts would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Visual Character and Scenic Quality

Impact AES-3	The Project is in a non-urbanized area and would not substantially degrade the existing visual character of quality of public views of the site and its surroundings.

Impact Analysis

The Project site is located in a rural community, and the surrounding vicinity would be considered as industrial and agricultural. The Project would include development of new industrial land uses and infrastructure that may have the potential to alter the existing visual character of the area. From the center of the Project site, existing visual character of the area includes views of ridgelines located in the distance to the south and west of the Project site, agricultural lands in all directions, residences to the east, and lands developed with industrial uses to the south (Owens Brockway Glass Container Manufacturing Facility) and west (Cordes Ranch). Additionally, there is the Valpico Memorial Park located approximately 1 mile to the southeast of the Project site as well as a future park to the northwest of the Project site that will be



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Aesthetics

constructed as part of Cordes Ranch. These parks have the potential to be visually impacted by the Project by changing the existing viewshed from agricultural lands to industrial space. There are no other known open spaces, parks or trails in the vicinity. Although the development of the Project would fundamentally and irreversibly change the visual character of the Project site, it would be compatible with other surrounding uses and consistent with the proposed IPCP2 Specific Plan and adjacent areas. Therefore, the Project would not substantially degrade the visual quality of the Project area or its surroundings, and the impact related to changed character would be considered less than significant.

Construction

Project construction would involve the removal of existing agricultural operations (almond trees), including site preparation and grading, and building of proposed structures. Construction within the Project area is expected to occur in phases. Phase 1 and 2 area development is expected to occur within 5 years, while full build out of the Project would be completed within 10 years, depending on market conditions, demand, and other relevant factors. Construction activities would occur Monday through Friday, between 7 AM and 7 PM and, if necessary, between 8 AM and 8 PM on Saturday and Sunday, consistent with the San Joaquin County Development Title. During construction, the almond orchard would be removed and equipment, vehicles, and staging areas would be present and introduce new features to the Project site that could degrade visual character from nearby roadways and parks. However, visibility of these features would be temporary as all equipment, vehicles, and staging areas would be removed from the Project site once construction is complete. While the existing almond orchard would be removed as part of construction, the Project site would be consistent with other existing or proposed industrial buildings in the area. Therefore, Project construction activities would not substantially degrade the existing visual environment, and impacts would be less than significant.

Operation

While views of hillsides from roadways, Valpico Memorial, and the proposed park in IPC Phase 1 are already somewhat limited due to existing development and topography, they may become further obstructed or more limited after construction, as the Project would place several new structures on the site that are significantly taller than the existing almond trees, which range from about 13 to 20 feet in height. Though development of the Project would result in degradation to the existing visual character of the Project area, implementation of County General Plan policies would reduce potential impacts. The Project would be required to comply with County General Plan Policy LU-3.3 which requires appropriate transitions and a balance of the scale and massing of new development to the physical and visual character of adjoining uses. Additionally, the Project would comply with County General Plan Policy LU-3.10 which encourages new development to maintain views of hillsides and other distinctive natural areas by regulating building orientation, height, and bulk.

The proposed IPCP2 Specific Plan contains detailed development standards and design guidelines that establish criteria for site design, architecture, landscaping, parking, and circulation that has been developed to ensure compliance with County regulations and standards for development. Although the development of the proposed Project would fundamentally and irreversibly change the visual character of the Project site, it



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Aesthetics

would be compatible with surrounding uses. The IPCP2 Specific Plan guidelines would comply with the County General Plan policies and therefore, the development of the Project would comply with County General Plan policies adopted to protect visual resources in the area. By complying with County General Plan policies, the Project would not result in a substantial degradation of existing visual character or quality of public views of the site and its surroundings, and impacts would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Light and Glare

Impact AES-4	The Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Impact Analysis

The Project site is currently in agricultural use, with almond orchards planted across the site. As such, existing light and glare sources on the Project site are limited, with limited sources of light and glare associated with operations on the site. Existing light and glare sources in the vicinity include lighting associated with structures utilized for surrounding industrial developments and from vehicles on the surrounding roadways. Development of the Project would result in new sources of light and glare being introduced on the Project site.

Project construction would involve the removal of the existing almond orchard, site preparation and grading, undergrounding of the WSID canal, and building of proposed structures. Construction of the Project is expected to be completed within 10 years, and construction activities would occur Monday through Friday, between 7 AM and 7 PM and, if necessary, between 8 AM and 8 PM on Saturday and Sunday, consistent with the San Joaquin County Development Title. Lighting used during nighttime work would also be temporary and focused on the Project site, away from the adjacent commercial and residential uses. Therefore, nighttime construction lighting would not create a new source of substantial light.

Operation of the Project would increase the number of and intensity of lighting sources at the Project site. The development of the Project would result in the installation of new sources of light and glare on the Project site. These new sources of light include additional street lighting along internal roadways, building-mounted light fixtures, and pole-mounted light fixtures within parking areas. Additionally, illuminated signage may be employed. Development would be consistent with the lighting requirements outlined in the Specific Plan, Chapter 4. The Specific Plan requires that all lighting be low profiles and in scale with the surrounding Project character and would only allow accent lighting when it would not impact adjacent developments, roadways, or residences. The Project would be required to comply with General Plan Policy



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Aesthetics

NCR-7.7 which encourages the use of Project designs, lighting configurations, complementary land uses, and operational practices that reduce the potential for glare during daytime hours and reduce nighttime light pollution. The Project would also be required to comply with regulations and standards identified by the San Joaquin County Municipal Code Section 9-1025.6, Light and Glare. Energy efficient lighting and control systems would be utilized as an integral part of the lighting systems in all buildings developed for the Project. Lighting levels for outdoor illumination would meet the minimum standards required for safety, and all exterior lighting would be required to be controlled by timers and designed to limit light spill over. Architectural design guidelines outlined in the IPCP2 Specific Plan would generally require building base materials consisting of concrete tilt-up panels and other sustainable materials, such as cross laminated timber, that would not be glare inducing. The use of such exterior building materials would not include the use of reflective glazing, thereby further reducing the potential for glare impacts. Although the Project would introduce new sources of light and glare at the Project site, compliance with County General Plan policies and the County Municipal Code would reduce potential impacts, and impacts would be less than significant.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

3.1.4 Notice of Preparation Comments Related to Aesthetics

As discussed in Section 1.0, Introduction, the County distributed a NOP of the Draft EIR for the Project beginning on March 31, 2023. The NOP was distributed for a 30-day comment period that ended on May 1, 2023. The Public Scoping Meeting on the Draft EIR for the Project was held on April 10, 2023. The comments received on the NOP and during the Public Scoping Meeting were considered in the preparation of this Draft EIR. Comments related to aesthetics and where they are addressed in this section are provided in Table 3.1-1. Additionally, each comment includes a brief summary of how the concern was addressed, the impact, or why additional analysis is not required. Commenters may have made comments addressing multiple EIR sections, but only specific aesthetics comments are provided in Table 3.3-1. See Table 1.2-1 in Section 1.0, Introduction for a summary of all comments made during the NOP scoping period.

Table 3.1-1. Comments Received on the NOP for Aesthetics

Affiliation	Signatory	Date	Comment Description	Location Addressed in Aesthetics Chapter	Response to Comment
Private Parties – Written Comments Received					
Interested Individual	Wendy Tocchini	April 30, 2023	Concerns related to Cordes Ranch	• Subsection 3.1.3,	Impact AES-4 evaluates the potential light and



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Aesthetics

Affiliation	Signatory	Date	Comment Description	Location Addressed in Aesthetics Chapter	Response to Comment
			Project, as well as overall concerns related to light pollution.	Environmental Impacts, Project Impacts and Mitigation Measures	glare from the Project. Operation of the Project would increase the amount of lighting sources in the Project site but would comply with County General Plan policies, County Municipal Code, and would implement Mitigation Measure AES-1 that requires the Project applicant to develop and prepare a Photometric Plan that requires all exterior lights to be faced downwards. Cumulative aesthetic impacts, including the Project in conjunction with Cordes Ranch, are evaluated in Section 4.0, Cumulative Effects.



3.2 AGRICULTURAL AND FORESTRY RESOURCES

This section describes the environmental setting for agricultural and forestry resources, including the existing site conditions, regulatory setting, and potential impacts that would result from the Project, and, if significant impacts are identified, the mitigation measures that would reduce these impacts. Additional detail and background on agricultural and forestry resources are based, in part, on the 2023 Agricultural Conversion Study and LESA Modeling prepared by Stantec, July 2023 (Stantec 2023), included in Appendix B to this EIR.

3.2.1 Environmental Setting

San Joaquin County is one of the nation's top ten agricultural areas in productivity and market value, and agriculture in the County is a \$2 billion annual industry (San Joaquin County 2014). San Joaquin County agricultural crops and commodities vary annually on their individual rankings based on the amount of acreage dedicated to each commodity. The top ten crops for 2024, listed in descending order of gross value, were as follows (San Joaquin County 2025):

1. Milk: \$536,945,000
2. Almonds: \$492,310,000
3. Grapes: \$319,310,000
4. Eggs, Chicken (All): \$261,572,656
5. Walnuts: \$240,050,000
6. Cherries: \$240,018,000
7. Cattle and Calves: \$165,629,000
8. Tomatoes (All): \$120,653,000
9. Blueberries: \$77,647,000
10. Silage (Other): \$70,633,000

The 2024 gross value of San Joaquin County's agricultural production is \$3,146,586,502 which represents a 2.29 percent decrease in value of \$3,220,324,000 over 2023. In 2024, milk was San Joaquin County's number one leading commodity, however this is a 13.59 percent decrease in value from 2023 due to high heat during the summer months and High Path Avian Influenza in the Fall. Almonds showed a 43.30 percent increase due to a rise in prices; grapes showed an 1.94 percent decrease due to lower yield and lower prices; eggs and chicken showed a 9.48 percent increase; walnut prices grew significantly from 2023 leading to a 60.76 increase in production value, however, there was a significant drop in production; and cherries showed a 12.20 percent decrease in production value due to a slight drop in price and yield. Other

INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Agricultural and Forestry Resources

commodity groups that showed gains include apiary products due to honey price increases and expanded number of hives dedicated to pollination, as well as livestock and poultry, which saw growth due to a rise in head count in cattle and calves (San Joaquin County 2025).

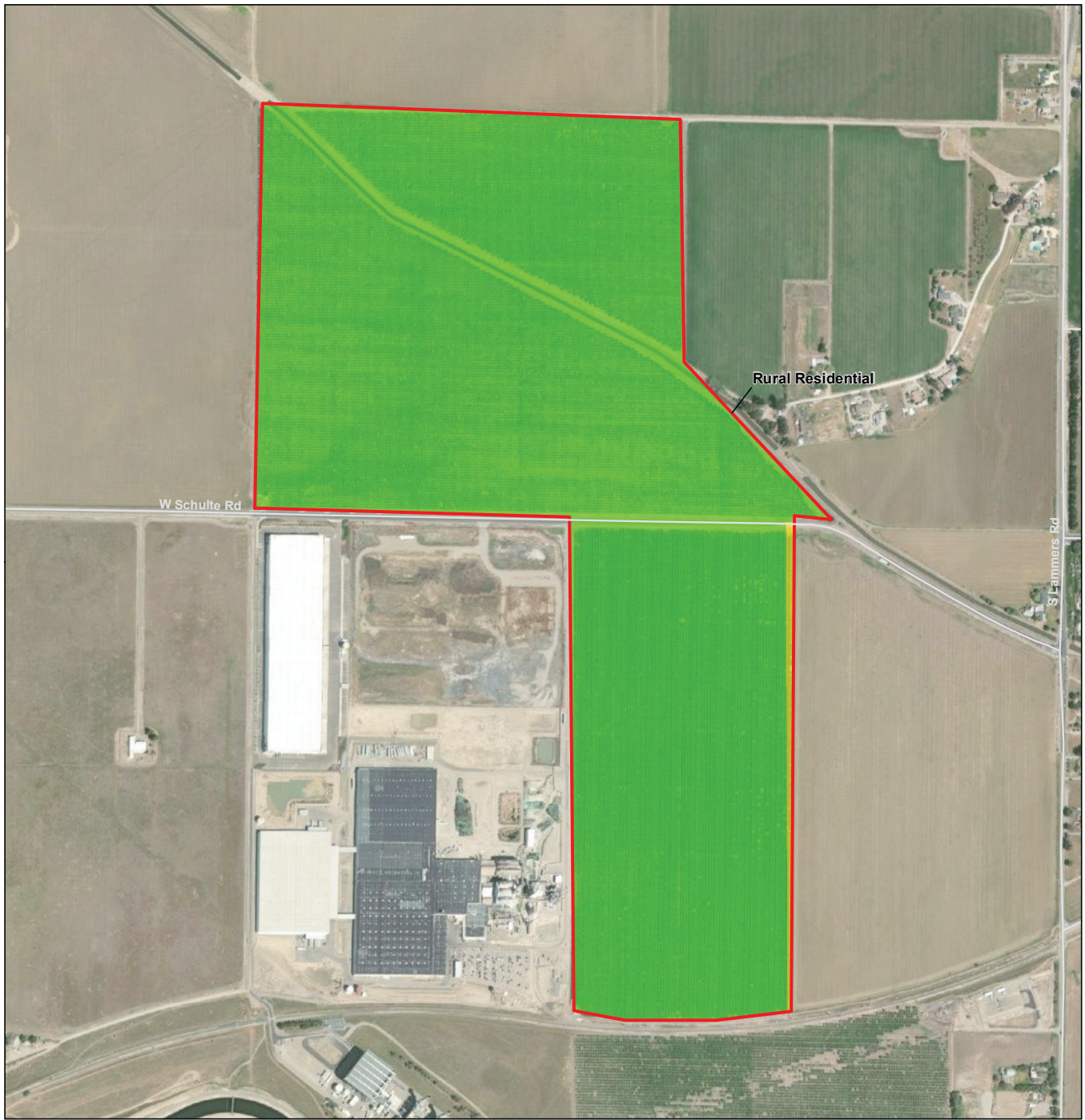
According to the California Department of Conservation (DOC) Division of Land Protection's Farmland Mapping and Monitoring Program (FMMP), the County lost 27,420 acres of Important Farmland between 1990 and 2022 (DOC 2022). Approximately 53,331 acres of agricultural land uses in the County, including Important Farmland, were converted to urbanized uses during the same time frame. According to the General Plan, as of 2010, there were approximately 533,000 acres of Williamson Act lands that exist in the County. Approximately 38,500 acres of County Williamson Act lands (both prime and non-prime lands) were currently under non-renewal, as identified in the General Plan. Additionally, San Joaquin County contains an additional 60,000 acres of land that are designated as Farmland Security Zone (FSZ) lands, which are areas where contracts are of longer duration than regular Williamson Act contracts, initially at least 20-year terms (San Joaquin County 2014).

Project Site

Based on the FMMP data, as demonstrated in Figure 13, the Project site consists of approximately 281 acres of Prime Farmland, approximately 3 acres of Farmland of Local Importance, and 0.002 acre of Rural Residential Land (DOC 2025a). No parcels under Williamson Act contract or FSZ contract are currently located on the Project site. However, the Project site is identified as within an agricultural preserve (Stantec 2023). As defined by the DOC, an agricultural preserve defines the boundary of an area within which a city or country may enter into contracts with landowners. The boundary is designated by resolution of the Board of Supervisors or City Council having jurisdiction. Agricultural preserves are regulated by rules and restrictions designated in the resolution to ensure that the land within the preserve is maintained for agricultural or open space use (DOC 2025a).

The County's General Plan Land Use Map designates the Project site as General Agriculture (A/G), and the Project site is in the AG-40 zoning district. The Project site and surrounding parcels are not zoned forest land or timberland.





- Project Area (284.26 ac.)**
- FMMP Farmland Type**
- Prime Farmland (281.29 ac.)
 - Farmland of Local Importance (2.97 ac.)
 - Rural Residential Land (0.002 ac.)

Source: Farmland Mapping and Monitoring Program,
California Department of Conservation,
Division of Land Resource Protection, August 2022

0 500 1,000
Feet
1:12,000
(At original document size of 8.5x11)



Project Location
San Joaquin County, California

Prepared by PG on 2023-02-17
TR by EM on 2023-02-01

Client/Project

International Park of Commerce Phase 2 Project

Figure 13

Important Farmland

3.2.2 Regulatory Setting

Federal

Farmland Protection Policy Act

The U.S. Department of Agriculture (USDA) administers the Farmland Protection Policy Act of 1981 (the Act). The Act is intended to minimize the extent to which federal programs contribute to the unnecessary conversion of farmland to nonagricultural uses. The Act also requires these programs to be compatible with state, local, and private efforts to protect farmland.

Natural Resources Conservation Service (NRCS)

The NRCS maps soils and farmland uses to provide comprehensive information necessary for understanding, managing, conserving, and sustaining the country's limited soil resources. The NRCS manages the Farmland Protection Program, which provides funds to help purchase development rights to keep productive farmland in agricultural uses.

Agricultural Conservation Easement Program

The Agricultural Act of 2014 established the Agricultural Conservation Easement Program (ACEP), which consolidated previously separate federal farmland conservation programs. Under the ACEP, USDA's National Resource Conservation Service (NRCS) provides financial and technical assistance to help conserve agricultural lands and wetlands and their related benefits. Under the Agricultural Land Easements component, NRCS helps Indian tribes, state and local governments, and non-governmental organizations protect working agricultural lands and limit non-agricultural uses of the land.

State

Farmland Security Zones

The FSZ provisions of the Land Conservation Act were added in 1998. An FSZ contract offers landowners greater property tax reduction in return for an initial contract term of 20 years, with renewal occurring automatically each year. Land restricted by an FSZ contract is valued for property assessment purposes at 65 percent of its Land Conservation Act valuation, or 65 percent of its Proposition 13 valuation, whichever is lower. Land contract under existing Williamson Act contracts, as well as non-contracted land, can go directly into an FSZ contract. Cities and special districts that provide non-agricultural services are generally prohibited from annexing land enrolled under an FSZ contract. Similarly, school districts are prohibited from taking FSZ lands for school facilities.

California Farmland Conservancy Program

Implemented by the California Department of Conservation, the California Farmland Conservancy Program (CFCP) is a voluntary program that seeks to encourage the long-term, private stewardship of agricultural lands through the use of agricultural conservation easements. The CFCP, formerly known as the



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Agricultural and Forestry Resources

Agricultural Land Stewardship Program, was created in 1996, and provides grant funding for projects that use and support agricultural conservation easements for the protection of agricultural lands (DOC 2025b).

Cortese-Knox-Hertzberg Local Government Reorganization Act

The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 established procedures for local government changes of organization, including city incorporations, annexations to a city or special district, and city and special district consolidations. This act requires that development or use of land for other than open-space shall be guided away from existing prime agricultural lands in open-space use toward areas containing non-prime agricultural lands, unless that action would promote the planned, orderly, efficient development of an area. In addition, Local Agency Formation Commissions (LAFCOs) have several responsibilities under the Act, including the power to act on local agency boundary changes and adopt spheres of influence (SOIs) for local agencies.

Open Space Subvention Act

The Open Space Subvention Act (OSSA) was enacted on January 1, 1972, to provide for the partial replacement of local property tax revenue foregone as a result of participation in the Williamson Act and other enforceable open space restriction programs (Government Code Section 16140 *et seq.*). Participating local governments receive annual payment on the basis of the quantity (number of acres), quality (soil type and agricultural productivity), and, for Farmland Security Zone contracts, location (proximity to a city) of land enrolled under eligible enforceable open space restrictions.

California Timberland Productivity Act

The California Timberland Productivity Act (TPA) of 1982 (Government Code Sections 51100 *et seq.*) was enacted to help preserve forest resources. Similar to the Williamson Act, this program gives landowners tax incentives to keep their land in timber production. Contracts involving Timberland Production Zones (TPZ) are on 10-year cycles.

California Forest Legacy Act of 2007

The California Forest Legacy Act of 2007, codified in Public Resources Code Section 12220(g), promotes conservation easements in environmentally sensitive forest areas. This act defines “forest land” as “land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.”

Timberland Production Zones

Under the Z'berg-Warren-Keene-Collier Forest Taxation Reform Act of 1976, codified in Government Code Sections 51110-51119.5, counties must provide for the zoning of land used for growing and harvesting timber as TPZs. A TPZ is a 10-year restriction on the use of timberland, similar to the Williamson Act for agricultural lands. Land use under a TPZ is restricted to growing and harvesting timber or to compatible uses. In return, taxation of timberland under a TPZ will be based only on such restrictions in use.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Agricultural and Forestry Resources

California Timberland Productivity Act of 1982

The California Timberland Productivity Act (CTPA) of 1982, codified in Government Code Sections 51100-51104, describes the authority of local government to protect timberlands. The law is designed to ensure continued availability of timberland by establishing TPZs on all qualifying timberland. The Act discourages premature or unnecessary conversion of timberland to urban or other uses and encourages investment in timberlands based on reasonable expectation of harvest. Similar to a Right to Farm Ordinance, the CTPA also states that timber operations conducted in accordance with California forest practice rules shall not be restricted due to neighboring conflicting land uses.

Williamson Act

The California Land Conservation Act of 1965, commonly known as the Williamson Act, was established based on numerous State legislative findings regarding the importance of agricultural lands in an urbanizing society. Policies emanating from those findings discourage premature and unnecessary conversion of agricultural land to urban uses and discourage discontinuous urban development patterns, which unnecessarily increase the cost of community services to community residents. The Williamson Act authorizes each County to establish an agricultural preserve. Land within the agricultural preserve is eligible to be placed under a contract between the property owner and County that would restrict the use of the land to agriculture in exchange for a tax assessment that is based on the yearly production yield. The contracts have a 10-year term that is automatically renewed each year, unless the property owner requests a non-renewal or the contract is cancelled. If the contract is cancelled the property owner is assessed a fee of up to 12.5 percent of the property value.

Department of Conservation Important Farmland Mapping and Monitoring Program

The DOC, Division of Land Resource Protection, maintains the FMMP, which monitors the conversion of the state's farmland to and from agricultural use. The map series identifies eight classifications (discussed below) and uses a minimum mapping unit size of 10 acres. The program also produces a biannual report on the amount of land converted from agricultural to non-agricultural use. The program maintains an inventory of state agricultural land and updates its "Important Farmland Series Maps" every two years. The FMMP designates Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance as "Important Farmland." The classifications of farmland as Prime Farmland, Unique Farmland, and Farmland of Statewide Importance are based on the suitability of soils for agricultural production, as determined by a soil survey conducted by the Natural Resources Conservation Service (NRCS). The DOC also manages the California Important Farmland Finder, an interactive website, which can be used to identify the farmland classification of a specific area (DOC 2025a).

Prime Farmland (P)

Prime Farmland is farmland with the best combination of physical and chemical features to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Agricultural and Forestry Resources

Farmland of Statewide Importance (S)

Farmland of Statewide Importance is similar to Prime Farmland but has minor shortcomings, such as greater slopes or a lesser ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

Unique Farmland (U)

Unique Farmland has lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date.

Farmland of Local Importance (L)

Farmland of Local Importance is land important to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee.

Grazing Land (G)

Grazing Land is land on which the vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California's Cattlemen's Association, the University of California Cooperative Extension, and other groups interested in the extent of grazing activities. The minimum mapping unit for Grazing Land is 40 acres.

Urban and Built-Up Land (D)

Urban and Built-Up Land is land occupied by structures with a building density of at least 1 unit per 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.

Other Land (X)

Other Land is land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines and borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

California Agricultural Land Evaluation and Site Assessment Model

Land Evaluation and Site Assessment (LESA) is a term used to define an approach for rating the relative quality of agricultural land based upon specific measurable features. The formulation of a California LESA Model is the result of Senate Bill 850 (Chapter 812/1993), which charges the Resource Agency (in



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Agricultural and Forestry Resources

consultation with LUCI) with developing an amendment to Appendix G of the CEQA Guidelines concerning agricultural lands. Such an amendment is intended “to provide lead agencies with an optional methodology to ensure that significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process” (PRC Section 21095).

A LESA analysis is based on the following definition of agricultural land contained in CEQA, PRC Section 21060.1:

21060.1 (a) “Agricultural land” means prime farmland, farmland of statewide importance, or unique farmlands, as defined by the United States Department of Agriculture land inventory and monitoring criteria as modified for California.

21060.1 (b) In those areas of the state where lands have not been surveyed for the classifications specific in subdivision (a), “agricultural land” means land that meets the requirement of “prime agricultural land” as defined in paragraph (1), (2), (3), or (4) of subdivision (c) of Section 51201 of the Government Code [the Williamson Act].

Local

Local Agency Formation Commission

The San Joaquin County LAFCo has specific policies and procedures for determining SOIs. These policies were originally adopted in 2007 and most recently revised in 2012. They state that LAFCo shall use SOI to promote cooperative planning efforts among cities and the county to address concerns regarding land use, including premature conversion of agricultural and open space lands. SOIs shall consider city and county general plans, and all SOIs must be included within the applicable city’s general plan land use element. Policies indicate that LAFCo prefers an SOI that minimizes the conversion of open space and agricultural land, and that agricultural land shall not be included in an SOI unless its exclusion would impede orderly development (San Joaquin LAFCo 2012).

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

The San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP), administered by the San Joaquin Council of Governments (SJCOG), is the largest habitat mitigation program in the County. Adopted in 2001, the SJMSCP is centrally concerned with the preservation of habitat land to satisfy the species protection requirements of federal and state law. The key purpose of the SJMSCP is to:

- provide a strategy for balancing the need to conserve Open Space and the need to Convert Open Space to non-Open Space uses while protecting the region's agricultural economy;
- preserve landowner property rights;
- provide for the long-term management of plant, fish and wildlife species, especially those that are currently listed, or may be listed in the future, under the federal ESA or the California ESA;



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Agricultural and Forestry Resources

- provide and maintain multiple-use Open Space which contribute to the quality of life of the residents of San Joaquin County; and
- accommodate a growing population while minimizing costs to project proponents and society at large.

The plan also has had other indirect benefits, including the protection of agricultural resources. The 2001 SJMSCP calls for the preservation of about 100,000 acres, including 57,000 agricultural acres, over a 50-year period for the protection of a variety of biological species (SJCOG 2000). Many agricultural conservation easements in the County are the product of the SJMSCP.

The SJMSCP, in accordance with federal ESA Section 10(a)(1)(B) and California ESA Section 2081(b) Incidental Take Permits, provides compensation for the Conservation of Open Space to non-Open Space uses that affect the plant, fish, and wildlife species covered by the SJMSCP. Among other activities, the SJMSCP compensates for conversions of open space for urban development.

San Joaquin County Agricultural Mitigation Ordinance

In 2006, the San Joaquin County Board of Supervisors enacted the Agriculture Mitigation Ordinance. Finding that the “loss of farmland to development is irreparable” and that zoning and other regulatory measures are an “inadequate” approach to preservation, the ordinance calls for:

- At least a 1:1 ratio between the acres of farmland lost and preserved;
- Preservation through the acquisition of easements either (1) directly by the developer or (2) through payment of in-lieu fees;
- Mitigation of either a General Plan amendment or rezoning that changes land from an agricultural to non-agricultural designation, regardless of the non-agricultural designation;
- Having a “qualified entity” hold the easements and administer the fees—generally assumed to be the Central Valley Farmland Trust (CVFT) or another agency;
- Coordination with similar mitigation efforts of the cities, the SJMSCP, and the Delta Protection Commission; and
- Organization of a nine-member Agricultural Technical Advisory Committee (with three members each appointed by the San Joaquin Farm Bureau Federation, the Building Industry Association, and the Board of Supervisors) to develop a Mitigation Strategy, report annually on the effectiveness of the program, and advise the County.

Agricultural Conservation Easements

Agricultural easements are voluntary and combine elements of landowner compensation and regulation. Conservation easements typically eliminate, in perpetuity, the development rights from affected parcels. Landowners voluntarily sell their future development rights for cash, tax benefits, or a mix of both, keeping



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Agricultural and Forestry Resources

all other rights of ownership. Typically, the economic benefit of an easement is the difference between its value in agricultural use and its development potential market value. Landowners negotiate terms and sell their easements to government agencies or nonprofit land trusts, which then become responsible for monitoring parcel use to ensure compliance with the easement terms. Legally recorded in property deeds, easements run with the land and are not affected by ownership changes. CVFT is emerging as the principal broker and holder of agriculture-oriented easements in the County, and easements in San Joaquin County held by CVFT were first established in 2006.

San Joaquin County Right to Farm Ordinance

Division 9, Right to Farm, of the San Joaquin County Ordinance Code established the County's Right to Farm Ordinance which addresses the problem of urban growth encroaching on agricultural land by seeking to reduce nuisance complaints about farm operations from residential neighbors. Using disclosure methods, purchasers and existing owners of residential property are informed about the local importance of agriculture and the possible negative impacts of residing near normal farm operations, such as noise, odors, insects, dust, fumes, operation of machinery, application of pesticides and fertilizers, storage and disposal of manure, and other operational requirements. The ordinance is intended to protect existing farming operations from pressure to cease operations when residential development occurs nearby. The County established an Agricultural Grievance Committee to assist in resolution of disputes that arise regarding such operations or activities (San Joaquin County 2014).

San Joaquin County General Plan

The General Plan presents a vision for the County's future, looking ahead to 2035. This long-range planning document includes a comprehensive framework for the County's physical, economic, and social development and environmental resources preservation, as well as policies to guide day-to-day decisions. The General Plan emphasizes that future development must occur in a way that makes the most of existing infrastructure and public facilities, minimizes impacts to natural resources, expands opportunities for job growth, restores and revitalizes unincorporated communities, and provides greater opportunities to all County residents.

The General Plan includes the following goals and policies related to agriculture that are applicable to the Project (San Joaquin County 2016):

Goal LU-1: Direct most urban development towards cities and urban and rural communities within the unincorporated county to promote economic development, while preserving agricultural lands and protecting open space resources.

- **Policy LU-1.1: Compact Growth and Development.** The County shall discourage urban sprawl and promote compact development patterns, mixed-use development, and higher development intensities that conserve agricultural land resources, protect habitat, support transit, reduce vehicle trips, improve air quality, make efficient use of existing infrastructure, encourage healthful, active living, conserve energy and water, and diversify San Joaquin County's housing stock.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Agricultural and Forestry Resources

- **Policy LU-1.4: Encourage Infill Development.** The County shall encourage infill development to occur in Urban and Rural Communities and City Fringe Areas within or adjacent to existing development in order to maximize the efficient use of land and use existing infrastructure with the capacity to serve new development. The County shall balance infill development within outward expansion of communities and new development in other unincorporated areas.
- **Policy LU-1.5: Clear Boundaries.** The County shall strive to preserve agricultural and open space areas that contribute to maintaining clear boundaries among cities and unincorporated communities.

Goal LU-2: Promote efficient development and land use practices in new development that provide for the protection of vital resources and enhancement of communities.

- **Policy LU-2.1: Compatible and Complimentary Development.** The County shall ensure that new development is compatible with adjacent uses and complements the surrounding natural or agricultural setting.
- **Policy LU-2.10: Soils Information.** The County shall consider the soils information from the Farmland Mapping and Monitoring Program during review of proposed new development projects.
- **Policy LU-2.14: General Plan Land Use Amendments.** When reviewing proposed General Plan amendments to change or modify land use designations or the land use diagram or a zoning reclassification, the County shall consider the following:
 - consistency of the proposal with the Vision and Guiding Principles and the goals and policies of the General Plan;
 - new physical, social, or economic factors that were not present when the time of General Plan was adopted;
 - reasonable alternative sites in the vicinity that are already planned for the use and can accommodate the proposal;
 - potential for an undesirable, growth-inducing precedent or premature conversion of agricultural land; and
 - the availability of infrastructure and services; and the effect on the fiscal health of the County.
- **Policy LU-2.15: Agricultural Conversions.** When reviewing proposed General Plan amendments to change a land use diagram or zoning reclassification to change from an agricultural use to non-agricultural use, the County shall consider the following:
 - potential for the project to create development pressure on surrounding agricultural lands;



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Agricultural and Forestry Resources

- potential for the premature conversion of prime farmland, farmland of statewide importance, unique farmland, farmland of local importance, and confined animal agriculture;
- potential for impacts on surrounding farming operations and practices; and
- provision of infrastructure and services to the new use and the potential impact of service demands or on the surrounding area.

Goal LU-7: Provide for the long-term preservation of productive farmland and to accommodate agricultural services and related activities that support the continued viability of the County's agricultural industry.

- **Policy LU-7.5: Right to Farm.** The County shall strive to protect agricultural land against nuisance complaints from non-agricultural land uses through the implementation of the San Joaquin County Right to Farm ordinance and, if necessary, other appropriate regulatory and land use planning mechanisms.
- **Policy LU-7.7. Agricultural Buffers.** The County shall ensure non-agricultural land uses at the edge of agricultural areas incorporate adequate buffers (e.g., fences and setbacks) to limit conflicts with adjoining agricultural operations.
- **Policy LU-7.10: Agricultural Mitigation Program.** The County shall continue to require agricultural mitigation for projects that convert agricultural lands to urban uses.
- **Policy LU-7.11: Agricultural Land Preservation Mechanisms.** The County shall support regulatory, incentive-based, and financial mechanisms for the preservation of agricultural land.
- **Policy LU-7.12: Agricultural Land Conversion Mitigation.** The County shall maintain and implement the Agricultural Mitigation Ordinance to permanently protect agricultural land within the County.

3.2.3 Environmental Impacts

This section analyzes the Project's potential to result in significant impacts on agricultural, and timber resources. Impacts to forest resources were evaluated within the Initial Study. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid impacts.

Methodology

The following analysis is based on a review of documents pertaining to the Project site, including the General Plan, General Plan EIR, and the DOC Important Farmland Map. Additionally, the following analysis is based on analysis contained within the 2023 Agricultural Conversion Study and LESA Modeling prepared for the Project by Stantec Consulting Services, Inc. (Appendix B).

The LESA Model was developed to provide a Lead Agency with an optional methodology to ensure that potentially significant environmental effects of agricultural land conversions are quantitatively and



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Agricultural and Forestry Resources

consistently considered in the environmental review process (PRC Section 21095), including during CEQA reviews. As a Lead Agency, the County may depend on the LESA Model to evaluate the significance of agricultural land conversions.

The LESA Model evaluates and measures a project site's size, soil resource quality, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. These factors are then rated, weighted, and combined, resulting in a single numeric score. This score becomes the basis for determining the significance of a project's potential impacts on agricultural resources.

Using the LESA Model, a project would result in a significant impact on agricultural resources if the project meets the threshold criteria provided in Table 3.2-1. The criteria include a Land Evaluation (LE) scoring threshold and a Site Assessment (SA) scoring threshold. A single LESA score is generated for a project after all the individual LE and SA factors have been scored and weighted. Scores are based on a scale of a maximum of 100 points. Table 3.2-1 provides the ratings that determine whether a project would result in a significant impact on agricultural resources.

Table 3.2-1. California LESA Model Scoring Thresholds

Total LESA Score	Scoring Decision
0 to 39 points	Not considered significant
40 to 59 points	Considered significant only if LE and SA subscores are each greater than or equal to 20 points
60 to 79 points	Considered significant unless either LE or SA subscores is less than 20 points
80 to 100 points	Considered significant

Source: DOC 1997.

The LESA Modeling worksheets prepared to evaluate the Project's potential impacts are provided in Appendix B.

This impact analysis also considers Project consistency with applicable laws, regulations, ordinances, permits, and other legal requirements pertaining to agricultural and forest resources, as discussed.

Thresholds of Significance

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purposes of this EIR, implementation of the Project may result in the potentially significant impact on agricultural resources if it would do any of the following:

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



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Agricultural and Forestry Resources

- 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))?
- 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?

The following issues were determined to have no impact or a less than significant impact during the Initial Study and NOP Scoping process. These issues are summarized in Section 7.0, Effects Found Not to Be Significant, and are not discussed further in this section.

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

Project Impacts and Mitigation Measures

Conversion of Farmland

Impact AGR-1	The Project would cause the conversion of a 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.

Impact Analysis

The Project site has approximately 281 acres of Prime Farmland and approximately 3 acres of Farmland of Local Importance. As noted previously, Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance are considered "Important Farmland." Thus, the Project site includes 284 acres of Important Farmland. The Project site is located in unincorporated San Joaquin County and is located within an area of the County that is used for both industrial and agricultural uses. The Project site is currently in agricultural use, with almond orchards planted across the site.

The California LESA Model is designed to assess the significance of a proposed Project's conversion of agricultural land. Loss of agricultural land has typically involved conversion to permanent urban uses, and the LESA Model has generally been used to evaluate that type of potential impact. The LESA score for the Project site was determined to be 80.14, which is considered significant (refer to Table 3.2-1). The Project would affect the agricultural land on the Project site for the duration of the life of the Project. Due to the long-term conversion of Important Farmland and based on the LESA score of 80.14, the Project would have a potentially significant impact on agricultural resources (Stantec 2023).

As the Project would have a significant impact on agricultural resources, mitigation would be required. The Project would be required to implement and comply with the General Plan goals and policies identified above, see Section 3.2.2, related to the protection and preservation of agricultural lands within the County. However, projects located within the County that convert Important Farmland would conflict with the San Joaquin County Right to Farm Ordinance and General Plan Policy LU-7.5. As a result, these projects are subject to General Plan Policy LU-7.10, General Plan Policy LU-7.12, and the County's Agricultural Mitigation Ordinance, which requires preservation of farmland at a 1:1 ratio between the acres of farmland



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Agricultural and Forestry Resources

lost and preserved. Preservation of farmland would be completed through the acquisition of easements, either directly by the developer or through the payment of in-lieu fees. Compliance with the Agricultural Mitigation Ordinance would be required by Mitigation Measure AGR-1, which would require the Project applicant to participate in the preservation of farmland by purchasing easements directly or through the payment of in-lieu fees. These easements typically eliminate, in perpetuity, the development rights of parcels and the cost is based on the value in agricultural use as compared to its potential market value as a development. The Project would be required to pay all fees as required by the Agricultural Mitigation Ordinance. However, the payment of compensatory fees would not be sufficient to reduce the level of impact, and other feasible mitigation measures do not exist. Although the Project would comply with the requirements established by the County's Agricultural Mitigation Ordinance, the Project would still convert 284 acres of Important Farmland to non-agricultural use and, as a result, the impact would remain significant and unavoidable.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

MM AGR-1 Agricultural Mitigation Ordinance. Prior to the conversion of Important Farmland on the Project site, the Project applicant shall comply with the County's Agricultural Mitigation Ordinance by preserving farmland at a 1:1 ratio. The Project applicant shall either directly complete the acquisition of easements or pay in-lieu fees established on a per-acre basis for the loss of Important Farmland. Fees paid toward the County's program shall be used to fund conservation easements on comparable or better agricultural lands to provide compensatory mitigation.

Level of Significance After Mitigation

Significant and Unavoidable Impact.

Zoning Conflicts with Williamson Act Contracts

Impact AGR-2	The Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract.

Impact Analysis

The County's Zoning Ordinance designates the Project site as AG-40 zoning district. The purpose of the AG-40 district is to identify agricultural lands for the continuation of commercial agricultural enterprises, as long as such operations are feasible. The Project involves the development of approximately 284 acres of land with a warehouse and distribution facility with internal traffic circulation and vehicle, truck, and trailer parking and outdoor storage, as well as onsite water and wastewater treatment facilities. Industrial uses are not permitted under the AG-40 zoning designation and, therefore, the Project would conflict with existing zoning for agricultural uses. However, the Project proposes to rezone the site from AG-40 to I-G/SP-1. The I-G/SP-1 zoning is intended to allow for flexibility in development. The I-G/SP-1 zoning district would provide for a variety of industrial uses, such as manufacturing, distribution, and storage uses, and the SP-1



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Agricultural and Forestry Resources

zoning district would allow development of other uses, including wastewater treatment. The General Plan EIR identified that if conversion of existing agricultural zoning designation does occur, this could result in a significant impact if incompatible uses are considered for these lands such that a physical environmental effect would occur (San Joaquin County 2014). With the approval of the rezoning, the Project would be consistent with the allowed uses under the I-G/SP-1 zoning district and the Project site would not be developed with incompatible uses. Additionally, there are no Williamson Act contract lands on the Project site. As such, no conflicts would occur. Therefore, with the approval of the proposed rezoning, the Project would be consistent with the zoning designation of the site, and impacts would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Zoning Conflicts with Forest Land/Timberland

Impact AGR-3	The Project would not 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)).

Impact Analysis

The Project site is currently in the AG-40 zoning district and is not zoned forest land or timberland. As identified in the General Plan, forest lands within the County are located within the Oak Grove Regional Park, Micke Grove Park, and a blue oak habitat community habitat that covers approximately 20,000 acres located in the southwestern corner of the County (San Joaquin County 2014). The Project site is not located near these areas and as the Project site is not zoned forest land or timberland, development of the Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. Therefore, there would be no impact.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report
Agricultural and Forestry Resources

Changes to the Existing Environment causing Conversion of Farmland

Impact AGR-4	The Project would not 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.

Impact Analysis

The Project would not cause changes to the existing environment that would result in conversion of Farmland outside the Project site boundary to non-agricultural use or forest land to non-forest uses. As identified previously, the Project site is located in an area developed with agricultural and industrial uses and is not located near forest land. Therefore, the Project would not result in the conversion of forest land to non-forest uses.

Farmland conversion is caused primarily by urbanization; other chief causes for the loss of Farmland include development of low-density rural residences and ecological restoration projects, such as wetlands and wildlife habitat. The Project site is located within an area of the County that is used for both industrial and agricultural uses. Land located directly adjacent to the west of the Project site is developed with industrial uses with additional industrial uses located within one mile west of the Project site. Rural residential and single-family residential uses are located to the east of the Project site. The conversion of the Project site could result in changes to the existing environment, due to their location and nature, and result in conversion of Farmland to non-agricultural uses, including the construction of roadways and water and wastewater treatment facilities. However, the Promontory Parkway and Pavilion Parkway would be constructed as extensions of the roadways proposed under Cordes Ranch and these roadways are only designed for the use of IPC Phase I and the Project. Additionally, the water and wastewater treatment facilities will be sized for the Project site and would not promote any additional growth.

However, the General Plan EIR identified that implementation of the County's Right to Farm Ordinance and adopted General Plan policies would minimize this impact (San Joaquin County 2014). The Right to Farm Ordinance addresses the problem of urban growth encroaching on agricultural land by seeking to reduce nuisance complaints about farm operations from non-agricultural users. The ordinance is intended to protect existing farming operations from pressure to cease operations when non-agricultural development occurs nearby. The General Plan includes policies that discourage agricultural land conflicts which state that development approval processes shall consider the impact on, and compatibility with, surrounding agricultural lands and that such developments are sized and located to avoid potential conflicts. Additionally, the Project would be subject to the SJMSCP. The SJMSCP, in accordance with federal ESA Section 10(a)(1)(B) and California ESA Section 2081(b) Incidental Take Permits, provides compensation for the Conservation of Open Space to non-Open Space uses that affect the plant, fish, and wildlife species covered by the SJMSCP. Among other activities, the SJMSCP compensates for conversions of open space for urban development. Implementation of the County's Right to Farm Ordinance, General Plan policies, and the SJMSCP would reduce land use conflicts and would protect existing agricultural lands from conversion to non-agricultural uses. Therefore, impacts would be less than significant.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report
Agricultural and Forestry Resources

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

3.2.4 Notice of Preparation Comments Related to Agriculture

As discussed in Section 1.0, Introduction, the County distributed a NOP of the Draft EIR for the Project beginning on March 31, 2023. The NOP was distributed for a 30-day comment period that ended on May 1, 2023. The Public Scoping Meeting on the Draft EIR for the Project was held on April 10, 2023. The comments received on the NOP and during the Public Scoping Meeting were considered in the preparation of this Draft EIR. Comments related to agriculture and where they are addressed in this section are provided in Table 1.2-1. Additionally, each comment includes a brief summary of how the concern was addressed, the impact, or why additional analysis is not required. Commenters may have made comments addressing multiple EIR sections, but only specific agriculture comments are provided in Table 1.2-1. See Table 1.2-1 in Section 1.0, Introduction for a summary of all comments made during the NOP scoping period.

Table 3.2-2. Comments Received on the NOP for Agriculture

Affiliation	Signatory	Date	Comment Description	Location Addressed in Agriculture Chapter	Response to Comment
Private Parties – Written Comments Received					
San Joaquin Farm Bureau Federation	Andrew Watkins	May 1, 2023	Concerns related to impacts to prime agricultural land and zone reclassification to industrial uses. The commenter references the San Joaquin County Agricultural Mitigation Ordinance and states that the applicant should implement the agricultural mitigation under County Code Section 9-1080.	- Subsection 3.2.3, Environmental Impacts, Project Impacts and Mitigation Measures - LESA modeling (Appendix B)	Impact AG-1 addresses the impacts of converting Prime Farmland to industrial zoning. The Project would comply with the County's Agricultural Mitigation Ordinance, see County Code Section 9-1080) and implement Mitigation Measure AG-1. However, impacts were found to be significant and unavoidable.
City of Tracy	Kris Balaji	September 14, 2023	The commenter states that the conversion of 285-acres of agricultural land to non-	Subsection 3.2.3, Environmental Impacts, Project	Impact AG-1 addresses the impacts of converting Prime Farmland to industrial zoning. The Project would comply with



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report
Agricultural and Forestry Resources

Affiliation	Signatory	Date	Comment Description	Location Addressed in Agriculture Chapter	Response to Comment
			agricultural uses would be inconsistent with the County's land use policies..	Impacts and Mitigation Measures	the County's Agricultural Mitigation Ordinance, see County Code Section 9-1080) and implement Mitigation Measure AG-1. However, impacts were found to be significant and unavoidable. Consistency with County land use policies is discussed in Table 3.11-2.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

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3.3 AIR QUALITY

This section describes the environmental setting for air quality, including the existing site conditions, regulatory setting, and potential impact that would result from the Project, and, if significant impacts are identified, the mitigation measures that would reduce these impacts. Additional detail and background on air quality is based, in part, on the Air Quality, Health Risk Assessment, Greenhouse Gas Summary Methodology Memorandum prepared by Stantec (Stantec 2023), included as Appendix C to this EIR.

3.3.1 Environmental Setting

The Project is located within San Joaquin County which lies within the San Joaquin Valley Air Basin (SJVAB) which is under the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD).

Air pollution in the SJVAB can be attributed to both human-related (anthropogenic) and natural (non-anthropogenic) activities that produce emissions. Air pollutants from significant anthropogenic activities in the SJVAB includes a variety of industrial-based sources as well as on- and off-road mobile sources.

Activities that tend to increase mobile activity include increases in population, increases in general traffic activities (including automobiles, trucks, aircraft, and rail), urban sprawl (which will increase commuter driving distances), and general local land management practices as they pertain to modes of commuter transportation. These sources, coupled with geographical and meteorological conditions unique to the area, stimulate the formation of unhealthy air.

Climate and Meteorology

The following information is excerpted from the most recent version of the SJVAPCD Guide for Assessing and Mitigating Air Quality Impacts (GAMAQI), adopted in March 2015 (SJVAPCD 2015).

The SJVAB has an “inland Mediterranean” climate and is characterized by long, hot, dry summers and short, foggy winters. Sunlight can be a catalyst in the formation of some air pollutants (such as ozone); the SJVAB averages over 260 sunny days per year. The SJVAB is generally shaped like a bowl. It is open in the north and is surrounded by mountain ranges on all other sides. The Sierra Nevada mountains are along the eastern boundary (8,000 to 14,000 feet in elevation), the Coast Ranges are along the western boundary (3,000 feet in elevation), and the Tehachapi Mountains are along the southern boundary (6,000 to 8,000 feet in elevation).

Dominant airflows provide the driving mechanism for transport and dispersion of air pollution. The mountains surrounding the SJVAB form natural horizontal barriers to the dispersion of air contaminants. The wind generally flows south-southeast through the valley, through the Tehachapi Pass and into the Southeast Desert Air Basin portion of Kern County. As the wind moves through the Basin, it mixes with the air pollution generated locally, generally transporting air pollutants from the north to the south in the summer and in a reverse flow in the winter.

INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Generally, the temperature of air decreases with height, creating a gradient from warmer air near the ground to cooler air at elevation. This gradient of cooler air over warm air is known as the environmental lapse rate. Inversions occur when warm air sits over cooler air, trapping the cooler air near the ground. These inversions trap pollutants from dispersing vertically and the mountains surround the San Joaquin Valley trap the pollutants from dispersing horizontally. Strong temperature inversions occur throughout the SJVAB in the summer, fall, and winter. Daytime temperature inversions occur at elevation of 2,000 to 2,500 feet above the San Joaquin Valley floor during the summer and at 500 to 1,000 feet during the winter. The result is a relatively high concentration of air pollution in the valley during inversion episodes. These inversions cause haziness, which in addition to moisture may include suspended dust, a variety of chemical aerosols emitted from vehicles, particulates from wood stoves, and other pollutants. In the winter, these conditions can lead to carbon monoxide “hotspots” along heavily trafficked roads and at busy intersections. During summer’s longer daylight hours, stagnant air, high temperatures, and plentiful sunshine provide the conditions and energy for the photochemical reaction between reactive organic gases (ROG) and oxides of nitrogen (NO_x), which results in the formation of ozone.

Because of the prevailing daytime winds and time-delayed nature of ozone, concentrations are highest in the southern portion of the SJVAB. Summers are often periods of hazy visibility and occasionally unhealthy air, while winter air quality impacts tend to be localized and can consist of (but are not exclusive to) odors from agricultural operations; soot or smoke around residential, agricultural, and hazard-reduction wood burning; or dust near mineral resource recovery operations.

Criteria Air Pollutants and Human Health Effects

Criteria air pollutants includes ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulate matter (measured both in units of smaller than 2.5 microns in diameter [PM_{2.5}] and in units of particulate matter smaller than 10 microns in diameter [PM₁₀]), and lead (Pb).

Ozone. Most ground-level ozone is formed as a result of complex photochemical reactions in the atmosphere between ROG, NO_x, and oxygen. ROG and NO_x are considered precursors to the formation of ozone, a highly reactive gas that can damage lung tissue and affect respiratory function. While ozone in the lower atmosphere is considered a damaging air pollutant, ozone in the upper atmosphere is beneficial, as it protects the Earth from harmful ultraviolet radiation. However, atmospheric processes preclude ground-level O₃ from reaching the upper atmosphere (United States Environmental Protection Agency [USEPA] 2022a).

Adverse Human Health Effect of Ozone: Exposure to ozone can cause coughing, difficult breathing, damage to the airways, increase lung susceptibility to infection, and increase the frequency of asthma attacks. These effects have been found to be more serious in people with lung diseases like asthma. Long-term exposure can create asthma or aggravate existing asthma (USEPA 2023a).



Carbon Monoxide. CO is a colorless, odorless, poisonous gas produced by the incomplete combustion of fossil fuels such as natural gas, gasoline, or wood and can be generated from a variety of combustion sources including vehicles, power plants, and wildfires (CARB 2024a).

Adverse Human Health Effect of Carbon Monoxide: Exposure to CO can reduce oxygen delivery to the brain which can cause fatigue, headaches, confusion, and dizziness. Inadequate oxygen delivery to the heart muscle can lead to chest pain and decreased tolerance to exercise. Those with pre-existing anemia, heart, or respiratory disease as well as unborn babies, infants, and the elderly are more likely to experience the health effects of CO exposure (CARB 2024a).

Nitrogen Dioxide. NO₂ is a brownish, highly reactive gas primarily produced as a result of the burning of fossil fuels. NO₂ can also lead to the formation of ozone in the lower atmosphere. NO₂ can lead to degradations in the health of aquatic and terrestrial ecosystems (USEPA 2022a).

Adverse Human Health Effect of Nitrogen Dioxide: Exposure to NO₂ can increase the risk of premature death, cardiopulmonary effects, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses. Infants and children are particularly at risk as high levels of NO₂ exposure as it can lead to slow lung growth resulting in smaller lungs at maturity (CARB 2024b)

Sulfur Dioxide. SO₂ is primarily emitted from the combustion of coal and oil by steel mills, pulp and paper mills, non-ferrous smelters, natural gas and petroleum extraction, and oil refining. SO₂ contributes to acid rain, which in turn, can lead to the acidification of lakes and streams and the acidification of soils (USEPA 2022a, CARB 2024c).

Adverse Human Health Effect of Sulfur Dioxide: Short term exposure to SO₂ can exacerbate asthma and cause respiratory irritation such as wheezing, shortness of breath, and chest tightness. High concentration of SO₂ can aggravate existing respiratory and cardiovascular diseases in asthmatics and others who suffer from emphysema or bronchitis (CARB 2024c).

Particulate Matter. Airborne PM is not a single pollutant, but rather is a mixture of many chemical species. PM is a complex mixture of solids and aerosols composed of small droplets of liquid, dry solid fragments, and solid cores with liquid coatings. Particles vary widely in size, shape, and chemical composition, and may contain inorganic ions, metallic compounds, elemental carbon, organic compounds, and compounds from the earth's crust. Particles are defined by their diameter for air quality regulatory purposes. Those with a diameter of 10 microns or less (PM₁₀) are inhalable into the lungs and can induce adverse health effects. Fine particulate matter is defined as particles that are 2.5 microns or less in diameter (PM_{2.5}). Therefore, PM_{2.5} comprises a portion of PM₁₀. Emissions from combustion of gasoline, oil, diesel fuel or wood produce much of the PM_{2.5} pollution found in outdoor air, as well as significant proportion of PM₁₀. PM₁₀ also includes dust from construction sites, landfills and agriculture, wildfires and brush/waste burning, industrial sources, wind-blown dust from open lands, pollen, and fragments of bacteria.



PM may be either directly emitted from sources (primarily particles) or formed in the atmosphere through chemical reactions of gases (secondary particles) such as SO₂, NO_x, and certain organic compounds (USEPA 2022a).

Adverse Human Health Effect of Particulate Matter: Short-term exposure of PM_{2.5} can cause premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. Long-term exposure to PM_{2.5} is linked to premature death especially for people with chronic heart or lung disease and reduced lung function in children. Infants, children, and older adults with preexisting heart or lung diseases are the most susceptible to the impacts of PM_{2.5}.

Short-term exposure of PM₁₀ can worsen respiratory diseases, including asthma and chronic obstructive pulmonary disease (CARB 2024d).

Lead. Sources of Pb include pipes, fuel, and paint, although the use of Pb in these materials has declined dramatically over the years. Historically, a main source of Pb was automobile emissions. Pb can be inhaled directly or ingested by consuming Pb-contaminated food, water, or dust. Through regulations, USEPA has gradually reduced the Pb content of gasoline. This program has essentially eliminated violations of the Pb standard in urban areas except those areas with Pb point sources (USEPA 2022b).

Adverse Human Health Effect of Lead. Pb accumulates in bones where it is slowly excreted. Exposure to small amounts of lead over time can accumulate to harmful lead levels within the body. Therefore, lead exposure can damage multiple organ systems and people of any age group. Fetuses and children are most susceptible to Pb poisoning, which can result in heart disease, nervous system damage, anemia, liver or kidney damage, and brain damage (USEPA 2022b, CARB 2024e).

Ambient Air Quality Standards

For the protection of public health and welfare, the Federal Clean Air Act (FCAA) required that the USEPA establish National Ambient Air Quality Standards (NAAQS) for various pollutants. These pollutants are referred to as "criteria" pollutants because the USEPA publishes criteria documents to justify the choice of standards. These standards define the maximum amount of an air pollutant that can be present in ambient air. An ambient air quality standard is generally specified as a concentration averaged over a specific time, such as one hour, eight hours, 24 hours, or one year. The different averaging times and concentrations are meant to protect against different exposure effects. Standards established for the protection of human health are referred to as primary standards, whereas standards established for the prevention of environmental and property damage are called secondary standards. The FCAA allows individual states to adopt additional or more health-protective standards. The State's air quality regulatory framework and ambient air quality standards are discussed in greater detail later in this report. **Table 3.3-1** provides a summary of the California Ambient Air Quality Standards (CAAQS) and NAAQS.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Table 3.3-1. California and National Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards	National Standards	
			Primary	Secondary
Ozone	1 Hour	0.09 ppm (180 µg/m³)	—	Same as Primary Standard
	8 Hour	0.070 ppm (137 µg/m³)	0.070 ppm (137 µg/m³)	
Respirable Particulate Matter	24 Hour	50 µg/m³	150 µg/m3	Same as Primary Standard
	Annual Arithmetic Mean	20 µg/m³	—	
Fine Particulate Matter	24 Hour	—	35 µg/m³	Same as Primary Standard
	Annual Arithmetic Mean	12 µg/m³	9.0 µg/m³	
Carbon Monoxide	1 Hour	20 ppm (23 mg/m³)	35 ppm (40 mg/m³)	—
	8 Hour	9.0 ppm (10 mg/m³)	9 ppm (10 mg/m³)	—
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m³)	—	—
Nitrogen Dioxide	1 Hour	0.18 ppm (339 µg/m³)	100 ppb (188 µg/m³)	—
	Annual Arithmetic Mean	0.030 ppm (57 µg/m³)	0.053 ppm (100 µg/m³)	Same as Primary Standard
Sulfur Dioxide	1 Hour	0.25 ppm (655 µg/m³)	75 ppb (196 µg/m³)	—
	3 Hour	—	—	0.5 ppm (1,300 µg/m³)
	24 Hour	0.04 ppm (105 µg/m³)	0.14 ppm (for certain areas)	—
	Annual Arithmetic Mean	—	0.030 ppm (for certain areas)	—
Lead	30-Day Average	1.5 µg/m³	—	—
	Calendar Quarter	—	1.5 µg/m³	Same as Primary Standard
	Rolling 3-Month Average	—	0.15 µg/m³	
Visibility-Reducing Particles	8 Hour	See Footnote 1	No National Standards	
Sulfates	24 Hour	25 µg/m³		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m³)		
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m³)	—	

Notes:

¹ In 1989, the CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

ppm = parts per million

ppb = parts per billion

µg/m³ = micrograms per cubic meter

mg/m³ = milligrams per cubic meter

Source: CARB 2016, USEPA 2024a.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Attainment Status

The USEPA and California Air Resources Board (CARB) designate air basins where ambient air quality standards are exceeded as “nonattainment” areas. If standards are met, the area is designated as an “attainment” area. If there is inadequate or inconclusive data to make a definitive attainment designation, they are considered “unclassified.” National nonattainment areas are further designated as marginal, moderate, serious, severe, or extreme as a function of deviation from standards.

Each standard has a different threshold for what constitutes attainment, based on specific air quality statistics. For example, the federal 8-hour CO standard is not to be exceeded more than once per year; therefore, an area is in attainment of the CO standard if no more than one 8-hour ambient air monitoring value exceeds the threshold per year. In contrast, the federal annual standard for PM_{2.5} is met if the 3-year average of the annual average PM_{2.5} concentration is less than or equal to the standard.

The current attainment designations for the SJVAB are shown in Table 3.3-2. The SJVAB is designated as nonattainment for federal O₃ and PM_{2.5} as well as State O₃, PM₁₀, and PM_{2.5} (USEPA 2023a).

Table 3.3-2. San Joaquin Valley Air Basin Attainment Status

Pollutant	Designation/Classification			
	SJVAB		SFAB	
	Federal Standards ^a	State Standards ^b	Federal Standards ^a	State Standards ^b
Ozone – One hour	No Federal Standard ^f	Nonattainment/Severe	Nonattainment	Nonattainment
Ozone – Eight Hour	Nonattainment/Extreme ^e	Nonattainment	Nonattainment	Nonattainment
PM ₁₀	Attainment ^c	Nonattainment	Unclassified	Nonattainment
PM _{2.5}	Nonattainment ^d	Nonattainment	Attainment/Unclassified	Attainment
Carbon Monoxide	Attainment/Unclassified	Attainment/Unclassified	Attainment	Attainment
Nitrogen Dioxide	Attainment/Unclassified	Attainment	Attainment	Attainment
Sulfur Dioxide	Attainment/Unclassified	Attainment	Attainment	Attainment
Lead	No Designation/Classification	Attainment	No Designation/Classification	Attainment
Hydrogen Sulfide	No Federal Standard	Unclassified	No Federal Standard	Unclassified
Sulfates	No Federal Standard	Attainment	No Federal Standard	Attainment
Visibility Reducing Particles	No Federal Standard	Unclassified	No Federal Standard	Unclassified
Vinyl Chloride	No Federal Standard	Attainment	No Federal Standard	No information available



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Pollutant	Designation/Classification			
	SJVAB		SFAB	
	Federal Standards ^a	State Standards ^b	Federal Standards ^a	State Standards ^b

Notes:

^a See 40 CFR Part 81

^b See CCR Title 17 Sections 60200-60210

^c On September 25, 2008, USEPA redesignated the San Joaquin Valley to attainment for the PM₁₀ NAAQS and approved the PM₁₀ Maintenance Plan.

^d The Valley is designated nonattainment for the 1997 PM_{2.5} NAAQS. USEPA designated the Valley as nonattainment for the 2006 PM_{2.5} NAAQS on November 13, 2009 (effective December 14, 2009).

^e Though the Valley was initially classified as serious nonattainment for the 1997 8-hour ozone standard, USEPA approved Valley reclassification to extreme nonattainment in the Federal Register on May 5, 2010 (effective June 4, 2010).

^f Effective June 15, 2005, the USEPA revoked the federal 1-hour ozone standard, including associated designations and classifications. USEPA had previously classified the SJVAB as extreme nonattainment for this standard. EPA approved the 2004 Extreme Ozone Attainment Demonstration Plan on March 8, 2010 (effective April 7, 2010). Many applicable requirements for extreme 1-hour ozone nonattainment areas continue to apply to the SJVAB.

Source: SJVAPCD 2023a, BAAD 2017.

Ambient Air Quality

The local air quality can be evaluated by reviewing relevant air pollution concentrations near the Project. The nearest air quality monitoring station to the Project is the Tracy Airport located at 5749 South Tracy Boulevard, approximately 3 miles southeast of the site. Table 3.3-3 includes a summary of the air quality monitoring data at the Tracy Airport Monitoring Station for the years 2022 through 2024.

Table 3.3-3. Tracy Airport Monitoring Station Data

Pollutant	Air Pollutant, Averaging Time (Units)	2022	2023	2024
Ozone (ppm)	Maximum 1-hour	0.082	0.075	0.084
	California 1-hour number of days over standard ^a	0	0	0
	Maximum 8-hour	0.074	0.064	0.077
	National 8-hour number of days over standard	1	0	3
	California 8-hour number of days over standard	1	0	3
Nitrogen Dioxide (ppb)	Maximum 1-hour	34.7	32.2	34.7
	Annual average	4	4	3
	National 1-hour number of days over standard	0	0	0
	California 1-hour number of days over standard	0	0	0
PM _{2.5} (µg/m ³)	Maximum 24-hour	24.9	28.6	25.1
	National 24-hour number of days over standard	*	*	*
	Annual average	4.6	4.5	*
PM ₁₀ (µg/m ³)	Maximum 24-hour	75.3	72.5	65.3
	National 24-hour number of days over standard	0	0	0
	California 24-hour number of days over standard	10	11	7
	Annual average	22.4	19.6	21.0



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Notes:

* = insufficient data

^a The Federal 1 hour Ozone Standard was revoked in June 2005; California retained a 1 hour Ozone Standard.

ppm = parts per million

g/m³ = micrograms per cubic meter

Source: CARB 2025.

Odors

Typically, odors are generally regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from the psychological (i.e., irritation, anger, or anxiety) to the physiological, including circulatory and respiratory effects, nausea, vomiting, and headache.

The ability to detect odors varies considerably among the population and overall is quite subjective. Some individuals can smell very minute quantities of specific substances; others may not have the same sensitivity but may have sensitivities to odors of other substances. In addition, people may have different reactions to the same odor and in fact an odor that is offensive to one person may be perfectly acceptable to another (e.g., fast food restaurant). It is important to also note that an unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. This is because of the phenomenon known as odor fatigue, in which a person can become desensitized to almost any odor and recognition only occurs with an alteration in the intensity.

Quality and intensity are two properties present in any odor. The quality of an odor indicates the nature of the smell experience. For instance, if a person describes an odor as flowery or sweet, then the person is describing the quality of the odor. Intensity refers to the strength of the odor. For example, a person may use the word strong to describe the intensity of an odor. Odor intensity depends on the odorant concentration in the air. When an odorous sample is progressively diluted, the odorant concentration decreases. As this occurs, the odor intensity weakens and eventually becomes so low that the detection or recognition of the odor is quite difficult. At some point during dilution, the concentration of the odorant reaches a detection threshold. An odorant concentration below the detection threshold means that the concentration in the air is not detectable by the average human.

Neither the State nor the federal governments have adopted rules or regulations for the control of odor sources. The SJVAPCD does not have an individual rule or regulation that specifically addresses odors; however, odors would be subject to SJVAPCD Rule 4102, Nuisance. Any actions related to odors would be based on citizen complaints to local governments and the SJVAPCD.

Potential sources of odor on the Project site include the wastewater treatment plant that would process sewage and the brine waste generated from the treatment process.

Toxic Air Contaminants

Toxic air contaminants (TACs) are air pollutants that may cause or contribute to an increase in mortality or serious illness, or which may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air, but due to their high toxicity, they may pose a threat to public health even at very low concentrations. Because there is no threshold level below which adverse health impacts are not expected



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

to occur, TACs differ from criteria pollutants for which acceptable levels of exposure can be determined and for which State and federal governments have set ambient air quality standards. TACs, therefore, are not considered “criteria pollutants” under either the FCAA or the California Clean Air Act (CCAA) and are thus not subject to NAAQS and CAAQS. Instead, the USEPA and the CARB regulate Hazardous Air Pollutants (HAPs) and TACs, respectively, through statutes and regulations that generally require the use of the maximum or best available control technology (BACT) to limit emissions. In conjunction with Air District rules, these State and federal statutes and regulations establish the regulatory framework for TACs. At the national levels, the USEPA has established National Emission Standards for HAPs (NESHAPs), in accordance with the requirements of the FCAA and subsequent amendments. These are technology-based source-specific regulations that limit allowable emissions of HAPs.

Within California, TACs are regulated primarily through the Tanner Air Toxics Act (Assembly Bill [AB] 1807) and the Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588). The Tanner Act sets forth a formal procedure for CARB to designate substances as TACs. The following provides a summary of the primary TACs of concern within the State of California and related health effects:

Valley Fever

Valley fever is an infection caused by a fungus that lives in the soil. The fungus that causes Valley fever, *Coccidioides immitis* (*C. immitis*), is found in the southwestern United States, parts of Mexico and Central America, and parts of South America. The fungus grows naturally and is endemic in many areas within the Central Valley. People can get this infection by breathing in fungal spores from the air, especially when the wind blows the soil with the fungal spores into the air, or the dirt is moved by human activity. About 10,000 cases in the United States are reported each year, mostly from Arizona and California. Valley fever can be misdiagnosed because its symptoms are like those of other illnesses. For most people, the symptoms of Valley fever will go away within a few months without any treatment. Some people may develop a more severe infection, especially those with compromised immune systems (Centers for Disease Control and Prevention 2020).

Approximately 65 percent of cases of Valley fever in California are reported in people who live in the Central Valley and Central Coast regions. In California, the number of reported Valley fever cases has greatly increased in recent years. Since 2000, the number of reported cases from increased from 1,000 to more than 9,000 cases reported in 2019 (California Department of Public Health 2021). In 2021, 117 cases of Valley fever were recorded within San Joaquin County (California Department of Public Health 2023).

Asbestos

Asbestos is the name given to a number of naturally occurring fibrous silicate minerals with useful properties such as thermal insulation, chemical and thermal stability, and high tensile strength. The three most common types of asbestos are chrysotile, amosite, and crocidolite. Chrysotile, also known as white asbestos, is the most common type of asbestos found in buildings. Chrysotile makes up approximately 90 to 95 percent of all asbestos contained in buildings in the United States. Exposure to asbestos fibers may result in health issues such as lung cancer, mesothelioma (a rare cancer of the thin membranes lining the



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

lungs, chest, and abdominal cavity), and asbestosis (a non-cancerous lung disease that causes scarring of the lungs). Exposure to asbestos can occur during demolition or remodeling of buildings constructed prior to 1977 when it was banned for use in buildings. Exposure to naturally occurring asbestos can occur during soil disturbing activities in areas with deposits present (USEPA 2023b).

Diesel Particulate Matter

Diesel Particulate Matter (DPM) was identified as a TAC by CARB in August 1998. DPM is emitted from both mobile and stationary sources. In California, DPM emissions are generated from mobile and stationary sources. Mobile sources include on-road vehicles (trucks, buses, etc.), off-road vehicles and equipment (locomotives, tractors, cargo handling equipment, construction equipment, etc.), marine vessels (recreational watercraft, commercial harbor craft, and ocean-going vessels), and transport refrigeration units. Stationary sources include stationary engines used in emergency-standby generators, prime generators, and agricultural irrigation pumps, as well as portable equipment such as portable generators and pumps (Office of Environmental Health Hazard Assessment [OEHHA] 2001).

DPM is typically composed of carbon particles (“soot”, also called black carbon) and numerous organic compounds, including over 40 known cancer-causing organic substances. Examples of these chemicals include polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene. Diesel exhaust also contains gaseous pollutants, including ROG and NO_x. NO_x emissions from diesel engines are important because they can undergo chemical reactions in the atmosphere leading to formation of PM_{2.5} and ozone.

In California, diesel exhaust particles have been identified as a carcinogen accounting for an estimated 70 percent of the total known cancer risks in California. DPM is estimated to increase statewide cancer risk by 520 cancers per million residents exposed over an estimated 70-year lifetime. Non-cancer health effects associated with exposure to DPM include premature death, exacerbated chronic heart and lung disease, including asthma, and decreased lung function in children. Short-term exposure to diesel exhaust can also have immediate health effects. Diesel exhaust can irritate the eyes, nose, throat, and lungs, and it can cause coughs, headaches, lightheadedness, and nausea. In studies with human volunteers, diesel exhaust particles made people with allergies more susceptible to the materials to which they are allergic, such as dust and pollen. Exposure to diesel exhaust also causes inflammation in the lungs, which may aggravate chronic respiratory symptoms and increase the frequency or intensity of asthma attacks (CARB 2023a).

Individuals most vulnerable to non-cancer health effects of DPM are children, whose lungs are still developing, the elderly, who often have chronic health problems, and people with emphysema, asthma, and chronic heart and lung disease (CARB 2023a). In addition to its health effects, DPM significantly contributes to haze and reduced visibility.

Regional Air Quality Improvements

The Project lies within the SJVAB which is under the jurisdiction of the SJVAPCD. SJVAPCD was created in 1992 with the unification of eight individual counties (San Joaquin, Stanislaus, Merced, Madera, Fresno,



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Kings, Tulare, and the SJVAB portion of Kern County). Prior to the formation of the SJVAPCD, each county had its own set of rules and regulations to govern air quality. The purpose of the SJVAPCD is to develop comprehensive plans and regulatory programs for the region to attain federal standards by specific dates as well as meeting State standards by the earliest date achievable.

Due to the topography, climate, wildfires, and winds that transport pollutants to the San Joaquin Valley, the SJVAB faces challenges in attaining criteria air pollutants. Additionally, the San Joaquin Valley's population continues to grow which leads to additional pollutant emissions from increased consumer product use and vehicle use. Despite these challenges, criteria air pollutant emissions within SJVAB have declined due to rules and regulations implemented by SJVAPCD to meet FCAA requirements (SJVAPCD 2022). For example, since 2003, the number of "good" air quality days on the air quality index (AQI) in each county had steadily increased, see Figure 14 (SJVAPCD 2024b).

The changes in emissions from each criteria air pollutant and TAC is detailed below:

Criteria Air Pollutant Trends

Ozone

Due to these reductions in NO_x and ROG emissions, ozone exposure within the SJVAB has been significantly reduced since 2000. Specifically, in 2000 the number of days within the SJVAB that exceed the 1-hour and 8-hour federal ozone standards were 30 and 160 days, respectively. However, in 2020, the number of days with 1-hour and 8-hour federal ozone standard exceedances were down to approximately 4 days and 140 days, respectively, see Figures 15 and 16 (SJVAPCD 2022). The SJVAB became the first air basin in the country to improve from a 1-hour ozone designation of "extreme" non-attainment to attainment in 2016.

Nitrogen Dioxide

Since 1980, due to CARB and SJVAPCD regulations, overall NO_x emissions within SJVAB have been reduced by 75 percent, with stationary source emissions decreasing by 93 percent, see Figure 17 (SJVAPCD 2022).

Carbon Monoxide

Due to stringent requirements set by CARB for cleaner vehicles, equipment, and fuels, CO levels across the State have significantly declined since 1980. SJVAB reached attainment for CO in 1994 (SJVAPCD 2024). CO emissions are estimated to continue to decline with additional CARB regulations and implementation of a cleaner vehicle fleet (CARB 2004).



Sulfur Dioxide

All air basins within California are in attainment or unclassified for SO₂. Within the SJVAB, SO₂ is only monitored in Clovis, approximately 113 miles southeast of Tracy, and Bakersfield, approximately 211 miles southeast of Tracy (SJVAPCD 2023c).

In 1990, the USEPA implemented a series of programs to reduce SO₂ emissions generated by power plants. The majority of SO₂ emissions within the United States are emitted from southern and east coast states. Regardless, these programs reduced SO₂ emissions within California from approximately 7,500 tons in 1990 to 198 tons in 2022, a decrease of 97 percent, see Figure 18 (USEPA 2024b).

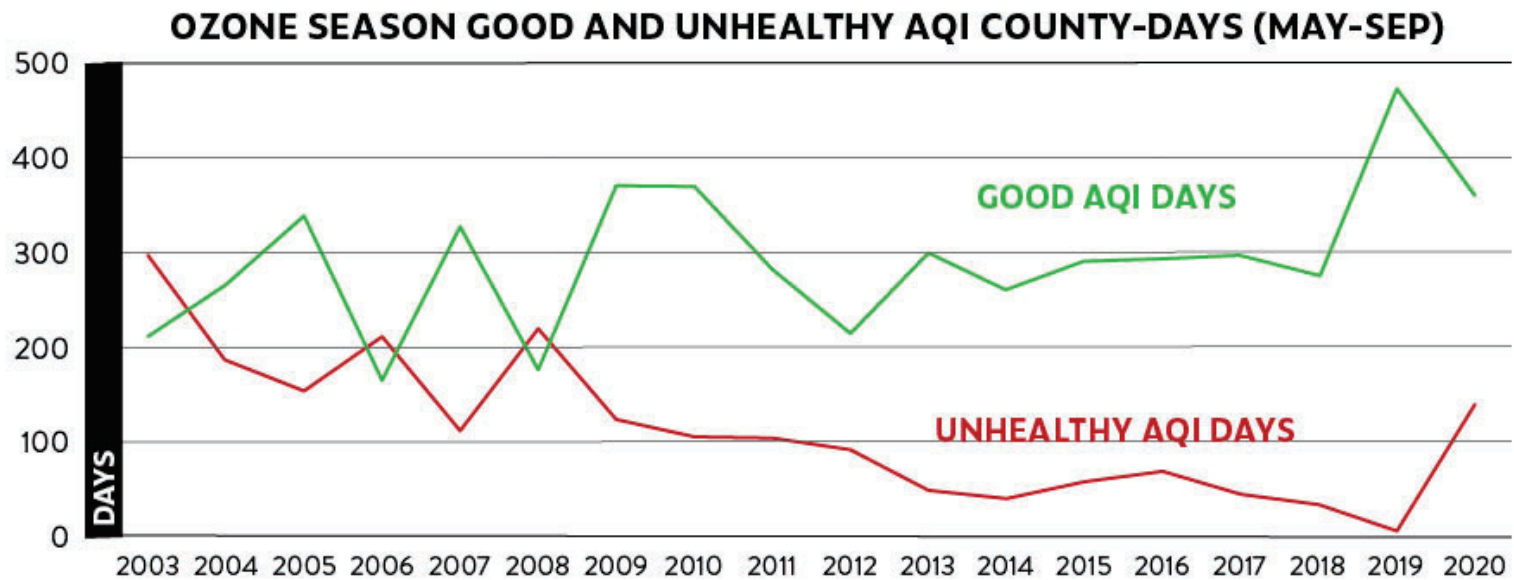
Particulate Matter

SJVAPCD is in federal non-attainment for PM_{2.5}, which is generated from mobile, stationary, area, and natural sources. Overall, PM_{2.5} emissions tend to be higher during winter months due to stagnant weather conditions. According to the SJVAPCD, from 2000, the wintertime emissions of PM_{2.5} within SJVAB are projected to be reduced by approximately 50 percent in 2025, see Figure 19 (SJVAPCD 2018). Additionally, NO_x is a precursor for PM_{2.5}, therefore the reductions in NO_x (see Figure 17) would in turn reduce PM_{2.5} emissions.

Lead

The SJVAB does not have a designation for federal lead standards. Within SJVAPCD, lead is monitored as a toxic metal in Stockton, Fresno, and Bakersfield (SJVAPCD 2023c). The USEPA also monitors the concentration of lead throughout the county in order to evaluate the risks to public health and the environment. From 2010 to 2022, the national average of lead emissions declined by 88 percent, see Figure 20 (USEPA 2023d).





Source: San Joaquin Valley Air Pollution Control District, 2024

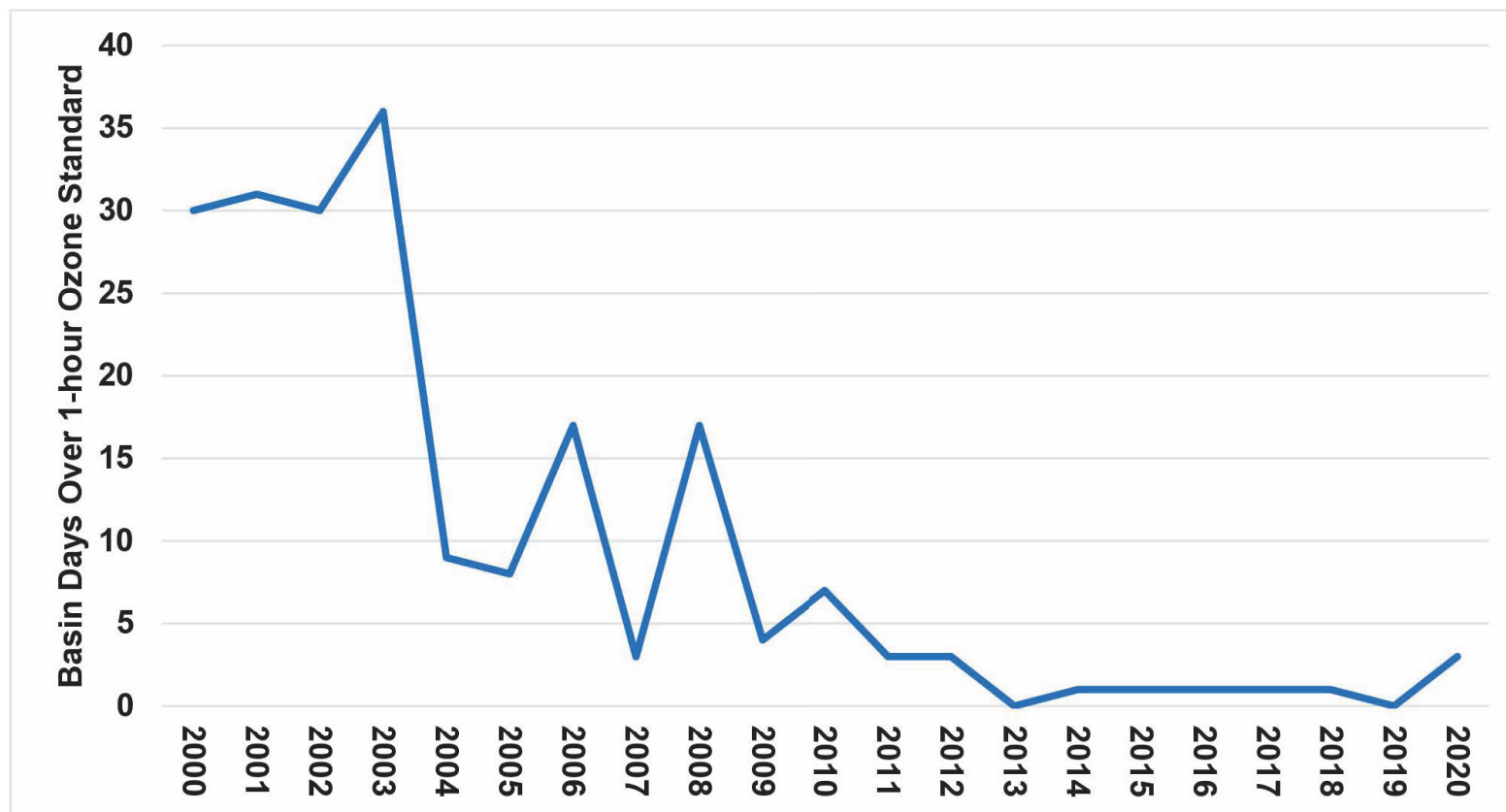
Project Location
San Joaquin County

Project
International Park of Commerce Specific Plan
Phase 2

Figure No.
14

Title

**Ozone Season Good and Unhealthy
AQI County Days, 2003-2020**



Source: San Joaquin Valley Air Pollution Control District 2022

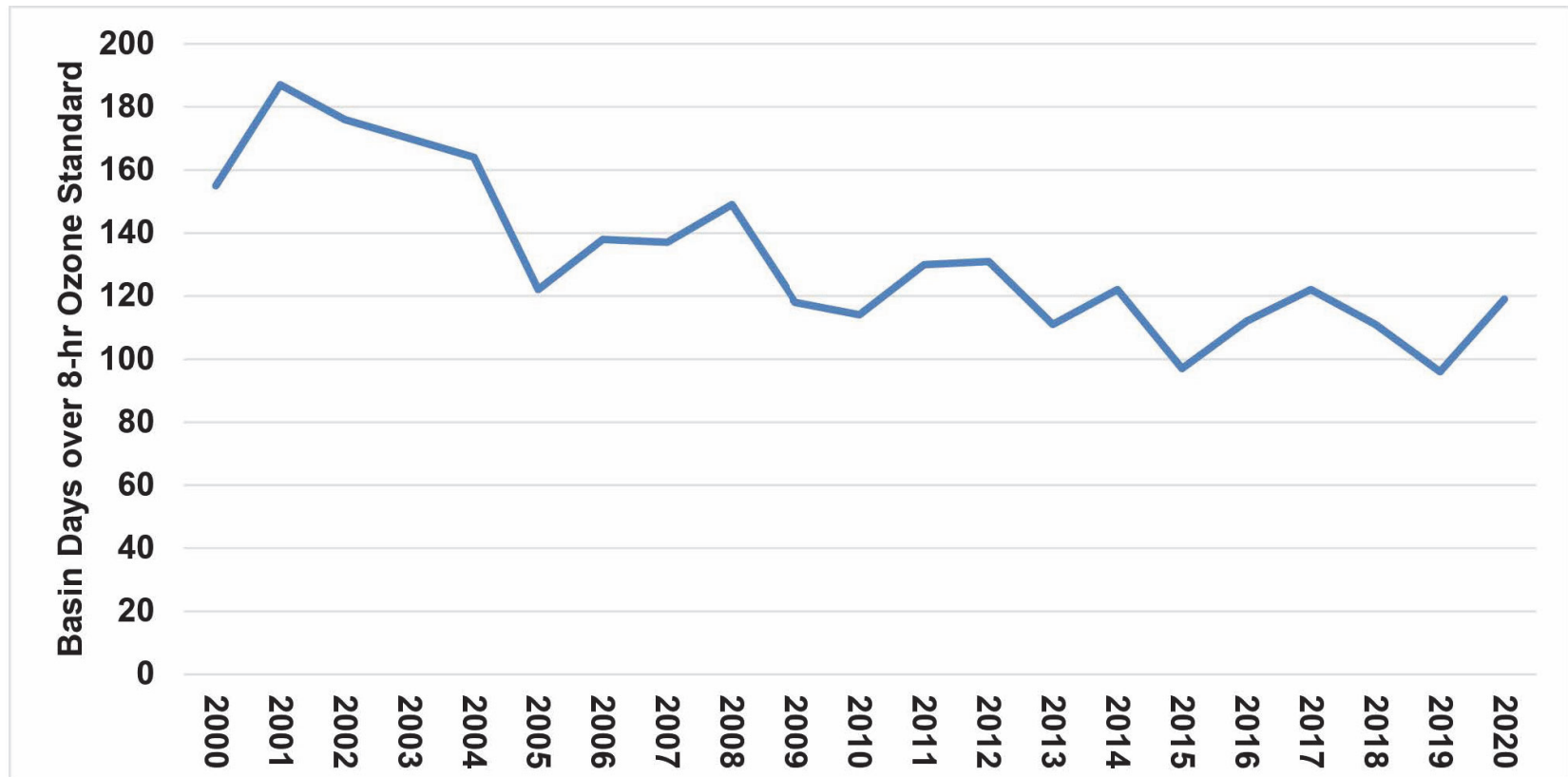
Project Location
San Joaquin County

Project
International Park of Commerce Specific Plan
Phase 2

Figure No.
15

Title

**Basin Days Over the 1979 1-Hour
Ozone Standard, 2000-2020**



Source: San Joaquin Valley Air Pollution Control District 2022

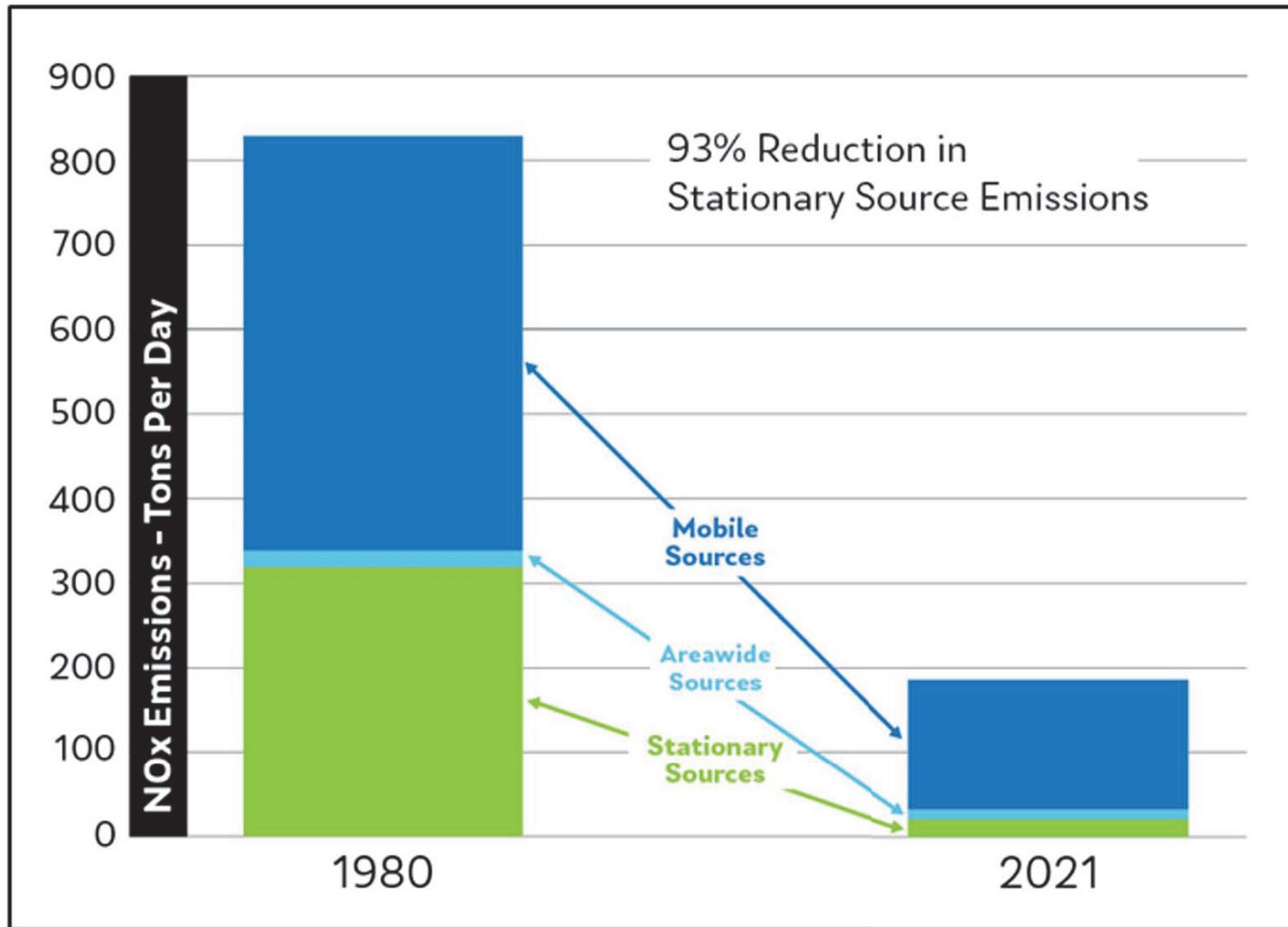
Project Location
San Joaquin County

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Figure No.
16

Title

**Basin Days Over the 2015 8-Hour
Ozone Standard, 2000-2020**



Source: San Joaquin Valley Air Pollution Control District 2022

Project Location
San Joaquin County

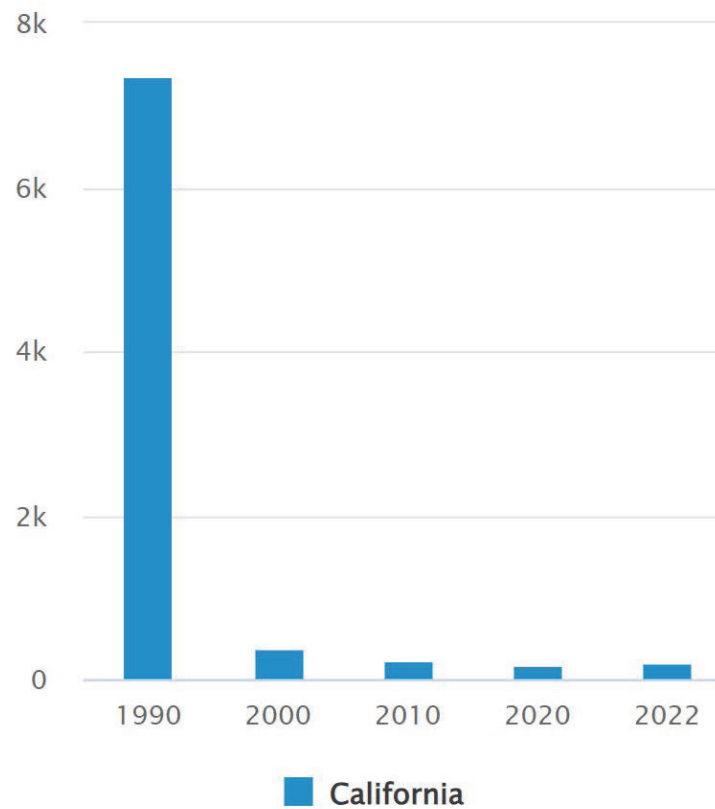
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International Park of Commerce Specific Plan
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Figure No.
17

Title

**NOx Emissions Reductions,
1980-2021**

SO₂ Emissions (tons)



Source: United States Environmental Protection Agency 2024

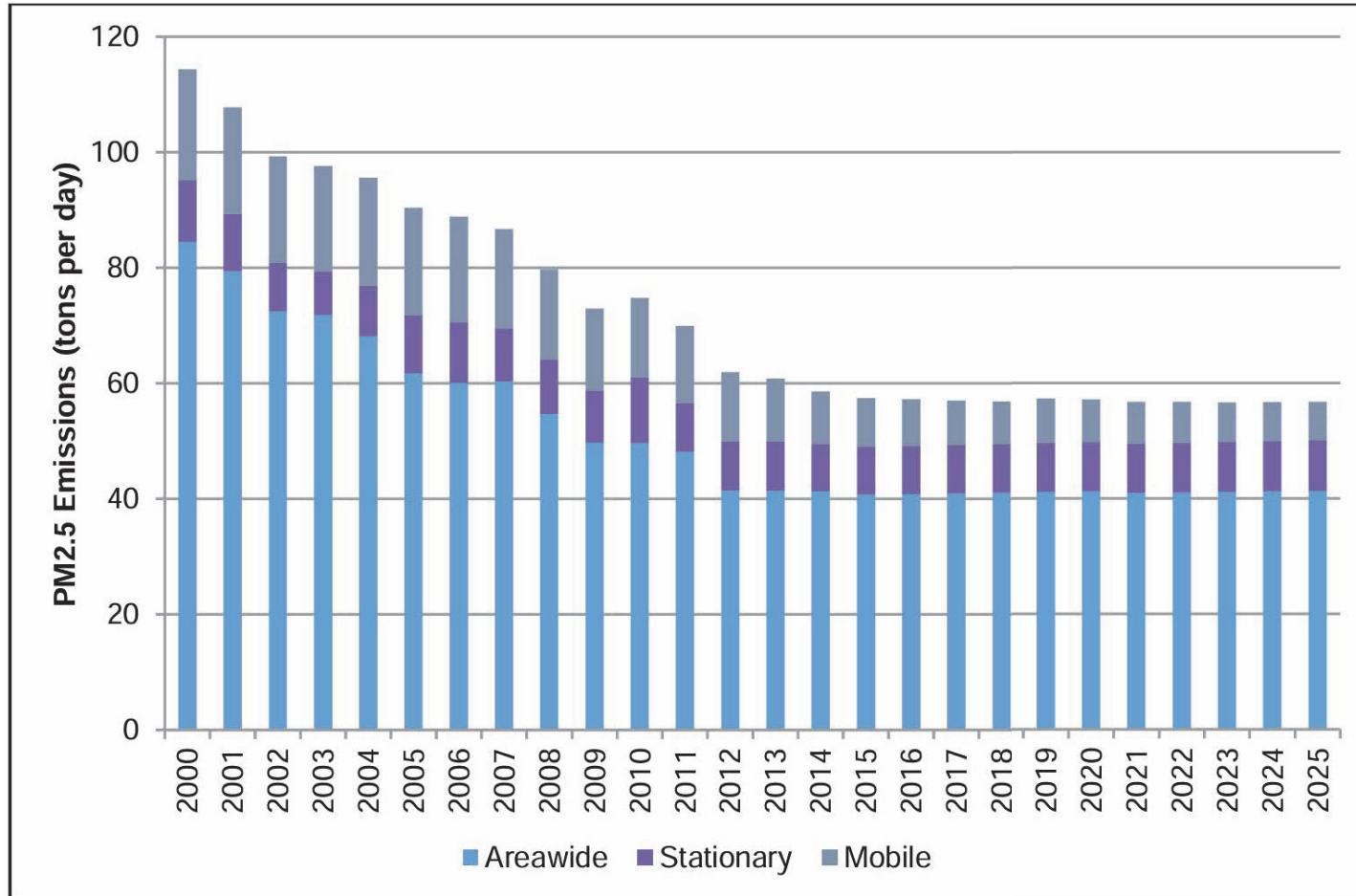
Project Location
San Joaquin County

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International Park of Commerce Specific Plan
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Figure No.
18

Title

**SO_x Emission Reductions in
California, 1990-2025**



Source: San Joaquin Valley Air Pollution Control District 2018

Project Location
San Joaquin County

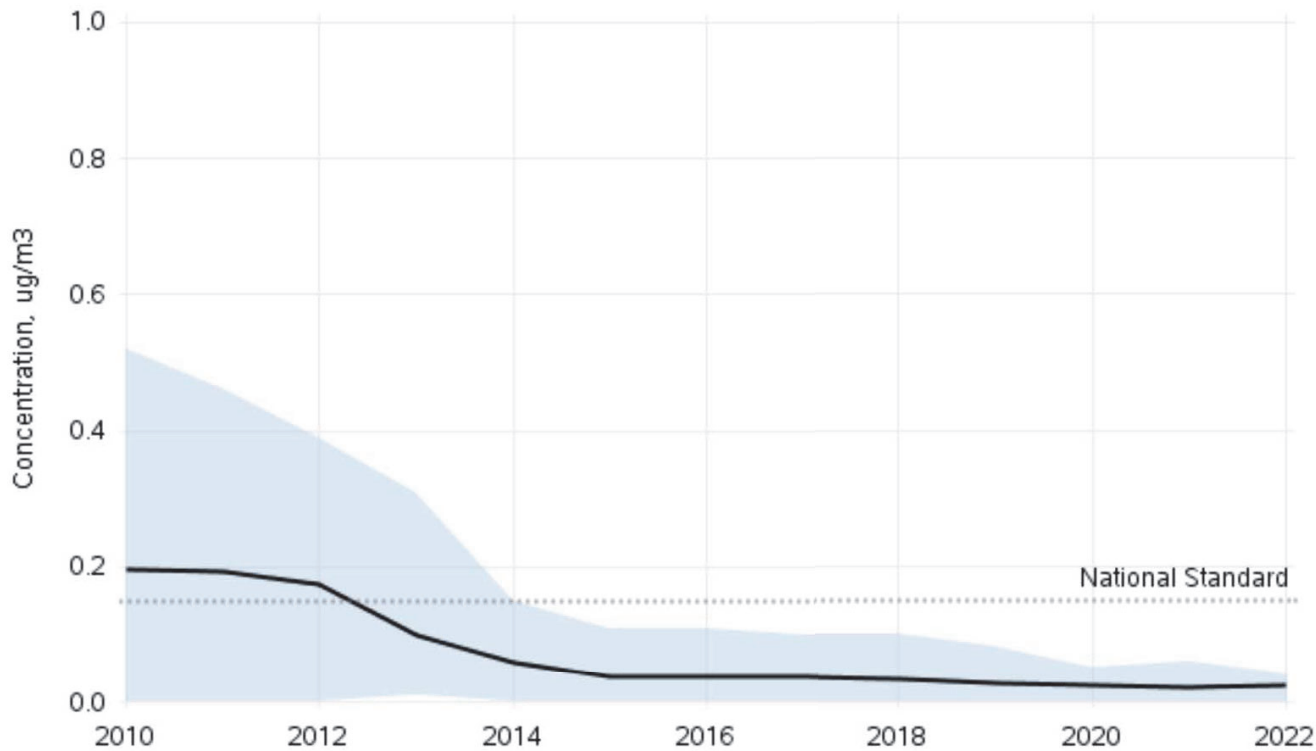
Project
International Park of Commerce Specific Plan
Phase 2

Figure No.
19

Title

**SJVAPCD PM2.5 Winter Emissions
Inventory Trend, 2000-2015**

Lead Air Quality, 2010 - 2022
(Annual Maximum 3-Month Average)
National Trend based on 81 Sites



2010 to 2022 : 88% decrease in National Average

Source: United States Environmental Protection Agency 2024

Project Location
San Joaquin County

Project
International Park of Commerce Specific Plan
Phase 2

Figure No.
20

Title

**National Average Air Quality
Emissions of Lead, 2010-2022**

Toxic Air Contaminant Trends

In 1984, as a result of public concern for exposure to airborne carcinogens, CARB adopted regulations to reduce the amount of TAC emissions resulting from mobile and area sources, such as cars, trucks, stationary sources, and consumer products. Between 1990 and 2012, the ambient concentration and emission trends for the seven TACs responsible for most of the known cancer risk associated with airborne exposure in California have declined significantly. These seven TACs are derived from mobile sources (DPM, benzene, and 1,3-butadiene), stationary sources (perchloroethylene and hexavalent chromium), and photochemical reactions of emitted ROG (formaldehyde and acetaldehyde) (Proper 2015). The decline in ambient concentration and emission trends of these TACs are a result of regulations implemented by CARB to reduce cancer risk.

Mobile Source TACs

CARB introduced two programs to reduce mobile emissions for light and medium duty vehicles through vehicle emissions controls and cleaner fuel. These programs include on-board diagnostics and reformulated gasoline.

On-Board Diagnostics

CARB adopted On-Board Diagnostic System-I (OBD-I) in 1988 to monitor emissions controls components in vehicles. In 1996, the On-Board Diagnostic System-II (OBD-II) program was adopted that refined the shortcomings in OBD-I. Since 1996, vehicles sold within California are equipped with this OBD-II system. The OBD-II system monitors virtually every component that can affect the emission performance of the vehicle to ensure that the vehicle remains as clean as possible over its entire life and assists repair technicians in diagnosing and fixing problems with the computerized engine controls. If a problem is detected, the OBD-II system illuminates a warning lamp on the vehicle instrument panel to alert the driver. This warning lamp typically contains the phrase “Check Engine” or “Service Engine Soon.” The system would also store important information about the detected malfunction so that a repair technician can accurately find and fix the problem. In 2018, CARB adopted similar OBD requirements for heavy-duty vehicles over 14,000 pounds.

Reformulated Gasoline

CARB’s phase II Reformulated Gasoline Regulation (RFG-2), adopted in 1996, also led to a reduction of mobile source TAC emissions. Through such regulations, benzene levels declined 88 percent from 1990 to 2012. 1,3-Butadiene concentrations also declined 85 percent from 1990 to 2012 as a result of the use of reformulated gasoline and motor vehicle regulations (Proper 2015).

Diesel Particulate Matter Reductions

CARB has also set a series of regulations for diesel engines and rules that have led to a 68 percent decrease in DPM levels since 1990. These regulations, as part of CARB’s Diesel Risk Reduction Plan,



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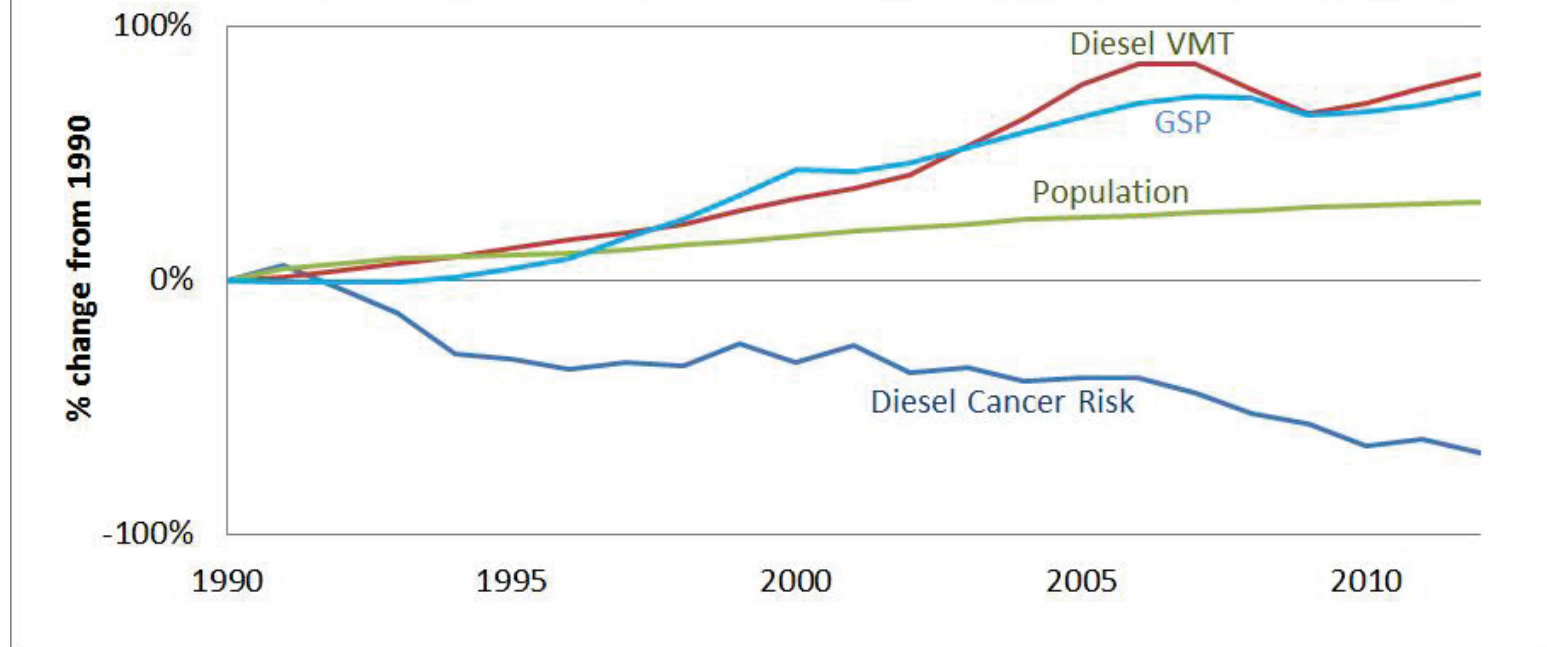
Draft Environmental Impact Report

Air Quality

include diesel fuel reformulation programs, promoting cleaner cargo handling equipment at ports and railyards, truck and bus regulations to upgrade engines to newer model years, and other programs to promote electrification and the reduction of diesel use. In comparison to year 2010 inventory of statewide DPM emissions, CARB estimates that emissions of DPM in 2035 will be reduced by more than 50 percent (CARB 2023a). Since 1990, the State population, gross State product, and vehicle miles traveled (VMT) have all increased but, due to CARB's policies to reduce DPM emissions, the cancer risk posed from diesel has decreased, see Figure 21.



California Population, Gross State Product (GSP), Diesel Cancer Risk, Diesel Vehicle-Miles-Traveled (VMT)



Source: California Air Resources Board 2024

Project Location
San Joaquin County

Project
International Park of Commerce Specific Plan
Phase 2

Figure No.
21

Title

California Population, Gross State Product (GSP), Diesel Cancer Risk, Diesel Cancer Risk, Diesel Vehicle Miles Traveled (VMT) 1990-2010

Local Sources of Air Pollution

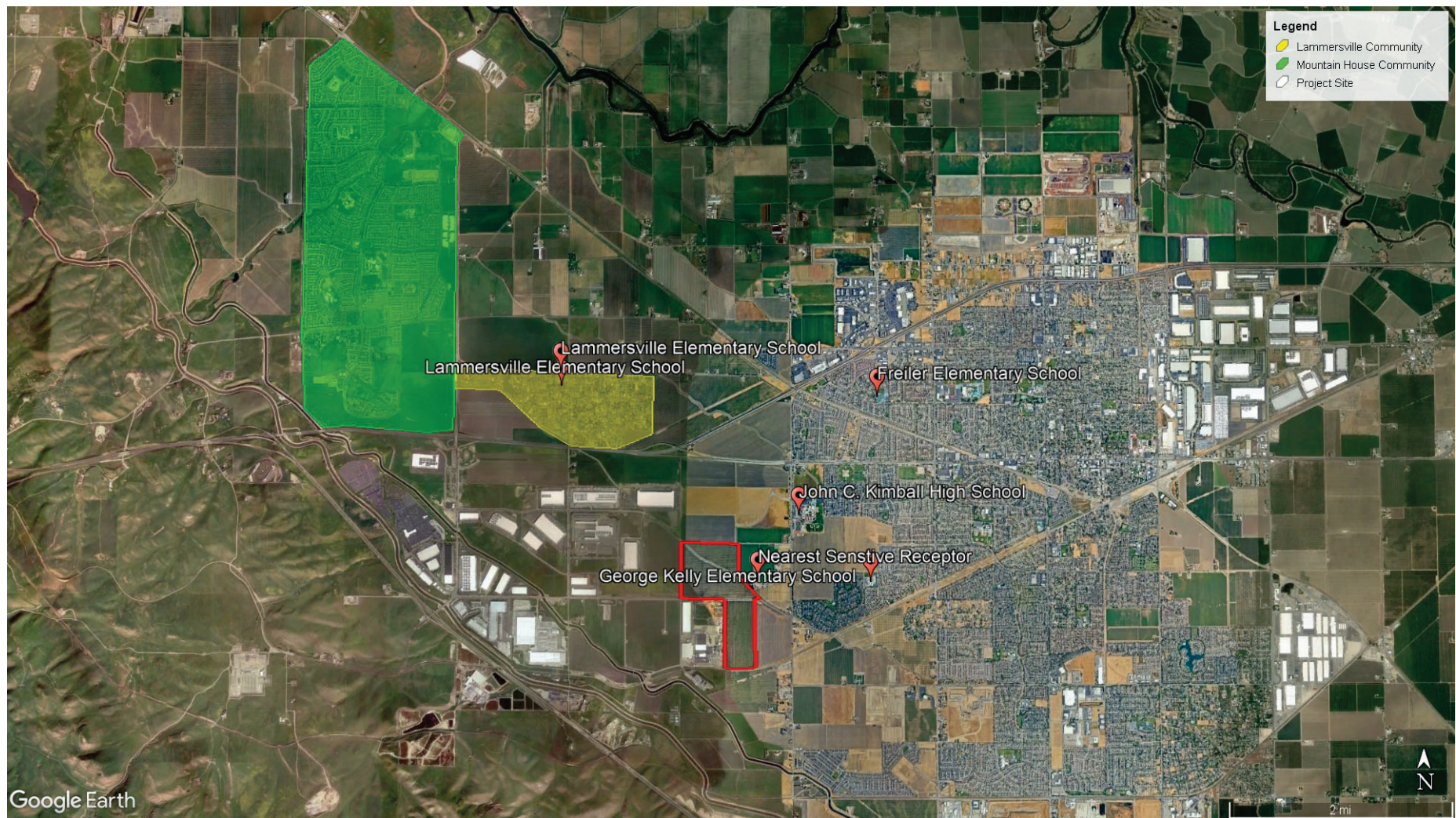
The Project site is located in a transitioning industrial area with other industrial uses or planned industrial uses immediately adjacent to the site. The main sources of air pollution are mobile sources associated with vehicles traveling along the nearby roadways, including I-580 and I-205, and other industrial sources in the Project vicinity.

Sensitive Receptors

Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiovascular diseases. Examples of sensitive receptors include hospitals, residences, convalescent facilities, and schools.

The Project site and trucking routes are located near existing sensitive receptors that could be exposed to diesel emission exhaust during the construction and operation of the Project. The nearest sensitive receptors to the Project site are single-family residences located east of the Project site (across from the WWID canal). The closest of these residences is located approximately 200 feet east of the Project boundary, see Figure 22. The receptor locations were based on community concern and proximity to the Project site and modeled roadway segments. The nearest residence within Lammersville was found to lie approximately 900 meters (2,950 feet) north of the modeled roadway segments. Receptors within 1,000 meters (3,280 feet) of the modeled roadway segment were chosen within Lammersville to capture any potential risk differential due to meteorological data. To be consistent, all receptors within 1,000 meters of the Project site or modeled roadway segments were evaluated, including residences located in southeastern Lammersville, residences located east of the Project and west of South Lammers Road, residences east of John C. Kimball High School, north of agricultural land, and south of West 11th Street, and residences east of South Lammers Road, south of agricultural land, and north of Western Pacific Way, see Figure 22. The following schools were evaluated in the health risk assessment (HRA): John C. Kimball High School, approximately 2,760 feet northeast of the Project site boundary and 561 feet north from a modeled roadway segment and George Kelly Elementary School, approximately 4,900 feet east of the Project site boundary and 2,784 feet east from a modeled roadway segment. Other schools near the Project site include Freiler Elementary School, approximately 1.76 miles northeast of the Project site boundary; and Lammersville Elementary School, approximately 1.90 miles northwest of the Project site boundary, see Figure 22.





Project Location
San Joaquin County

Project
International Park of Commerce Specific Plan
Phase 2

Figure No.

22

Title

Location of Nearest Sensitive Receptor

3.3.2 Regulatory Setting

Air quality within the project area is regulated by several jurisdictions including the USEPA, CARB, and SJVAPCD. Each of these jurisdictions develops rules, regulations, and policies to attain the goals or directives imposed upon them through legislation. Although USEPA regulations may not be superseded, both State and local regulations may be more stringent.

Federal

U.S. Environmental Protection Agency

At the federal level, the USEPA has been charged with implementing national air quality programs. The USEPA's air quality mandates are drawn primarily from the FCAA, which was signed into law in 1970. Congress substantially amended the FCAA in 1977 and again in 1990.

Federal Clean Air Act

The FCAA required the USEPA to establish NAAQS and also set deadlines for their attainment. Two types of NAAQS have been established: primary standards, which protect public health, and secondary standards, which protect public welfare from non-health-related adverse effects, such as visibility restrictions. NAAQS are summarized in Table 3.3-1.

National Emission Standards for Hazardous Air Pollutants

Pursuant to the FCAA of 1970, the USEPA established the NESHAPs. These are technology-based source-specific regulations that limit allowable emissions of HAPs. Among these sources include asbestos-containing building materials (ACBMs). NESHAPs include requirements pertaining to the inspection, notification, handling, and disposal of ACBMs associated with the demolition and renovation of structures.

Non-Road Diesel Rule

The USEPA has established a series of increasingly strict emissions standards for new off-road diesel equipment, on-road diesel trucks, and locomotives. New construction equipment used for the Project, including heavy-duty trucks and off-road construction equipment, would be required to comply with the emissions standards.

State

California Air Resources Board

The CARB is the agency responsible for coordination and oversight of State and local air pollution control programs in California and for implementing the CCAA of 1988. Other CARB duties include monitoring air quality (in conjunction with air monitoring networks maintained by air pollution control districts and air quality management districts), establishing CAAQS, which in many cases are more stringent than the NAAQS, and



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

setting emissions standards for new motor vehicles. The emission standards established for motor vehicles differ depending on various factors including the model year, and the type of vehicle, fuel and engine used. The CAAQS are summarized in Table 3.3-1.

California Clean Air Act

The CCAA requires that all air districts in the State endeavor to achieve and maintain CAAQS for O₃, CO, SO₂, and NO₂ by the earliest practical date. The CCAA specifies that districts focus attention on reducing the emissions from transportation and area-wide emission sources, and the act provides districts with authority to regulate indirect sources. Each district plan is required to either (1) achieve a 5 percent annual reduction, averaged over consecutive 3-year periods, in district-wide emissions of each non-attainment pollutant or its precursors, or (2) to provide for implementation of all feasible measures to reduce emissions. Any planning effort for air quality attainment would thus need to consider both State and federal planning requirements.

Assembly Bills 1807 & 2588 - Toxic Air Contaminants

Within California, TACs are regulated primarily through AB 1807 (Tanner Air Toxics Act) and AB 2588 (Air Toxics Hot Spots Information and Assessment Act of 1987). The Tanner Air Toxics Act sets forth a formal procedure for CARB to designate substances as TACs. This includes research, public participation, and scientific peer review before CARB designates a substance as a TAC.

Existing sources of TACs that are subject to the Air Toxics Hot Spots Information and Assessment Act are required to: (1) prepare a toxic emissions inventory; (2) prepare a risk assessment if emissions are significant; (3) notify the public of significant risk levels; and (4) prepare and implement risk reduction measures.

Assembly Bill 617

In response to AB 617 (C. Garcia, Chapter 136, Statutes of 2017), the CARB established the Community Air Protection Program. The Community Air Protection Program includes community air monitoring and community emissions reduction program's focus is to reduce exposure in communities most impacted by air pollution. The Legislature has appropriated funding to support early actions to address localized air pollution through targeted incentive funding to deploy cleaner technologies in these communities, as well as grants to support community participation in the AB 617 process. AB 617 also includes new requirements for accelerated retrofit of pollution controls on industrial sources, increased penalty fees, and greater transparency and availability of air quality and emissions data, which will help advance air pollution control efforts throughout the State.

Regulatory Attainment Designations

Under the CCAA, CARB is required to designate areas of the State as attainment, nonattainment, or unclassified with respect to applicable standards. An "attainment" designation for an area signifies that pollutant concentrations did not violate the applicable standard in that area. A "nonattainment" designation



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

indicates that a pollutant concentration violated the applicable standard at least once, excluding those occasions when a violation was caused by an exceptional event, as defined in the criteria. Depending on the frequency and severity of pollutants exceeding applicable standards, the nonattainment designation can be further classified as serious nonattainment, severe nonattainment, or extreme nonattainment, with extreme nonattainment being the most severe of the classifications. An “unclassified” designation signifies that the data does not support either an attainment or nonattainment designation. The CCAA divides districts into moderate, serious, and severe air pollution categories, with increasingly stringent control requirements mandated for each category.

The USEPA designates areas for O₃, CO, and NO₂ as “does not meet the primary standards,” “cannot be classified,” or “better than national standards.” For SO₂, areas are designated as “does not meet the primary standards,” “does not meet the secondary standards,” “cannot be classified,” or “better than national standards.” However, CARB terminology of attainment, nonattainment, and unclassified is more frequently used. The USEPA uses the same sub-categories for nonattainment status: serious, severe, and extreme. In 1991, USEPA assigned new nonattainment designations to areas that had previously been classified as Group I, II, or III for PM₁₀ based on the likelihood that they would violate national PM₁₀ standards. All other areas are designated “unclassified.”

As noted previously, the SJVAB is designated as nonattainment for ozone, PM₁₀, and PM_{2.5}. For 8-hour ozone, the SJVAB is only one of two areas in the nation designated by the USEPA as extreme nonattainment (USEPA 2023a).

Low-Emission Vehicle Program

The CARB first adopted Low-Emission Vehicle (LEV) program standards in 1990. These first LEV standards ran from 1994 through 2003. LEV II regulations, running from 2004 through 2010, represent continuing progress in emission reductions. As the State’s passenger vehicle fleet continues to grow and more sport utility vehicles and pickup trucks are used as passenger cars rather than work vehicles, the more stringent LEV II standards were adopted to provide reductions necessary for California to meet federally mandated clean air goals outlined in the 1994 State Implementation Plan (SIP). In 2012, CARB adopted the LEV III amendments to California’s LEV regulations. These amendments include more stringent emission standards for both criteria pollutants and greenhouse gases (GHGs) for new passenger vehicles.

In June 2025, the US Congress passed, and Trump signed joint resolutions to revoke three waivers previously granted to California by the Biden administration. These waivers would allow California to implement CARB’s Advanced Clean Cars II, Omnibus Low NO_x regulations, and Advanced Clean Trucks. The LEV program is a part of the Advanced Clean Cars II regulations. California, joined by 10 other states, filed a lawsuit asserting that the waivers are not subject to congressional review and the revocation violates the Constitution. The lawsuit is ongoing, and the waivers remain in effect while this legal action being is resolved.



On-Road Heavy-Duty Vehicle Program

The CARB has adopted standards for emissions from various types of new on-road heavy-duty vehicles. Section 1956.8, Title 13, California Code of Regulations contains California's emission standards for on-road heavy-duty engines and vehicles, and test procedures (Omnibus Low NO_x regulations). CARB has also adopted programs to reduce emissions from in-use heavy-duty vehicles including the Heavy-Duty Diesel Vehicle Idling Reduction Program, the Heavy-Duty Diesel In-Use Compliance Program, the Public Bus Fleet Rule and Engine Standards, and the School Bus Program and others.

In addition, the CARB's Truck and Bus regulation was established to meet federal attainment standards. This regulation requires heavy-duty diesel vehicles that operate in California to reduce TAC emissions from their exhaust. Diesel exhaust is responsible for 70 percent of the cancer risk from airborne toxics. Therefore, by January 1, 2023, nearly all trucks and buses were required to have 2010 or newer model year engines to reduce PM and NO_x emissions. To help ensure that the benefits of this regulation are achieved, starting in 2020, only vehicles compliant with this regulation were registered by the California Department of Motor Vehicles.

As discussed above, the US Congress and the Trump administration are attempting to revoke waivers that would allow for the implementation of the Omnibus Low NO_x regulations. The lawsuit is ongoing, and the waivers remain in effect while this legal action is being resolved.

Advanced Clean Truck Act

To reduce emissions, the Advanced Clean Truck Act (ACT) requires original equipment manufacturers of medium- and heavy-duty vehicles to sell ZEVs or near-zero-emissions vehicles (NZEVs), such as plug-in electric hybrids, at an increasing percentage of their annual sales from 2024 to 2035. A ZEV is a vehicle that produces zero tail-pipe emissions, including BEVs and hydrogen fuel cell vehicles. A NZEV is a vehicle with an internal combustion engine and an electric energy storage system, including plug-in hybrid vehicles and hydrogen internal combustion engine vehicles. The ACT includes a cap-and-trade system, capping the number of fossil fuel vehicles sold by stipulating annual sales percentage requirements. Manufacturers can comply with the ACT by generating compliance credits through the sale of ZEVs or NZEVs or through the trading of compliance credits.

As discussed above, the US Congress and the Trump administration are attempting to revoke waivers that would allow for the implementation of this program. The lawsuit is ongoing, and the waivers remain in effect while this legal action is being resolved.

Regional

San Joaquin Valley Air Pollution Control District

The SJVAPCD is the agency primarily responsible for ensuring that NAAQS and CAAQS are not exceeded and that air quality conditions are maintained in the SJVAB, within which the Project is located.

Responsibilities of the SJVAPCD include, but are not limited to, preparing plans for the attainment of



ambient air quality standards, adopting and enforcing rules and regulations concerning sources of air pollution, issuing permits for stationary sources of air pollution, inspecting stationary sources of air pollution and responding to citizen complaints, monitoring ambient air quality and meteorological conditions, and implementing programs and regulations required by the FCAA and the CCAA.

SJVAPCD Rules and Regulations

The SJVAPCD rules and regulations that may apply during buildout of the Project include, but are not limited to, the following:

Rule 2010 – Permits Required. The purpose of this rule is to require any person constructing, altering, replacing or operating any source operation which emits, may emit, or may reduce emissions to obtain an Authority to Construct or a Permit to Operate. This rule also explains the posting requirements for a Permit to Operate and the illegality of a person willfully altering, defacing, forging, counterfeiting or falsifying any Permit to Operate.

Rule 2201 – New and Modified Stationary Source Review Rule. The purpose of this rule is to provide for the following:

- The review of new and modified Stationary Sources of air pollution and to provide mechanisms including emission trade-offs by which Authorities to Construct such sources may be granted, without interfering with the attainment or maintenance of ambient air quality standards; and
- No net increase in emissions above specified thresholds from new and modified Stationary Sources of all nonattainment pollutants and their precursors.

Rule 4002 – National Emission Standards for Hazardous Air Pollutants. This rule incorporates the National Emission Standards for Hazardous Air Pollutants from Part 61, Chapter I, Subchapter C, Title 40, CFR and the National Emission Standards for Hazardous Air Pollutants for Source Categories from Part 63, Chapter I, Subchapter C, Title 40, CFR.

Rule 4101 – Visible Emissions. This rule prohibits the emissions of visible air contaminants to the atmosphere. The rule applies to any source operation which emits or may emit air contaminants.

Rule 4102 – Nuisance. The purpose of this rule is to protect the health and safety of the public and applies to any source operation that emits or may emit air contaminants or other materials.

Rule 4601 – Architectural Coatings. The purpose of this rule is to limit ROG emissions (also called Volatile Organic Compound [VOC] emissions) from architectural coatings. Emissions are reduced by limits on VOC content and providing requirements on coatings storage, cleanup, and labeling.

Rule 4623 – Storage of Organic Liquids. The purpose of this rule is to limit ROG emissions from the storage of organic liquids.



Rule 4624 – Transfer of Organic Liquids. The purpose of this rule is to limit ROG emissions from the transfer of organic liquids.

Rule 4641 – Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations. The purpose of this rule is to limit ROG emissions from asphalt paving and maintenance operations. If asphalt paving will be used, then the paving operations will be subject to Rule 4641.

Regulation VIII – Fugitive PM₁₀ Prohibitions. Rules 8011 through 8081 are designed to reduce PM₁₀ emissions (predominantly dust/dirt) generated by human activity, including construction and demolition activities, road construction, bulk materials storage, paved and unpaved roads, carryout and trackout, etc. Project construction contractors shall be required to comply with the following:

- Water previously exposed surfaces (soil) whenever visible dust is capable of drifting from the site or approaches 20 percent opacity.
- Water all unpaved haul roads a minimum of three-times/day or whenever visible dust from such roads is capable of drifting from the site or approaches 20 percent opacity.
- Reduce speed on unpaved roads to less than 15 miles per hour (mph).
- Install and maintain a track out control device that meets the specifications of SJVAPCD Rule 8041 if the site exceeds 150 vehicle trips per day or more than 20 vehicle trips per day by vehicles with three or more axles.
- Stabilize all disturbed areas, including storage piles, which are not being actively utilized for production purposes using water, chemical stabilizers or by covering with a tarp or other suitable cover.
- Control fugitive dust emissions during land clearing, grubbing, scraping, excavation, leveling, grading, or cut and fill operations with application of water or by presoaking.
- When transporting materials offsite, maintain a freeboard limit of at least 6 inches and cover or effectively wet to limit visible dust emissions.
- Limit and remove the accumulation of mud and/or dirt from adjacent public roadways at the end of each workday (Use of dry rotary brushes is prohibited except when preceded or accompanied by sufficient wetting to limit visible dust emissions and use of blowers is expressly forbidden).
- Stabilize the surface of storage pile following the addition or removal of materials using water or chemical stabilizers/suppressants.
- Remove visible track-out from the site at the end of each workday.
- Cease grading or other activities that cause excessive (greater than 20 percent opacity) dust formation during periods of high winds (greater than 20 mph over a one-hour period).



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Rule 9410 – Employee Based Trip Reduction. The purpose of this rule is to reduce VMT from private vehicle used by employees to commute to and from their worksites to reduce emissions of NO_x, ROG, and PM. This rule applies to employers within the SJVAB with at least 100 eligible employees at a worksite for at least 16 consecutive weeks.

Rule 9510 – Indirect Source Review. This rule reduces the impact of NO_x and PM₁₀ emissions from growth on the SJVAB. The rule places application and emission reduction requirements on development projects meeting applicability criteria to reduce emissions through onsite mitigation, offsite District - administered projects, or a combination of the two.

Consistent with Rule 9510, the Project applicant would be required to submit an Air Impact Assessment (AIA) application to the SJVAPCD, which will identify emission reduction measures for emissions of NO_x and PM₁₀. The AIA would require a combination of on-site emission reductions or off-site fees to meet the following performance measures:

- Related to construction-related emissions, the exhaust emissions for construction equipment greater than fifty (50) horsepower used or associated with the project shall be reduced by the following amounts from the statewide average as estimated by the ARB: 20 percent of the total NO_x emissions, and 45 percent of the total PM₁₀ exhausts emissions. Construction emissions can be reduced by using less polluting construction equipment, which can be achieved by utilizing add-on controls, cleaner fuels, or newer lower emitting equipment.
- Related to operational emissions, NO_x Emissions shall be reduced by 33.3 percent of the project's operational baseline NO_x emissions over a period of ten years as quantified in the approved AIA. PM₁₀ emissions shall be reduced by 50 percent of the project's operational baseline PM₁₀ emissions over a period of ten years as quantified in the approved AIA.

SJVAPCD Voluntary Emission Reduction Agreement

A Voluntary Emission Reduction Agreement (VERA) is an air quality mitigation measure by which a developer can voluntarily enter into a contractual agreement with the SJVAPCD to mitigate a development project's impact on air quality. Under the agreement, the developer provides funds to the District to administer the implementation of the VERA. The District then identifies emissions reductions projects, fund those projects, and verifies that the specified emission reductions have been successfully achieved. The District considers implementation of a VERA to be a feasible mitigation measure under CEQA, effectively achieving emission reductions necessary to reduce impacts to a less than significant level (SJVAPCD 2023d). To be clear, the VERA is the best available tool in the SJVAPCD's suite of mitigation measures to mitigate a project's air emissions to zero. But the VERA's efficacy comes at an incredibly high cost. Hence, not all developers are able to utilize the VERA as a mitigation tool.

Here, the Project applicant has agreed to enter into a VERA to mitigate air emissions to zero. A letter from SJVAPCD confirming the Project Applicant's intention to implement a VERA consistent with the schedule of previous VERA approvals is provided in Appendix D. The VERA fee allows SJVAPCD to mitigate the



emissions generated by the Project to be offset off-site through programs like upgrading agricultural and construction equipment to cleaner engines, electric vehicle rebates, and wood stove replacements.

SJVAPCD Air Quality Plans

2024 Plan for the 2012 PM_{2.5} Standard. In June 2024, the SJVAPCD adopted the 2024 Plan for the 2012 Annual PM_{2.5} Standard to outline how the SJVAPCD would meet the NAAQS 2012 PM_{2.5} standard by 2030. The plan includes attainment strategy and emission reduction commitments, progress/quantitative milestones, and contingency measures. The 2024 plan documents the significant progress made since the 2018 plan (see below) and provides an updated PM_{2.5} strategy based on the latest science and research. The 2024 plan is also seeking a five year extension from the USEPA to meet attainment by 2030, instead of the 2025 target date set in the 2018 plan. The strategies outlined in the 2024 plan such as the reliance on previously adopted rules and regulations as well as new rules (Rule 4550, Conservation Management Practices) would reduce District wide PM_{2.5} emissions by 16 percent (10.8 tons per day) and NO_x by 66 percent (148.7 tons per day) from 2017 to 2030 (SJVAPCD 2024c).

2018 Plan for the 1997, 2006, and 2012 PM_{2.5} Standards. The SJVAPCD adopted the 2018 Plan for the 1997, 2006, and 2012 PM_{2.5} Standards on November 15, 2018. CARB adopted the 2018 Plan on January 24, 2019, and portions were approved by the USEPA on June 30, 2020. The plan addresses the federal 1997 annual PM_{2.5} standard of 15 micrograms per cubic meter (µg/m³) and 24-hour PM_{2.5} standard of 65 µg/m³; the 2006 24-hour PM_{2.5} standard of 35 µg/m³; and the 2012 annual PM_{2.5} standard of 12 µg/m³. The 2018 Plan builds upon previous PM_{2.5} Attainment Plans but identifies new actions to further reduce emissions. The attainment deadline for the 1997 PM_{2.5} Standard is December 31, 2015, the 2006 PM_{2.5} Standard is December 31, 2024 (with a 5-year extension request), and the 2012 PM_{2.5} Standard is December 31, 2025 (SJVAPCD 2018).

2022 8-Hour Ozone Plan. In December 2022, the SJVAPCD approved the 2022 Plan for the 2015 8-Hour Ozone Standard (2022 Ozone Plan). The 2022 Ozone Plan develops a strategy to attain the federal 2015 NAAQS of 70 parts per billion as quickly as possible, and no later than the 2037 attainment deadline (SJVAPCD 2022).

2016 8-Hour Ozone Plan. In June 2016, the SJVAPCD's Governing Board approved the 2016 Plan for the 2008 8-Hour Ozone Standard (2016 Ozone Plan). The comprehensive strategy in this plan is intended to reduce NO_x emissions by over 60 percent between 2012 and 2031. This will require another 207.7 tons per day in NO_x reductions from stationary and mobile sources throughout the San Joaquin Valley. The SJVAB faces significant and unique challenges in reducing ozone. Specifically, the geography and meteorology exacerbate the formation and retention of air pollution and the SJVAB has one of the fastest population growth rates in the State. The 2016 Ozone Plan accounts for these challenges and builds upon the SJVAPCD's approved 1-hour ozone and particulate matter strategies to meet NAAQS. The 2016 Ozone Plan is expected to bring the SJVAB into federal attainment of USEPA's 2008 8-hour ozone standard as expeditiously as practicable, but no later than December 31, 2031 (SJVAPCD 2016).



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

2020 Reasonably Available Control Technology (RACT) Demonstration. Pursuant to Sections 182(b) and (f) of the FCAA, areas classified as moderate or higher for O₃ nonattainment are required to implement RACT requirements for sources that are subject to USEPA Control Techniques for major sources of ROG and Nox. RACT requirements ensure that significant sources of emissions in nonattainment areas are controlled to a reasonable extent. The SJVAPCD prepared the 2020 RACT Demonstration for the 2015 8-Hour Ozone Standard Demonstration (2020 RACT Demonstration) to build upon previous RACT reports and to provide a comprehensive evaluation of all Nox and VOC SJVAPCD rules to ensure that each rule meets or exceeds RACT requirements. The document fulfills FCAA requirements and demonstrates that all federal RACT requirements continue to be satisfied in the SJVAB (SJVAPCD 2020). **2023 Maintenance Plan and Redesignation Request for the Revoked 1-Hour Ozone Standard.** In June 2023, the SJVAPCD adopted the 2023 Maintenance Plan. The SJVAB has been in attainment for the revoked 1-hour O₃ NAAQS since 2014, and the 2023 Maintenance Plan includes a demonstration that would ensure that the area remains in attainment through 2036 (SJVAPCD 2023b).

2013 Revoked 1-Hour Ozone Plan. The SJVAPCD developed the 2013 Ozone Plan for USEPA's revoked 1-hour ozone standard. The SJVAPCD had previously prepared a 1-Hour Ozone Plan in 2004 that was approved by the USEPA. However, in 2010, the USEPA withdrew this approval as a result of litigation. The SJVAPCD's 2013 Plan for the Revoked 1-Hour Ozone Standard was approved by the Governing Board in September 2013 (SJVAPCD 2013).

2007 PM₁₀ Maintenance Plan. In October 2006, the USEPA determined that the SJVAB attained PM₁₀ standards, based on ambient monitoring data from the years 2003 through 2005. In order to constitute redesignation to attainment, the SJVAPCD prepared the 2007 PM₁₀ Maintenance Plan. The 2007 PM₁₀ Maintenance Plan addresses both the 24-hour and the rescinded annual PM₁₀ standards (CARB 2007).

Local

San Joaquin County 2035 General Plan

The General Plan presents a vision for the County's future, looking ahead to 2035. This long-range planning document includes a comprehensive framework for the County's physical, economic, and social development and environmental resources preservation, as well as policies to guide day-to-day decisions. The General Plan emphasizes that future development must occur in a way that makes the most of existing infrastructure and public facilities, minimizes impacts to natural resources, expands opportunities for job growth, restores and revitalizes unincorporated communities, and provides greater opportunities to all County residents.

The General Plan includes the following goals and policies related to air quality that are applicable to the Project (San Joaquin County 2016):

- **Goal PHS-5:** To protect public health, agricultural crops, scenic resources, and the built and natural environments from air pollution.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

- **Policy PHS-5.1: Air Quality Monitoring.** The County shall participate in programs to monitor harmful air contaminants to determine their impacts.
- **Policy PHS-5.2: San Joaquin Valley Air Pollution Control District Coordination.** The County shall coordinate with the SJVAPCD during the review of new development projects which have the potential for causing adverse air quality impacts.
- **Policy PHS-5.4: Innovative Mitigation Measures.** The County shall encourage innovative mitigation measures and project redesign to reduce air quality impacts by coordinating with the SJVAPCD, project applicants, and other interested parties.
- **Policy PHS-5.5: Air District Best Performance Standards.** The County shall consider the Best Performance Standards adopted by SJVAPCD during the review of new development proposals.
- **Policy PHS-5.6: Toxic Air Contaminants.** The County shall require effective buffers between residential areas and other sensitive receptors and non-residential land uses, such as highways, trucking centers, gasoline dispensing facilities, and dry cleaners, that generate toxic air contaminants.
- **Policy PHS-5.7: TAC Exposure Reduction Measures for New Development.** The County shall require new development projects to implement all applicable best management practices that will reduce exposure of sensitive receptors (e.g., hospitals, schools, daycare facilities, elderly housing and convalescent facilities) to TACs.
- **Policy PHS-5.8: Minimize Motor Vehicle Emissions.** The County shall strive to minimize motor vehicle emissions through land use and transportation strategies, as well as by promotion of alternative fuels.
- **Policy PHS-5.9: Particulate Emissions from Construction.** The County shall support SJVAPCD efforts to reduce PM₁₀ and PM_{2.5} emissions from construction, grading, excavation, and demolition to the maximum extent feasible and consistent with State and Federal regulations.
- **Policy PHS-5.10: Particulate Emissions from County Roads.** The County shall require PM₁₀ and PM_{2.5} emission reductions on County-maintained roads to the maximum extent feasible and consistent with State and Federal regulations.
- **Policy PHS-5.11: Paving Materials.** The County shall require all access roads, driveways, and parking areas serving new commercial and industrial development to be constructed with materials that minimize particulate emissions and area appropriate to the scale and intensity of use.



- **Policy PHS-5.13: Industrial Best Management Practices.** The County shall require industrial facilities to incorporate economically feasible Best Management Practices and control technology to reduce PM₁₀ and PM_{2.5} emissions consistent with state and federal regulations.
- **Policy PHS-5.14: Energy Consumption Reduction.** The County shall encourage new development to incorporate green building practices and reduce air quality impacts from energy consumption.

3.3.3 Environmental Impacts

This section analyzes the Project's potential to result in significant impacts related to air quality. If an impact is determined to be significant, mitigation measures are identified that would reduce or avoid impacts.

Methodology

The assessment of potential impact presented below is based on a comparison of existing site setting with defined or anticipated conditions that would occur as a result of the Project. A summary of the methodology and modeling software used to quantify and analyze air pollutant emissions and potential health risk effects are provided below. Modeling output files are provided in Appendix C.

Criteria Air Pollutant Emissions

Criteria air pollutant emissions were quantified with the California Emissions Estimator Model (CalEEMod) version 2022.1.1.21 and EMFAC2021 version 1.2 (California Air Pollution Control Officers Association [CAPCOA] 2022a, CARB 2024f). CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential emissions associated with construction and operation of a land use project. EMFAC2021 is a tool developed by CARB to provide vehicle emission rates by vehicle type, fuel type, fleet year, and geography across California. To estimate emissions, the following scenarios were evaluated: 1) Baseline Modeling; 2) Phase 1 and Phase 2 construction and operation; and 3) Phase 3 construction and operation.

Baseline Modeling

Baseline modeling was prepared through CalEEMod based on the existing site use, size, and estimated operational activities. As an active almond orchard, the existing site generates emissions from workers and truck trips to the site, harvest operations, and water transport. Modeling assumptions for each of these emissions sources are detailed below:

Existing Vehicle Trips

The existing site use is assumed to generate 42 employees, based on an employment rate of 0.15 employees per acre of orchard (Southern California Association of Governments [SCAG] 2001). The employment estimate for the orchard was based on SCAG estimates as there were no County or Central Valley resources available. Therefore, employees were estimated to make 84 vehicles trips per day.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Moreover, crop production for mature almond trees is estimated to be approximately 0.9-1.6 tons per acre (Yara North America 2023). As such, the existing site use would produce between 255.6 and 454.4 tons of almonds per year. CalEEMod assumes that hauling trucks have a carrying capacity of 20 tons per truckload (CAPCOA 2022). Therefore, the existing site would generate approximately 26 to 46 heavy-duty truck trips per year.

Harvest Operations

Typical almond harvest operations include weed and debris clearing, tree shaking to remove the nut from the tree, and collection from the ground. Almond harvest takes place from mid-August through October (USDA 2023). The following equipment types, hours per day, and days per year were assumed for this analysis.

Table 3.3-4. Existing Almond Orchard Harvesting Equipment

Equipment	Modeled Equipment	Number	Hours of Operation per Day	Days per Year
Trucks	Off-Road Truck	2	8	60
Shaking Machines	Tractors/Loaders/Backhoes	2	8	20
Sweeping Machines	Tractors/Loaders/Backhoes	2	8	20
Almond Harvesters	Tractors/Loaders/Backhoes	2	8	20

Water Transport

Kier and Wright prepared a Water Supply Assessment (WSA) in June 2023 to estimate the water use of the existing site and the Project (Kier and Wright 2023). The WSA concluded that the existing site uses approximately 1,500 acre-feet per year (AFY) of water.

Phase 1, Phase 2, and Phase 3 Modeling

CalEEMod Assumptions

LAND USE

The Project is anticipated to construct a maximum of 5.36 million square feet of building space that includes industrial buildings, parking, roadways, water treatment facilities, sewer treatment facilities, and landscaping over a 284-acre site.

The exact nature of the land uses that would ultimately develop on the site are currently unknown, however estimates of the size and types were derived from the Fehr & Peers Traffic Impact Analysis (TIA) prepared for the Project (Fehr & Peers 2024). The TIA includes various industrial land use types based on the land uses categories presented in the Institute of Transportation Engineers (ITE) Trip Generation Manual. These land uses are more specific than the CalEEMod modeling. The breakdown of industrial land uses modeled within CalEEMod as compared to the TIA land use estimates and are included in Table 3.3-5. The land



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

uses and land use sizes disclosed in Table 3.3-5 present the maximum square footage of total industrial buildout. This land use breakdown is considered a conservative assumption of how buildout may occur on the site.

The roadways, water treatment facilities, wastewater treatment facilities, and parking land use sizes were derived from the March 24, 2023, IPC – Phase 2 Draft Specific Plan prepared by Prologis LLC. The landscaping area was calculated based on details provided within the Master Landscape Plan detailed within the Specific Plan. Specifically, the Master Landscape Plan states that landscaping elements would be included as part of the roadways, intersections, and pedestrian and bicycle facilities with landscape setbacks of 25 to 30 feet. Based on the proposed roadway acreage (9.6 acres), the average setback distance on each side of the road (27.5 feet), and the average roadway width (36 feet^{2, 3}), it was assumed that the total landscaping area is approximately 638,880 square feet (14.7 acres).

The Project would also include five detention basins that range from one to 2.5 acres. For this analysis, it was assumed that 8.75 acres would be detention basins which are not modeled as individual land uses, but instead modeled as part of Project grading. Project land uses modeled within CalEEMod are provided in Table 3.3-5. Details regarding phasing are provided below.

Table 3.3-5. Project Land Uses Modeled by Phase

Proposed Land Use from TIA	Land Use Modeled in CalEEMod	Phase 1 and Phase 2 Land Use Sizes	Phase 3 Land Use Sizes	Total Land Use Sizes
Industrial Land Uses				
High-Cube Transload and Short-Term Storage Warehouse	Unrefrigerated Warehouse-No Rail	321,600 SF	214,400 SF	536,000 SF
High-Cube Fulfillment Center Warehouse – Sort	Unrefrigerated Warehouse-No Rail	160,800 SF	107,200 SF	268,000 SF
Warehousing	Unrefrigerated Warehouse-No Rail	804,000 SF	536,000 SF	1,340,000 SF
High-Cube Parcel Hub Warehouse	Unrefrigerated Warehouse-No Rail	321,600 SF	214,400 SF	536,000 SF
High-Cube Fulfillment Center Warehouse – Non-sort	Unrefrigerated Warehouse-No Rail	804,000 SF	536,000 SF	1,340,000 SF
High-Cube Cold Storage Warehouse	Refrigerated Warehouse-No Rail	321,600 SF	214,400 SF	536,000 SF
General Light Industrial	General Heavy Industry ¹	321,600 SF	214,400 SF	536,000 SF

² According to the California Department of Transportation (Caltrans), the average roadway width is 12 feet. The proposed roadways would be 2-4 lanes. Therefore, the width of the roadways are assumed to be an average of 36 feet (Caltrans 2015).

³ 9.6 acres of roadway is approximately 418,176 square feet. Therefore, assuming an average width of 36 feet, the length of roadway to be constructed is 11,616 feet. With an average landscape setback of 27.5 feet, and assuming landscaping on two sides of each roadway, then the average amount of landscaping is 638,880 square feet.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Proposed Land Use from TIA	Land Use Modeled in CalEEMod	Phase 1 and Phase 2 Land Use Sizes	Phase 3 Land Use Sizes	Total Land Use Sizes
Manufacturing	Manufacturing	160,800 SF	107,200 SF	268,000 SF
Total (Industrial)		3,216,000 SF	2,144,000 SF	5,360,000 SF
Landscaping				
Landscaping		383,328 SF	255,552 SF	638,880 SF
Total (Landscaping)		383,328 SF	255,552 SF	638,880 SF
Utilities				
Water Treatment Facility	General Heavy Industry	1.90 AC	-	1.90 AC
Sewer Treatment Facility	General Heavy Industry	1.80 AC	-	1.80 AC
Substation	User Defined Industrial	1,600 SF (0.04 AC)	-	1,600 SF (0.04 AC) ²
Total (Utilities)		3.74 AC	-	3.74 AC
Parking and Roadways				
Roadways	Other Asphalt Surface	5.76 AC	3.84 AC	9.6 AC
Employee Parking	Parking Lot	1,604 spaces (14.44 AC)	1,069 spaces (9.62 AC)	2,673 spaces (24.06 AC)
Truck and Trailer Parking ³	Parking Lot	56.29 AC	37.52 AC	93.81 AC ³
Total (Parking and Roadways)		76.49 AC	50.98 AC	127.47 AC

Notes:

¹ The CalEEMod modeling limits General Light Industry to 50,000 sf. Therefore, the proposed General Light Industrial land use would be modeled as General Heavy Industry.

² Square footage of substation based on previous PG&E substation design. See: Architectural Record. 2021. PG&E Electrical Substations by Stanley Saitowitz and Natoma Architects. Website: <https://www.architecturalrecord.com/articles/15262-pge-electrical-substations-by-stanley-saitowitz-and-natoma-architects#:~:text=Size%3A%201%2C534%20square%20feet,%28Embarcadero%29%3B%201%2C632%20square%20feet%20%28Potrero%29.>

³ Truck and trailer parking based on the remaining acreage after accounting for industrial land uses, employee parking, utilities, roadways, landscaping, the WSID canal, and detention basins.

SF = square feet

AC = acres

CONSTRUCTION MODELING INPUTS

Construction emissions were calculated within CalEEMod. CalEEMod modeling inputs for construction include the schedule, off-road construction equipment, and mobile trips associated with construction worker, vendor, and hauling trips.

Construction Schedule

Construction of the Project would require various tasks including site preparation, grading, building construction, architectural coatings, and paving. There are no existing buildings or other structures on the site. As such, demolition was not included within the schedule. Overall, construction is anticipated to take place over a period of 10 years, with actual construction timing based on market conditions. Phase 1 and Phase 2 would take place over the first 5 years of construction and Phase 3 would take place over 5 years.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Phase 1 and Phase 2 would overlap and, as a result, were calculated in one model. Phase 3 was modeled separately.

The northern portion of the Project site would be constructed during Phase 1 (water and wastewater treatment plant) and Phase 2 (Industrial Buildings 1-3), and the southern portion of the site would be constructed during Phase 3 (Industrial Buildings 4-5). As such, three-fifths of the proposed industrial building space, roadways, parking, and landscaping, as well as the utility infrastructure, were modeled to occur during Phase 1 and 2.

Construction is anticipated to begin late 2026. The modeling assumes a start date of early 2026, however, due to increasingly stringent regulations and advances in technology, construction emissions generally become lower if later years of construction are assumed. Therefore, in the event that construction begins at a later date or, for example, if Phase 3 would actually construct Building 3, then emissions would actually be lower than what was analyzed within the CalEEMod modeling. The Project construction schedule is provided in Table 2.0-4 in Section 2.0, Project Description.

Construction Equipment

The off-road equipment fleet for construction was generated using default values from CalEEMod. CalEEMod generates construction fleets for construction activities based on the size of the construction areas derived from a South Coast Air Quality Management District (SCAQMD) survey. The survey is limited to mid-sized projects with the maximum acreage of 34 acres (CAPCOA 2022b). As a result, the modeling is limited to estimating construction equipment from a maximum site size of 34 acres. To account for this limitation in the modeling, the amount of equipment required based on defaults were multiplied by a factor consistent with the acreage to be developed during each phase. Phases 1 and 2 would develop approximately 170 acres of the Project site, therefore the default equipment numbers for Phases 1 and 2 were multiplied by a factor of 5. Phase 3 would develop approximately 107 acres of the Project site, therefore the default equipment numbers for Phase 3 were multiplied by a factor of 3.

Grading is also assumed to require a chipper or grinder in order to remove the trees from the existing, on-site almond orchard. Construction equipment for each construction activity by phase is shown in Table 3.3-6.

Table 3.3-6. Proposed Construction Equipment

Activity	Equipment Type	Fuel Type	Number/Day	Hours/Day	Horsepower	Load Factor
Phase 1 and Phase 2						
Site Preparation	Rubber Tired Dozers	Diesel	15	8	367	0.40
	Tractors/Loaders/Backhoes	Diesel	20	8	84	0.37
Grading	Graders	Diesel	5	8	148	0.41
	Excavators	Diesel	10	8	36	0.38
	Tractors/Loaders/Backhoes	Diesel	10	8	84	0.37



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Activity	Equipment Type	Fuel Type	Number/Day	Hours/Day	Horsepower	Load Factor
	Scrapers	Diesel	10	8	423	0.48
	Rubber Tired Dozers	Diesel	5	8	367	0.40
	Chipper (modeled as Other Construction Equipment)	Diesel	5	8	82	0.42
Building Construction	Forklifts	Diesel	15	8	82	0.20
	Generator Sets	Diesel	5	8	14	0.74
	Cranes	Diesel	5	7	367	0.29
	Welders	Diesel	5	8	46	0.45
	Tractors/Loaders/Backhoes	Diesel	15	7	84	0.37
Paving	Pavers	Diesel	10	8	81	0.42
	Paving Equipment	Diesel	10	8	89	0.36
	Rollers	Diesel	10	8	36	0.38
Architectural Coatings	Air Compressors	Diesel	5	6	37	0.48
Phase 3						
Site Preparation	Rubber Tired Dozers	Diesel	9	8	367	0.40
	Tractors/Loaders/Backhoes	Diesel	12	8	84	0.37
Grading	Graders	Diesel	3	8	148	0.41
	Excavators	Diesel	6	8	36	0.38
	Tractors/Loaders/Backhoes	Diesel	6	8	84	0.37
	Scrapers	Diesel	6	8	423	0.48
	Rubber Tired Dozers	Diesel	3	8	367	0.40
	Chipper (modeled as Other Construction Equipment)	Diesel	3	8	82	0.42
Building Construction	Forklifts	Diesel	9	8	82	0.20
	Generator Sets	Diesel	3	8	14	0.74
	Cranes	Diesel	3	7	367	0.29
	Welders	Diesel	3	8	46	0.45
	Tractors/Loaders/Backhoes	Diesel	9	7	84	0.37
Paving	Pavers	Diesel	6	8	81	0.42
	Paving Equipment	Diesel	6	8	89	0.36
	Rollers	Diesel	6	8	36	0.38
Architectural Coatings	Air Compressors	Diesel	3	6	37	0.48



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Construction Vehicle Trips

Off-site construction emissions are caused by motor vehicle exhaust from delivery vehicles, worker traffic, hauling trucks to remove almond trees, and road dust (PM₁₀ and PM_{2.5}).

Construction Worker Trips. CalEEMod quantifies the number of construction workers by multiplying 1.25 times the number of pieces of equipment for all phases (except Building Construction and Architectural Coating).

Vendor Trips. CalEEMod default values would be used to estimate the number of vendor vehicle trips, which includes cement and water trucks.

Hauling Trips. The Project would include approximately 1.45 million cubic yards of material movement across the site during the construction phases. Dirt is expected to be balanced on the northern and southern sides of the Project site and would be moved by the on-site equipment. Therefore, there would be no hauling trips associated with graded dirt. Under the stormwater optionality design, larger detention ponds would be excavated to store two consecutive 10-year storms in a 48-hour period. While this would require additional cubic yards of material movement, the dirt would continue to be balanced on the northern and southern sides of the Project site and moved by the on-site equipment. As such, emissions from the stormwater optionality design would be similar to the Project.

Grading would also include the removal of on-site almond trees. Phases 1 and 2 would remove the almond trees on the northern portion of the site and Phase 3 would remove the almond trees on the southern portion of the site. No demolition or associated trucks would be required.

Construction Fleet Mix and Trip Distance. The fleet mix for worker trips consists of light-duty passenger vehicles to light-duty trucks. The vendor trips fleet mix is composed of a mixture of medium and heavy-duty diesel trucks. The hauling trips were assumed to be 100 percent heavy-duty diesel truck trips. Employees and vendors were assumed to travel 15.5 miles, which would account for vehicle travel from nearby urban areas like Manteca, Livermore, and Tracy. This mileage assumption is also more conservative than CalEEMod default trip distances of 11.89 miles for workers and 9.1 miles for vendors.

The almond tree waste would be hauled to a co-generation plant within the County.

OPERATIONAL MODELING ASSUMPTIONS

Operational emissions are those emissions that occur during operation of the Project. Sources of emissions include vehicle trips (passenger and truck trips), area sources, on-site equipment, and indirect sources. Operational emissions were calculated within CalEEMod with the exception of emissions from transportation refrigeration units (TRUs) and brine trucks, which were calculated using CARB's EMFAC2021.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Motor Vehicles

Motor vehicle emissions refer to exhaust and road dust emissions from automobiles and trucks that would travel to and from the Project site. Assumptions for motor vehicles are based on the scope of work prepared by Fehr & Peers for the Project TIA. During the weekday, the site is expected to generate approximately 14,698 trips per day.

The daily trip rates for industrial land uses from the TIA scope of work is provided in Table 3.3-7. Within the modeling, the weekday trip rates were also assumed for weekends. The TIA used trip generation rates published in the Institute of Transportation Engineer's *Trip Generation Manual, 11th Edition*, which are considerably higher than those measured at similar warehousing and logistics facilities in the County (Fehr & Peers 2024).

Table 3.3-7. Industrial Vehicle Trip Rates

ITE Land Uses	Square Footage (ksf)	Weekday Daily Trip Rate (Trips per ksf)	Weekday Trips per Day
High-Cube Transload and Short-Term Storage Warehouse	536	1.40	751
High-Cube Fulfillment Center Warehouse – Sort	268	6.44	1,726
Warehousing	1,340	1.71	2,292
High-Cube Parcel Hub Warehouse	536	4.63	1,137
High-Cube Fulfillment Center Warehouse – Non-sort	1,340	1.81	2,426
High-Cube Cold Storage Warehouse	536	2.12	2,482
General Light Industrial	538	4.87	2,611
Manufacturing	268	4.75	1,273
Total			14,698

Ksf = 1,000 square feet

Trip Lengths. Consistent with the TIA prepared by Fehr & Peers, trucks (heavy and medium) and passenger vehicles were modeled to travel 41.8 miles per trip and 25.29 miles per trip, respectively (Fehr & Peers 2024). Passenger vehicles for operation were assumed to be higher during operation than construction. While both workforces would come from the local population, the trip length for construction worker trips only accounts for construction workers. However, operational passenger vehicle trips accounts for employees and visitors to the site that may come from outside the County.

Average trip length for automobile trips was obtained from the SJCOG travel demand model for baseline and cumulative conditions while the average trip length for truck trips was obtained from the *San Joaquin Countywide Warehousing Data Collection and Travel Behavior Study*. The *San Joaquin Countywide Warehousing Data Collection and Travel Behavior Study* collected 72 hours of driveway vehicle classification count data at 39 warehousing buildings across San Joaquin County in June 2021 in order to calculate an average trip generation rate and travel distance when used in combination with data from



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

StreetLight Data, Inc. (Fehr & Peers 2024). As stated above, trip generation is based on the Institute of Transportation Engineer's *Trip Generation Manual, 11th Edition*, which are considerably higher than those measured at similar warehousing and logistics facilities in the county.

Vehicle Fleet Mix. The TIA scope of work prepared by Fehr & Peers in February 2024 provides a range of fleet mixes for heavy trucks, medium trucks, and automobiles based on the different types of industrial uses. The weighted average fleet mix for heavy trucks, medium trucks, and autos was calculated and modeled within CalEEMod. Table 3.3-8 summarizes the average fleet mix.

Table 3.3-8. Fleet Mix

Vehicle Type	Transload and Short-Term Storage	Cold Storage	Fulfillment Center	Parcel Hub	Average Fleet Mix
Heavy Trucks (HHDT)	16.0%	35.4%	3.0%	9.2%	13.36%
Medium Trucks (MHDT)	15.2%	4.1%	5.8%	28.4%	12.59%
Autos (LDA)	68.8%	60.5%	91.2%	62.3%	74.04%

The trip types, trip distances by trip type, and fleet mix were all accounted for within the modeling. The CalEEMod modeling includes three different trip types for nonresidential projects, these include H-W trips (employees traveling from home to work), W-O trips (trips from work to another location), and O-O trips (trips to other locations that do not involve home or work). Employee trips were assumed to be H-W trips and therefore, this trip type was assumed to have a distance of 25.29 miles. Truck trips were assumed to be W-O trip, this trip type was assumed to have a distance of 41.8 miles. Based on the fleet mix, 74 percent of all trips were assumed to be H-W trips and 26 percent of trips were assumed to be W-O trips. No trips were modeled as O-O trips. CalEEMod also includes trip purpose percentages. All trips generated from the Project were anticipated to be primary.

Transportation Refrigeration Units. A portion of the Project was assumed to include cold storage (a maximum of 536,000 sf). Cold storage would require TRUs. All heavy and medium truck trips associated with the cold storage land use were assumed to have TRUs. TRU emissions calculations are based on CARB's Health Analysis: Transportation Refrigeration Units and EMFAC2021 (CARB 2021, CARB 2024f).

Brine Trucks. Additionally, during operation, the wastewater treatment facility would produce up to 100 cubic yards of brine per year. The brine would be hauled off-site, assuming up to 14 truckloads per year (approximately 16 cubic yard capacity per truck). The brine hauling truck emissions were calculated using EMFAC2021.

Area Sources

Consumer Products. Consumer products are various solvents used in non-industrial applications that emit ROG during their product use. These typically include cleaning supplies, kitchen aerosols, cosmetics, and toiletries. The default CalEEMod values were used for this Project.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Architectural Coatings. Architectural coatings, such as paints and solvents, release ROG emissions. Architectural coatings would be applied during Project construction and would be reapplied during operation. CalEEMod defaults for architectural reapplications and ROG paint concentrations were used for this analysis.

Landscaping Emissions. Based on CalEEMod defaults for San Joaquin County, it was assumed that landscaping activities would take place 180 days per year.

Operational Equipment

The Project site would include the operation of a water and sewer treatment facility as well as 5.36 million square feet of industrial space. Water treatment facilities are assumed to require a water pump for each ground well.

While the end users of the industrial space are not known at this time, industrial land uses typically require some off-road operational equipment. The most common type of equipment required at an industrial warehouse is a yard tractor. Yard tractors were assumed to have a horsepower range between 175 and 200 and were modeled as the Tractors/Loaders/Backhoes equipment type within the modeling. According to the SCAQMD, high-cube warehouse projects typically have 3.6 yard trucks per million square feet of building space (SCAQMD 2014). For the purpose of the analysis, it was assumed 3.6 yard trucks per million square feet would be required across all industrial land uses.

Table 3.3-9 includes the estimated operational equipment on the site. All yard trucks were assumed to be diesel-powered and operate 4 hours per day for 365 days per year. The equipment for the water treatment facility was assumed to be electric and operate 12 hours per day for 365 days per year. Additionally, emergency generators may be used during operation. It was assumed up to one emergency diesel generator would be used per proposed industrial building. Each emergency generator was assumed to operate up to 50 hours per year to account for routine maintenance.

Table 3.3-9. Operational Equipment

Land Use	Size	Proposed Equipment	Modeled Equipment	Amount
Phase 1 and Phase 2				
Industrial Buildings	3.216 million sf	Yard Trucks	Tractors/Loaders/Backhoes	12
		Emergency Generator	Emergency Generator	3
Water Treatment Facility	2-3 wells	Water/Fire Pumps	Pumps	3
		Membrane Filter	Other Material Handling Equipment	1
Phase 3				
Industrial Buildings	2.144 million sf	Yard Trucks	Tractors/Loaders/Backhoes	8
		Emergency Generator	Emergency Generator	2



Indirect Emissions

While this section of the EIR addresses air quality impacts, the same CalEEMod modeling also calculates the GHG emissions associated with a project. Therefore, the GHG specific inputs are also briefly discussed here. For GHG emissions, CalEEMod contains calculations to estimate indirect GHG emissions. Indirect emissions are emissions where the location of consumption or activity is different from where actual emissions are generated. For example, electricity would be consumed at the proposed Project site; however, emissions associated with producing that electricity are generated off-site at a power plant. Since the electricity can vary greatly based on locations, the user should override these values if they have more specific information.

Energy Use. Pacific Gas and Electric (PG&E) would provide electricity and natural gas services to the Project site. PG&E provides emission factors for the electricity it provides to customers for its energy portfolio that can be used to estimate project emissions. The latest iteration of the CalEEMod model accounts for the Renewable Portfolio Standard (RPS). Default energy factors in CalEEMod for PG&E were used in the analysis.

The emissions associated with the building electricity and natural gas usage (non-hearth) were estimated based on the land use type and size. The electricity energy use is in units of kilowatt hours per size metric for each land use type. Natural gas use is in units of one thousand British Thermal Units per size metric for each land use type. Hearths and stoves are not assumed to be used in industrial projects.

Water Use. According to the WSA prepared by Kier and Wright in June 2023, the Project would result in net new potable water demand of 78 AFY (Kier and Wright 2023). In the modeling, it was assumed 60 percent of the water use demand would occur during Phase 1 operation (46.8 AFY) and the remaining 40 percent would be demanded during Phase 2 operation (31.2 AFY). The water use input accounts for the greenhouse gas emissions associated with the energy required to treat and move the water.

Almond Tree Removal

CalEEMod recommends that the emissions associated with the change of trees on a development site be evaluated through the USDA i-Tree Planting Calculator then input within the modeling. The i-Tree Planting Calculator estimates the average amount of carbon stored per year per tree. Carbon sequestration rates for the existing trees were based on the average tree diameter of an almond tree. The analysis estimated the loss of future stored carbon based on the number of trees that would be removed as a result of Project construction. The Project would also plant approximately 535 trees across the Project site. As such, the i-Tree software was also utilized to account for the carbon reduction from these trees. Carbon sequestration rates were based on a California shade tree species from Chapter 5 of the IPC2 Specific Plan with an average tree diameter of 12 inches.



Health Risk Assessment

Multiple health risk scenarios were modeled for the Project including: (1) construction HRA; (2) full Project buildout; (3) overlapping risks; (4) existing conditions; and (5) future, without Project. Under each scenario, the USEPA's AERMOD steady-state air dispersion model was used to estimate the concentration of DPM at nearby receptors. The concentration of DPM and the maximally exposed receptors was applied in CARB's HARP2 software and health risks were calculated in accordance with SJVAPCD GAMAQI and the OEHHA 2015 Risk Guidance (OEHHA 2015). During construction and operation, the main source of TAC emissions would be DPM from off-road construction equipment and heavy-duty trucks. DPM emissions were calculated using CalEEMod and CARB EMFAC2021 emission factors. Approximately 90% of all DPM emissions are less than 1 micron (CARB 2023a). For this analysis, PM₁₀ exhaust served as a proxy for DPM for this analysis as this would capture all potential particle sizes of DPM as PM₁₀ accounts for all particulate matter under 10 microns. Modeling inputs and health risk calculations for each scenario are detailed below.

AERMOD Meteorological Data

For the analysis, meteorological data from the Tracy Station (Station ID 99008) was used (SJVAPCD 2024d). The latest available data from the Tracy Station is from 2004 to 2008.

Receptors Evaluated

Health risks were modeled for the maximally exposed individual resident (MEIR) and the maximally exposed individual school receptor (MEISR) receptor under several scenarios. To find the MEIR, the model calculated the concentration at nearby residential receptors. According to CARB, DPM dissipates with distance from the source, especially within the first 500 feet (CARB 2005). As such, the Bay Area District (BAAD) requires the health risks to be evaluated for receptors up to 1,000 feet from a project site (BAAD 2023). However, SJVAPCD does not have a specific cutoff for evaluation. The receptor locations were based on community concern and proximity to the Project site and modeled roadway segments. Due to community concerns, the nearest Lammersville residential receptors were included within the analysis. The nearest residence within Lammersville was found to lie approximately 900 meters (2,950 feet) north of the modeled roadway segments. Receptors within 1,000 meters (3,280 feet) of the modeled roadway segment were chosen within Lammersville to capture any potential risk differential due to meteorological data. To be consistent, all receptors within 1,000 meters of the Project site or modeled roadway segments were evaluated. This resulted in the following residential communities to be evaluated: (1) residences located in southeastern Lammersville; (2) residences located east of the Project and west of South Lammers Road; (3) residences east of John C. Kimball High School, north of agricultural land, and south of W 11th Street; and (4) residences east of South Lammers Road, south of agricultural land, and north of Western Pacific Way, see Figure 22. These receptors would be exposed to higher levels of DPM and, therefore, have a higher health risk than receptors located further from the Project site or roadway segments. The MEIR for Project buildout was identified as the residential receptor located immediately east of W Lammers Road



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

and north of the WSID canal.⁴ The MEIR for Phase 1 and Phase 2 construction was the receptor located approximately 200 feet east of the site⁵ and the MEIR for Phase 3 construction was the receptor located approximately east of W Lammers Road and south of the WSID canal.⁶ The health risks provided within the analysis represent the health risks for the highest concentration at any point in Project construction or operation. This would provide a higher health risk result than assuming a single point. As such, the risks presented in the analysis represent the highest theoretical risk a single resident could be exposed to. Actual health risks would likely be lower.

The MEISR was evaluated for an elementary school aged child (assumed to be exposed from kindergarten through 6th grade) and a high school aged child (assumed to be exposed from 9th through 12th grade). Based on the HRA, the maximally exposed elementary school aged child be located approximately 4,900 feet east of the Project site boundary and 2,874 feet east from a modeled roadway segment and the maximally exposed high school aged child would be located approximately 2,760 feet northeast of the Project site boundary and 561 feet north from a modeled roadway segment, see Figure 22.

Age Sensitivity Factors. OEHHA recommends evaluating receptors based on age sensitivity factors. For example, residential receptors exposed over a 70-year period are assumed to be exposed as a third trimester receptor (-0.25 to 0 years), infant (0 to 2 years), child (2 to 16 years), and adult (16 to 70 years). Each age bracket includes specific input factors for daily breathing rate and age sensitivity factors. The default age-specific factors for age sensitivity and daily breathing rates in HARP were used in the analysis and are based on OEHHA guidance. Consistent with SJVAPCD guidance, this analysis does not include a fraction of time at home assumptions for any of the MEIR age brackets (SJVAPCD 2021). This is a more conservative assumption as the fraction of time at home would reduce the annual exposure period. Removing the fraction of time at home value assumes the receptor is continuously at home exposed to DPM. In other words, the HRA analysis assumes that an individual is at the sensitive receptors for 24 hours a day seven days a week, which is more conservative than reality. The HRA scenarios, receptors, and duration of exposure by age bracket are presented in Table 3.3-10.

Sources

The Project would result in the release of emissions from the Project site and roadway segments.

Area Source. The Project site was modeled as an area source. All emissions during construction were modeled to occur on the Project site. For operation, emissions from truck idling (including TRU trucks), on-site operational equipment, and the back-up generators were estimated. For this analysis, it was assumed that each heavy-duty truck visiting the cold storage warehouses would be equipped with a TRU, for a total of 1,241 TRUs visiting the site each day at full Project buildout. Consistent with CARB's recommended parameters, each TRU was assumed to idle for 3.3 hours per load.

⁴ 37.719587° N, -121.476207° W

⁵ 37.723273° N, -121.483097° W

⁶ 37.7716330° N, -121.476010° W



Line Volume Sources. Roadways used during operation were modeled as line volume sources. 14 distinct segments were considered (see Figure 3.3-1). Pollutants from the roadways were calculated within CalEEMod and assigned to roadways based on the TIA prepared by Fehr & Peers (Fehr & Peers 2024). The calculations for roadway emissions are provided in Appendix C.

Risk Scenarios Evaluated

Scenario 1: Construction HRA. The construction HRA evaluated the health risk posed from off-road construction equipment and on-road diesel trucks.

The average emission rate of DPM by phase was applied in two separate AERMOD models. Phase 1 and Phase 2 were modeled as an area-polygon source with emissions generated uniformly across the northern portion of the site, and Phase 3 was modeled as an area-polygon source on the southern portion of the site.

The concentration of DPM derived from AERMOD at the MEIR and MEISR was used to calculate the cancer and non-cancer health risks using OEHHA's most recent guidance, which requires the cancer risk to be calculated with age factors that account for the higher risk posed to infants and children. The cancer risks during Phases 1 and Phase 2, Phase 3, and total construction risk were calculated with the CARB's HARP2 software starting at the third trimester through the first ten years of life for the MEIR. The MEISR health risk was calculated for the duration of student exposure at John C. Kimball High School and George Kelley Elementary School. See Table 3.3-10 for a summary of the years of exposure by receptor age for each scenario.

The mitigated and unmitigated construction HRA was prepared for this analysis.

Scenario 2: Full Project Buildout. Scenario 2 evaluated the risk posed to sensitive receptors during full Project operation over a 70-year period. The risk is assumed to begin during the first year of full operation (2036). The onsite emissions from any diesel equipment (i.e., forklifts, tractors, back-up generators) were modeled as an area-polygon source across the entire site. Vehicle emissions were modeled as line volume sources on the proposed trucking routes. The DPM generated from heavy duty trucks were split based on the frequency of travel by route. The traffic and routing information was provided within the TIA (Fehr & Peers 2024). See Table 3.3-10 for a summary of the years of exposure by receptor age for each scenario.

The mitigated and unmitigated full project buildout HRA was prepared for this analysis.

Scenario 3: Overlapping Risks. Scenario 3A calculated the risk posed to sensitive receptors during Project construction and operation, including the overlap in emissions from Phases 1-2 operation and Phase 3 construction. The modeling for Phases 1-2 construction in Scenario 1 and full Project buildout under Scenario 2 was also be used in this analysis. In addition, an AERMOD model was prepared to assess the concentration at the MEIR and MEISR during Phases 1-2 of operation. For the Phases 1-2 operational scenario, all on-site sources of emissions were modeled as an area-polygon source on the northern end of the Project site and all on-road emissions were modeled as line volume sources. The amount of traffic and associated emissions on each roadway were based on the percentage of buildout



under Phases 1-2 and the TIA. See Table 3.3-10 for a summary of the years of exposure by receptor age for each scenario.

The mitigated and unmitigated overlapping risks HRA was prepared for this analysis.

Scenario 4: Existing Conditions. Scenario 4 calculated the risks posed to sensitive receptors over a 70-year period under existing conditions (2023). The existing Project site serves as an almond orchard. The air modeling included a baseline analysis of the existing site based on assumptions for the annual workers and truck trips to the site as well as annual harvesting emissions. See Table 3.3-10 for a summary of the years of exposure by receptor age for each scenario.

Scenario 5: Future Conditions without Project. Under this scenario, a quantitative HRA was prepared over a 70-year period beginning in the buildout year of the Project (2036) to determine the risks posed to receptors under the future conditions without implementation of the Project based on traffic data provided within the TIA. See Table 3.3-10 for a summary of the years of exposure by receptor age for each scenario.

HARP2

After the concentration of DPM was determined using AERMOD, the cancer and non-cancer health risks were calculated within CARB's HARP2 software. HARP2 output files and results are provided in Appendix C.



INTERNATIONAL PARK OF COMMERCE PHASE 2
Draft Environmental Impact Report
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Table 3.3-10. Health Risk Scenarios Summary

Scenario Number	Scenario Description	Project Phases Evaluated	Receptors Evaluated	Duration of Exposure	Duration of Exposure by Receptor Age and Project Phase
1	Construction (2025-2035)	Phase 1-2 Construction; Phase 3 Construction	Residential	10 years of life starting at the 3 rd Trimester.	3 rd Trimester, Phase 1-2 Construction (-0.25 to 0 years)
					Infant, Phase 1-2 Construction (0-2 years)
					Child, Phase 1-2 Construction (2-5 years))
					Child, Phase 3 Construction (5-10 years)
			Elementary School Child	7 years, from kindergarten (age 5) to 6 th grade (age 12)	Child, Phase 1-2 Construction (5-10 years)
					Child, Phase 3 Construction (10-12 years)
			High School Child	4 years, from 9 th grade (age 14) to 12 th grade (age 18)	Child, Phase 1-2 Construction (14-16 years) Adult, Phase 1-2 Construction (16-18 years)
2	Full Project Buildout (2035-2105)	Phase 1-3 Operation	Residential	70 years of life starting at the 3 rd Trimester	3 rd Trimester, Phase 1-3 Operation (-0.25 to 0 years)
					Infant, Phase 1-3 Operation (0-2 years)
					Child, Phase 1-3 Operation (2-16 years)
					Adult, Phase 1-3 Operation (16-70 years)
			Elementary School Child	7 years, from kindergarten (age 5) to 6 th grade (age 12)	Child, Phase 1-3 Operation (5-10 years)
					Child, Phase 1-3 Operation (10-12 years)
			High School Child	4 years, from 9 th grade (age 14) to 12 th grade (age 18)	Child, Phase 1-3 Operation (14-16 years) Adult, Phase 1-3 Operation (16-18 years)
3	Overlapping Risks (2025-2095)	Phase 1-2 Construction; Phase 3 Construction and Phase 1-2 Operation; Phase 1-3 Operation	Residential	70 years of life starting at the 3 rd Trimester	3 rd Trimester, Phase 1-2 Construction (-0.25 to 0 years)
					Infant, Phase 1-2 Construction (0-2 years)
					Child, Phase 1-2 Construction (2-5 years)
					Child, Phase 3 Construction and Phase 1-2 Operation (5-10 years)
					Child, Phase 3 Operation (10-16 Years)
					Adult, Phase 1-3 Operation (16-70 years)

INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Scenario Number	Scenario Description	Project Phases Evaluated	Receptors Evaluated	Duration of Exposure	Duration of Exposure by Receptor Age and Project Phase
			Elementary School Child	7 years, from kindergarten (age 5) to 6 th grade (age 12)	Child, Phase 1-2 Construction (5-7 years)
			High School Child	4 years, from 9 th grade (age 14) to 12 th grade (age 18)	Child, Phase 1-2 Operation and Phase 3 Construction (7-12 years)
					Child, Phase 1-2 Operation and Phase 3 Construction (14-16 years)
					Adult, Phase 1-2 Operation and Phase 3 Construction (16-18 years)
4	Existing Conditions (2023-2093)	Existing Almond Orchard Operations	Residential	70 years of life starting at the 3 rd Trimester	3 rd Trimester, Existing Conditions (-0.25 to 0 years)
					Infant, Existing Conditions (0-2 years)
					Child, Existing Conditions (2-5 years)
					Child, Existing Conditions (5-10 years)
					Child, Existing Conditions (10-16 Years)
					Adult, Existing Conditions (16-70 years)
			Elementary School Child	7 years, from kindergarten (age 5) to 6 th grade (age 12)	Child, Existing Conditions (5-12 years)
			High School Child	4 years, from 9 th grade (age 14) to 12 th grade (age 18)	Child, Existing Conditions (14-16 years)
5	Future No Project (2035-2105)	Future Conditions without the Project	Residential	70 years of life starting at the 3 rd Trimester	Adult, Existing Conditions (16-18 years)
					3 rd Trimester, Future No Project (-0.25 to 0 years)
					Infant, Future No Project (0-2 years)
					Child, Future No Project (2-5 years)
					Child, Future No Project (5-10 years)
					Child, Future No Project (10-16 Years)
					Adult, Future No Project (16-70 years)
			Elementary School Child	7 years, from kindergarten (age 5) to 6 th grade (age 12)	Child, Future No Project (5-12 years)
			High School Child	4 years, from 9 th grade (age 14) to 12 th grade (age 18)	Child, Future No Project (14-16 years)
					Adult, Future No Project (16-18 years)



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Ambient Air Quality Modeling

The air quality analysis also includes ambient air quality dispersion modeling to measure the concentration of CO during Project construction and operations. The dispersion modeling was conducted using the USEPA's AERMOD dispersion modeling tool. The ambient air quality AERMOD modeling assumes the same inputs as the HRA, except the receptor locations are different. For the ambient air quality analysis, fence line receptors surrounding the Project boundary are analyzed. Receptors were placed 10 meters from the fence line at intervals of 25 meters. Ambient air dispersion modeling files including AERMOD output files and calculations are included in Appendix C.

Odor Analysis

SJVAPCD's GAMAQI includes screening level guidance for determining if a Project has the potential to result in an odor impact based on its proposed land uses and distance to nearby sensitive receptors. The Project would operate a wastewater treatment plant within two miles of a nearby receptor and, therefore, SJVAPCD requires a more detailed odor analysis (SJVAPCD 2015). Potential odor impacts to nearby sensitive receptors were evaluated based on the local wind patterns and an evaluation of the wastewater treatment's design and compliance standards.

Thresholds of Significance

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purposes of this EIR, implementation of the Project may result in a potentially significant impact on air quality if it would do any of the following:

- a. Conflict with or obstruct implementation of the applicable air quality plan?
- b. Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?
- c. Expose sensitive receptors to substantial pollutant concentrations?
- d. Results in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Project-Level Thresholds

SJVAPCD

While the final determination of whether a project is significant is within the purview of the Lead Agency pursuant to Section 15064(b) of the CEQA Guidelines, the SJVAPCD recommends that its quantitative air pollution thresholds, shown in Table 3.3-11, be used to determine the significance of project emissions. If the Lead Agency finds that a project has the potential to exceed these air pollution thresholds, a project should be considered to have significant air quality impacts.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Table 3.3-11. SJVAPCD Significance Thresholds

Pollutant	Significance Threshold (tons per year [tpy])	
	Construction Emissions	Operational Emission
ROG	10	10
NO _x	10	10
CO	100	100
SO _x	27	27
PM ₁₀	15	15
PM _{2.5}	15	15

Source: SJVAPCD 2015.

BAAD

The Project site lies within SJVAB; however, it is situated approximately 3.5 miles east of the San Francisco Bay Area Air Basin (SFBAAB). Therefore, vehicle trips from the Project traveling west on I-580 or travelling to the Project site from within the Bay Area would also pass through the SFBAAB. SFBAAB is under the jurisdiction of the BAAD (BAAD). The BAAD has its own set of project-level, operational thresholds to determine the significance of air quality impacts. Since the Project would generate transportation-related emissions within SFBAAB, the Project's mobile source emissions were also compared to BAAD thresholds. BAAD operational thresholds are provided in Table 3.3-12. Unlike the SJVAPCD, BAAD does not provide significance thresholds for CO or SO_x emissions.

Table 3.3-12. BAAD Operational Significance Thresholds

Pollutant	Operational Thresholds	
	Average Daily Emissions (lbs/day)	Maximum Annual Emissions (tpy)
ROG	54	10
NO _x	54	10
PM ₁₀	82	15
PM _{2.5}	54	10

Source: BAAD 2022.

Localized Significance Thresholds

The SJVAPCD has established a screening threshold for localized impacts of criteria air pollutants. If a project exceeds the screening thresholds, then more detailed ambient air quality modeling would be required. If a project does not exceed these screening thresholds, then it can be assumed that it would not cause a violation of an ambient air quality standard or result in any localized impacts. SJVAPCD localized thresholds are provided in Table 3.3-13.

Table 3.3-13. SJVAPCD Localized Significance Thresholds

	Emissions (pounds per day)			
	NO _x	CO	PM ₁₀	PM _{2.5}



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

SJVAPCD Localized Construction Thresholds	100	100	100	100
SJVAPCD Localized Operational Thresholds	100	100	100	100

Source: SJVAPCD 2015.

Health Risk Thresholds

In addition, according to the SJVAPCD, a project would result in a significant impact if it would individually expose sensitive receptors to TACs resulting in an increased cancer risk greater than 20.0 in 1 million over a 70-year timeframe, or an increased non-cancer hazard index greater than 1.0.

Project Impacts and Mitigation Measures

Conflicts with Air Quality Plan

Impact AIR-1	The Project would conflict with or obstruct implementation of the applicable air quality plan.

Impact Analysis

The CEQA Guidelines indicate that a significant impact would occur if the Project would conflict with or obstruct implementation of the applicable air quality plan. Air districts are required to prepare air quality plans to identify strategies to bring regional emissions into compliance with State and federal air quality standards. Air districts establish emissions thresholds for individual projects to demonstrate the point at which a project would be considered to increase the air quality violations. A project would conflict with the applicable air quality plan if they exceeded any emissions thresholds for which the region is in nonattainment for.

As noted previously, the SJVAB is designated as nonattainment for O₃, PM₁₀, and PM_{2.5}. Accordingly, the SJVAPCD has prepared air quality plans, including the 2018 Plan for the 1997, 2006, and 2012 PM_{2.5} Standards and the 2022 Ozone Plan, to achieve attainment of the applicable O₃ and PM standards. The SJVAPCD's GAMAQI states that projects that fall below the thresholds of significance (see Table 3.3-) for criteria air pollutants would be determined to not conflict with the SJVAPCD's air quality plans. Projects that exceed the thresholds would be considered to conflict with the applicable air quality plans (SJVAPCD 2015).

As described under Impact AIR-2, the Project would exceed the thresholds established by the SJVAPCD as well as BAAD. However, the Project would implement Mitigation Measures AQ-1 through AQ-26, which require on-site and off-site emissions reductions, and Mitigation Measures TRANS-1 and TRANS-2 that would reduce impacts less than significant levels. Mitigation Measure TRANS-1 would require the Project applicant to work with San Joaquin Regional Transit Authority to extend bus service to the area, and Mitigation Measure TRANS-2 would require the Project to implement a Transportation Demand Management program. While the purpose of Mitigation Measures TRANS-1 and TRANS-2 is to reduce vehicle traffic and VMT impacts, implementation of such measures would also reduce mobile source air quality emissions. Moreover, the Project would implement all SJVAPCD rules and regulations, including



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Regulation VIII to reduce fugitive dust during construction. As a result, with the implementation of mitigation, the Project would not conflict with or obstruct implementation of the applicable air quality plan.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

- MM AQ-1 Minimize Construction Exhaust Emissions.** Exhaust emissions shall be minimized during construction activities with the use of off-road equipment engines that meet or exceed CARB's Tier 4 Final engine emissions standards for off-road equipment exceeding 50 horsepower (hp). At a minimum, all construction equipment shall be certified as compliant with the Tier 4 Final engine emissions standards as provided in CCR, Title 13, section 2423(b)(1)(B). Engines can achieve these standards through the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, or other options as they become available. This requirement shall be included in construction contracts.
- MM AQ-2 Construction Equipment Recordings.** Project contractors shall keep equipment maintenance records and data sheets, including design specifications, emission control tier classifications, and hours of use. Records shall be kept on-site and be made available to the County or other regulators upon request. This requirement shall be included in construction contracts.
- MM AQ-3 Electric Hand Tools, Forklifts, and Pressure Washers.** Project contractors shall only use electric hand tools, forklifts, pressure washers, and any other off-road equipment with a power rating below 19 kilowatt. This requirement shall be included in construction contracts.
- MM AQ-4 Designated Construction Charging Area.** During construction, an area of the site shall be designated for electric power vehicle and equipment charging. This requirement shall be included in construction contracts.
- MM AQ-5 Heavy Duty Construction Trucks.** During construction, all heavy duty trucks entering the construction site during the grading and building construction phases are required to be model year 2014 or later. This requirement shall be included in construction contracts.
- MM AQ-6 On-Site Food Options.** During construction and operation, the Project Applicant, contractors, and tenants shall allow food trucks on the property in accordance with the allowable hours within the jurisdiction.
- MM AQ-7 Leadership in Energy and Environmental Design (LEED) Silver Compliance.** Prior to the issuance of building permits, the applicant/developer shall demonstrate (e.g., provide building plans) that the proposed buildings are designed to meet the standards of LEED Silver as established by the U.S. Green Building Council.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

- MM AQ-8 Solar Roof Design.** Prior to the issuance of building permits, the County shall verify that the roof structure is designed to support the installation of solar panels.
- MM AQ-9 On-Site Solar.** Prior to the issuance of building permits, the applicant/development shall demonstrate (e.g., provide building plans) that the proposed building includes enough solar paneling to power the industrial office space.
- MM AQ-10 Architectural Coatings.** Owners, operators, and tenants shall be required to use architectural and industrial maintenance coatings (e.g., paints) applied on the Project site with a maximum VOC content of less than 10 grams per liter (g/L).
- MM AQ-11 Yard Sweeping.** During Project operation, owners, operators, and tenants shall provide periodic yard and parking areas sweeping to minimize dust generation.
- MM AQ-12 Zero Emission Forklifts and Yard Trucks During Operation.** Owners, operators, and tenants shall require all forklifts, yard trucks, and other equipment used for on-site movement of trucks, trailers, and warehoused goods during operation to be electrically powered or zero-emission. The owner, operator, or tenant shall provide on-site electrical charging facilities to adequately service electric vehicles and equipment. Lease agreements shall require owners, operators, and tenants to use zero emission forklifts and yard trucks.
- MM AQ-13 Truck Idling Restrictions.** Owners, operators, or tenants shall be required to make their best effort to restrict truck idling on-site to a maximum of three minutes during Project construction and operation, subject to exceptions defined by CARB in 13 CCR § 2485. Idling restrictions shall be enforced by highly-visible posting at the site entry, posting at other on-site locations frequented by truck drivers, conspicuous inclusion in employee training and guidance material, and owners, operators, and tenants direct action as required. Lease agreements shall require owners, operators, and tenants to comply with the three minute idling restriction.
- MM AQ-14 Truck Idling Training.** Owners, operators, and tenants shall train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- MM AQ-15 Heavy Duty Trucks.** Owners, operators, and tenants shall ensure that all heavy-duty trucks (Class 7 and 8) domiciled on site are model year 2014 or later from the start of operations. Owners, operators, and tenants shall keep truck maintenance records and data sheets, including model year. Records shall be kept on-site and be made available to the County or other regulators upon request.

Domiciled on site vehicles is any vehicle either (i) parked or kept overnight at the qualifying facility(ies) more than 70% of the calendar year or (ii) dedicated to the qualifying facility(ies) site (defined as more than 70% of the truck routes during the calendar year that start at the qualifying facility(ies) site even if parked or kept elsewhere). The tenant/operator of the qualifying facility(ies) shall not be responsible to



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

meet “clean fleet” requirements for vehicles used by common carriers operating under their own authority that provide delivery services to or from the qualifying facility(ies) site.

- MM AQ-16** **Truck Routing Signage.** Owners, operators, and tenants shall post signage at every truck exit driveway providing directional information to the truck route.
- MM AQ-17** **Electric Truck Charging.** At all times during Project operation, owners, operators, and tenants shall be required to provide electric charging facilities on the Project site sufficient to charge all electric trucks domiciled on the site and such facilities shall be made available for all electric trucks that use the Project site. Domiciled on site vehicles is any vehicle either (i) parked or kept overnight at the qualifying facility(ies) more than 70 percent of the calendar year or (ii) dedicated to the qualifying facility(ies) site (defined as more than 70 percent of the truck routes during the calendar year that start at the qualifying facility(ies) site even if parked or kept elsewhere). The tenant/operator of the qualifying facility(ies) shall not be responsible to meet “clean fleet” requirements for vehicles used by common carriers operating under their own authority that provide delivery services to or from the qualifying facility(ies) site. Lease agreements will require owners, operators, and tenants to annually review the number of electric trucks domiciled on the Project site and ensure sufficient electric charging stations are provided or develop new electric charging stations.
- MM AQ-18** **Electric Docking Plugs at Cold Storage Facilities.** Construction plans shall require electric plugs for electric transportation refrigeration units (TRUs) at every dock door and require truck operators with TRUs to use the electric plugs when using loading docks instead of idling their engines. Lease agreements will require owners, operators, and tenants to maintain TRU hookups.
- MM AQ-19** **Transportation Refrigeration Units.** Owners, operators, and tenants are required to only use plug-in capable TRU trucks on-site.
- MM AQ-20** **Diesel Generators.** Owners, operators, and tenants shall prohibit the use of diesel generators, except in emergency situations, in which case such generators shall have Best Available Control Technology (BACT) that meets the CARB’s Tier 4 emission standards.
- MM AQ-21** **Employee Transit Route Information.** The Project Applicant, owners, operators, and tenants shall provide construction workers and employees transit route and schedule information on systems serving the Project area and coordinate ridesharing amongst employees.
- MM AQ-22** **Electric Water Pumps.** All water pumps installed on the Project site for the water treatment system are required to be 100% electric.
- MM AQ-23** **Low to Zero VOC Cleaning Products.** Owners, operators, and tenants shall only be permitted to use cleaning products rated as low to zero Volatile Organic Compound (VOC) content. Examples of products meeting this standard include cleaning products labeled with the USEPA’s Safer Choice Standard label. Under the Safer Choice Standard



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

label products would be restricted to VOC limits prescribed by the Ozone Transport Commission and CARB.

- MM AQ-24 Zero Emission Landscaping Equipment.** Owners, operators, and tenants shall provide zero emission landscaping equipment or hire from landscaping services that only use zero emission equipment for all landscaping on the Project site.
- MM AQ-25 Ride Share.** Owners, operators, and tenants shall be required to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
- MM AQ-26 Emission Reductions Programs.** The Project Applicant shall provide owners, operators, and tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.
- MM AQ-27 Reduction of Remaining Emissions.** The Project will be developed over a long-period of time, with future tenants and operators of the contemplated buildings being unknown. Accordingly, due to emerging technologies that come on-line during buildout, emissions are anticipated to reduce in future years, meaning that when the Project or portions thereof are built in the future, emissions may be less than significant when compared to San Joaquin Valley Air Pollution Control District (SJVAPCD) threshold levels ("District Threshold Levels"), and require no additional mitigation measures outside of MM AQ-1 through MM AQ-26 at that time.

In order to accurately analyze the Project's air quality emissions as the Project is developed over time to determine whether additional mitigation is needed, the Project Applicant and/or the future owner/operator of a portion of the Project will work with the County, prior to the County's issuance of a final permit needed to install tenant improvements within a particular building for a future operator within the Project (the "Development"), to evaluate the potential criteria air pollutant emissions that may come from the Project at that time (including any potential reductions in assumed emissions that may result from the advent of cleaner technologies to be used in both the construction and operation phases), and compare the Project-wide estimated emissions at that time to the District Threshold Levels ("Updated Emissions Analysis"). The County shall perform an Updated Emissions Analyses in connection with each future Development within the Project until the County has determined that the Project's specific and cumulative air quality impacts either do not require further mitigation because the Project's emissions meet or fall below the District's Threshold Levels, or have been mitigated to a less than significant impact.

If, after an Updated Emissions Analysis, the County determines that the Project would comply with the District's Threshold levels, and thus result in a less than significant impact, no additional mitigation is needed in connection with the Project at that time.

Alternatively, if the Updated Emissions Analysis demonstrates that the Project at that time exceeds the District's Threshold Levels, the tenant, lessee, or other operating party



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

has the option of implementing one or all of the following measures: enrollment in USEPA SmartWay program, using zero emission light and medium duty vehicles, requiring domiciled trucks to be Model Year 2020 or newer, and/or best available control technology at the time. If the County determines that the implementation of these measures would result in a reduction of the Project's relevant emissions, and render them less than significant (i.e. the Project's emissions do fall below or meet the District's Threshold Levels), and those mitigation measures are complied with, no additional mitigation is needed.

In addition to, or as an alternative to, these potential mitigation measures, prior to the County's issuance of the first permit needed to install tenant improvements within a particular building for the first operator within the Project, the Project Applicant and/or the relevant owner of the Project at that time shall enter into a Voluntary Emissions Reductions Agreement (VERA) with San Joaquin Valley Air Pollution Control District (SJVAPCD) applicable to the entire Project area, the terms of which are described below.

The VERA is an air quality mitigation measure by which a developer can voluntarily enter into a contractual agreement with the SJVAPCD to mitigate a development project's impact on air quality. The VERA shall ensure that the Project's emissions of ROG, NOx, and PM10 either meet or remain below the District's Threshold Levels. Under the agreement, the Project Applicant or its successors-in-interest/assigns shall provide funds to the SJVAPCD to administer the implementation of the VERA. The SJVAPCD then identifies emissions reductions projects, funds those projects, and verifies that the specified emission reductions have been successfully achieved. The SJVAPCD considers implementation of a VERA to be a feasible mitigation measure under CEQA, effectively achieving the emission reductions necessary to reduce impacts to a less than significant level.

Due to the fact that the Project contemplates multiple phases of development, along with a variety of different potential operators when the Project is built, the VERA will require the assessment of the Project's air quality impacts on an iterative basis as Developments are proposed to provide an accurate accounting and assessment of the Project's air quality impacts. Further, to accommodate future Development, fees (when necessary) required to be paid pursuant to the VERA will be imposed on a Development by Development basis.

The VERA will require the payment of fees to SJVAPCD solely where the County determines that the Project (at the time a particular Development is proposed) would result in air quality impacts that exceed the District Threshold Levels that have not been sufficiently mitigated as each Development within the Project is brought forward. In such a case, the VERA will only require the payment of funds needed to address the additional emissions caused by the Development as well as any cumulative impacts tied to the Development that were not sufficiently mitigated, and resulted in an exceedance of SJVAPCD's thresholds. These payments will only be due immediately prior to the issuance of the final permit needed for the installation and/or construction of tenant improvements for a particular Development.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

In this way, the VERA will ensure that each Development pays the required fees to offset each Development's pro rata share of impacts and to otherwise offset its share of any cumulative impacts as the Project is developed. Accordingly, when the Project is completed, the Project's specific and cumulative air quality impacts will have been sufficiently mitigated through the Developments' payment of the requisite fees over time.

If the County determines at any time that the Project's specific and cumulative air quality impacts have been sufficiently mitigated to remain below SJVAPCD's thresholds at any time, either because mitigation was not required, or because the County has determined that the Project's specific and cumulative impacts have been reduced to a less than significant level (either through the adoption of mitigation measures and/or implementation of the VERA), then no further mitigation is needed.

For the purposes of this condition the "District Threshold Levels," shall mean and refer to the District's CEQA significance threshold of 10 tons per year of NO_x, 10 tons per year of VOC/ROG, and 15 tons per year of PM₁₀. This condition herein will ensure that the Project's overall air quality impacts will fall below these District Threshold Levels.

Mitigation Measures TRANS-1 and TRANS-2 are required.

Level of Significance After Mitigation

Less than Significant Impact with Mitigation.

Cumulatively Considerable Net Increase of Criteria Pollutants

Impact AIR-2	The Project would 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.

Impact Analysis

In developing thresholds of significance for air pollutants, the SJVAPCD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

Construction Emissions

Emissions during construction of the Project would be generated primarily from off-road construction equipment and mobile sources. Unmitigated construction emissions associated with the Project are shown in Table 3.3-14.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Table 3.3-14. Construction Criteria Pollutant Emissions (Unmitigated)

Construction Year ¹	Emissions (tpy)					
	ROG	NOx	CO	SOx	PM ₁₀ ²	PM _{2.5} ²
Phase 1 and Phase 2						
2026	0.18	1.58	1.89	0.004	0.30	0.13
2027	2.02	12.63	17.46	0.039	2.94	1.08
2028	2.18	9.78	15.99	0.037	2.86	0.91
2029	2.18	9.78	15.99	0.037	2.86	0.91
2030	2.18	9.78	15.99	0.037	2.86	0.91
2031	5.70	6.71	11.42	0.026	1.96	0.61
Phase 3						
2031	0.09	0.42	0.58	0.002	0.15	0.06
2032	1.09	6.52	9.99	0.026	2.35	0.83
2033	1.22	4.93	8.62	0.020	1.85	0.56
2034	1.22	4.93	8.62	0.020	1.85	0.56
2035	1.22	4.93	8.62	0.020	1.85	0.56
2036	3.52	3.45	6.24	0.013	1.24	0.37
<i>Maximum Annual Emissions³</i>	<i>5.79</i>	<i>12.63</i>	<i>17.46</i>	<i>0.039</i>	<i>2.94</i>	<i>1.08</i>
SJVAPCD Thresholds	10	10	100	27	15	15
Exceed Threshold?	No	Yes	No	No	No	No

Notes:

¹ CalEEMod construction modeling assumes a 1/1/2026 start date. Construction is anticipated to begin in late 2026. Emissions were recalculated off model to accurately assess the annual emissions by calendar year under the updated schedule. The recalculations account for the ratio of construction phase and activity by calendar year in the modeled schedule and the ratio of the construction phase and activity by calendar year in the updated schedule to account for the updated construction start date. These calculations are provided in Appendix C.

² The modeling accounts for fugitive dust reduction measures required under SJVAPCD Regulation VIII.

³ Maximum Annual Emissions for ROG is from 2031 and combines Phase 1 and Phase 2031 emissions with Phase 3 2031 emissions.

As shown in Table 3.3-14, the unmitigated emissions from construction would exceed SJVAPCD thresholds for NOx during the first two years of Phase 1 and Phase 2 construction. As a result, the Project would be required to implement Mitigation Measure AQ-1, which requires Tier 4 Final construction equipment be used throughout Project construction. The USEPA adopted a multiple tier approach to reducing emissions from equipment engines. The USEPA has required that all new engines be manufactured to Tier 4 Final standards since 2015. While other sources of NOx emissions would occur during Project construction, for example emissions from construction worker vehicle trips, additional mitigation would not be required to reduce construction emissions to less than significant levels.

Mitigated construction emissions are presented in Table 3.3-15 and demonstrate that, with implementation of Mitigation Measure AQ-1, the Project construction emissions would be reduced to below SJVAPCD thresholds of significance.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Table 3.3-15. Construction Criteria Pollutant Emissions (Mitigated)

Construction Year ¹	Emissions (tpy)					
	ROG	NOx	CO	SOx	PM ₁₀ ²	PM _{2.5} ²
Phase 1 and Phase 2						
2026	0.07	0.49	2.14	0.004	0.25	0.08
2027	1.23	5.09	19.31	0.039	2.63	0.79
2028	1.69	5.20	17.29	0.037	2.69	0.75
2029	1.69	5.20	17.29	0.037	2.69	0.75
2030	1.69	5.20	17.29	0.037	2.69	0.75
2031	5.35	3.59	12.30	0.026	1.84	0.51
Phase 3						
2031	0.04	0.15	0.68	0.002	0.14	0.05
2032	0.69	2.87	11.14	0.026	2.27	0.71
2033	0.97	2.77	9.08	0.020	1.91	0.50
2034	0.97	2.77	9.08	0.020	1.91	0.50
2035	3.35	1.94	6.66	0.013	0.74	0.33
2036	5.39	5.20	19.31	0.039	2.69	0.79
<i>Maximum Annual Emissions³</i>	5.39	5.20	19.31	0.039	2.69	0.79
SJVAPCD Thresholds	10	10	100	27	15	15
Exceed Threshold?	No	No	No	No	No	No

Notes:

¹ CalEEMod construction modeling assumes a 1/1/2026 start date. Construction is anticipated to begin in late 2026. Emissions were recalculated off model to accurately assess the annual emissions by calendar year under the updated schedule. The recalculations account for the ratio of construction phase and activity by calendar year in the modeled schedule and the ratio of the construction phase and activity by calendar year in the updated schedule to account for the updated construction start date. These calculations are provided in Appendix C.

² The modeling accounts for fugitive dust reduction measures required under SJVAPCD Regulation VIII.

³ Maximum Annual Emissions for ROG is from 2031 and combines Phase 1 and Phase 2031 emissions with Phase 3 2031 emissions.

⁴ Mitigation Measure AQ-3 was not included in the modeling, implementation would further reduce emissions from what is presented in the table.

Operational Emissions

Emissions during operation of the Project would be generated primarily from mobile sources (employee vehicle, hauling truck trips, TRU trailers, and hauling trips to remove brine waste from the wastewater treatment plant), area sources (paints and cleaning supplies), energy sources, off-road equipment, stationary sources (emergency generators) and the loss of on-site vegetation that previously served as a sequestration source. The majority of the operational emissions would take place within SJVAB; therefore, total operational emissions were compared to SJVAPCD thresholds to determine significance. Net operational emissions are presented in Table 3.3-16.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Table 3.3-16. Operational Criteria Pollutant Emissions (Unmitigated)

Source	Emissions (tpy)					
	ROG	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Baseline Conditions						
Mobile	0.07	0.09	0.66	0.00	0.13	0.03
Off-Road	0.04	0.28	0.30	0.00	0.01	0.01
<i>Subtotal</i>	<i>0.11</i>	<i>0.37</i>	<i>0.96</i>	<i>0.00</i>	<i>0.14</i>	<i>0.04</i>
Full Project Buildout (Phase 1, 2, and 3)						
Mobile	3.67	44.90	82.70	0.71	59.00	15.60
Area	25.86	0.18	21.04	0.00	0.04	0.03
Energy	0.16	2.86	2.40	0.02	0.22	0.22
Off-Road	0.24	2.31	4.47	0.01	0.05	0.04
Stationary	0.04	0.12	0.15	0.005	0.01	0.01
TRUs	0.06	0.05	0.01	0.00	0.00	0.00
Vegetation	0.00	2.46	0.00	0.59	0.54	0.15
Brine Trucks ¹	0.002	0.00	0.00	0.00	0.00	0.00
<i>Subtotal</i>	<i>30.03</i>	<i>52.88</i>	<i>110.77</i>	<i>1.34</i>	<i>59.86</i>	<i>16.05</i>
Net Operational Emissions						
Net Operational Emissions (Project compared to Baseline Conditions)	29.92	52.51	109.81	1.34	59.72	16.01
SJVAPCD Thresholds	10	10	100	27	15	15
Exceed Threshold?	Yes	Yes	Yes	No	Yes	Yes

Notes:

tpy = tons per year

TRUs = transportation refrigeration units

¹ The wastewater treatment plant would generate approximately 100 cubic yards of brine per year. The brine trucks refer to the mobile trips needed to remove the brine waste every year.

As shown in Table 3.3-16, unmitigated Project operational emissions would exceed the SJVAPCD thresholds of significance for ROG, NOx, CO, PM₁₀ and PM_{2.5}. The Project would be required to implement Mitigation Measures AQ-6 through AQ-25 to reduce operational emissions. These measures would reduce the Project's energy demand, fuel use, and water consumption. Implementation of Mitigation Measures AQ-6 through AQ-25 would reduce operational CO and PM_{2.5} to less than significant levels. However, ROG, Nox, and PM₁₀ would continue to exceed SJVAPCD thresholds. The Project applicant intends to enter into a VERA with SJVAPCD to reduce Project emissions to less than significant levels. Under the agreement, the developer provides funds to the SJVAPCD to administer the implementation of the VERA. The SJVAPCD then identifies emissions reductions projects, funds those projects, and verifies that the specified emission reductions have been successfully achieved. The SJVAPCD considers implementation of a VERA to be a feasible mitigation measure under CEQA, effectively achieving emission reductions necessary to reduce impacts to a less than significant level. The Project applicant has engaged in conversations with the SJVAPCD and will continue to have future



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

discussions with SJVAPCD staff in order to determine the specific terms of the VERA, as ensured via Mitigation Measure AQ-27. A letter from SJVAPCD confirming the Project Applicant's ongoing discussion of the VERA is provided in Appendix D.

Mitigated operational emissions are presented in **Table 3.3-17** and demonstrate that, with implementation of Mitigation Measures AQ-7 through AQ-27, the Project operational emissions would not exceed SJVAPCD thresholds of significance.

Table 3.3-17. Operational Criteria Pollutant Emissions (Mitigated)

Source	Emissions (tpy)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Baseline Conditions						
Mobile	0.07	0.09	0.66	0.00	0.13	0.03
Off-Road	0.04	0.28	0.30	0.00	0.01	0.01
<i>Subtotal</i>	<i>0.11</i>	<i>0.37</i>	<i>0.96</i>	<i>0.00</i>	<i>0.14</i>	<i>0.04</i>
Full Project Buildout (Phase 1, 2, and 3)						
Mobile ¹	3.57	43.52	81.05	0.71	53.75	14.26
Area ²	21.33	0.00	0.00	0.00	0.00	0.00
Energy ³	0.16	2.86	2.40	0.02	0.22	0.22
Off-Road ⁴	0.00	0.00	0.00	0.00	0.00	0.00
Stationary ⁵	0.04	0.12	0.15	0.005	0.01	0.01
TRUs	0.06	0.05	0.01	0.00	0.00	0.00
Vegetation	0.00	2.46	0.00	0.59	0.54	0.15
Brine Trucks	0.002	0.00	0.00	0.00	0.00	0.00
Reductions from MM AQ-11	0	0	0	0	-5.25	-1.34
Reductions from MM AQ-13	-0.10	-1.38	-1.65	-0.002	-0.0006	-0.0006
Reductions from MM TRANS-2	-0.12	-0.23	-16.41	-0.005	-0.065	-0.026
<i>Subtotal</i>	<i>23.32</i>	<i>46.94</i>	<i>63.93</i>	<i>1.29</i>	<i>52.07</i>	<i>14.01</i>
Net Operational Emissions						
Net Operational Emissions (Project compared to Baseline Conditions)	23.21	46.57	62.97	1.29	51.93	13.97
Reductions Required from MM AQ-27	-13.21	-36.57	0	0	-36.93	-
Project Net Emissions	10	10	62.97	1.29	15	13.97
SJVAPCD Thresholds	10	10	100	27	15	15
Exceed Threshold?	No	No	No	No	No	No



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Source	Emissions (tpy)					
	ROG	NOx	CO	SOx	PM ₁₀	PM _{2.5}

Notes:

¹ Mobile air emissions include reductions from Mitigation Measure AQ-21, Employee Transit Route Information.

² Area source emissions include reductions from Mitigation Measure AQ-10, Architectural Coatings and MM AQ-23, Low to Zero VOC Cleaning Products,

³ Energy source emissions include reductions from Mitigation Measure AQ-9, On-Site Solar, and MM AQ-22, Electric Water Pumps.

⁴ Off-Road emissions include reductions from Mitigation Measure AQ-12, Zero Emission Forklifts and Yard Trucks and MM AQ-24, Zero Emission Landscaping Equipment.

⁵ Stationary source emissions include reductions from MM AQ-19, Diesel Generators.

Tpy = tons per year

TRUs = transportation refrigeration units

As shown in Table 3.3-17, the Project's operational emissions would fall below SJVAPCD thresholds with Mitigation Measures AQ-7 through AQ-27. Therefore, operational emissions would be less than significant with mitigation.

Transportation Emissions Against BAAD Thresholds

As stated above, mobile sources from the Project would pass through the BAAD as they travel to or from the Project site. According to the TIA, approximately 21 percent of trucks and 17 percent of automobiles would travel west to the SFAB (this includes trucks and autos traveling west on the I-580 and trucks and autos travels north on the I-205, which connects to I-580) (Fehr & Peers 2024).⁷ The mobile source emissions travelling through BAAD were calculated based on the VMT of trucks (HHDT and MHDT) and autos, the pollution burden of trucks versus autos (calculated through EMFAC), and the percentage of trucks and autos anticipated to travel to SFAB. Calculations are provided in Appendix C.

The subset of mobile sources generated from the Project that were estimated to travel to SFBAAB were compared to the BAAD significance thresholds for operation. As shown in Table 3.3-18, the transportation emissions would not exceed BAAD's daily and annual operational thresholds and would be less than significant within SFAB.

Table 3.3-18. Project Transportation Criteria Pollutant Emissions

Source	ROG	NOx	PM ₁₀	PM _{2.5}
SFAB Mobile Emissions (tons/year)	0.71	9.37	12.26	3.24
BAAD Annual Thresholds (tons/year)	10	10	15	10
Exceed Threshold?	No	No	No	No
Average Daily Net Mobile Emissions (lbs/day)	3.92	51.36	67.17	17.77
BAAD Average Daily Thresholds (lbs/day)	54	54	82	54
Exceed Threshold?	No	No	No	No

Notes:

Mobile source emissions within the BAAD are unmitigated and do not account for the reductions associated with implementation of MM AQ-15, MM AQ-21, and MM TRANS-2.

⁷ This percentage is based on Figure 21 in the TIA.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

As shown in Table 3.3-18, emissions would fall below BAAD thresholds. The emissions account for the first full year of operation of the Project and assumes all trucks would be MHD and HHD trucks and all automobiles were LDAs.

Overlapping Construction and Operational Emissions

Upon completion of Phase 1 and 2 construction, it is assumed that Industrial Buildings 1 through 3 and the Project utilities would become operational and Phase 3 construction would begin. Therefore, there would be a period of time during Project implementation where construction and operational emissions would overlap. The unmitigated, overlapping emissions are shown in Table 3.3-19.

Table 3.3-19. Overlapping Criteria Pollutant Emissions (Unmitigated)

Source	Emissions (tpy)					
	ROG	NOx	CO	SOx	PM ₁₀ ¹	PM _{2.5} ¹
Baseline Conditions						
Total	0.11	0.37	0.96	0.00	0.14	0.04
Phase 1 and 2 Operation						
Total	18.90	37.18	73.59	0.86	35.53	9.78
Phase 3 Construction						
Maximum Annual Construction Emissions ²	5.49	7.68	10.60	0.03	2.68	1.06
Net Overlapping Emissions						
Net Overlapping Emissions (Overlapping Project compared to Baseline Conditions)	24.28	44.49	83.23	0.89	38.07	10.80
SJVAPCD Thresholds of Significance	10	10	100	27	15	15
Exceed Threshold?	Yes	Yes	No	No	Yes	No

Notes:

¹ The modeling accounts for fugitive dust reduction measures required under SJVAPCD Regulation VIII.

² The construction emissions presented are the highest annual emissions per pollutant. For example, the highest emissions of ROG during Phase 3 construction would occur in 2035; however, the highest emissions of NOx during Phase 3 construction would occur in 2031.

Tpy = tons per year

TRUs = transportation refrigeration units

As shown in Table 3.3-19, ROG, NOx, and PM₁₀ emissions would exceed SJVAPCD thresholds during the five-year period with Phase 1 and 2 operation and Phase 3 construction. The Project would be required to implement Mitigation Measures AQ-1 through AQ-26 to reduce construction and operational emissions. However, Mitigation Measures AQ-1 through AQ-26 would not reduce operational emissions to less than significant levels. Therefore, the Project applicant intends to enter into a VERA with SJVAPCD to reduce operational emissions to zero and therefore would fall below SJVAPCD significance levels. The VERA requires the Project applicant to pay a fee for each ton of pollutant that exceeds



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

thresholds. The fee allows SJVAPCD to mitigate the emissions generated by the Project to be offset off-site through programs like upgrading agricultural and construction equipment to cleaner engines, electric vehicle rebates, and wood stove replacements. The Project applicant has engaged in conversations with the SJVAPCD and, as required by Mitigation Measure AQ-27, will continue to have future discussions with SJVAPCD staff in order to determine the specific terms of the VERA. The VERA will be paid in full prior to any construction or paid as the Project is developed. Regardless, the VERA will be enacted prior to the operation of any Project facility. A letter from SJVAPCD confirming the Project Applicant's ongoing discussion of the VERA is provided in Appendix D. Therefore, even during a period of overlap between construction and operation, emissions will be reduced to less than significant levels as shown in Table 3.3-20.

Table 3.3-20. Overlapping Criteria Pollutant Emissions (Mitigated)

Source	Emissions (tpy)					
	ROG	NOx	CO	SOx	PM ₁₀ ¹	PM _{2.5} ¹
Baseline Conditions						
Total	0.11	0.37	0.96	0.00	0.14	0.04
Phase 1 and 2 Operation						
Total	14.62	34.28	45.97	0.84	32.27	8.70
Phase 3 Construction^{1, 2}						
Maximum Annual Construction Emissions	5.35	3.08	12.40	0.03	2.47	0.87
Net Overlapping Emissions						
<i>Net Overlapping Emissions (Overlapping Project compared to Baseline Conditions)</i>	19.86	36.99	57.41	0.87	34.60	9.53
Reductions Required from MM AQ-26 ³	-9.86	-26.99	0	0	-19.6	0
Project Net Emissions	10	10	57.41	0.87	15	9.53
SJVAPCD Thresholds of Significance	10	10	100	27	15	15
Exceed Threshold?	No	No	No	No	No	No

Notes:

¹ The modeling accounts for fugitive dust reduction measures required under SJVAPCD Regulation VIII.

² The construction emissions presented are the highest annual emissions per pollutant. For example, the highest emissions of ROG during Phase 3 construction would occur in 2035; however, the highest emissions of NOx during Phase 3 construction would occur in 2031.

³ Consistent with Mitigation Measure AQ-26, Reduction of Remaining Emissions, the Project Applicant and County will recalculate the operational emissions prior to the issuance of the final permit approval of the operator. Phases 1 and 2 operation will be required to account for the construction emissions of Phase 3 to ensure emissions at all stages of the Project remain at thresholds. As shown in Table 3.3-17, the reductions required under MM AQ-20 for overlapping emissions are within the total required reductions for buildout.

⁴ Mitigation Measure AQ-3 was not included in the modeling, implementation would further reduce emissions from what is presented in the table.

tpy = tons per year

TRUs = transportation refrigeration units



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

As shown in Table 3.3-17, the Project's overlapping emissions would fall below SJVAPCD thresholds with implementation of Mitigation Measures AQ-1 through AQ-27. Therefore, emissions would be less than significant with mitigation.

Future Project Emissions

Over time, due to increased regulations and the development of control technologies, long-term operational emissions for the Project would change with no change in the planned operational activity. The following table is presented for informational purposes and demonstrates the reductions in the Project's operational emissions in the year 2050 as compared to 2036 due to improved technologies and stricter emission standards.

Table 3.3-21. Future Year, Project Operational Emissions (Unmitigated)

Source	Emissions (tpy)					
	ROG	NOx	CO	SOx	PM ₁₀	PM _{2.5}
2036 Net Operational Emissions (Project compared to Baseline Conditions)	29.92	52.51	109.81	1.34	59.72	16.01
2050 Net Operational Emissions (Project compared to Baseline Conditions) ¹	29.02	44.71	102.09	1.24	59.49	15.91
Percent Reduction	-3.10%	-14.85%	-7.03%	-7.46%	-0.39%	-0.62%

Notes:

tpy = tons per year

TRUs = transportation refrigeration units

¹ Accounts for reductions in CalEEMod assuming an operational year of 2050.

Health Impacts

In a recent court ruling in *Sierra Club v. County of Fresno (Friant Ranch)*, the California Supreme Court determined that the EIR was inadequate as it failed to correlate the significant increase in emissions that the project would generate to the adverse impacts on human health or explain why it is not scientifically possible to do so.

The court noted that the project failed to explain the health impacts from NO_x, ROG, PM, CO, and SO₂ generated from the Project. Section 3.3.1 includes discussion of the potential risks posed from these pollutants and ozone. In summary, ROG emissions can cause eye and throat irritation, damage to the central nervous system, and exposure to some types of ROG can cause cancer (American Lung Associated 2025). NO_x exposure can lead to cardiopulmonary impacts, respiratory symptoms, and can worsen asthma (USEPA 2024b). NO_x and ROG can interact with oxygen in the air to form O₃. O₃ exposure can damage airways, cause respiratory symptoms, and create or aggravate asthma (USEPA 2023a). CO emissions can reduce oxygen flow in the body resulting in dizziness and chest pain (CARB 2024a). PM exposure can lead to bronchitis, asthma attacks, and other respiratory symptoms (CARB 2024d). SO₂ exposure can cause wheezing, shortness of breath, chest tightness, and aggravate existing



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

respiratory and cardiovascular diseases (CARB 2024c). The Project's construction and operational emissions of ozone precursors (ROG and NO_x), PM, CO, and SO₂ were calculated and provided in Tables 3.3-15 through 3.3-20 above. MMs AQ-1 through AQ-26 would reduce impacts from ozone precursors (ROG and NO_x), PM, CO, and SO₂ to less than SJVAPCD significance thresholds. An air district establishes thresholds at which an exceedance would be expected to result in a cumulatively considerable increase of criteria pollutant for which an air district is in non-attainment for NAAQS and CAAQS (SJVAPCD 2025). As mentioned in Section 3.3.1, NAAQS and CAAQS are the levels at which background levels of criteria air pollutants would be considered harmful to public health and the environment. Therefore, falling below SJVAPCD thresholds for ROG, NO_x, PM, CO, and SO₂ with the implementation of MM AQ-1 through MM AQ-20 would result in the Project not contributing to a worsening of the background levels of pollutants and would not be considered harmful to the public.

The Project would directly emit ROG and NO_x emissions. However, ozone is created as ROG and NO_x react with oxygen and therefore is created as an indirect impact of the project. As such the analysis above does not account for the health impacts associated with ozone emissions. A Health Impacts Related to Ozone from the International Park of Commerce Phase 2 Memorandum was prepared by Stantec on December 12, 2024 (updated on November 18, 2025), see Appendix C, to assess the potential health risks created by Project affiliated ozone. The analysis reviewed the risk of ozone related health impacts from the Project utilizing the Sacramento Metropolitan Air Quality Management District's (SMAQMD) Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District including a screening level analysis using district approved ozone tool of the Project under the following scenarios: (1) construction (unmitigated); (2) construction (mitigated); (3) operational (unmitigated); and (4) operational (mitigated). Additionally, these scenarios were evaluated using USEPA's Co-Benefits Risk Assessment Health Impacts Screening and Mapping Tool (COBRA), which was designed as a screening tool for state and local governments to understand the health impacts related to ozone based on the change in emissions, location, and emission type relative to the baseline. The health risks evaluated in both models include hospital admissions, emergency room visits for asthma, and mortality. For the SMAQMD ozone tools, under all Project scenarios, the increase in ozone health risks from the Project would be less than 0.015 percent for all health risks under all scenarios. For example, the asthma related emergency room visits for unmitigated and mitigated operational scenarios were calculated to increase by 0.79 incidences per year (0.014% increase) and 0.42 incidence per year (0.0072% increase) as compared to baseline conditions. Similarly, the COBRA modeling found increases in health risks. For example, the COBRA modeling found that within the County, the unmitigated and mitigated operational scenarios would increase asthma related emergency room visits by 0.001 incidence per year and 0.00013 incidences per year, respectively. This would result in a 0.000000013 percent increase in incidences across the San Joaquin County population with unmitigated operational emissions or a 0.000000002 percent increase in incidences across the San Joaquin County population with implementation of mitigation.

The SMAQMD model does not calculate the change in background ozone levels as a result of Project emissions. However, the COBRA modeling can calculate the change in background ozone across the United States as a result of Project level emissions. The maximum increase in background ozone under all scenarios evaluated would be less than 0.01 ug/m³. The National Institute for Occupational Safety and Health REL and OSHA PEL for ozone are set at 0.2 micrograms per cubic meter (200 ug/m³) (CDC 2014). Therefore, the increase in ozone is 0.005% percent of the NOISH REL and OSHA PEL. As such,



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

relative to the background levels of ozone, the Project would represent an insignificant increase in ozone related health impacts. Therefore, the impact would be less than significant.

Conclusion

As shown in Table 3.3-14 through Table 3.3-20, criteria pollutant emissions would not exceed any threshold of significance during Project construction or operation with implementation of Mitigation Measures AQ-1 through AQ-26. Therefore, the Project would not 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, and the impact would be less than significant with mitigation.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measures AQ-1 through AQ-27, Mitigation Measure TRANS-1, and Mitigation Measure TRANS-2 are required.

Level of Significance After Mitigation

Less than Significant Impact with Mitigation.

Exposure of Sensitive Receptors to Substantial Pollutant Concentrations

Impact AIR-3	The Project would not expose sensitive receptors to substantial pollutant concentrations.

Impact Analysis

This discussion addresses whether the Project would expose sensitive receptors to substantial criteria pollutant emissions or TACs during construction or operations. According to CARB, some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Heightened sensitivity may be caused by health problems, proximity to the emissions source, or duration of exposure to air pollutants. Children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the effects of air pollution. Accordingly, land uses that are typically considered to be sensitive receptors include residences, schools, childcare centers, playgrounds, retirement homes, convalescent homes, hospitals, and medical clinics.

The nearest sensitive receptor is a single-family residence located approximately 200 feet east of the Project site. Other single-family residences near the site or near the anticipated trucking routes lie within the City of Tracy and in the unincorporated communities of Lammersville and Mountain House. In addition, the site lies near the following schools: John C. Kimball High School; George Kelly Elementary School; Freiler Elementary School; and Lammersville Elementary School.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Construction Emissions

During construction associated with the Project, the potential exists for emissions of fugitive dust, ROG, *C. immitis* spores (commonly known as Valley Fever), naturally occurring asbestos (NOA), pesticides, and DPM to be released. Each TAC is discussed separately below. In addition, the potential for the Project to result in an air pollutant hotspot is evaluated.

Fugitive Dust

Fugitive dust (PM₁₀) would be generated from site grading and other earth-moving activities. Most of this fugitive dust would remain localized and would be deposited near the Project site. However, there is potential for impacts from fugitive dust to exist unless control measures are implemented to reduce the emissions from the Project site. SJVAPCD Regulation VIII, Fugitive PM₁₀ Prohibitions, is designed to reduce PM₁₀ emissions generated by human activity, including construction and demolition activities. Regulation VIII also requires projects that exceed 5 acres of surface area to prepare Dust Control Plans or Construction Notification forms. The Project would be subject to all requirements under Regulation VIII. Moreover, as demonstrated in Table 3.3-14, PM₁₀ emissions from construction would not exceed the applicable threshold of significance. Therefore, the impacts from fugitive dust during construction would be less than significant.

Reactive Organic Gases

ROG is emitted during asphalt paving. The amount emitted is dependent on the amount of ROG (or VOC) in the paving materials. There are three types of asphalt that are typically used in paving: asphalt cements, cutback asphalts, and emulsified asphalts. However, SJVAPCD Rule 4641 prohibits the use of the following types of asphalt: rapid cure cutback asphalt; medium cure cutback asphalt; slow cure asphalt that contains more than one-half (0.5) percent of organic compounds that evaporate at 500 degrees Fahrenheit (°F) or lower; and emulsified asphalt containing organic compounds, in excess of 3 percent by volume, that evaporate at 500°F or lower. An exception to this is medium cure asphalt when the National Weather Service official forecast of the high temperature for the 24-hour period following application is below 50°F.

The acute (short-term) health effects from worker direct exposure to asphalt fumes include irritation of the eyes, nose, and throat. Other effects include respiratory tract symptoms and pulmonary function changes. The studies were based on occupational exposure of fumes. Sensitive receptors are located 200 feet from the Project site and would not be exposed to direct asphalt paving fumes. In addition, the restrictions that are placed on asphalt in the San Joaquin Valley reduce ROG emissions from asphalt. The impact to sensitive receptors from ROG during construction is less than significant.

Valley Fever

Valley fever is an infection caused by inhalation of the spores of a fungus, *C. immitis*, that lives in soil. Activities or conditions that increase the amount of fugitive dust contribute to greater exposure, and they include dust storms, grading, and recreational off-road activities. The San Joaquin Valley is considered an endemic area for Valley fever.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Construction activities would generate dust that could contain *C. immitis* spores, which is a preexisting environmental condition. However, the Project would minimize the generation of fugitive dust during construction activities by complying with the SJVAPCD's Regulation VIII. Additionally, the Project would comply with all worker safety measures required by the Occupational Safety and Health Administration. Therefore, the impacts related to Valley fever during construction would be less than significant.

Naturally Occurring Asbestos

Construction in areas of rock formations that contain NOA could release asbestos to the air and pose a health hazard. The air toxic control measures for construction, grading, quarrying and surface mining operations were signed into State law on July 22, 2002, and became effective in the SJVAB in November 2002. The purpose of this regulation is to reduce public exposure to NOA. A review of the map with areas more likely to have rock formations containing NOA in California indicates that there is no asbestos in the immediate Project area (USGS 2011). Therefore, construction of the Project would not expose sensitive receptors to NOA, and the impact would be less than significant.

Pesticides

The Project site is currently developed with an almond orchard that has historically used pesticides. As a result, pesticides are likely present in the on-site soils. Construction workers and nearby receptors may be exposed to pesticides during the removal of the almond trees and grading operations. The risks posed by pesticides are evaluated within the Phase I Environmental Site Assessment (ESA), prepared by Farallon Consulting, LLC (Farallon). The potential presence of residual fertilizers in site soils were determined to represent a de minimis condition as there is an absence of evidence of concentrated long-term fertilizer use and the planned use would not include any residential or school uses (Farallon 2021a, Farallon 2021b, Farallon 2021c), see Appendix I. Additionally, the Project would be required to comply with SJVAPCD Regulation VIII which would limit fugitive dust emissions that may contain traces of pesticides. Therefore, construction of the Project would not expose sensitive receptors to pesticides, and the impact would be less than significant.

Diesel Particulate Matter

Exposure to DPM from diesel vehicles and off-road construction equipment can result in health risks to nearby sensitive receptors. A HRA was prepared for the Project to assess potential health impacts to nearby receptors from DPM generated during Project construction based on the assumptions and methodology presented in Appendix C. Results of the construction HRA are presented in Table 3.3-22 and demonstrate that unmitigated risks would not exceed SJVAPCD thresholds.

Table 3.3-22. Health Risk from Project Construction (Unmitigated)

Receptor Scenario	Cancer Risk Per Million	Chronic Inhalation Hazard Index
Maximally Exposed Individual Receptor		
Phase 1 and 2	20.78	0.0091
Phase 3	1.28	0.0014
<i>Total</i>	<i>22.06</i>	<i>0.0105</i>



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Receptor Scenario	Cancer Risk Per Million	Chronic Inhalation Hazard Index
SJVAPCD Thresholds	20.0	1.0
Exceed Threshold?	Yes	No
Maximally Exposed Individual School Child (Elementary)		
Phase 1 and 2	1.29	0.0009
Phase 3	0.13	0.0013
<i>Total</i>	<i>1.42</i>	<i>0.002</i>
SJVAPCD Thresholds	20.0	1.0
Exceed Threshold?	No	No
Maximally Exposed Individual School Child (High School)		
Phase 1 and 2 ¹	0.60	0.0010
<i>Total</i>	<i>0.60</i>	<i>0.001</i>
SJVAPCD Thresholds	20.0	1.0
Exceed Threshold?	No	No

Notes

¹ The high school student receptor would be exposed for a period of 4 years (the duration of high school). Therefore, the receptor would only be exposed for a portion of Phase 1 and 2 construction that would take place over a 5 year period. As Phase 3 would construct a smaller portion of the Project site, it would result in less DPM emissions. Therefore, a high school student exposed during Phase 3 would have a lower risk than that exposed during Phase 1 and 2 construction.

As shown in the table, construction of the Project would not expose nearby receptors to cancer and non-cancer risks that exceed the SJVAPCD's threshold of significance. In addition, as discussed under Impacts AQ-1 and AQ-2, the Project would be required to implement Mitigation Measure AQ-1, which required the use of Tier 4 construction equipment. The use of Tier 4 equipment would further reduce the cancer and non-cancer health risks, as shown in Table 3.3-23.

Table 3.3-23. Health Risk from Project Construction (Mitigated)

Receptor Scenario	Cancer Risk Per Million	Chronic Inhalation Hazard Index
Maximally Exposed Individual Receptor		
Phase 1 and 2	6.36	0.0028
Phase 3	0.43	0.0005
<i>Total</i>	<i>6.79</i>	<i>0.0033</i>
SJVAPCD Thresholds	20.0	1.0
Exceed Threshold?	No	No
Maximally Exposed Individual School Child (Elementary)		
Phase 1 and 2	0.39	0.0003
Phase 3	0.04	0.0004
<i>Total</i>	<i>0.43</i>	<i>0.0007</i>
SJVAPCD Thresholds	20.0	1.0



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Receptor Scenario	Cancer Risk Per Million	Chronic Inhalation Hazard Index
Exceed Threshold?	No	No
Maximally Exposed Individual School Child (High School)		
Phase 1 and 2	0.18	0.0003
<i>Total</i>	<i>0.18</i>	<i>0.0003</i>
SJVAPCD Thresholds	20.0	1.0
Exceed Threshold?	No	No

Therefore, the impact related to DPM exposure during construction would be less than significant with mitigation.

Localized Impacts

Emissions occurring at or near the Project site have the potential to create a localized impact, also referred to as an air pollutant hotspot. Localized emissions are considered significant if, when combined with background emissions, they would result in exceedance of any health-based air quality standard. In the GAMAQI, the SJVAPCD has established a screening threshold for localized impacts of 100 pounds per day of any criteria pollutant. If a project exceeds the screening threshold of 100 pounds per day of any criteria pollutant, then more detailed ambient air quality modeling would be required. If a project does not exceed 100 pounds per day of any criteria pollutant, then it can be assumed that it would not cause a violation of an ambient air quality standard or result in any localized impacts.

Table 3.3-24 presents the localized emissions of NO_x, CO, and PM that would occur on-site during Project construction in comparison to the SJVAPCD's screening threshold.

Table 3.3-24. Localized Emissions of NO_x, CO, PM₁₀, and PM_{2.5} for Construction

Construction Year	Emissions (pounds per day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Phase 1 and 2				
2026	146.0	148.0	24.1	12.7
2027	47.0	64.7	1.7	1.6
2028	44.6	64.7	1.5	1.4
2029	42.9	64.5	1.4	1.3
2030	42	64.4	1.3	1.2
SJVAPCD Thresholds	100	100	100	100
Exceed Thresholds?	Yes	Yes	No	No
Phase 3				
2031	72.9	86.1	30.5	13.5
2032	23.6	38.4	0.7	0.6
2033	23.0	38.3	0.6	0.6
2034	22.6	38.3	0.6	0.5
2035	22.0	38.1	0.5	0.5



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Construction Year	Emissions (pounds per day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
SJVAPCD Thresholds	100	100	100	100
Exceed Threshold?	No	No	No	No

As shown in the table, NO_x and CO localized emissions would exceed the localized impact screening threshold during Phase 1 and 2 construction. However, the Project would be required to implement Mitigation Measures AQ-1, which requires the use of Tier 4 equipment during construction. With implementation of Mitigation Measure AQ-1, Project localized emissions would be reduced to the levels presented in Table 3.3-25.

Table 3.325. Localized Emissions of NO_x, CO, PM₁₀, and PM_{2.5} for Construction (Mitigated)

Construction Year	Emissions (pounds per day)			
	NO _x	CO ¹	PM ₁₀	PM _{2.5}
Phase 1 and 2				
2026	22.9	188.0	18.65	7.8
2027	14.1	74.1	0.4	0.4
2028	14.1	74.1	0.4	0.4
2029	14.1	74.1	0.4	0.4
2030	14.1	74.1	0.4	0.4
SJVAPCD Thresholds	100	100	100	100
Exceed Threshold?	No	Yes	No	No
Phase 3				
2031	13.8	113.0	28.1	11.4
2032	8.4	44.5	0.2	0.2
2033	8.4	44.5	0.2	0.2
2034	8.4	44.5	0.2	0.2
2035	8.4	44.5	0.2	0.2
SJVAPCD Thresholds	100	100	100	100
Exceed Threshold?	No	Yes	No	No

Notes:

¹ CO emissions increase due to implementation of Tier 4 construction equipment.

² Mitigation Measure AQ-3 was not included in the modeling, implementation would further reduce emissions from what is presented in the table.

As shown in Table 3.3-25, with implementation of Mitigation Measure AQ-1, localized NO_x emissions would no longer exceed the SJVAPCD's screening threshold. However, the incorporation of Tier 4 equipment would increase the amount of CO emitted and, as a result, CO emissions would exceed the screening thresholds during both construction periods. As a result, the localized emissions of CO are evaluated in further detail below.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Ambient Air Quality Analysis for CO during Project Construction

Consistent with SJVAPCD's GAMAQI, when a project exceeds the localized screening threshold, the next step to determining project significance is to complete an ambient air quality standard analysis utilizing the USEPA's dispersion model, AERMOD. The goal of the ambient air quality analysis is to determine if the Project emissions, combined with background concentration of the same pollutant, would exceed the CAAQS and/or NAAQS. As shown in Tables 3.3-23, even with mitigation, the localized CO emissions during construction continued to exceed SJVAPCD screening thresholds of 100 pounds per day. As such, an ambient air quality analysis was prepared for CO.

The AERMOD modeling conducted for this analysis assumes the same meteorological inputs as the construction HRA (see Appendix C), except for the receptor locations. For the ambient air quality analysis, fence line receptors surrounding the Project site boundary were analyzed. Receptors were placed 10 meters from the fence line at intervals of 25 meters. The Project site was modeled as an area polygon with emissions generated uniformly across the site. The mitigated, annual CO emissions generated from the CalEEMod modeling were converted into an average emission rate and input into the AERMOD modeling in order to derive the concentration of CO at each fence line receptor. To determine significance, the background concentration of CO in the Project region was added to the Project-generated increase in CO and compared against the CAAQS and NAAQS. The results of the analysis are presented in Table 3.3-26.

Table 3.3-26. Construction Ambient Air Quality Analysis for CO

Averaging Time, units	Background Concentration ¹	Project Increase	Total (Background + Project)	NAAQS Thresholds	Exceed?	CAAQS Thresholds	Exceed?
1-Hour, mg/m ³	2.5 ppm (2.86 mg/m ³)	0.014 mg/m ³	2.90 mg/m ³	35 ppm (40 mg/m ³)	No	20 ppm (23 mg/m ³)	No
8-Hour, mg/m ³	1.7 ppm (1.95 mg/m ³)	0.01 mg/m ³	1.96 mg/m ³	9 ppm (10 mg/m ³)	No	9 ppm (10 mg/m ³)	No

Notes:

¹ USEPA. 2023. Air Quality Statistics Report.

² Mitigation Measure AQ-3 was not included in the modeling, implementation would further reduce emissions from what is presented in the table.

mg/m³ = milligrams per cubic meter

As shown above, the total localized concentration of CO would not exceed the localized air quality standards, and a less than significant impact would occur.

Operational Emissions

During Project operations, the potential exists for nearby receptors to be exposed to TACs, primarily DPM, as well as air pollutant hotspots and carbon monoxide hotspots. As shown in Table 2.2-1, the Project may construct and operate automotive and truck repair land uses. These would not include any paint booths that would lead to potential health risks from ROG emissions.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Diesel Particulate Matter

Exposure to DPM from diesel vehicles, off-road equipment, and stationary sources can result in health risks to nearby sensitive receptors. According to the SJVAPCD, a project would result in a significant impact if it would individually expose sensitive receptors to TACs resulting in an increased cancer risk greater than 20.0 in 1 million over a 70-year timeframe or if a project would result in an increase chronic hazard index greater than 1.0. In order to assess the risks posed to nearby sensitive receptors, the following operational scenarios were modeled:

- 1) Health Risk under Existing Conditions;
- 2) Health Risk under Future Conditions with No Project;
- 3) Health Risk with Overlapping Emissions; and
- 4) Health Risk under Full Project Buildout.

Health Risk under Existing Conditions scenario establishes the baseline risks already posed to sensitive receptors around the Project site from existing almond orchard operations. The Health Risk under Future Conditions with No Project scenario accounts for the risk posed to receptors in future years if the Project was not constructed. The Health Risk with Overlapping Emissions scenario accounts for the maximum risk posed to receptors that begin exposure during construction of Phase 1 and 2 and through buildout of the entire Project. The Health Risk under Full Project Buildout scenario analyzes the risk posed to sensitive receptors once the Project is fully operational. In all scenarios, the maximally exposed residential receptor was analyzed assuming exposure for a period of 70 years. Additional details regarding each modeled scenario, the analysis methodology, and modeling inputs are available in Appendix C.

Baseline Health Risk Assessments

In order to establish the baseline risk posed to receptors from the current operations on the Project site, the health risk under existing conditions was modeled. In addition, to establish the baseline risk that would be posed to receptors in the future if the Project were not implemented, the health risk under future conditions without the Project was modeled. The baseline risks posed to MEIR and MEISR receptors are presented in Table 3.3-27 and Table 3.3-28.

Table 3.3-27. Health Risk under Existing Conditions

Receptor Type	Cancer Risk Per Million	Chronic Inhalation Hazard Index
Maximally Exposed Individual Receptor	1.26	0.000084
Maximally Exposed Individual School Child (Elementary)	0.0563	0.000028
Maximally Exposed Individual School Child (High School)	0.0164	0.000028



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Table 3.3-28. Health Risk under Future Conditions with No Project

Receptor Type	Cancer Risk Per Million	Chronic Inhalation Hazard Index
Maximally Exposed Individual Receptor	0.44	0.00002
Maximally Exposed Individual School Child (Elementary)	0.0201	0.00001
Maximally Exposed Individual School Child (High School)	0.0059	0.00001

The health risks for the Project scenarios (Health Risk with Overlapping Emissions and Health Risk under Full Project Buildout) were determined for the maximally exposed residential and school receptors. The MEIR and MEISR for these scenarios were determined based on which receptor had the greatest increase in cancer risks compared to the baseline conditions. As a result, the MEIR and MEISR locations may be different for each scenario.

Overlapping Construction and Operation Health Risk Assessment

Table 3.3-29 provides a summary of the unmitigated change in health risks from the Overlapping Emissions scenario as compared to the health risks under the Existing Conditions scenario (see Table 3.3-29).

Table 3.3-29. Net Change in Health Risk, Overlapping Emissions compared to Existing Conditions (Unmitigated)

Receptor Type	Cancer Risk Per Million	Chronic Inhalation Hazard Index
Maximally Exposed Individual Receptor ¹	27.00	0.0110
Maximally Exposed Individual School Child (Elementary)	1.19	0.0013
Maximally Exposed Individual School Child (High School)	0.96	0.0003
SJVAPCD Thresholds	20.0	1.0
Exceed Threshold?	Yes	No

Notes

¹ The MEIR for Project buildout was identified as the residential receptor located immediately east of W Lammers Road and north of the WSID canal (37.7719587° N, -121.476207° W).

As shown in the table, the MEISR at the nearest elementary school and high school would not be exposed to an increase in cancer risk or chronic inhalation hazard index that exceeds the applicable threshold. However, without mitigation, the increase in cancer risk at the MEIR would exceed the SJVAPCD's threshold of significance. Table 3.3-30 presents the change in health risks from the Overlapping Emissions scenario as compared to the health risks under the Existing Conditions scenario at the MEIR and school receptors with implementation of Mitigation Measures AQ-1 through AQ-26 which would reduce construction and operational emissions. It should be noted that while the Project would also implement Mitigation Measure AQ-27, the reductions from this mitigation may result in the decrease of



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

emissions on-site, on roadways, or off-site and therefore the reductions would be speculative when evaluating a health risk that is dependent on the exposure distance.

Table 3.3-30. Net Change in Health Risk, Overlapping Emissions compared to Existing Conditions (Mitigated)

Receptor Type	Cancer Risk Per Million	Chronic Inhalation Hazard Index
Maximally Exposed Individual Receptor	10.52	0.0054
Maximally Exposed Individual School Child (Elementary)	0.55	0.0010
Maximally Exposed Individual School Child (High School)	0.16	0.002
SJVAPCD Thresholds	20.0	1.0
Exceed Threshold?	No	No

As demonstrated in Table 3.3-29, with implementation of Mitigation Measure AQ-1 through AQ-26, the net change in health risk from the Overlapping Emissions scenario compared to the Existing Conditions scenario would not exceed the SJVAPCD's threshold, and the impact would be reduced to less than significant with mitigation.

Full Project Buildout Health Risk Assessment

Table 3.3-31, below, provides a summary of the unmitigated change in health risks from the Full Project Buildout scenario as compared to the health risks under the Future with No Project scenario (see Table 3.3-31).

Table 3.3-31. Net Change in Health Risk, Full Project Buildout compared to Future with No Project (Unmitigated)

Receptor Type	Cancer Risk Per Million	Chronic Inhalation Hazard Index
Maximally Exposed Individual Receptor	11.32	0.0020
Maximally Exposed Individual School Child (Elementary)	0.35	0.0002
Maximally Exposed Individual School Child (High School)	0.09	0.0002
SJVAPCD Thresholds	20.0	1.0
Exceed Threshold?	No	No

As shown in the table, construction of the Project would not expose nearby receptors to cancer and non-cancer risks that exceed the SJVAPCD's threshold of significance. In addition, as discussed under Impacts AQ-1 and AQ-2, the Project would be required to implement Mitigation Measure AQ-7 through AQ-26 that would further reduce emissions and the associated health risks (see Table 3.3-32). It should be noted that while the Project would also implement Mitigation Measure AQ-27, the reductions from this mitigation may result in the decrease of emissions on-site, on roadways, or off-site and therefore the



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

reductions would be speculative when evaluating a health risk that is dependent on the exposure distance.

Table 3.3-32. Net Change in Health Risk, Full Project Buildout compared to Future with No Project (Mitigated)

Receptor Type	Cancer Risk Per Million	Chronic Inhalation Hazard Index
Maximally Exposed Individual Receptor	9.37	0.0016
Maximally Exposed Individual School Child (Elementary)	0.12	0.0002
Maximally Exposed Individual School Child (High School)	0.02	0.0002
SJVAPCD Thresholds	20.0	1.0
Exceed Threshold?	No	No

As shown in the table, the MEIR and the MEISR at the nearest elementary school and high school would not be exposed to an increase in cancer risk or chronic inhalation hazard index that exceeds the applicable threshold and would be further reduced with mitigation.

The analysis above assumes that each proposed building would include one diesel-fueled emergency generator. Such equipment would be subject to SJVAPCD's Stationary Source Review pursuant to Rule 2201, as well as Mitigation Measure AQ-20, Diesel Generators. The generators would only operate during emergency conditions or when electricity is otherwise unavailable at the Project site. Additionally, the five total generators associated with the Project would be tested monthly, up to 50 hours per year. The generators are included in the emissions for stationary area sources in Table 3.3-9.

Moreover, the future buildout emissions conservatively assumes the first year of buildout emissions would be the same throughout the receptor's exposure duration. As discussed in Section 3.2, the Project's emissions would decrease over time without any changes to the operations of the Project due to advancement in clean technologies and stricter regulations. This would further reduce DPM generated by the Project site and further reduce health risks. These reductions can be shown in Tables 3.3-26 and 3.3-27 that evaluates the MEIR under Existing Conditions and Future Conditions with No Project. For these scenarios, operation of the existing site was anticipated to be the same but the Existing Conditions analysis accounted for the emission rates in 2023 while the Future Conditions with No Project analysis accounted for emission rates in 2036. As shown in Tables 3.3-26 and 3.3-27, the risk posed to the MEIR under these scenarios would be reduced by approximately 63%. As such, the health risk results presented above are conservative and would decline in future years. Therefore, the impact would be less than significant.

Localized Impacts

On-site operational emissions would come from area, energy, mobile, off-road sources, stationary sources, TRUs, and vegetation. The localized concentrations analysis only evaluates the on-site emissions. Most on-road mobile source emissions would be generated off-site on existing roadways. In order to capture the mobile sources generated from truck and vehicle movement on-site and idling, a CalEEMod model was prepared to estimate on-site vehicle movement. To reflect any on-site movement



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

of vehicles, the model run assumes trucks and vehicles would only travel one mile. Table 3.3-33 presents the unmitigated localized emissions of NO_x, CO, and PM that would occur on-site during Project operations in comparison to the SJVAPCD's screening threshold.

Table 3.3-33. Localized Emissions of NO_x, CO, PM₁₀, and PM_{2.5} for Operations (Unmitigated)

Source	Maximum Emissions (pounds per day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Area	0	234	0.42	0.31
Energy	15.7	13.2	1.19	1.19
Mobile	48.0	77.3	11.0	2.94
Off-Road	12.7	24.5	0.26	0.24
Stationary	9.94	11.9	0.48	0.48
TRUs	0.00	0.00	0.00	0.00
Vegetation	13.5	-	2.95	0.80
<i>Project Total</i>	<i>99.75</i>	<i>360.6</i>	<i>16.3</i>	<i>6.0</i>
SJVAPCD Thresholds	100	100	100	100
Exceed Threshold?	No	Yes	No	No

Notes:

Maximum NO_x emissions from winter. Maximum CO, PM₁₀, and PM_{2.5} from summer.

As shown in the table, CO emissions would exceed SJVAPCD screening threshold. Table 3.3-34 presents the mitigated localized emissions of NO_x, CO, and PM that would occur on-site during Project operations with implementation of Mitigation Measure AQ-7 through AQ-26. As shown in the table, with implementation of mitigation, localized NO_x emissions would not exceed SJVAPCD screening thresholds, and further analyses is not required. However, even with mitigation, localized CO emissions would still exceed the SJVAPCD screening threshold. As a result, the localized emissions of CO are evaluated in further detail below.

Table 3.3-34. Localized Emissions of NO_x, CO, PM₁₀, and PM_{2.5} for Operations (Mitigated)

Source	Maximum Emissions (pounds per day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Area ¹	0.00	0.00	0.00	0.00
Energy ²	15.7	13.2	1.19	1.19
Mobile ³	46.1	85.2	10.6	2.82
Off-Road ⁴	0.00	0.00	0.00	0.00
Stationary ⁵	3.45	11.9	0.17	0.17
TRUs	0.00	0.00	0.00	0.00
Vegetation	13.5	-	2.95	0.80
Reductions from MM AQ-13 ⁶	-7.57	-9.06	-0.003	-0.003
<i>Project Total</i>	<i>71.2</i>	<i>101.2</i>	<i>14.9</i>	<i>4.97</i>



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Source	Maximum Emissions (pounds per day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
SJVAPCD Thresholds	100	100	100	100
Exceed Threshold?	No	Yes	No	No

Notes:

¹ Area source emissions include reductions from Mitigation Measure AQ-10, Architectural Coatings.

² Energy source emissions include reductions from Mitigation Measure AQ-9, On-Site Solar, MM AQ-23, Low to Zero VOC Cleaning Products, and MM AQ-22, Electric Water Pumps.

³ Mobile air emissions include reductions from Mitigation Measure AQ-21, Employee Transit Route Information.

⁴ Off-Road emissions include reductions from Mitigation Measure AQ-12, Zero Emission Forklifts and Yard Trucks and MM AQ-24, Zero Emission Landscaping Equipment.

⁵ Stationary source emissions include reductions from MM AQ-20, Diesel Generators.

⁶ Mitigation Measures AQ-13, Truck Idling Restrictions, and AQ-11, Yard Sweeping, would occur on-site therefore the reductions from the measures could be applied to the localized on-site emissions. However, Mitigation Measure AQ-11 would only occur monthly and therefore was not accounted for in the daily emissions.

Tpy = tons per year

TRUs = transportation refrigeration units

Ambient Air Quality Analysis for CO during Project Operations

As noted previously, when a project exceeds the localized screening threshold, the next step to determining project significance is to complete an ambient air quality standard analysis utilizing the USEPA's dispersion model, AERMOD. As shown in Table 3.3-31, localized NO_x emissions were reduced to less than significant levels with mitigation. However, localized CO continue to exceed screening thresholds with mitigation.

The AERMOD modeling conducted for this analysis assumes the same meteorological inputs as the previous HRAs conducted in this analysis (see Appendix C), except for the receptor locations. For the ambient air quality analysis, fence line receptors surrounding the Project site boundary were analyzed. Receptors were placed 10 meters from the fence line at intervals of 25 meters. The Project site was modeled as an area polygon with emissions generated uniformly across the site. The annual, mitigated, operational CO emissions were converted to an emission rate in grams per second and applied to AERMOD. Additionally, receptors evaluated for the localized concentration were flagpole receptors placed along the Project boundary. All other inputs into the AERMOD modeling such as meteorological data were consistent with the health risk assessment. To determine significance of localized CO, the background concentration of CO in the Project region was added to the Project-generated increase in CO and compared against the CAAQS and NAAQS. The results of the analysis are presented in Table 3.3-35.

Table 3.3-35. Operational Ambient Air Quality Analysis for CO

Averaging Time, units	Background Concentration ¹	Project Increase	Total (Background + Project)	NAAQS Thresholds	Exceed?	CAAQS Thresholds	Exceed?
1-Hour, mg/m ³	2.5 ppm (2.86 mg/m ³)	0.027 mg/m ³	2.89 mg/m ³	35 ppm (40 mg/m ³)	No	20 ppm (23 mg/m ³)	No



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

8-Hour, mg/m ³	1.7 ppm (1.95 mg/m ³)	0.020 mg/m ³	1.97 mg/m ³	9 ppm (10 mg/m ³)	No	9 ppm (10 mg/m ³)	No

Notes:

¹ USEPA. 2023. Air Quality Statistics Report.

mg/m³ = milligrams per cubic meter

As shown above, the total localized concentration of CO would not exceed the localized air quality standards, and a less than significant impact would occur.

Carbon Monoxide Hotspot

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near congested roadways or intersections may reach unhealthful levels (i.e., adversely affecting residents, school children, hospital patients, the elderly, etc.). CO concentrations at congested intersections that experience high levels of traffic and elevated background concentrations may reach unhealthy CO levels that affect nearby sensitive receptors. The SJVAB is designated as an attainment/unclassified area for the State and federal CO standards (see Table 3.3-2). The USEPA has identified a decline in CO emissions even though VMT throughout the United States has increased (USEPA 2023c, US Department of Energy 2022). According to the SJVAPCD, background concentrations of CO are still high enough to be considered potential problems in urban areas with high levels of traffic congestion. The SJVAPCD has established the following screening criteria to determine if a project could result in a violation of the CO standard:

- 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 in the project vicinity.

During operation, the Project would increase traffic in the Project area from truck trips to and from the site as well as trips from employees. As explained by the SJVAPCD, CO hot spots may occur in urban areas with high levels of traffic. The Project site is located in a generally rural area transitioning from agricultural use to industrial use. Review of the Project-specific traffic study prepared by Fehr & Peers demonstrates that the Project would result in a worsening of intersection LOS near the Project site as compared to existing conditions. Specifically, Project traffic is expected to worsen intersection operations to LOS E or F at the following intersections (Fehr & Peers 2024):

1. Mountain House Parkway/I-205 Westbound Ramps;
2. International Parkway/West Schulte Road;
3. International Parkway/Interstate-580 Northbound Ramps;
4. International Parkway/I-580 Southbound Ramps;
5. Lammers Road/Byron Road; and
6. Lammers Road/West Schulte Road.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

While these intersections would result in higher levels of traffic and idling that would increase CO emissions, a hotspot would only occur if there were an exceedance of the State one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. The SCAQMD conducted an analysis within the 1992 Federal Attainment Plan for Carbon Monoxide in Los Angeles County to evaluate the amount of traffic that would be required to create a CO hotspot. This analysis was prepared as part of the SCAQMD's 2003 Air Quality Management Plan and can be used to demonstrate the potential for CO exceedances. SCAQMD's CO study looked at four intersections across the County during AM peak and PM peak hour traffic. The study concluded that at the busiest intersection in Los Angeles County, Wilshire Boulevard and Veteran Avenue, which has a traffic volume of approximately 100,000 vehicles per day, there was no violation of CO standards (SCAQMD 2003).

The BAAD similarly concludes that a given project would have to increase traffic volumes by 44,000 vehicles per day or 24,000 vehicles per hour in order to generate a significant CO impact (BAAD 2023).

According to the TIA, the Project would generate 14,698 vehicles per day with an AM peak of 1,721 vehicles and a PM peak of 1,790 vehicles. Additionally, the Project includes Mitigation Measures TRANS-1 and TRANS-2 that would reduce vehicle traffic and VMT. Therefore, the Project would not generate traffic exceeding 100,000 vehicles per day, 44,000 vehicles per day, or 24,000 vehicles per hour. Moreover, each intersection would only support a fraction of the total Project vehicle trips per day. Therefore, even though the Project would result in intersections with LOS E or F, the Project is not expected to generate traffic that would exceed CO ambient air quality standards.

Environmental Justice Communities

As shown above, the proposed Project is not anticipated to result in any significant health impacts to nearby receptors or communities. The risks posed from fugitive dust, Valley fever, CO, and NOA are all expected to be less than significant. The localized impacts of the Project would be below SJVACPD localized thresholds for PM, and ambient air with the Project would not exceed CAAQS or NAAQS for CO during construction. Finally, the cancer risk posed to these communities from DPM generated during construction and operation of the Project would not exceed SJVAPCD thresholds and, therefore, would not result in a significant impact.

To further the discussion of the risk posed to nearby receptors and communities, the pollution and poverty burden at census tracts within the Project vicinity were reviewed in OEHHA's California Environmental Screening Tool, version 4.0 (CalEnviroScreen 4.0). CalEnviroScreen presents a relative evaluation of the pollution and population characteristics of each census tract compared to the rest of the State. Pollution burdens that impact communities include exposures (i.e., ozone, DPM, hazardous waste) and environmental effects (i.e., impaired waters, cleanup sites). Population characteristics of communities include sensitive population indicators (i.e., asthma, low birth weight) and socioeconomic factors (i.e., unemployment, education level, poverty level). CalEnviroScreen results are presented as percentiles compared to the State. The higher the percentile, the higher the greater the environmental risk in that area.

Table 3.3-36 includes a summary of the census tracts that make up and surround the Project site, the receptors, and communities within that census tract, and their CalEnviroScreen results. Additionally, a map of the CalEnviroScreen results for this area are provided in Figure 23.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Table 3.3-36. CalEnviroScreen Scores

Census Tract	Pollution Burden Percentile ¹	Highest Percentile Pollution Burdens	Population Characteristics Percentile ²	Highest Percentile Population Characters	Overall CalEnviroScreen Percentile
6077005207 ³	53	- Groundwater Threats - Hazardous Wastes - Pesticides - Traffic	37	- Cardiovascular Disease - Low Birth Weight - Asthma - Unemployment	43
60770053403	21	- Groundwater Threats - Traffic - Ozone - Hazardous Waste	60	- Asthma - Cardiovascular Disease - Education - Low Birth Weight	43
6077005206 ⁴	86	- Groundwater Threats - Impaired waters - Pesticides - Drinking Water	37	- Cardiovascular Disease - Low Birth Weight - Education - Asthma	58
6077005305	63	- Traffic - DPM - Impaired Waters - Ozone	61	- Asthma - Impaired Waters - Cardiovascular Disease - Cleanup Sites	67
6077005307	31	- DPM - Ozone - Hazardous Waste - Traffic	78	- Low Birth Weight - Asthma - Cardiovascular Diseases - Housing Burden	61
6077005308	39	- Groundwater Threats - Traffic - Hazardous Waste - DPM	59	- Asthma - Unemployment - Cardiovascular Disease - Poverty	54
6077005210	6	- Ozone - Hazardous Waste - DPM - Drinking Water	45	- Cardiovascular Disease - Asthma - Unemployment - Low Birth Weight	21
6077005208	10	- Ozone - Pesticides - Hazardous Waste - Toxic Releases	52	- Asthma - Cardiovascular Disease - Unemployment - Low Birth Weight	30



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Census Tract	Pollution Burden Percentile ¹	Highest Percentile Pollution Burdens	Population Characteristics Percentile ²	Highest Percentile Population Characters	Overall CalEnviroScreen Percentile
6077005502	83	• Hazardous Waste • Groundwater Threats • Cleanup Sites • Impaired Waters	33	• Education • Low Birth Weight • Cardiovascular Disease • Unemployment	55

¹ Pollution burden includes environmental effects and exposures.

² Population characteristics include socioeconomic and sensitive population indicators.

³ Census tract 6077005207 includes the Project site, the nearest residential receptor (approximately 200 feet east of the Project boundary), John C. Kimball High School, and George Kelly Elementary School.

⁴ Census tract 6077005206 includes the Lammersville Community, Lammersville Elementary, and Mountain House Community.

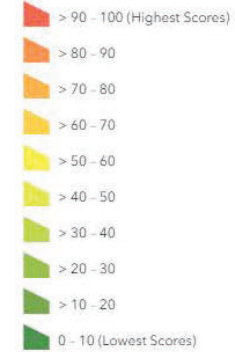
Implementation of the Project would increase pollution burden from DPM, ozone, and traffic. The risks associated with implementation of the Project posed from DPM and the associated emissions from traffic and ozone precursors have been evaluated above. As shown in Table 3.3-22, Table 3.3-23, and Table 3.3-27 through Table 3.3-32, the Project would not result in a significant cancer risk from DPM. As shown in Table 3.3-15, Table 3.3-17, Table 3.3-25, Table 3.3-26, Table 3.3-34, and Table 3.3-35 the Project would not result in any ambient air quality violations. The Project would result in the storage and movement of hazards and hazardous waste as well as the movement of dirt that may release stored pesticides during construction but, as discussed further in Section 3.9, Hazards and Hazardous Materials, the Project would follow all State and local regulations pertaining to hazards. Therefore, the emissions from the Project would not result in an increased health burden to the nearby communities, and an impact related to environmental justice would not occur.



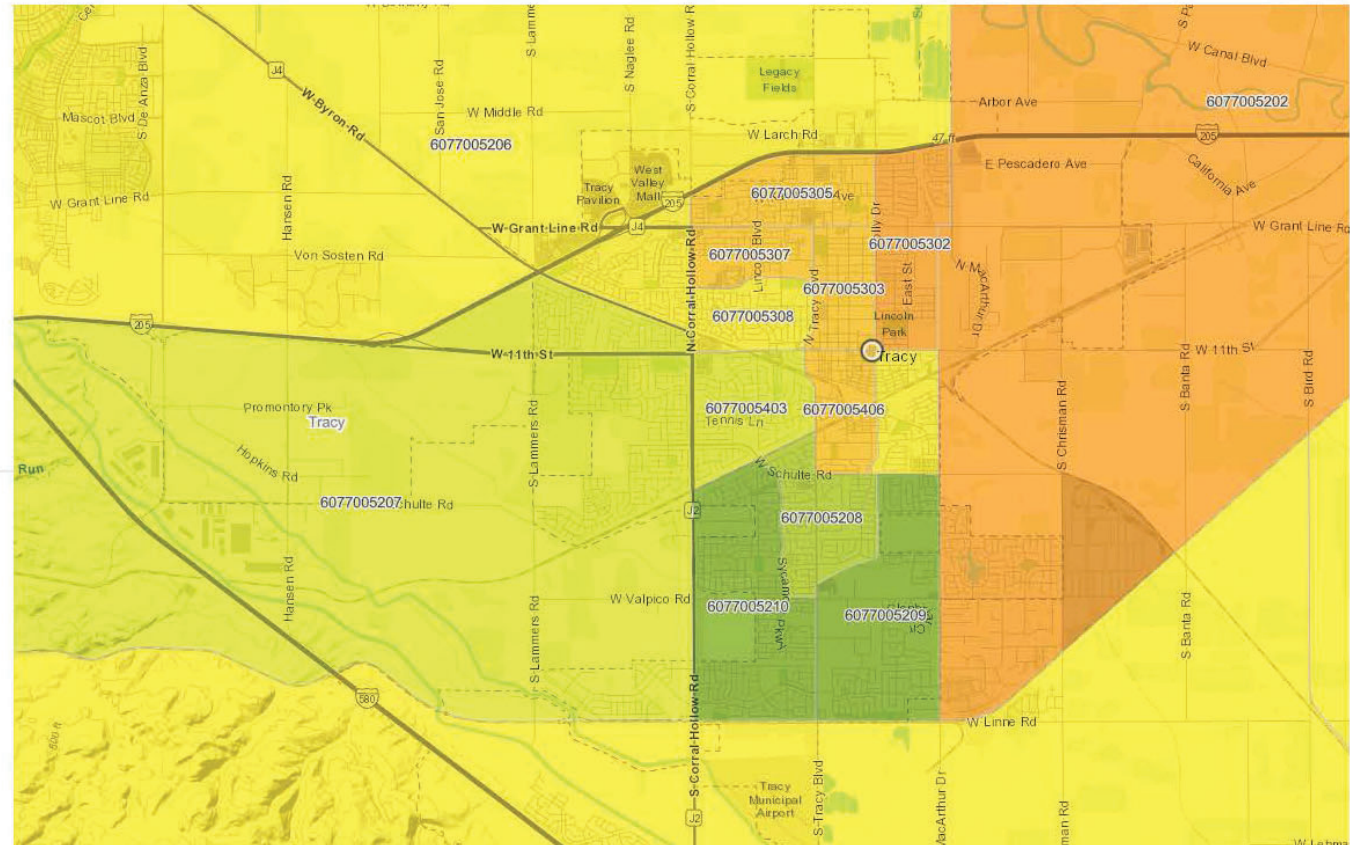
IPC2CalEnviroScreen

Legend

CalEnviroScreen 4.0 Results



CalEnviroScreen 4.0 High Pollution, Low Population



Source: OEHHA 2023

Project Location
San Joaquin County

Project
International Park of Commerce Specific Plan
Phase 2

Figure No.

27

Title

CalEnviroScreen Results

INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Conclusion

During construction of the Project, implementation of SJVAPCD's Regulation VIII would be required to ensure that nearby receptors and on-site workers are not exposed to *C. immitis* spores, and Mitigation Measure AQ-1 and AQ-2 would be required to reduce emissions of DPM. During operations, Mitigation Measures AQ-3 through AQ-19 would be required to reduce localized emissions of CO to a less than significant level and Mitigation Measures TRANS-1 and TRANS-2 would reduce vehicle trips and VMT resulting in a lower CO hotspot risk. Overall, with implementation of mitigation, the Project would not expose sensitive receptors to substantial pollutant concentrations. The impact would be less than significant with mitigation.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measures AQ-1 through AQ-26 and TRANS-1 and TRANS-2 are required.

Level of Significance After Mitigation

Less than Significant Impact.

Odors or Other Emissions

Impact AIR-4	The Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Impact Analysis

While offensive odors rarely cause any physical harm, they can still be unpleasant, leading to distress among the public and often generating citizen complaints. The occurrence and severity of odor impacts depends on numerous factors, including the nature, frequency, and intensity of the source, the wind speed and direction, and the sensitivity of the receptor. The nearest sensitive receptors to the Project site are the residents occupying a single-family residence approximately 200 feet to the east.

Construction

Diesel exhaust and VOCs would be emitted during construction of the Project from equipment exhaust, painting, and paving activities, odors associated with such are considered objectionable to some; however, construction activities would be minimal, and emissions would disperse rapidly from the Project site. In addition, Project construction would also be required to comply with all applicable SJVAPCD rules and regulations, particularly those associated with permitting of air pollutant sources. Compliance with the aforementioned regulations would help to minimize emissions, including emissions leading to odors.

Operation

During operation, the Project has the potential to generate odors from the wastewater treatment plant and brine transportation.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

The SJVAPCD has identified some common types of facilities that have been known to produce odors in the SJVAB, along with a reasonable distance from the source within which the degree of odors could possibly be significant, see Table 3.3-37. According to the SJVAPCD, if a project would result in a sensitive receptor being located closer than the screening level distances, a more detailed odor analysis should be provided (SJVAPCD 2015).

Table 3.3-37. SJVAPCD Screening Distances for Potential Odor Sources

Type of Facility	Distance
Wastewater Treatment Facilities	2 miles
Sanitary Landfill	1 mile
Transfer Station	1 mile
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plant	1 mile
Chemical Manufacturing	1 mile
Fiberglass Manufacturing	1 mile
Painting/Coating Operations (e.g., auto body shops)	1 mile
Food Processing Facility	1 mile
Feed Lot/Dairy	1 mile
Rendering Plant	1 mile

Source: SJVAPCD 2015.

The Project would construct a new, on-site wastewater treatment facility located in the middle of the northern portion of the Project site. The wastewater treatment facility lies approximately 0.5 miles from the nearest residence, 1.37 miles from Kelley Elementary School, and 0.78 miles from John C. Kimball High School. Therefore, the wastewater treatment facility would be located within the applicable screening distance (2 miles) of a sensitive receptor.

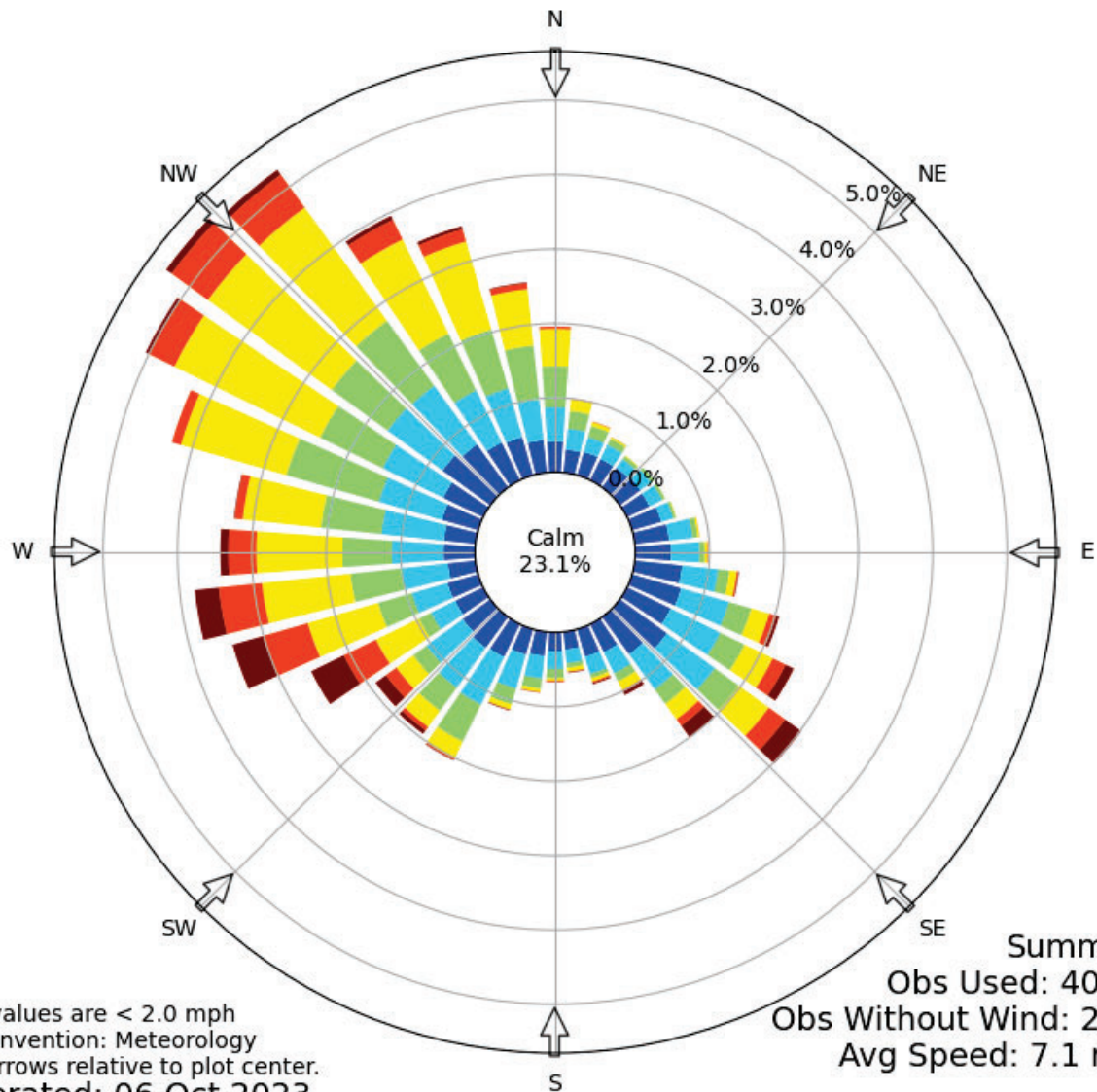
The National Oceanic and Atmospheric Administration (NOAA) in conjunction with Iowa State University prepares wind roses at airports across the State. The closest airport to the Project site, Tracy Municipal Airport, lies approximately 3.14 miles to the southeast. Figure 24 shows the annual wind patterns near the Project site from 2018 to 2023. The average wind speed is 7.1 mph and remains calm (with wind speeds below 2 mph) approximately 23 percent of the time. On average, the wind blows from the northwest towards the southwest direction (Iowa State University 2023). However, as shown in Figure 24, there is also the potential for winds to transport odor from the west, towards the nearest residential receptors that lie east of the Project site and west of W Lammers Road.



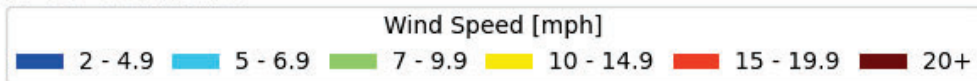


Windrose Plot for [TCY] Tracy

Obs Between: 05 Nov 2018 11:55 AM - 06 Oct 2023 01:55 AM America/Los_Angeles



Calm values are < 2.0 mph
Bar Convention: Meteorology
Flow arrows relative to plot center.
Generated: 06 Oct 2023



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

The wastewater treatment facility would be constructed on a 2-acre parcel on the Project site between Buildings 1, 2, and 3. The wastewater treatment system would have a design flow rate of 62,000 gallons per day. The treatment process would result in approximately 12 cubic yards per year of solids that would be disposed of on-site as fertilizer for landscaping. The only byproduct from the wastewater treatment facility that would be transported off-site is brine. Up to 100 cubic yards of brine would be removed per year. The wastewater treatment process, including the solids used as fertilizer, would generate hydrogen sulfide, a by-product of decomposition. Hydrogen sulfide is a colorless gas that has an odor of rotten eggs. The brine waste would have a high concentration of salts as well as other chemicals used in the wastewater treatment process which may result in odor emissions.

The wastewater treatment facility would be constructed to comply with the County's EHD and RWQCB standards, which would include design elements to reduce odor. Moreover, the wastewater treatment facility would be located within an enclosed building that would prevent odor emissions from being released from the wastewater treatment site. Once in operation, the wastewater treatment facility would be monitored and maintained to assure that the operational conditions, including nuisance odor control, are in compliance with the use area design. Nuisance odors would be sampled quarterly, and an annual report would be submitted by the Regional Water Board Executive Office. The Project applicant would either contract with a licensed wastewater operator or dedicate the system to an entity, such as Cal Water Services, to own and operate the wastewater system and monitor nuisance odor (Kier and Wright 2023). Therefore, odors would be regularly sampled as part of the Project in order to ensure that nearby receptors are not exposed to nuisance. The solids created by the wastewater treatment process would be used on-site as fertilizers. Only 12 cubic yards of solids would be produced per year and used on landscaping throughout the Project site. Therefore, a minimal amount of solid waste would be used near the existing sensitive receptors and therefore any odor generated from the solids would be insignificant.

The brine waste would be regulated by County Environmental Health and would be hauled off-site to a Class I or a Class II landfill. The exact location of landfill where the brine waste would be disposed of is unknown at this time; however, given the substantial remaining capacity available at area landfills, it is anticipated that Class I and Class II landfills in the area would be able to adequately handle the brine waste generated during operation of the Project.

Furthermore, SJVAPCD regulates objectionable odors through Rule 4102, Nuisance. Thus, although not anticipated, if odor complaints are made after the Project is developed, the SJVAPCD would ensure that such odors are addressed, and any potential odor effects are minimized or eliminated.

Other sources of on-site odors may occur from diesel exhaust or cigarette smoke from workers. Diesel exhaust would be limited on-site through Mitigation Measures AQ-1 through AQ-25. Additionally, Mitigation Measure AQ-27 would be required to ensure that any designated smoking areas are located at least 25 feet from the Project site boundary so that off-site receptors would not be impacted by cigarette smoke.

Conclusion

Based on the above, construction of the Project would not generate substantial odors. During operations, the design of the wastewater treatment facility coupled with implementation of Mitigation Measure AQ-19 would ensure that the Project would not result in other emissions, such as those leading to odors,



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

adversely affecting a substantial number of people. Therefore, the impact would be less than significant with mitigation.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

MM AQ-28 Designated Smoking Areas. Owners, operators, or tenants shall ensure that any outdoor areas allowing smoking are at least 25 feet from the nearest Project site boundary.

Mitigation Measures AQ-1 through AQ-26 and TRANS-1 and TRANS-2 are required.

Level of Significance After Mitigation

Less than Significant Impact with Mitigation.

3.3.4 Notice of Preparation Comments Related to Air Quality

As discussed in Section 1.0, Introduction, the County distributed a NOP of the Draft EIR for the Project beginning on March 31, 2023. The NOP was distributed for a 30-day comment period that ended on May 1, 2023. The Public Scoping Meeting on the Draft EIR for the Project was held on April 10, 2023. The comments received on the NOP and during the Public Scoping Meeting were considered in the preparation of this Draft EIR. Comments related to air quality and where they are addressed in this section are provided in Table 1.2-1. Additionally, each comment includes a brief summary of how the concern was addressed, the impact, or why additional analysis is not required. Commenters may have made comments addressing multiple EIR sections, but only specific air quality comments are provided in Table 1.2-1. See Table 1.2-1 in Section 1.0, Introduction for a summary of all comments made during the NOP scoping period.

Table 3.3-38. Comments Received on the NOP for Air Quality

Affiliation	Signatory	Date	Comment Description	Location Addressed in Air Quality Chapter	Response to Comment
Private Parties – Written Comments Received					
California Air Resources Board	Robert Krieger	April 28, 2023	The comment requests that an HRA be prepared that identifies the potential risk to nearby receptors from existing baseline, future baseline, full buildout, and Project construction following the guidance set in OEHHA's 2015 guidance.	- Subsection 3.3.3, Environmental Impacts, Project Impacts and Mitigation Measures - Table 3.3-39	Consistent with CARB recommendations, the health risks posed during construction and operation are quantified using OEHHA's 2015 Guidance and CARB's HARP2 modeling. Construction and operational health risks (for existing baseline, future baseline, full buildout, and overlapping construction and operation) are



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Affiliation	Signatory	Date	Comment Description	Location Addressed in Air Quality Chapter	Response to Comment
			Additionally, the comment includes a list of recommended construction and operational measures for warehouse and distribution center projects, including not allowing the use of cold storage.		evaluated in Impact AQ-3. The HRAs evaluated the TAC emissions generated from the Project itself during existing, construction, and operational activities. The cancer risks posed to residential and school receptors were determined to be less than significant with mitigation. Cumulative health risk impacts were also identified and discussed within Section 4.0, Cumulative Impacts. The cumulative risks evaluation considers the existing, proposed, and reasonably foreseeable projects to determine that the Project would be less than significant based on SJVAPCD's thresholds. CARB also recommends that if the Project does not use cold storage, then the tenant lease agreements should prohibit tenants from operating TRUs. Cold storage is anticipated on the site, therefore these measures would not be applicable. TRU emissions were calculated consistent with CARB guidance and are disclosed in Table 3.3-16. The Project also includes mitigation that aligns with many of CARB's recommended operation measures including Mitigation Measure AQ-1, AQ-3, AQ-12, AQ-18, and AQ-19. Project consistency with CARB recommended measures are evaluated in Section 3.3, Table 3.3-39.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Affiliation	Signatory	Date	Comment Description	Location Addressed in Air Quality Chapter	Response to Comment
Interested Individual	Dale and Patricia Brandes	April 24, 2023	The commenters request that impacts related to air quality be included in the EIR.	Subsection 3.3.3, Environmental Impacts, Project Impacts and Mitigation Measures	The EIR addressed all CEQA Appendix G questions related to air quality and with the implementation of Mitigation Measures AQ-1 to AQ-28, TRANS-1, and TRANS-2 impacts were found to be less than significant.
California Department of Justice	Christie Vosburg	April 11, 2023	Recommendation to use Attorney General's (AG) "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document, to reduce impacts to sensitive receptors.	- Subsection 3.3.3, Environmental Impacts, Project Impacts and Mitigation Measures - Table 3.3-40	Project consistency with the best practices and recommended mitigation in the AG's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document is evaluated in Table 3.3-40.
Mitchell Tsai, on behalf of Nor Cal Carpenters	Mitchell Tsai	May 1, 2023	Commenter seeks to require the use of a local workforce to improve air quality. The comment included as Exhibit A, a letter from Soil Water Air Protection Enterprise that summarizes the default worker trip parameters in CalEEMod and provides a conceptual emissions calculation of potential GHG emissions that may be saved from locally hiring construction workers within 10 miles of the Project site.	Subsection 3.3.3, Environmental Impacts, Methodology and Impact AQ-2.	The modeling parameters used within this analysis are provided in Section 3.3.3. As discussed, the default number of construction worker trips were applied within the modeling and the trip distance for workers was increased from 11.89 miles to 15.5 miles in order to account for workers that may travel from other nearby urban areas. The analysis is intended to provide a conservative estimate of the potential air quality emissions that may be generated during Project construction. It is acknowledged that reducing the distance traveled would in turn reduce air quality impacts, however reducing the distance traveled in the EIR's analysis would be speculative and less



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Affiliation	Signatory	Date	Comment Description	Location Addressed in Air Quality Chapter	Response to Comment
					conservative. As shown in Tables 3.3-15, with the implementation of Tier 4 construction equipment, the Project's construction emissions would fall below SJVAPCD guidelines and no other mitigation or reduction measures would be required, including the use of a local workforce.
Sierra Club	Margo Praus	May 1, 2023	List of conditions of approval including measures related to air quality, GHG emissions and project setbacks, as well as the AG's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document.	- Subsection 3.3.3, Environmental Impacts, Project Impacts and Mitigation Measures - Table 3.3-40 - Table 3.3-41	Project consistency with the best practices and recommended mitigation in the AG's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document is evaluated in Table 3.3-40. Consistency with the other recommended conditions of approval related to air quality from Sierra Club are provided in Table 3.3-41.
San Joaquin Valley Air Pollution Control District	Brian Clements	May 1, 2023	Restatement of Air District's standard requirements and rules that must be complied with including an evaluation of construction and operational emissions through CalEEMod, project trip length for HHD travel, health risks, and ambient air quality analysis. Additionally, the comment recommended the Project enter into a Voluntary Emissions Reduction Agreement and implement industrial reduction measures,	- Subsection 3.3.3, Environmental Impacts, Methodology and Impact AQ-2. - Appendix C	The air quality analysis was prepared consistent with GAMAQI guidance. SJVAPCD was provided methodology and assumption memorandums for CalEEMod modeling and health risk assessments on September 1, 2023. The comments received on the memorandums were incorporated. Please see Appendix D for those memos and SJVAPCD's responses. Construction and operational emissions, health risks, and the ambient air quality were evaluated within Subsection 3.3.3. Additionally, as shown



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Affiliation	Signatory	Date	Comment Description	Location Addressed in Air Quality Chapter	Response to Comment
			SJVAPCD rules, and regulations.		in Table 3.3-17, the Project's emissions would exceed SJVAPCD thresholds even with on-site mitigation and, as a result, the applicant would enter into a VERA with SJVAPCD to reduce ROG, NOx, and PM ₁₀ emissions to zero. A letter from SJVAPCD confirming the Project Applicant's ongoing discussion of the VERA is provided in Appendix D.
Interested Individual	Wendy Tocchini	April 30, 2023	The commenter requests that impacts related to air quality be included in the EIR.	Subsection 3.3.3, Environmental Impacts, Project Impacts and Mitigation Measures	The EIR addressed all CEQA Appendix G questions related to air quality and with the implementation of Mitigation Measures AQ-1 to AQ-28, TRANS-1, and TRANS-2 impacts were found to be less than significant.
Private Parties – Comment Cards at Scoping Meeting					
Interested Individual	Dale and Patricia Brandes	April 10, 2023	The commenters request that impacts related to air quality be included in the EIR.	Subsection 3.3.3, Environmental Impacts, Project Impacts and Mitigation Measures	The EIR addressed all CEQA Appendix G questions related to air quality and with the implementation of Mitigation Measures AQ-1 to AQ-28, TRANS-1, and TRANS-2 impacts were found to be less than significant.
Interested Individual	Dotty Nygard	April 10, 2023	Request to follow AG's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document.	- Subsection 3.3.3, Environmental Impacts, Project Impacts and Mitigation Measures - Table 3.3-40	Project consistency with the best practices and recommended mitigation in the AG's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document is evaluated in Table 3.3-40.
Interested Individual	Keith Vanderveen	April 10, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns	Subsection 3.3.3, Environmental Impacts,	The EIR addressed all CEQA Appendix G questions related to air quality and with the



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Affiliation	Signatory	Date	Comment Description	Location Addressed in Air Quality Chapter	Response to Comment
			related to air quality and John C. Kimball school.	Project Impacts and Mitigation Measures	implementation of Mitigation Measures AQ-1 to AQ-28, TRANS-1, and TRANS-2 impacts were found to be less than significant. Additionally, the health risks posed to students at John C. Kimball High School were calculated and determined to be less than significant. Cumulative impacts are evaluated in Section 4.0.
City of Tracy	Kris Balaji	September 14, 2023	The commenter states that the TACs associated with diesel trucks and diesel generators typical of logistics uses can result in cancer risks exceeding regional thresholds.	Subsection 3.3.3, Environmental Impacts, Project Impacts and Mitigation Measures	Impact AQ-3 includes an evaluation of the cancer risks posed to nearby residential and school receptors from diesel during Project construction and operation. The cancer risks were determined to be less than SJVAPCD thresholds with the implementation of mitigation.

CARB's Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers

CARB's comment letter dated April 28, 2023 included "Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers" as Attachment A. These measures are recommended by CARB for developers and government agencies to implement during project construction and operation. The best practices and mitigation recommendations for air quality and GHGs as well as a consistency analysis for the Project are provided in Table 3.3-39. The table demonstrates how the Project is consistent with the measures or examines why certain measures may not be necessary, applicable, or feasible.

Table 3.3-39. Project Consistency with CARB's Air Quality Recommendations for Warehouses and Distribution Centers

CARB Emission Reduction Measures	Project Consistency
Recommended Construction Measures	
Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary	Consistent. The Project would utilize Tier 4 construction equipment (see Mitigation Measure AQ-1), limit the maximum allowable hours of any one piece of construction equipment operating (see Mitigation Measure AQ-3), require electric hand tools,



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

CARB Emission Reduction Measures	Project Consistency
infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.	forklifts, and pressures washers during construction (see Mitigation Measure AQ-4), and limit truck idling to three minutes to reduce vehicle exhaust emissions (see Mitigation Measure AQ-13). Construction emissions were found to be less than significant with mitigation.
Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating on site. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, on-site vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.	Consistent. The Project would require electric hand tools, forklifts, and pressures washers (see Mitigation Measure AQ-3), require the use of zero emission forklifts and yard trucks during operation (see Mitigation Measure AQ-12), require sufficient electric charging facilities for trucks domiciled onsite (see Mitigation Measure AQ-17), require electric docking plugs at cold storage facilities (see Mitigation Measure AQ-18), and eliminate diesel generators unless installed for emergency use only (see Mitigation Measure AQ-20). As such, the Project would implement and plan for the necessary infrastructure to support zero emissions vehicles and equipment.
In construction contracts, include language that requires all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits, such that, emission reductions achieved are equal to or exceed that of a Tier 4 engine.	Consistent. See Mitigation Measure AQ-1.
In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.	Consistent. See Mitigation Measure AQ-3.
In construction contracts, include language that requires all heavy-duty trucks entering the construction site during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-oxides of nitrogen (NO _x) standard starting in the year 2022.	Partially Consistent. The Project would require all heavy-duty trucks entering the construction site during grading and building construction to be model year 2014 or later (see Mitigation Measure AQ-5). However, Federal Clean Air Act waiver for the NO _x Omnibus Rule was revoked by the USEPA in 2025. The revoking of these rules has been challenged by California and other states.
In construction contracts, include language that requires all construction equipment and fleets to be in compliance with all current air quality regulations. CARB is available to assist in implementing this recommendation.	Consistent. The Project Applicant as well as owners, operators, and tenants would be required to comply with all applicable CARB rules and regulations as they are coded into California law. For example, construction equipment rated over 50 horsepower would be required to be permitted through CARB's Portable Equipment Registration Program or through SJVAPCD consistent with California Code Regulations Title 13, §2450.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

CARB Emission Reduction Measures	Project Consistency
Recommended Operation Measures	
Include contractual language in tenant lease agreements that requires tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site.	Consistent. The Project would require owners, operators, and tenants to ensure all domiciled trucks are model year 2014 or later (see Mitigation Measure AQ-15) and provide electric charging facilities on the Project site sufficient to charge all electric trucks domiciled on the site and those facilities shall be made available for all electric trucks that use the Project site (see Mitigation Measure AQ-17).
Include contractual language in tenant lease agreements that requires all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with transport refrigeration units (TRUs) or auxiliary power units. This requirement will substantially decrease the amount of time that a TRU powered by a fossil-fueled internal combustion engine can operate at the project site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration are encouraged and can also be included in lease agreements.	Consistent. The Projects would require electric docking plugs for TRU trucks at cold storage facilities (see Mitigation Measure AQ-18).
Include contractual language in tenant lease agreements that requires all TRUs entering the project-site be plug-in capable.	Consistent. See Mitigation Measure AQ-19.
Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available and can be purchased using incentive funding from CARB's Clean Off-Road Equipment Voucher Incentive Project (CORE).	Consistent. The Project would require the use of zero-emission forklifts, and yard trucks (see Mitigation Measure AQ-12).
Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering or on the project site to be zero-emission vehicles, and be fully zero-emission. A list of commercially available zero-emission trucks can be obtained from the Hybrid and Zero-emission Truck and Bus Voucher Incentive Project (HVIP). Additional incentive funds can be obtained from the Carl Moyer Program and Voucher Incentive Program.	Infeasible. The transition to a ZEV fleet would be infeasible. At this time, ZEV trucks are not widely available. In 2024, California only had 1,507 medium and heavy duty ZEV trucks registered across the State (CEC 2025). CARB developed the ACT Rule that assures that a minimum amount of electric truck sales occurs every year between 2024 to 2035. However, the ACT rule and other Clean Air Act waivers granted to California were revoked by the USEPA in May 2025. The revoking of these rules has been challenged by California and other states. Additionally, CARB developed the ACF Rule that requires manufacturers to only produce ZEV trucks starting in the 2036 model year. CARB withdrew their waiver to the Clean Air Act for ACF in January 2025 (USEPA 2025). The revoking of these rules may reduce the push towards ZEV truck manufacturing and delay fleet-wide truck turnover making implementation of ZEV trucks infeasible. Additionally, onsite owners, operators, and tenants may not be able to guarantee that outside vendors (i.e. postal service, trash collectors) traveling to the Project site would be zero-emission.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

CARB Emission Reduction Measures	Project Consistency
	Moreover, the Project would implement Mitigation Measures AQ-7 through AQ-27 that would reduce operational emissions to less than significant.
Include contractual language in tenant lease agreements that requires the tenant to be in, and monitor compliance with, all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Advanced Clean Trucks Regulation, Periodic Smoke Inspection Program (PSIP), and the Statewide Truck and Bus Regulation.	Consistent. The Project Applicant as well as owners, operators, and tenants would be required to comply with all applicable CARB rules and regulations as they are coded into California law.
Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than two minutes while on site.	Partially Consistent. The Project would implement MM AQ-13 that would reduce truck idling during construction and operation to three minutes consistent with the recommendations from the State's AG office (see Table 3.3-40).
Include rooftop solar panels for each proposed warehouse to the extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.	Partially Consistent. The Project would require all buildings to be designed to support the installation of solar panels (Mitigation Measure AQ-8) and the installation of enough solar paneling to power the industrial office space (Mitigation Measure AQ-9). The tenants for the Project are not known at this time. Certain businesses and potential tenants do not allow solar panels to be installed over their warehouse storage area. However, the Project Applicant is committed to generating solar and is ranked as the number two solar producer in the United States, generating one Gigawatt of solar generation in December 2025 (Prologis 2022, Prologis 2026). The Applicant works closely with end users to implement solar installations however as some customers do not allow it, it is not feasible to require solar coverage on all buildings.
Include contractual language in tenant lease agreements, requiring the installing of vegetative walls or other effective barriers that separate loading docks and people living or working nearby.	Consistent. The Specific Plan requires landscaping setbacks from the local roadways. Therefore, loading docks would be separate from people living or working nearby.
Include contractual language in tenant lease agreements, requiring all emergency generators to be powered by a non-diesel fuel.	Infeasible. The purpose of an emergency generator is to provide backup power in the event of a power outage which can be critical for cold storage facilities or manufacturers. Types of fuels for emergency generators typically include diesel and natural gas. Diesel emergency generators are readily available in the market and perform well in all weather conditions. Natural gas emergency generators are also available on the market and tend to generate less emissions per unit of power. However, natural gas emissions are more sensitive to extreme temperatures and are required to be connected to a continuous fuel source that may be interrupted in an emergency event (Joint Institute for Strategic Energy Analysis 2019). Future tenants are not known at this time, but may be required to use a fuel source without the risk of interruption in the event of an emergency. In the



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

CARB Emission Reduction Measures	Project Consistency
	event that future tenants require diesel emergency engines, the tenants would be subject to Mitigation Measure AQ-20 which prohibits the use of diesel generators, except in emergency situations, in which case such generators shall have Best Available Control Technology (BACT) that meets the CARB's Tier 4 emission standards. Moreover, the Project would implement Mitigation Measures AQ-7 through AQ-27 that would reduce operational emissions to less than significant.
The project should be constructed to meet CALGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking, and achieve a certification of compliance with LEED green building standards.	Partially Consistent. The Project would be required to meet CALGreen standards. The tier 2 standards are voluntary measures and not required under CALGreen. Instead, the Project would implement Mitigation Measure AQ-7 that requires the Project to be constructed to meet LEED Silver standards. Finally, the Project would also comply with SJVAPCD's Rule 9410 and the CTR program that includes incentives for ride-matching assistance, preferential carpool parking, car sharing program, and bicycle end trip facilities. The Project would also require operators to establish a rideshare program with financial incentives for alternative modes of transit (see Mitigation Measure AQ-25). The Project would require that any development within the Project site with over 200 parking spaces designate at least two percent for carpool and ride share vehicles, see Section 2.4.2. Moreover, the Project would implement Mitigation Measures AQ-7 through AQ-27 that would reduce operational emissions to less than significant.

Attorney General's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" Document

The State's AG office released the "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document to help agencies develop environmentally compliant CEQA documents for warehousing projects across California. The document provides best practices and examples of mitigation for CEQA resources areas. The best practices and mitigation recommendations for air quality and GHGs as well as a consistency analysis for the Project are provided in Table 3.3-37. As demonstrated therein, the Project would be consistent with all applicable recommendations.

Table 3.3-40. Project Consistency with Attorney General's Air Quality Recommendations

Attorney General's Air Quality and GHG Measures	Project Consistency
Best Practices	
Fully analyzing all reasonably foreseeable project impacts, including cumulative impacts. In general, new warehouse developments are not ministerial under CEQA because they involve public officials' personal judgment as to the wisdom or manner of carrying out the project, even when warehouses are permitted by a site's	Consistent. Project air quality impacts are evaluated based on CEQA and SJVAPCD guidelines, see Impacts AQ-1 through AQ-4. Cumulative air quality impacts are evaluated in Section 4.0, Cumulative Effects.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Attorney General's Air Quality and GHG Measures	Project Consistency
applicable zoning and/or general plan land use designation.	
When analyzing cumulative impacts, thoroughly considering the project's incremental impact in combination with past, present, and reasonably foreseeable future projects, even if the project's individual impacts alone do not exceed the applicable significance thresholds.	Consistent. Project air quality impacts are evaluated based on CEQA and SJVAPCD guidelines, see Impacts AQ-1 through AQ-4. Cumulative air quality impacts are evaluated in Section 4.0, Cumulative Effects.
Preparing a quantitative air quality study in accordance with local air district guidelines.	Consistent. The air quality analysis presented in this section was prepared in accordance with SJVAPCD guidance. Additionally, SJVAPCD reviewed the air modeling inputs and HRA methodologies used to evaluate the Project's air quality.
Preparing a quantitative health risk assessment in accordance with California Office of Environmental Health Hazard Assessment and local air district guidelines.	Consistent. A quantitative HRA that evaluates five Project scenarios, including both construction and operation, is presented in Impact AQ-3.
Refraining from labeling compliance with CARB or air district regulations as a mitigation measure—compliance with applicable regulations is required regardless of CEQA.	Consistent. SJVAPCD required measures are listed within Section 3.3.2, Regulations. The Project mitigation measures do not list regulations that are already required.
Disclosing air pollution from the entire expected length of truck trips. CEQA requires full public disclosure of a project's anticipated truck trips, which entails calculating truck trip length based on likely truck trip destinations, rather than the distance from the facility to the edge of the air basin, local jurisdiction, or other truncated endpoint. All air pollution associated with the project must be considered, regardless of where those impacts occur.	Consistent. Heavy duty trucks and autos were assumed to travel an average of 41.8 miles and 25.29 miles, respectively (Fehr & Peers 2024). The mobile-source emissions generated from all truck and auto trips based on their total distance of travel were compared to SJVAPCD project-level thresholds, see Table 3.3-16 and Table 3.3-17. This analysis accounts for all air pollution generated from the Project. Additionally, since some trucks and autos would likely travel to BAAD, all vehicle trips assumed to travel west, based on the TIA, were also compared to BAAD thresholds, see Table 3.3-18. This analysis accounts for any impacts that may occur within the BAAD as a result of the Project.
Accounting for all reasonably foreseeable greenhouse gas emissions from the project, without discounting projected emissions based on participation in California's Cap-and-Trade Program.	Consistent. GHG emissions were quantified and disclosed in Section 3.8, Greenhouse Gas.
Recommended, Construction Mitigation Measures	
Requiring off-road construction equipment to be hybrid electric-diesel or zero emission, where available, and all diesel-fueled off-road construction equipment to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.	Partially Consistent. The Project would require Tier 4 construction equipment (see Mitigation Measure AQ-1) and require electric hand tools, forklifts, and pressures washers (see Mitigation Measure AQ-3).
Prohibiting off-road diesel-powered equipment from being in the "on" position for more than ten hours per day.	Not Necessary. It is unlikely that any single piece of equipment would operate ten hours per day due to work shifts, County code restrictions on construction hours, and lunch breaks. Moreover, as discussed under Impact AIR-2, emissions were found to be less than significant with implementation of Mitigation



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Attorney General's Air Quality and GHG Measures	Project Consistency
	Measures AQ-1 through AQ-6. As such, additional mitigation is not required.
Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power.	Consistent. See Mitigation Measure AQ-3.
Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.	Consistent. See Mitigation Measure AQ-4.
Limiting the amount of daily grading disturbance area.	Consistent. Project construction would be required to comply with SJVAPCD Regulation VIII that would reduce visible dust emissions (VDE) to 20 percent opacity. In the event limiting the amount of daily grading disturbance area is required to achieve this standard, then the Project construction teams would be required to comply.
Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.	Consistent when Necessary. Project construction would be required to comply with SJVAPCD Regulation VIII that would reduce VDE to 20 percent opacity. To achieve this Regulation VIII, specifically Rule 8021 would require during pre-activity to water the site sufficient to limit VDE to 20% opacity and phase work to reduce the amount of disturbed surface area at any one time. During active construction, projects would be required to continuously apply water or chemical suppressants to the site and unpaved roadways and construct wind barriers to maintain VDE at 20% opacity. Consistent with Regulation VIII, a Dust Control Plan would be required that specifies all fugitive dust control measures than would be required. In the event that prohibiting grading on days with an Air Quality Index forecast greater than 100 for particulates or ozone is required to achieve this standard, then the Project construction teams would be required to comply.
Forbidding idling of heavy equipment for more than three minutes.	Consistent. MM AQ-13 would restrict the idling of all heavy duty trucks on the site to three minutes.
Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.	Consistent. The Project would implement Mitigation Measure AQ-2 that requires Project contractors to keep equipment maintenance records and data sheets, including design specifications, emission control tier classifications, and hours of use.
Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.	Consistent. As is standard practice and to ensure compliance with mitigation, the County would conduct periodic on-site inspections. Project construction contractors would be required to maintain records of construction equipment use consistent with Mitigation Measure AQ-2 and fugitive dust compliance records consistent with Regulation VIII.
Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.	Consistent. See Mitigation Measure AQ-10.
Providing information on transit and ridesharing programs and services to construction employees.	Consistent. See Mitigation Measure AQ-21.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Attorney General's Air Quality and GHG Measures	Project Consistency
Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.	Infeasible. According to the CalEEMod output files, the number of construction workers onsite would range between 23 and 679 per day. Some construction activities (Site Preparation and Paving) would not require enough workers onsite for an onsite food truck to be economically feasible and shuttling workers to meal destination areas would not be feasible due to time constraints. However, the Project would implement Mitigation Measure AQ-6 which would allow food trucks on the property during construction and operation.
Recommended, Operational Mitigation Measures	
Requiring all heavy-duty vehicles engaged in drayage to or from the project site to be zero-emission beginning in 2030.	Infeasible. The transition to a ZEV fleet would be infeasible. At this time, ZEV trucks are not widely available. In 2024, California only had 1,507 medium and heavy duty ZEV trucks registered across the State (CEC 2025). CARB developed the ACT Rule that assures that a minimum amount of electric truck sales occurs every year between 2024 to 2035. However, the ACT rule and other Clean Air Act waivers granted to California were revoked by the USEPA in May 2025. The revoking of these rules has been challenged by California and other states. Additionally, CARB developed the ACF Rule that requires manufacturers to only produce ZEV trucks starting in the 2036 model year. CARB withdrew their waiver to the Clean Air Act for ACF in January 2025 (USEPA 2025). The revoking of these rules may reduce the push towards ZEV truck manufacturing and delay fleet-wide truck turnover making implementation of ZEV trucks infeasible. Moreover, the Project would implement Mitigation Measures AQ-7 through AQ-27 that would reduce operational emissions to less than significant.
Requiring all on-site motorized operational equipment, such as forklifts and yard trucks, to be zero-emission with the necessary charging or fueling stations provided.	Consistent. See Mitigation Measure AQ-12.
Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.	Infeasible. Future tenants of the Project are not known at this time and may not own the fleet used for business operations. For example, employees may be required to use their own light duty vehicles or delivery trucks coming to and from the site may be owned by an outside entity (e.g. mail carriers or garbage trucks). Moreover, the Project would implement Mitigation Measures AQ-7 through AQ-27 that would reduce operational emissions to less than significant.
Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use.	Consistent. See Mitigation Measure AQ-13.
Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager.	Consistent. Signage regarding trucking routes would be required under Mitigation Measure AQ-16 and signage regarding idling restriction would be required under Mitigation Measure AQ-13.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Attorney General's Air Quality and GHG Measures	Project Consistency
Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers.	Partially Consistent. The Project would require all buildings to be designed to support the installation of solar panels (Mitigation Measure AQ-8) and the installation of enough solar paneling to power the industrial office space (Mitigation Measure AQ-9). The tenants for the Project are not known at this time. Certain businesses and potential tenants do not allow solar panels to be installed over their warehouse storage area. However, the Project Applicant is committed to generating solar and is ranked as the number two solar producer in the United States, generating one Gigawatt of solar generation in December 2025 (Prologis 2022, Prologis 2026). The Applicant works closely with end users to implement solar installations however as some customers do not allow it, it is not feasible to require solar coverage on all buildings.
Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.	Partially Consistent. The Project would require all buildings to be designed to support the installation of solar panels (Mitigation Measure AQ-8) and the installation of enough solar paneling to power the industrial office space (Mitigation Measure AQ-9). The tenants for the Project are not known at this time. Certain businesses and potential tenants do not allow solar panels to be installed over their warehouse storage area. However, the Project Applicant is committed to generating solar and is ranked as the number two solar producer in the United States, generating one Gigawatt of solar generation in December 2025 (Prologis 2022, Prologis 2026). The Applicant works closely with end users to implement solar installations however as some customers do not allow it, it is not feasible to require solar coverage on all buildings.
Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.	Partially Consistent. Mitigation Measure AQ-18 would require the Project to include electric docking plugs at every dock door at cold storage facilities. Additionally, Mitigation Measure AQ-17 requires owners, operators, and tenants to provide electric charging facilities on the Project site sufficient to charge all electric trucks domiciled on the site and those facilities shall be made available for all electric trucks that use the Project site. Therefore, electric truck charging would be available however build out would be proportional to the number of electric trucks domiciled on-site instead of the number of dock doors. Lease agreements will require owners, operators, and tenants to annually review the number of electric trucks domiciled on the Project site and ensure sufficient electric charging stations are provided or develop new electric charging stations.
Running conduit to designated locations for future electric truck charging stations.	Consistent. Mitigation Measure AQ-17 requires owners, operators, and tenants to provide electric charging facilities on the Project site sufficient to charge all electric trucks domiciled on the site and



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Attorney General's Air Quality and GHG Measures	Project Consistency
	those facilities shall be made available for all electric trucks that use the Project site.
Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space, constructing electric plugs for electric transport refrigeration units at every dock door and requiring truck operators with transport refrigeration units to use the electric plugs when at loading docks.	Consistent. The Project site would involve the construction and operation of refrigerated warehouse space, each dock door for the cold storage warehouse would be required to include electric docking plugs (see Mitigation Measure AQ-18).
Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.	Not Necessary. The Project would comply with the sizing requirements of the National Electric Code and would size rooms for the anticipated EV requirements of end-customers if known at buildout.
Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance)	Consistent. The Project would comply with all CALGreen building standards including EV charging requirements.
Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.	Consistent. The Project would comply with all CALGreen building standards including EV charging requirements.
Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.	Not Necessary. As discussed in Impact AQ-3, construction and operational health risk impacts were found to be less than significant with mitigation. Therefore, additional mitigation would not be required.
Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.	Not Necessary. As discussed in Impact AQ-3, the Project's operational emissions were determined to not result in an ambient air impact. Therefore, off-site monitoring would not be required.
Requiring all stand-by emergency generators to be powered by a non-diesel fuel.	Infeasible. The purpose of an emergency generator is to provide backup power in the event of a power outage which can be critical for cold storage facilities or manufacturers. Types of fuels for emergency generators typically include diesel and natural gas. Diesel emergency generators are readily available in the market and perform well in all weather conditions. Natural gas emergency generators are also available on the market and tend to generate less emissions per unit of power. However, natural gas emissions are more sensitive to extreme temperatures and are required to be connected to a continuous fuel source that may be interrupted in an emergency event (Joint Institute for Strategic Energy Analysis 2019). Future tenants are not known at this time, but may be required to use a fuel source without the risk of interruption in the event of an emergency. In the event that future tenants require diesel emergency engines, the tenants would be subject to Mitigation



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Attorney General's Air Quality and GHG Measures	Project Consistency
	Measure AQ-20 which prohibits the use of diesel generators, except in emergency situations, in which case such generators shall have BACT that meets the CARB's Tier 4 emission standards.
Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.	Consistent. See Mitigation Measure AQ-14.
Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.	Consistent. See Mitigation Measure AQ-25. Additionally, the Project would be subject to SJVAPCD Rule 9410 that requires the implementation of an Employer Based Trip Reduction Plan to reduce emissions from private vehicles.
Meeting CALGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.	Partially Consistent. The Project would be required to meet CALGreen standards. The tier 2 standards are voluntary measures and not required under CALGreen. Instead, the Project would implement Mitigation Measure AQ-7 that requires the Project to be constructed to meet LEED Silver standards. Finally, the Project would also comply with SJVAPCD's Rule 9410 and the CTR program that includes incentives for ride-matching assistance, preferential carpool parking, car sharing program, and bicycle end trip facilities. The Project would also require operators to establish a rideshare program with financial incentives for alternative modes of transit (see Mitigation Measure AQ-25). The Project would require that any development within the Project site with over 200 parking spaces designate at least two percent for carpool and ride share vehicles, see Section 2.4.2. Implementation of Mitigation Measure AQ-7 through AQ-27 would reduce operational impacts to less than significant.
Providing meal options onsite or shuttles between the facility and nearby meal destinations.	Infeasible. This analysis assumes up to 4,733 people would be employed at the site. However, this number was derived from the full buildout of 5.36 million square feet of warehousing and logistics space. Site buildout would take place over a period of ten years. Therefore, there are periods during buildout where there would be significantly less employees on-site that may result in on-site meal options to be economically infeasible. Moreover, shuttling workers to meal destination areas would not be feasible due to time constraints. However, the Project would implement Mitigation Measure AQ-6 which would allow food trucks on the property during construction and operation.
Posting signs at every truck exit driveway providing directional information to the truck route.	Consistent. The Project would be required to include signage regarding trucking routes (see Mitigation Measure AQ-16) and signage idling restriction (see Mitigation Measure AQ-13).
Improving and maintaining vegetation and tree canopy for residents in and around the project area.	Not Applicable. The Project does not include any new residents, the single nearby house does not require this provision, and there is no new residential development anticipated nearby.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Attorney General's Air Quality and GHG Measures	Project Consistency
Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.	Consistent. The Project would require compliance with current air quality regulations. As such, any regulations requiring on-site record keeping will be maintained with trained staff if required. Additionally, operational emissions will be tracked and reviewed as part of the proposed VERA process with SJVAPCD.
Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.	Partially Consistent. As noted in MM AQ-27, individual tenants may opt into the SmartWay program. However, future tenants of the Project are not known at this time and may not own the fleet used at the site or have control of renting from SmartWay carriers. Implementation of Mitigation Measure AQ-7 through AQ-27 would reduce operational impacts to less than significant.
Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.	Consistent. See Mitigation Measures AQ-26.

Sierra Club Recommended Conditions of Approval

Within the May 1, 2023, Comments on Notice of Preparation for the International Park of Commerce Phase 2, Sierra Club requests that the County consider specific conditions of approval related to air quality, GHGs, and Project setbacks as well as air quality and GHG mitigation measures to reduce impacts. A consistency analysis with these recommended conditions of approval is provided in Table 3.3-41.

Table 3.3-41. Project Consistency with Sierra Club Recommendations

Recommended Conditions of Approval/Mitigation	Consistency
Recommended Conditions of Approval	
Sufficient solar panels to provide power for the project.	Partially Consistent. The Project would require all buildings to be designed to support the installation of solar panels (Mitigation Measure AQ-8) and the installation of enough solar paneling to power the industrial office space (Mitigation Measure AQ-9). The tenants for the Project are not known at this time. Certain businesses and potential tenants do not allow solar panels to be installed over their warehouse storage area. However, the Project Applicant is committed to generating solar and is ranked as the number two solar producer in the United States, generating one Gigawatt of solar generation in December 2025 (Prologis 2022, Prologis 2026). The Applicant works closely with end users to implement solar installations however as some customers do not allow it, it is not feasible to require solar coverage on all buildings.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Recommended Conditions of Approval/Mitigation	Consistency
Utilize a “clean fleet” of light vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations.	Infeasible. Future tenants of the Project are not known at this time and may not own the fleet used for business operations. For example, employees may be required to use their own light duty vehicles or delivery trucks coming to and from the site may be owned by an outside entity (e.g. mail carriers or garbage trucks). Regardless, implementation of Mitigation Measure AQ-7 through AQ-27 would reduce operational impacts to less than significant.
Provide electric charging facilities on the Project site sufficient to charge all electric trucks and employee vehicles.	Consistent. Mitigation Measure AQ-17 requires owners, operators, and tenants to provide electric charging facilities on the Project site sufficient to charge all electric trucks domiciled on the site and those facilities shall be made available for all electric trucks that use the Project site. The Project would also comply with all CALGreen standards including the requirements for providing EV parking.
Design the Project to include a setback of at least 1,000 feet from the nearest homes.	Consistent. The nearest sensitive receptor lies off of Lammers Road, approximately 200 feet east of the Project site boundary. Between the nearest sensitive receptor and the closest building would be water wells, a detention basin, and site landscaping, see Figure 7. As such, there would be 1,000 feet between the nearest residence and any industrial activities. Moreover, as discussed under Impact AQ-3, impacts to the nearest sensitive receptors would be less than significant.
Provide a community benefits fund to assist local residents in upgrading air ventilation systems.	Not Necessary. Health risks posed to sensitive receptors during Project construction and operation were evaluated in Impact AQ-3. Impacts were found to be less than significant with mitigation. Therefore, additional mitigation would not be required.
Recommended Mitigation	
The Project shall include sufficient solar panels on the roofs of the project’s building or in the parking lot to provide power for the operation’s base power use at the start of operations and as base power use demand increases. To be clear, enough solar panels to power each individual building must be constructed at the same time the building is finished, and in operation prior to the first occupancy permit issued by the City.	Partially Consistent. The Project would require all buildings to be designed to support the installation of solar panels (Mitigation Measure AQ-8) and the installation of enough solar paneling to power the industrial office space (Mitigation Measure AQ-9). The tenants for the Project are not known at this time. Certain businesses and potential tenants do not allow solar panels to be installed over their warehouse storage area. However, the Project Applicant is committed to generating solar and is ranked as the number two solar producer in the United States, generating one Gigawatt of solar generation in December 2025 (Prologis 2022, Prologis 2026). The Applicant works closely with end users to implement solar installations however as some customers do not allow it, it is not feasible to require solar coverage on all buildings.
The project shall adopt standards to provide 100% electrification under the clean fleet requirements.	Infeasible. The transition to a ZEV fleet would be infeasible. At this time, ZEV trucks are not widely available. In 2024, California only had 1,507 medium and heavy duty ZEV trucks registered across the State (CEC 2025). CARB developed the ACT Rule that



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Recommended Conditions of Approval/Mitigation	Consistency
	assures that a minimum amount of electric truck sales occurs every year between 2024 to 2035. However, the ACT rule and other Clean Air Act waivers granted to California were revoked by the USEPA in May 2025. The revoking of these rules has been challenged by California and other states. Additionally, CARB developed the ACF Rule that requires manufacturers to only produce ZEV trucks starting in the 2036 model year. CARB withdrew their waiver to the Clean Air Act for ACF in January 2025 (USEPA 2025)x). The revoking of these rules may reduce the push towards ZEV truck manufacturing and delay fleet-wide truck turnover making implementation of ZEV trucks infeasible. Finally, implementation of Mitigation Measure AQ-7 through AQ-27 would reduce operational impacts to less than significant.
The property owner/tenant/lessee shall ensure that all heavy-duty trucks (Class 7 and 8) domiciled on the project site are model year 2014 or later from start of operations and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2025 or when commercially available for the intended application, whichever date is later.	Partially Consistent/Partially Infeasible. The Project would implement Mitigation Measure AQ-15 which would require owners, operators, and tenants to ensure that all heavy-duty trucks domiciled onsite are model 2014 or later. The transition to a ZEV fleet would be infeasible. At this time, ZEV trucks are not widely available. In 2024, California only had 1,507 medium and heavy duty ZEV trucks registered across the State (CEC 2025). CARB developed the ACT Rule that assures that a minimum amount of electric truck sales occurs every year between 2024 to 2035. However, the ACT rule and other Clean Air Act waivers granted to California were revoked by the USEPA in May 2025. The revoking of these rules has been challenged by California and other states. Additionally, CARB developed the ACF Rule that requires manufacturers to only produce ZEV trucks starting in the 2036 model year. CARB withdrew their waiver to the Clean Air Act for ACF in January 2025 (USEPA 2025x). The revoking of these rules may reduce the push towards ZEV truck manufacturing and delay fleet-wide truck turnover making implementation of ZEV trucks infeasible. Finally, implementation of Mitigation Measure AQ-7 through AQ-27 would reduce operational impacts to less than significant.
The property owner/tenant/lessee shall utilize a “clean fleet” of vehicles/delivery vans/trucks (Class 2 through 6) as part of operations.	Infeasible. Future tenants of the Project are not known at this time and may not own the fleet used for business operations. For example, employees may be required to use their own light duty vehicles or delivery trucks coming to and from the site may be owned by an outside entity (e.g. mail carriers or garbage trucks). Finally, implementation of Mitigation Measure AQ-7 through AQ-27 would reduce operational impacts to less than significant.
At all times during Project operation, owners, operators, or tenants shall be required to provide electric charging	Consistent. Mitigation Measure AQ-17 requires owners, operators, and tenants to provide electric



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Air Quality

Recommended Conditions of Approval/Mitigation	Consistency
facilities on the Project site sufficient to charge all electric trucks domiciled on the site and such facilities shall be made available for all electric trucks that use the Project site.	charging facilities on the Project site sufficient to charge all electric trucks domiciled on the site and those facilities shall be made available for all electric trucks that use the Project site.
The site plans for the Project shall ensure a minimum setback from the nearest residence of at least 1,000 feet, as recommended by the AG Guidelines. The setback area shall be landscaped with an earthen berm and mature trees and shrubs	Consistent. The nearest receptors lie off of Lammers Road, approximately 200 feet east of the Project site boundary. Between the nearest sensitive receptor and the closest building would be water wells, a detention basin, and site landscaping, see Figure 7. As such, there would be 1,000 feet between the nearest residence and any industrial activities. Moreover, as discussed under Impact AQ-3, impacts to the nearest sensitive receptors would be less than significant with mitigation.
The Project development agreement shall include a community benefits program that will be used for specific improvements to benefit the community, including upgrades to nearby residents and HVAC systems to mitigation air quality impacts. The program could also fund water filtration systems for the school and/or residents.	Not Necessary. Health risks posed to sensitive receptors during Project construction and operation were evaluated in Impact AQ-3. Impacts were found to be less than significant with mitigation. Moreover, the Project would construct and operate an on-site water and wastewater treatment system. As discussed in Section 3.10, Hydrology, and Section 3.18, Utilities and Service Systems, the Project would not have a significant impact on the groundwater or the ability for City of Tracy Water District to provide clean water to their service community. The Project would pay into the VERA program (see Mitigation Measure AQ-27) that funds community benefit programs such as tractor engine replacement, wood stove changeout, and EV vehicle rebates in order to reduce air pollution across SJVAB.
The Project shall install one open source air quality monitoring station near the site that can be monitored in real time by area residents.	Not Necessary. As discussed in Impact AQ-3, the Project would not result in an ambient air quality exceedance. Therefore, off-site monitoring would not be required.



3.4 BIOLOGICAL RESOURCES

This section describes the environmental setting for biological resources including the existing Project site conditions, regulatory setting, and potential impacts that could result from the Project, and, if significant impacts are identified, the mitigation measures that would reduce these impacts. Additional details and background information on biological resources are based, in part, on the Biological Assessment prepared by Moore Biological Consultants, October 9, 2025 (Moore 2025), included in Appendix E to this EIR.

3.4.1 Environmental Setting

This section presents information on biological resources in the Project region and describes the baseline conditions within the Project site. In addition, this section includes vegetation types to characterize the botanical resources and potential for wildlife to occur on the Project site. Biotic habitats suitable for the occurrence of plant and wildlife species of special status (State and federally listed threatened and endangered species), federal proposed and candidate species, California Native Plant Society (CNPS) List species, and California Species of Special Concern (SSC) are also described.

Vegetation

The Project site is currently used as an agricultural orchard with approximately 36,270 almond trees serving as the predominant vegetation. Other than almond trees, there is little existing vegetation on the site. However, there is grassland vegetation on the orchard floor, and along the edges of the roads. California annual grassland series (Sawyer and Keeler-Wolf 1995) best describes the ruderal annual grassland vegetation on the Project site. Grasses including oats (*Avena* sp.), ripgut brome (*Bromus diandrus*), and foxtail barley (*Hordeum murinum*) are dominant grass species on the Project site. Other grassland species such as common sunflower (*Helianthus annuus*), prickly lettuce (*Lactuca serriola*), yellow star thistle (*Centaurea solstitialis*), field bindweed (*Convolvulus arvensis*), filaree (*Erodium botrys*), rose clover (*Trifolium hirtum*), and common mallow (*Malva neglecta*) are intermixed with the grasses. Table 3.4-1 is a list of plant species observed in the Project site.

Table 3.4-1. Plant Species Observed in the Project Site

Scientific Name	Common Name
<i>Acmispon americanus</i>	Spanish clover
<i>Albutilon theophrasti</i>	velvetleaf
<i>Asclepias fascicularis</i>	narrow-leaf milkweed
<i>Avena</i> sp.	wild oat
<i>Brassica nigra</i>	black mustard
<i>Bromus diandrus</i>	ripgut brome
<i>Bromus hordeaceus</i>	soft brome
<i>Carduus pycnocephalus</i>	Italian thistle
<i>Centaurea solstitialis</i>	yellow star thistle



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Biological Resources

Scientific Name	Common Name
<i>Chenopodium murale</i>	nettle-leaved goosefoot
<i>Cirsium vulgare</i>	bull thistle
<i>Conium maculatum</i>	Poison hemlock
<i>Convolvulus arvensis</i>	field bindweed
<i>Cynodon dactylon</i>	Bermuda grass
<i>Cyperus eragrostis</i>	tall flat sedge
<i>Datura innoxia</i>	datura
<i>Dittrichia graveolens</i>	stinkwort
<i>Echinochloa colona</i>	Awnless barnyard grass
<i>Echinochloa crus-galli</i>	Barnyard grass
<i>Epilobium brachycarpum</i>	fireweed
<i>Eremocarpus setigerus</i>	turkey mullein
<i>Erigeron bonariensis</i>	flax-leaved horseweed
<i>Erigeron canadensis</i>	Canadian horseweed
<i>Erodium botrys</i>	filaree
<i>Helianthus annuus</i>	common sunflower
<i>Heliotropium curassavicum</i>	Seaside heliotrope
<i>Hordeum murinum</i>	foxtail barley
<i>Lactuca serriola</i>	prickly lettuce
<i>Lolium perenne</i>	perennial ryegrass
<i>Malva neglecta</i>	common mallow
<i>Malvella leprosa</i>	alkali mallow
<i>Medicago sativa</i>	alfalfa
<i>Phalaris aquatica</i>	Harding grass
<i>Polygonum aviculare</i>	prostrate knotweed
<i>Polypogon monspeliensis</i>	annual rabbit's-foot grass
<i>Populus fremontii</i>	Fremont's cottonwood
<i>Raphanus sativa</i>	radish
<i>Rumex crispus</i>	curly dock
<i>Salsola tragus</i>	Russian thistle
<i>Salix exigua</i>	Narrowleaf willow
<i>Sonchus oleraceus</i>	common sow-thistle
<i>Tribulus terrestris</i>	puncture vine
<i>Trifolium hirtum</i>	rose clover
<i>Xanthium strumarium</i>	Rough cocklebur

Source: Moore Biological Consultants 2025



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Biological Resources

Other than the almond trees in the site, the only other trees in the site are a few fan palms (*Washingtonia* sp.), date palms (*Phoenix dactylifera*), a peach tree, and a few other volunteer almond trees clustered in the east part of the site, just north of W. Schulte Road. It is not clear if a few relatively large blue glue gum (*Eucalyptus* sp.) and black walnut (*Juglans nigra*) trees associated with a residence approximately 200 feet east of the canal along the east edge of the site fall just within the site boundary or are just off-site.

No blue elderberry (*Sambucus nigra* ssp. *caerulea*) shrubs were observed in the site. There is a small blue elderberry shrub along the west side the canal approximately 200 feet north of W. Schulte Road and approximately 25 feet to the east of the site boundary. This off-site elderberry shrub will not be impacted by the proposed project.

There is a very narrow and discontinuous fringe of hydrophytic species along the water line on the interior banks of the canal. Common species include curly dock (*Rumex crispus*), tall flat sedge (*Cyperus eragrostis*), and barnyard grass (*Echinochloa crus-galli*). There are a few areas of shrubby narrowleaf willows (*Salix exigua*) scattered along the canal.

Wildlife

Birds

Several bird species were observed during the field surveys conducted on July 28, 2021, October 31, 2023, and September 19, 2025, by Moore Biological Consultants, all of which are common species found in agricultural areas of San Joaquin County (Table 3.4-2). Turkey vulture (*Cathartes aura*), Swainson's hawk (*Buteo swainsoni*), mourning dove (*Zenaida macroura*), California scrubjay (*Aphelocoma californica*), northern mockingbird (*Mimus polyglottos*), black phoebe (*Sayornis nigricans*), and house finch (*Haemorhous mexicanus*) are representative of the avian species observed on the Project site.

Table 3.4-2. Wildlife Species Observed in the Project Site

Scientific Name	Common Name
Birds	
<i>Ardea herodias</i>	Great blue heron
<i>Anas platyrhynchos</i>	Mallard
<i>Cathartes aura</i>	Turkey vulture
<i>Buteo swainsoni</i>	Swainson's hawk
<i>Buteo jamaicensis</i>	Red-tailed hawk
<i>Falco sparverius</i>	American kestrel
<i>Columba livia</i>	Rock dove
<i>Zenaida macroura</i>	Mourning dove
<i>Colaptes auratus</i>	Northern flicker
<i>Sayornis nigricans</i>	Black phoebe
<i>Sayornis saya</i>	Say's phoebe
<i>Lanius ludovicianus</i>	Loggerhead shrike
<i>Tyrannus verticalis</i>	Western kingbird



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Biological Resources

Scientific Name	Common Name
<i>Aphelocoma californica</i>	California scrub jay
<i>Corvus brachyrhynchos</i>	American crow
<i>Mimus polyglottos</i>	Northern mockingbird
<i>Sturnus vulgaris</i>	European starling
<i>Sturnella neglecta</i>	Western meadowlark
<i>Zonotrichia leucophrys</i>	White-crowned sparrow
<i>Euphagus cyanocephalus</i>	Brewer's blackbird
<i>Haemorhous mexicanus</i>	House finch
Mammals	
<i>Otospermophilus beecheyi</i>	California ground squirrel
Reptiles	
<i>Sceloporus occidentalis</i>	western fence lizard

Source: Moore Biological Consultants 2024

The almond trees in the site are too small to support nesting large raptors and it is unlikely raptors use the fan palms in the east part of the site for nesting. The cluster of large trees just east of the site associated with the nearby residence provide suitable nesting habitat for raptors and other birds. Due to the presence of large trees near the site and suitable raptor foraging habitat (i.e., open fields, alfalfa fields) nearby, it is possible raptors nests in trees near the site. Smaller birds, such as songbirds, and possibly some small raptors, may nest in the orchard trees in the site. Ground-nesting songbirds such as killdeer (*Charadrius vociferous*) may nest on the ground in and near the site and the grassland vegetation in parts of the site may be suitable for grassland-nesting species, such as red-winged blackbird (*Agelaius phoeniceus*).

Mammals

While a variety of mammals may occur in the site, no mammals were observed during the surveys; a few California ground squirrel (*Otospermophilus beecheyi*) burrows were observed. The site provides potentially suitable habitat for common mammals such as coyote (*Canis latrans*), raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), desert cottontail (*Sylvilagus audubonii*), black-tailed hare (*Lepus californicus*), Virginia opossum (*Didelphis virginiana*), and a number of species of small rodents including Botta's pocket gopher (*Thomomys bottae*), mice (*Mus musculus*, *Reithrodontomys megalotis*, and *Peromyscus maniculatus*) and voles (*Microtus californicus*).

Reptiles and Amphibians

Due to lack of suitable habitat, only a few amphibians and reptiles are expected to occur on the Project site. Western fence lizard (*Sceloporus occidentalis*) was the only reptile observed within the site; no amphibians were observed. The site provides potentially suitable habitat for other common amphibians and reptile species such as Pacific chorus frog (*Pseudacris regilla*), American bullfrog (*Lithobates catesbeianus*), and common garter snake (*Thamnophis sirtalis*) may occur in the Project site on occasion.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Biological Resources

Aquatic Resources

Waters of the U.S., including wetlands, are defined under 33 Code of Federal Regulations (CFR) 328 to include navigable waterways, their tributaries, and adjacent wetlands. State and federal agencies regulate these habitats and Section 404 of the Clean Water Act (CWA) requires that a permit be secured prior to the discharge of dredged or fill materials into any Waters of the U.S. The California Regional Water Quality Control Board (RWQCB) implements Section 401 of the CWA by issuing 401 Certification in support of 404 permits. Many jurisdictional Waters of the U.S. in California are also Waters of the State, and also fall under the jurisdiction of the California Department of Fish and Wildlife (CDFW).

“Waters of the U.S.”, as defined in 33 CFR 328.4, encompasses Territorial Seas, Tidal Waters, and Non-Tidal Waters; Non-Tidal Waters includes interstate and intrastate rivers and streams, their tributaries, and their adjacent wetlands. The limit of federal jurisdiction of Non-Tidal Waters of the U.S. extends to the “ordinary high water mark”. The ordinary high water mark is established by physical characteristics such as a natural water line impressed on the bank, presence of shelves, destruction of terrestrial vegetation, or the presence of litter and debris.

Wetlands have been defined as vegetated areas that meet specific vegetation, soil, and hydrologic criteria defined by the U.S. Army Corps of Engineers (USACE) Wetlands Delineation Manual and Regional Supplement (USACE 1987; 2008). Wetlands that are adjacent to or hydrologically closely associated with jurisdictional lakes, rivers, streams, and tributaries can also fall under USACE jurisdiction as “adjacent wetlands”. On May 25, 2023, the U.S. Supreme Court issued its ruling in *Sackett v. Environmental Protection Agency* (Sackett), which established a more stringent test to determine whether the CWA applies to certain categories of wetland. Under Sackett, adjacent wetlands must have a continuous surface connection with a jurisdictional Water of the U.S. such that the wetland is indistinguishable from the adjacent water. Geographically and hydrologically isolated wetlands are outside federal jurisdiction, but are regulated by the RWQCB as a “Water of the State”.

The *Sackett* ruling’s result is that certain adjacent wetlands formerly protected under the CWA will no longer be federally protected. The USACE and USEPA have acknowledged the Sackett ruling and indicated they will interpret Waters of the U.S. consistent with the U.S. Supreme Court’s decision. On March 12, 2025, the USACE and USEPA announced a joint memorandum issuing guidance on the implementation of the U.S. Supreme Court’s May 25, 2023, ruling. On November 17, 2025, the USEPA and USACE announced a proposed rule that would clarify the definition of “waters of the U.S.” and fully implement the U.S. Supreme Court’s decision. The updated definition defines the scope of federal jurisdiction over CWA permitting. On November 20, 2025, the proposed rule was published in the Federal Register. The 45-day public comment period closed on January 5, 2026. As of February 2026, public comments are still being reviewed, and a final ruling has not been made (USEPA 2026).

Jurisdictional Waters of the U.S. and wetlands include, but are not limited to, most perennial and intermittent creeks and lakes, as well as adjacent wetlands such as riparian wetlands along the edges of rivers. Waters of the U.S., wetlands, and other aquatic habitats provide critical habitat components, such as nest sites and a reliable source of water, for a wide variety of wildlife species.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Biological Resources

Under Section 1600-1616 of the Fish and Game Code of California (FGCC), project proponents are required to notify CDFW prior to initiating activities for any project that would divert water from, or obstruct or change the natural flow, bed, channel, or bank of any river, stream, or lake. When an existing fish or wildlife resource may be substantially adversely affected, CDFW is required to propose reasonable project changes to protect the resource. These modifications are formalized in a Streambed Alteration Agreement.

No potentially jurisdictional Waters of the U.S. or wetlands were observed in the site. There are also no areas in the site meeting the criteria of Waters of the State, including wetlands. The site supports upland (i.e., not wetland) plant species and on-site soils appear to be well-draining.

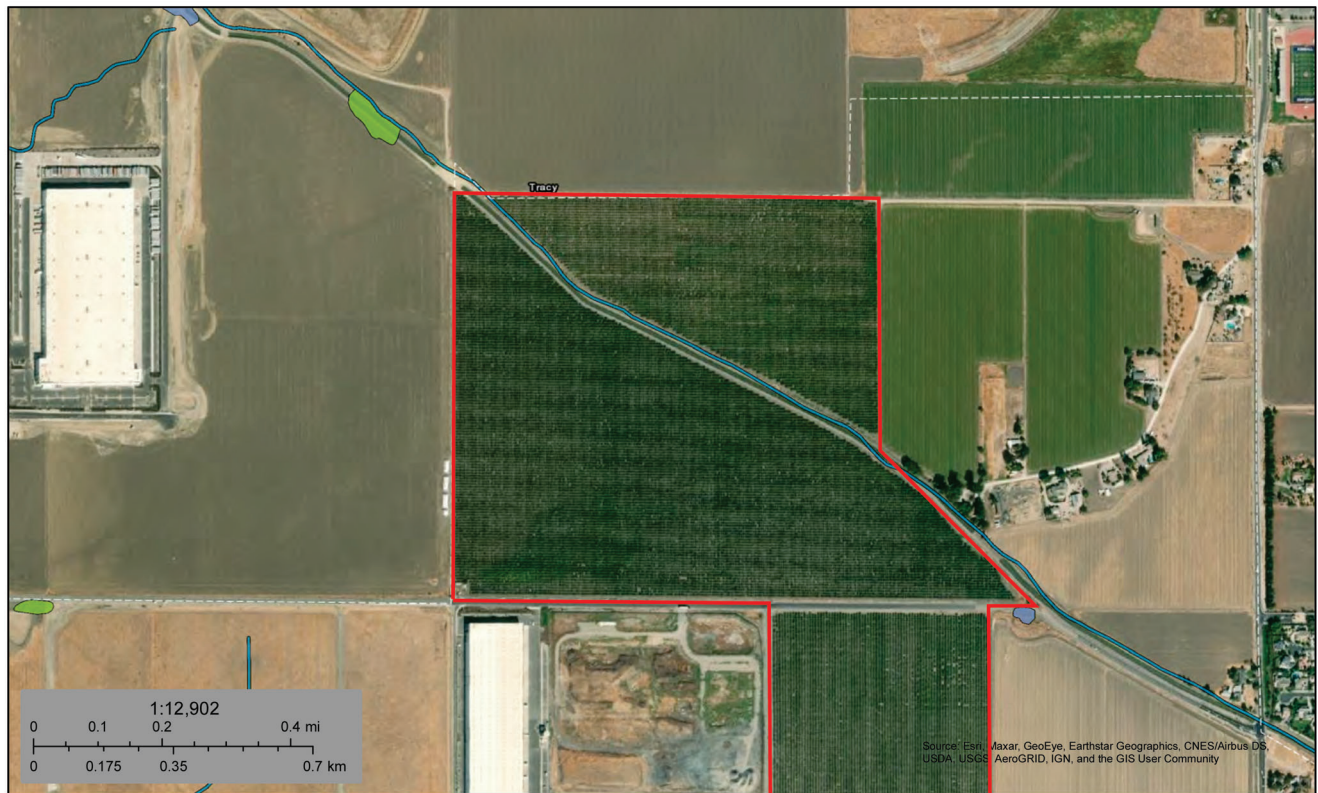
WSID's Upper Main Canal meanders through the site, separating blocks of orchards. The Upper Main Canal is mapped as a "Riverine" feature in the National Wetland Inventory (NWI) and is depicted as a "blue-line stream" on the USGS topographic map (Figure 25). The only other nearby aquatic feature is a constructed agricultural return pond situated immediately east of the Project site, outside of the Project boundary. This site is depicted on the USGS topographic map and as a "Freshwater Pond" on the NWI map (Figure 26).

The Upper Main Canal was constructed in uplands and is managed for agricultural purposes. Water in the Upper Main Canal is pumped out of Old River a few miles northwest of the site and conveys the water in a southeast direction to service agricultural lands. Due to its created nature and hydrologic regime, the Upper Main Canal does not meet the technical and regulatory criteria of a jurisdictional Water of the U.S. or a Water of the State (33 CFR 328).

The remnant agricultural return pond adjacent to the Project site been present for decades and appears to have been related to historical hay farming or irrigated pasture. The pond is dry most of the year during most years and the floor of the pond supports upland grasses and weeds. This pond was constructed in uplands for the purpose of regional irrigation and does not meet the technical and regulatory criteria of a jurisdictional Water of the U.S. or a Water of the State.

No other areas meeting the technical and regulatory criteria of jurisdictional Waters of the U.S. or wetlands or a Water of the State were observed on the Project site.





July 30, 2021

Wetlands

 Estuarine and Marine Deepwater	 Freshwater Emergent Wetland	 Lake
 Estuarine and Marine Wetland	 Freshwater Forested/Shrub Wetland	 Other
	 Freshwater Pond	 Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Wetlands Inventory (NWI)
This page was produced by the NWI mapper

Source: Moore Biological Consultants 2021

Project Location
San Joaquin County

Project
International Park of Commerce Specific Plan
Phase 2

Figure No.

25

Title

National Wetlands, North Project Site



U.S. Fish and Wildlife Service
National Wetlands Inventory

IPC Southeast (South)



July 30, 2021

Wetlands

Estuarine and Marine Deepwater	Freshwater Emergent Wetland	Lake
Estuarine and Marine Wetland	Freshwater Forested/Shrub Wetland	Other
	Freshwater Pond	Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Wetlands Inventory (NWI)
This page was produced by the NWI mapper

Source: Moore Biological Consultants 2021

Project Location
San Joaquin County

Project
International Park of Commerce Specific Plan
Phase 2

Figure No.

26

Title

**National Wetlands, South Project
Site**

Special-Status Species

Special-status species are plants and animals that are legally protected under the state and/or federal Endangered Species Act or other regulations. The Federal Endangered Species Act (FESA) of 1973 declares that all federal departments and agencies shall utilize their authority to conserve endangered and threatened plant and animal species. The California Endangered Species Act (CESA) of 1984 parallels the policies of FESA and pertains to native California species.

Special-status species also include other species that are considered rare enough by the scientific community and trustee agencies to warrant special consideration, particularly with regard to protection of isolated populations, nesting or denning locations, communal roosts, and other essential habitats. The presence of species with legal protection under the FESA often represents a constraint to development, particularly when the species are wide-ranging or highly sensitive to habitat disturbance and where proposed development would result in a take of these species.

Special-status plants are those which are designated rare, threatened, or endangered and candidate species for listing by the U.S. Fish and Wildlife Service (USFWS). Special-status plants also include species considered rare or endangered under the conditions of Section 15380 of the CEQA Guidelines, such as those plant species identified on Lists 1A, 1B and 2 in the Inventory of Rare and Endangered Vascular Plants of California (CNPS 2025). Finally, special-status plants may include other 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 CNPS List 3.

The likelihood of occurrence of listed, candidate, and other special-status species on the Project site is generally low. Table 3.4-3 (Table 3 in the Biological Assessment [Appendix E]) provides a summary of the listing status and habitat requirements of special-status species that have been documented in the greater Project vicinity or for which there is potentially suitable habitat in the greater Project vicinity. This table also includes an assessment of the likelihood of occurrence of each of these species on the Project site. The evaluation of the potential or occurrence of each species is based on the distribution of regional occurrences (if any), habitat suitability, and field observations.

Special-Status Plants

There are six special-status plant species documented in the CNDDDB (2025) within five miles of the site: big tarplant (*Blepharizonia plumosa* ssp. *plumosa*), caper-fruited tropidocarpum (*Tropidocarpum capparideum*), Lemmon's jewelflower (*Caulanthus lemmonii*), Mason's lilaeopsis (*Lilaeopsis masonii*), shining navarretia (*Navarretia nigelliformis* ssp. *radians*), and showy golden madia (*Madia radiata*). Large-flowered fiddleneck (*Amsinckia grandiflora*) is the only special-status plant species on the USFWS Species List (USFWS 2025).

No special-status plants or potentially suitable habitat for special-status plants was observed in the site. Special-status plants generally occur in relatively undisturbed areas in vegetation communities such as vernal pools, marshes and swamps, seasonal wetlands, riparian scrub, and areas with unusual soils. The Project site is an almond orchard that is highly disturbed and does not provide suitable habitat for any of the plants in Table 3.4-3 or other special-status plants. A portion of the WSID Upper Main Canal runs across



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Biological Resources

the northern portion of the Project site and also does not provide suitable aquatic habitat for any special-status plants in Table 3.4-3. Due to a lack of suitable habitat, no special-status plants are expected to occur on the Project site.

Special-Status Wildlife

The potential for intensive use of habitats within the Project site by special-status wildlife species is low. A total of 20 special-status wildlife and fish species that have been recorded within five miles of the Project site in the CNDDDB 2025 query. These species include Swainson's hawk, burrowing owl, tricolored blackbird (*Agelaius tricolor*), northern harrier (*Circus hudsonius*), least Bell's vireo (*Vireo bellii pusillus*), loggerhead shrike (*Lanius ludovicianus*), San Joaquin kit fox (*Vulpes macrotis mutica*), American badger (*Taxidea taxus*), Townsend's big-eared bat (*Corynorhinus townsendii*), California red-legged frog (*Rana draytonii*), California tiger salamander (*Ambystoma californiense*), foothill yellow-legged frog (*Rana boylei*), western spadefoot (*Spea hammondi*), northwestern pond turtle (*Actinemys marmorata*), San Joaquin coachwhip (*Masticophis flagellum ruddocki*), California glossy snake (*Arizona elegans occidentalis*), coast horned lizard (*Phrynosoma blainvillii*), green sturgeon (*Acipenser medirostris*), valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*), and Crotch bumble bee (*Bombus crotchii*). Although not included in the CNDDDB (2025) search area, California condor (*Gymnogyps californianus*), monarch butterfly (*Danaus plexippus*), vernal pool fairy shrimp (*Branchinecta lynchi*), and vernal pool tadpole shrimp (*Lepidurus packardii*) are included on the USFWS Species List. The USFWS Species List also contains a few of the same wildlife species as the CNDDDB (2025).

While the Project site may have provided habitat for special-status wildlife species at some time in the past, farming and development have substantially modified natural habitats in the greater Project vicinity, including the site. Of the wildlife species identified in the CNDDDB, Swainson's hawk and burrowing owl are the only species with potential to occur on the Project site on more than a transitory or occasional basis. Swainson's hawk and burrowing owl could be adversely affected by conversion of habitat to development and/or disturbed by construction if construction occurs in close proximity to active nests.

Swainson's Hawk

The Swainson's hawk is a migratory hawk listed by the State of California as a Threatened species. The Migratory Bird Treaty Act (MBTA) and Fish and Game Code of California protect Swainson's hawks year-round, as well as their nests during the nesting season (March 1 through September 15). Swainson's hawks are found in the Central Valley primarily during their breeding season, and a population is known to winter in the San Joaquin Valley.

Swainson's hawks prefer nesting sites that provide sweeping views of nearby foraging grounds consisting of grasslands, irrigated pasture, hay, and wheat crops. Orchards and vineyards do not provide suitable foraging habitat for this species. Most Swainson's hawks are migratory, wintering in Mexico and breeding in California and elsewhere in the western United States. This raptor generally arrives in the Central Valley in mid-March and begins courtship and nest construction immediately upon arrival at the breeding sites. The young fledge in early July, and most Swainson's hawks leave their breeding territories by late August (Moore 2025).



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Biological Resources

The Project site is within the nesting range of Swainson's hawks, and the CNDDDB (2025) contains several records of nesting Swainson's hawks near the greater Project vicinity (Attachment B of the Biological Assessment [Appendix E]). There are several occurrences of nesting Swainson's hawks in the CNDDDB (2025) search area within a few miles of the site, with the nearest record being within 0.5 miles east of the site. The site does not provide suitable foraging habitat for Swainson's hawk; however, alfalfa fields and open grassland areas adjacent to the Project site provide suitable foraging habitat for this species.

One adult and one juvenile Swainson's hawk were observed foraging in the alfalfa field northeast of the site during the 2021 field survey. It is possible that these hawks nested in the large trees east of the site or in trees in the general project vicinity.

The orchard trees on the site are not large enough to support nesting Swainson's hawks. Although unlikely, the palms in the east part of the site are potentially suitable Swainson's hawk nest trees. It is much more likely this species would nest in larger trees, such as the large eucalyptus trees adjacent to the east edge of the site, along the WSID canal.

No raptor stick nests were observed in the cluster of relatively small trees in the east part of the site or in the large trees near the site.

Burrowing Owl

The MBTA and Fish and Game Code of California protect burrowing owls year-round, as well as their nests during the nesting season (February 1 through August 31). Burrowing owls are a year-long resident in a variety of grasslands as well as scrub lands that have a low density of trees and shrubs with low growing vegetation; burrowing owls that nest in the Central Valley may winter elsewhere.

The primary habitat requirement of the burrowing owl is small mammal burrows for nesting. The owl usually nests in abandoned ground squirrel burrows, although they have been known to dig their own burrows in softer soils. In urban areas, burrowing owls often utilize artificial burrows including pipes, culverts, and piles of concrete pieces. This semi-colonial owl breeds from March through August and is most active while hunting during dawn and dusk.

A few ground squirrel burrows were observed along the farm roads adjacent to the Project site. There were also some burrows identified at the bases of some almond trees along the south edge of the site near the railroad tracks. No sign of burrowing owl, past or present, was observed near any of the burrows within the site. There are a few records of burrowing owls in the CNDDDB (2025) within a few miles of the site and the nearest is approximately one mile southwest of the Project site.

Other Special-Status Species

Other special-status birds may fly over the area on occasion but would not be expected to nest or roost in or immediately adjacent to the Project site, primarily due to lack of habitat. For example, the site does not contain emergent wetland vegetation or riparian vegetation that would provide suitable nesting habitat for tricolored blackbird or least-Bell's vireo. Similarly, there is no marsh habitat in or adjacent to the site to support northern harrier. California condor is not known from the area and is not expected to occur in or



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Biological Resources

near the site. Loggerhead shrike may nest in on-site trees, although this species is more often found in open grassland areas with widely scattered thorny trees and shrubs.

The Project site does not provide suitable denning habitat for American badger or San Joaquin kit fox. Townsend's big-eared bat and a few common bats may fly over or forage in the site on occasion, but the small orchard trees in the site are not highly suitable for roosting.

The Project site does not provide suitable aquatic habitat for California red-legged frog, foothill yellow-legged frog, California tiger salamander, northwestern pond turtle, western spadefoot, green sturgeon, or other special-status fish species. The grassland in the site is highly disturbed and does not provide suitable habitat for San Joaquin coachwhip, northern California legless lizard, coast horned lizard, or California glossy snake.

There are no vernal pools or seasonal wetlands in the site for vernal pool fairy shrimp, vernal pool tadpole shrimp, or other listed vernal pool branchiopods. Monarch butterfly could fly over the site during its migration, but is not expected to reproduce in the site due to a lack of milkweed and other floristic resources; this species is also more common in southern California and coastal environments. The site also does not provide suitable habitat for Crotch's bumble bee. Finally, there are no blue elderberry shrubs in the site, precluding the potential occurrence of valley elderberry longhorn beetle (Moore 2025).

Critical Habitat

The northeast part of the site is just within designated critical habitat for delta smelt (USFWS 1994), as the habitat extends far inland from the waterways where this fish occurs. The suitability of the site for development is not reduced by part of the site falling within delta smelt critical habitat as the Project does not propose to remove the WSID Upper Main Canal or any waterways; many newly developing areas in the vicinity also fall within this designation. Development should have no effect on off-site waterways and no effect on the suitability of delta waterways for delta smelt. Delta smelt have not been documents within the Project area and as a result are not listed in Table 3.4-3.

The site is not within designated critical habitat for any other species such as California condor (CFR 1977), least Bell's vireo (CFR 1994), California red-legged frog (USFWS (USFWS 2006), California tiger salamander (USFWS 2005a), federally listed vernal pool shrimp or plants (USFWS, 2005b), valley elderberry longhorn beetle (USFWS 1980), green sturgeon (NOAA 2009), Central Valley steelhead (NOAA 2005), or other federally or State listed species.

Wildlife Movement Corridors

Well-developed riparian corridors are often utilized for movement by wildlife species such as deer, coyote, red fox (*Vulpes vulpes*), and bobcat (*Felis rufus*), as well as a variety of amphibians, reptiles, and fish. There are no wildlife movement corridors in the site.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Biological Resources

Table 3.4-3. Special-Status Plant and Wildlife Species Documented or Potentially Occurring in the Project Vicinity

Common Name	Scientific Name	Federal Status ¹	State Status ²	CNPS List ³	Habitat	Potential for Occurrence on the Project Site
PLANTS						
Large-flowered fiddleneck	<i>Amsinckia grandiflora</i>	E	E	1B	Cismontane woodland, valley and foothill grassland.	Unlikely: the site does not provide suitable habitat for and is below the elevation range of large-flowered fiddleneck. There are no occurrences of this species in the CNDDDB (2025) search area. The site is not in large-flowered fiddleneck designated critical habitat (CFR 1985).
Big tarplant	<i>Blepharizonia plumosa</i> ssp. <i>plumosa</i>	None	None	1B	Valley and foothill grassland.	Unlikely: the Project site does not provide suitable habitat for this species. The nearest occurrence of big tarplant in the CNDDDB (2025) search area is approximately 3.5 miles southwest of the site.
Lemmon's jewelflower	<i>Caulanthus. lemmonii</i>	None	None	1B	Pinyon-juniper woodland, valley and foothill grassland.	Unlikely: the site does not provide suitable habitat for and is below the elevation range of Lemmon's jewelflower. The nearest occurrence of this species in the CNDDDB (2025) is approximately 5 miles southwest of the site.
Mason's lilaeopsis	<i>Lilaeopsis masonii</i>	None	R	1B	Marshes, swamps and riparian scrub.	Unlikely: the site does not provide suitable habitat for Mason's lilaeopsis. The nearest occurrence of this species in the CNDDDB (2025) is approximately 4 miles north of the site.
Showy golden madia	<i>Madia radiata</i>	None	None	1B	Cismontane woodland, valley and foothill grassland.	Unlikely: the site does not provide suitable habitat for and is below the elevation range of showy golden madia. The nearest occurrence of this species in the CNDDDB (2025) is approximately 5 miles south of the site.
Shining navarretia	<i>Navarretia nigelliformis</i> ssp. <i>radians</i>	None	None	1B	Cismontane woodland, valley and foothill grassland, vernal pools, usually in clay soils.	Unlikely: the Project site does not provide suitable habitat for this species. The nearest occurrence of shining navarretia in the CNDDDB (2025) search area is approximately 5 miles southwest of the site.
Caper-fruited tropidocarpum	<i>Tropidocarpum capparideum</i>	None	None	1B	Valley and foothill grassland, alkaline soils.	Unlikely: the grassland on the Project site is highly disturbed from farming activities and does not



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Biological Resources

Common Name	Scientific Name	Federal Status ¹	State Status ²	CNPS List ³	Habitat	Potential for Occurrence on the Project Site
						provide suitable habitat for caper-fruited tropidocarpum. The nearest occurrence of this species in the CNDDDB (2025) search area is approximately 1.5 miles southeast of the site.
WILDLIFE						
Birds						
California condor	<i>Gymnogyps californianus</i>	E	E	N/A	Rocky shrubland, coniferous forests and oak savannas; found near cliffs or large trees, which they use as nesting sites.	Unlikely: the orchard trees in the site do not provide suitable foraging habitat for California condor. There are no occurrences of this species in the CNDDDB (2025) search area. The Project site is not within critical habitat for California condor (CFR 1977).
Least Bell's Vireo	<i>Vireo bellii pusillus</i>	E	E	N/A	Nests in willow thickets and other shrubs, primarily in southern California riparian forests.	Unlikely: there is no suitable habitat for least Bell's vireo in or near the site. The nearest occurrence of least Bell's vireo in the CNDDDB (2025) search area is approximately 4.5 miles south of the site. The site is not within critical habitat for least Bell's vireo (CFR 1994).
Swainson's hawk	<i>Buteo swainsoni</i>	None	T	N/A	Breeds in stands of tall trees in open areas. Forages in habitats such as grasslands or alfalfa fields.	Moderate: while the site does not provide foraging or nesting habitat for Swainson's hawks, there are large trees in close proximity to the site that are suitable for nesting. Swainson's hawks were observed in the adjacent alfalfa field during the 2021 site visit. The nearest occurrence of Swainson's hawks in the CNDDDB (2025) is approximately 0.5 miles east of the site.
Tricolored blackbird	<i>Agelaius tricolor</i>	None	T	N/A	Nesting: open water and cattail, rose, or brambles; annual grassland for foraging.	Unlikely: there is no suitable nesting habitat on the Project site to support this species. The nearest occurrence of tricolored blackbird in the CNDDDB (2025) search area is approximately 2.5 miles southwest of the site.
Burrowing owl	<i>Athene cunicularia</i>	None	CE	N/A	Grasslands, deserts and scrubland; subterranean nester, dependent upon burrowing mammals.	Unlikely: while there are some ground squirrel burrows in the site, no burrowing owls or ground squirrel burrows with evidence of past occupancy were observed. There are numerous occurrences of burrowing owls in the CNDDDB (2025) within a few miles of the site, with the nearest being approximately 1 mile southwest of the site.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Biological Resources

Common Name	Scientific Name	Federal Status ¹	State Status ²	CNPS List ³	Habitat	Potential for Occurrence on the Project Site
Northern harrier	<i>Circus hudsonius</i>	None	SC	N/A	Coastal salt and fresh water marsh, nests and forage in grasslands.	Unlikely: the Project site does not provide suitable foraging or nesting habitat for northern harrier. The nearest occurrence of this species in the CNDDDB (2025) search area is approximately 3 miles northwest of the site.
Loggerhead shrike	<i>Lanius ludovicianus</i>	None	SC	N/A	Annual grasslands and agricultural areas; nests in trees and shrubs.	Unlikely: the Project site does not provide suitable habitat for loggerhead shrike. The nearest occurrence of this species in the CNDDDB (2025) search area is approximately 4.5 miles northwest of the site.
Mammals						
San Joaquin kit fox	<i>Vulpes macrotis mutica</i>	E	T	N/A	Inhabits open, dry annual or perennial grasslands and scrublands with loose textured soils for denning.	Unlikely: no San Joaquin kit fox or suitable dens for this species were observed in the site. The nearest occurrence of San Joaquin kit fox in the CNDDDB (2025) is a large, nonspecific record mapped approximately 2 miles southwest of the site.
American badger	<i>Taxidea taxus</i>	None	SC	N/A	Drier open stages of most shrub, forest, and herbaceous habitats, with friable soils.	Unlikely: no American badger or suitable dens for this species were observed in the site. The nearest occurrence of this species in the CNDDDB (2025) is approximately 3 miles northeast of the site mapped nonspecifically around the City of Tracy.
Townsend's big-eared bat	<i>Corynorhinus townsendii</i>	None	SC	N/A	Desert scrub, mixed conifer forest, and pinyon-juniper or pine forest. Primarily roosts in caves, mines, and buildings.	Unlikely: this species may fly over or forage on the Project site, but the small orchard trees on the Project site are not suitable roosting habitat for Townsend's big-eared bat. The nearest occurrence of this species in the CNDDDB (2025) search area is over 5 miles from the site.
Reptiles And Amphibians						
California red-legged frog	<i>Rana draytonii</i>	T	SC	N/A	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation.	Unlikely: there is no suitable aquatic habitat for California red-legged frog in the site. The nearest occurrence of this species in the CNDDDB (2025) is approximately 2 miles southwest of the site. The site is not in critical habitat for California red-legged frog (USFWS 2006).



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Biological Resources

Common Name	Scientific Name	Federal Status ¹	State Status ²	CNPS List ³	Habitat	Potential for Occurrence on the Project Site
California tiger salamander	<i>Ambystoma californiense</i> pop. 1	T	T	N/A	Seasonal water bodies without fish (i.e., vernal pools and stock ponds) and grassland or woodland habitats containing burrows.	Unlikely: there is no potentially suitable breeding habitat for this species in or adjacent to the site. The nearest occurrence of California tiger salamander in the CNDDDB (2025) is approximately 3.5 miles southeast of the site. The site is not in California tiger salamander critical habitat (USFWS 2005a).
Foothill yellow-legged frog	<i>Rana boylei</i> pop. 4	T	E	N/A	Perennial water bodies (i.e., streams and ponds) with abundant riparian vegetation.	Unlikely: there is no suitable aquatic habitat for foothill yellow-legged frog in the site. The nearest occurrence of this species in the CNDDDB (2025) is approximately 4.5 miles south of the site.
Northwestern pond turtle	<i>Actinemys marmorata</i>	PT	SC	N/A	Marshes, creeks and ditches with aquatic vegetation.	Unlikely: there is no suitable aquatic habitat in the site for this species; turtles are not expected to occur in the Upper Main Canal. The nearest occurrence of northwestern pond turtle in the CNDDDB (2025) is approximately 3.5 miles northwest of the site.
Western spadefoot	<i>Spea hammondi</i>	PT	SC	N/A	Breeds and lays eggs in seasonal water bodies such as deep vernal pools or stock ponds.	Unlikely: there is no suitable breeding habitat for western spadefoot in or adjacent to the site. The nearest occurrence of this species in the CNDDDB (2025) is approximately 4.5 miles south of the site.
San Joaquin coachwhip	<i>Masticophis flagellum ruddocki</i>	None	SC	N/A	Open, dry habitats with little or no tree cover; valley grassland.	Unlikely: the site does not provide suitable habitat for San Joaquin coachwhip. The nearest occurrence of this species in the CNDDDB (2025) is approximately 3 miles southwest of the site.
California glossy snake	<i>Arizona elegans occidentalis</i>	None	SC	N/A	Arid scrub, rocky washes, grasslands, and chaparral.	Unlikely: the site does not provide suitable habitat for California glossy snake; grassland habitat in the site is highly disturbed. The nearest occurrence of this species in the CNDDDB (2025) is approximately 4.5 miles southeast of the site.
Coast horned lizard	<i>Phrynosoma blainvillii</i>	None	SC	N/A	Coniferous forest, deciduous forest, scrub, and grassland habitats, usually in sandy soils.	Unlikely: the site does not provide suitable habitat for coast horned lizard; grassland habitat in the site is highly disturbed. The nearest occurrence of this species in the CNDDDB (2025) is approximately 3 miles southwest of the site.
Fish						
Green sturgeon – southern DPS	<i>Acipenser medirostris</i>	T	None	N/A	Spawns in the large tributaries to the delta; delta important for rearing juveniles.	None: there is no suitable aquatic habitat in the site for green sturgeon. The nearest occurrence of this species in the CNDDDB (2025) search area is



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Biological Resources

Common Name	Scientific Name	Federal Status ¹	State Status ²	CNPS List ³	Habitat	Potential for Occurrence on the Project Site
	<i>pop. 1</i>					approximately 4 miles north of the site. The site is not in designated critical habitat for green sturgeon (NOAA 2009).
Invertebrates						
Vernal pool fairy shrimp	<i>Branchinecta lynchi</i>	T	None	N/A	Vernal pools.	Unlikely: there are no vernal pools in the site. There are no occurrences of this species in the CNDDDB (2025) search area. The site is not in designated critical habitat for vernal pool fairy shrimp (USFWS 2005b).
Vernal pool tadpole shrimp	<i>Lepidurus packardii</i>	E	None	N/A	Vernal pools.	Unlikely: there are no vernal pools in the site. There are no occurrences of vernal pool tadpole shrimp in the CNDDDB (2025) search area. The site is not within designated critical habitat for vernal pool tadpole shrimp (USFWS 2005b).
Valley elderberry longhorn beetle	<i>Desmocerus californicus dimorphus</i>	T	None	N/A	Elderberry shrubs in the Central Valley and surrounding foothills	Unlikely: one blue elderberry shrub was observed approximately 25 feet east of the site. This shrub is small and lacks suitable habitat for valley elderberry longhorn beetle. The nearest occurrence of valley elderberry longhorn beetle in the CNDDDB (2025) is approximately 4.5 miles southwest of the site.
Monarch butterfly	<i>Danaus plexippus</i>	C	None	N/A	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico.	Unlikely: monarch butterfly may fly over the site during its migration, but is not expected to reproduce in the site due to a lack of milkweed and other floristic resources. This species is also commonly known to overwinter in coastal environments. There are no occurrences of this species in the CNDDDB (2025) search area.
Crotch bumble bee	<i>Bombus crotchii</i>	None	CE	N/A	Open grassland and scrub habitats throughout California; rarely found in the Central Valley.	Unlikely: the site does not provide suitable habitat for Crotch bumble bee. The nearest occurrence of Crotch's bumble bee in the CNDDDB (2025) is approximately 3.5 miles northeast of the site.

T = Threatened; E = Endangered; C = Candidate for Listing.

T = Threatened; E = Endangered; PT = Proposed for Threatened Status; CE = Candidate for Endangered Status; FP = Fully Protected; R = Rare; SC = State of California Species of Special Concern. CNPS List 1B includes species that are rare, threatened, or endangered in California and elsewhere; list 2 includes species that are rare, threatened, or endangered in California but more common elsewhere.

Source: Moore Biological Consultants 2025



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Biological Resources

3.4.2 Regulatory Setting

This subsection briefly describes federal, state, and local regulations, permits, and policies pertaining to biological resources and wetlands as they apply to the Project.

Federal

Endangered Species Act

The FESA protects plants and animals that are listed as endangered or threatened by USFWS and the National Marine Fisheries Service (NMFS). Section 9 of the FESA prohibits, without authorization, the taking of listed wildlife, where take is defined as “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in such conduct” (50 CFR 17.3). For plants, this statute governs removing, possessing, maliciously damaging, or destroying any listed plant under federal jurisdiction and removing, cutting, digging up, damaging, or destroying any listed plant in any other area in knowing violation of state law (16 U.S. Code [USC] 1538).

Under Section 7 of the FESA, federal agencies are required to consult with USFWS and/or NMFS if their actions, including permit approvals and funding, could adversely affect a listed (or proposed) species (including plants) or its critical habitat. Through consultation and the issuance of a biological opinion (BO), USFWS and NMFS may issue an incidental take statement allowing take of the species that is incidental to an otherwise authorized activity provided the activity will not jeopardize the continued existence of the species. Section 10 of FESA provides for the issuance of incidental take permits where no other federal actions are necessary provided a habitat conservation plan (HCP) is developed.

Critical Habitat

Critical Habitat is defined in Section 3 of the FESA as:

- the specific areas within the geographical area occupied by a species, at the time it is listed in accordance with the FESA, on which are found those physical or biological features essential to the conservation of the species and that may require special management considerations or protection; and
- specific areas outside the geographical area occupied by a species at the time it is listed, upon a determination that such areas are essential for the conservation of the species.

For inclusion in a Critical Habitat designation, habitat within the geographical area occupied by the species at the time it was listed must first have features essential to the conservation of the species (16 USC 1533). Critical Habitat designations identify, to the extent known and using the best scientific data available, habitat areas that provide essential life cycle needs of the species (areas on which are found the primary constituent elements). Primary constituent elements are the physical and biological features that are essential to the conservation of the species and that may require special management considerations or protection. These include but are not limited to the following:

- Space of individual and population growth and for normal behavior;



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Biological Resources

- Food, water, air, light, minerals, or other nutritional or physiological requirements;
- Cover or shelter;
- Sites for breeding, reproduction, or rearing (or development) of offspring;
- Habitats that are protected from disturbance or are representative of the historic, geographically, and ecological distribution of a species.

Migratory Bird Treaty Act

The MBTA implements international treaties between the U.S. and other nations devised to protect migratory birds, any of their parts, eggs, and nests from activities such as hunting, pursuing, capturing, killing, selling, and shipping, unless expressly authorized in the regulations or by permit. As authorized under the MBTA, USFWS issues permits to qualified applicants for the following types of activities: falconry, raptor propagation, scientific collecting, special purposes (rehabilitation, education, migratory game bird propagation, and salvage), take of depredating birds, taxidermy, and waterfowl sale and disposal. The regulations governing migratory bird permits can be found in 50 CFR part 13 General Permit Procedures and 50 CFR part 21 Migratory Bird Permits. The State of California has incorporated the protection of nongame birds in Section 3800, migratory birds in Section 3513, and birds of prey in Section 3503.5 of the California Fish and Game Code.

U.S. Fish and Wildlife Service Birds of Conservation Concern

The 1988 amendment to the Fish and Wildlife Conservation Act mandates USFWS “identify species, subspecies, and populations of all migratory nongame birds that, without additional conservation actions, are likely to become candidates for listing under ESA.” To meet this requirement, USFWS published a list of Birds of Conservation Concern (BCC) (USFWS 2006) for the U.S. The list identifies the migratory and nonmigratory bird species (beyond those already designated as federally threatened or endangered) that represent USFWS’s highest conservation priorities. Depending on the policy of the Lead Agency, projects that result in substantial impacts to BCC may be considered significant under CEQA.

Clean Water Act

The purpose of the federal CWA is to “restore and maintain the chemical, physical, and biological integrity of the nation’s waters.” Section 404 of the CWA prohibits the discharge of dredged or fill material into “Waters of the U.S.” without a permit from the USACE. The definition of Waters of the U.S. includes rivers, streams, estuaries, the territorial seas, ponds, lakes, and wetlands. Under the CWA, wetlands were defined as those areas “that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions” (33 CFR 328.3 7b). However, in May 2023, the U.S. Supreme Court issued its ruling in *Sackett*, which restricted the definition of protected wetlands so that the CWA now applies to a wetland if it has a continuous surface connection with a Water of the U.S.

The USEPA also has authority over wetlands, including the authority to veto permits issued by USACE under CWA Section 404(c) and have indicated that they will interpret Waters of the U.S. consistent with the U.S. Supreme Court *Sackett* ruling.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Biological Resources

Projects involving activities that have no more than minimal individual and cumulative adverse environmental effects may meet the conditions of one of the Nationwide Permits already issued by USACE (Federal Register 82:1860, January 6, 2017). If impacts on wetlands could be substantial, an individual permit is required. A Water Quality Certification or waiver pursuant to Section 401 of the CWA is required for Section 404 permit actions; this certification or waiver is issued by the RWQCB.

State

California Endangered Species Act

The CESA (California Fish and Game Code Sections 2050-2116) protects species of fish, wildlife, and plants listed by the state as endangered or threatened. Species identified as candidates for listing may also receive protection. Section 2080 of the CESA prohibits the taking, possession, purchase, sale, and import or export of endangered, threatened, or candidate species, unless otherwise authorized by permit. Take is defined in Section 86 of the California Fish and Game Code as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” The CESA allows for take incidental to otherwise lawful projects under permits issued by CDFW.

Fully Protected Species

The State of California first began to designate species as “fully protected” prior to the creation of the FESA and CESA. Lists of fully protected species were initially developed to provide protection to those animals that were rare or faced possible extinction and included fish, amphibians and reptiles, birds, and mammals. Most fully protected species have since been listed as threatened or endangered under the FESA and/or CESA. Fully protected species are identified in the California Fish and Game Code Section 4700 for mammals, Section 3511 for birds, Section 5050 for reptiles and amphibians, and Section 5515 for fish.

These sections of the California Fish and Game Code provide that fully protected species may not be taken or possessed at any time, including prohibition of CDFW from issuing incidental take permits for fully protected species under the CESA. CDFW will issue licenses or permits for take of these species for necessary scientific research or live capture and relocation pursuant to the permit and may allow incidental take for lawful activities carried out under an approved Natural Community Conservation Plan within which such species are covered.

Native Plant Protection Act

The NPPA of 1977 (California Fish and Game Code Sections 1900-1913) was established with the intent to “preserve, protect and enhance rare and endangered plants in this state.” The NPPA is administered by CDFW. The Fish and Game Commission has the authority to designate native plants as “endangered” or “rare.” The NPPA prohibits the take of plants listed under the NPPA, but the NPPA contains a number of exemptions to this prohibition that have not been clarified by regulation or judicial rule. In 1984, the CESA brought under its protection all plants previously listed as endangered under the NPPA. Plants listed as rare under the NPPA are not protected under the CESA but are still protected under the provisions of the NPPA. The Fish and Game Commission no longer lists plants under the NPPA, referring all listings to the CESA.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Biological Resources

California Fish and Game Code Special Protections for Birds

In addition to protections contained within the CESA and California Fish and Game Code Section 3511 described above, the California Fish and Game Code includes a number of sections that specifically protect certain birds.

Section 3800 states that it is unlawful to take nongame birds, such as those occurring naturally in California that are not resident game birds, migratory game birds, or fully protected birds, except when in accordance with regulations of the California Fish and Game Commission or a mitigation plan approved by CDFW for mining operations.

Section 3503 prohibits the take, possession, or needless destruction of the nest or eggs of any bird.

Section 3503.5 protects birds of prey (which includes eagles, hawks, falcons, kites, ospreys, and owls) and prohibits the take, possession, or destruction of any birds and their nests.

Section 3505 makes it unlawful to take, sell, or purchase egrets, ospreys, and several exotic non-native species, or any part of these birds.

Section 3513 specifically prohibits the take or possession of any migratory nongame bird as designated in the MBTA.

Lake or Streambed Alteration Agreements

Section 1602 of the California Fish and Game Code requires individuals or agencies to provide a Notification of Lake or Streambed Alteration to CDFW for “any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake.” CDFW reviews the proposed actions and, if necessary, proposed measures to protect affected fish and wildlife resources. The final proposal mutually agreed upon by CDFW and the applicant is the Lake or Streambed Alteration Agreement.

Porter-Cologne Water Quality Act

The RWQCB implements water quality regulations under the federal CWA and the Porter-Cologne Water Quality Act. These regulations require compliance with the National Pollutant Discharge Elimination System (NPDES), including compliance with the California Storm Water NPDES General Construction Permit for discharges of stormwater runoff associated with construction activities. General Construction Permits for projects that disturb one or more acres of land require development and implementation of a Storm Water Pollution Prevention Plan. Under the Porter-Cologne Water Quality Act, the RWQCB regulates actions that would involve “discharging waste, or proposing to discharge waste, with any region that could affect the water of the state” [Water Code Section 13260(a)]. Waters of the State are defined as “any surface water or groundwater, including saline waters, within the boundaries of the state” [Water Code Section 13050 (e)]. The RWQCB regulates all such activities, as well as dredging, filling, or discharging materials into Waters of the State, which are not regulated by USACE due to a lack of connectivity with a navigable water body. The RWQCB may require issuance of a Waste Discharge Requirements for these activities.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Biological Resources

California Environmental Quality Act

In accordance with CEQA Guidelines Section 15380, a species or subspecies not specifically protected under the FESA, CESA, or NPPA may be considered endangered, rare, or threatened for CEQA review purposes if the species meets certain criteria specified in the Guidelines. These criteria include definitions similar to definitions used in the FESA, the CESA, and the NPPA. Section 15380 was included in the CEQA Guidelines primarily to address situations in which a project under review may have a significant effect on a species that has not been listed under the FESA, the CESA, or the NPPA, but that may meet the definition of endangered, rare, or threatened. Animal species identified as SSC by CDFW and plants identified by the CNPS as rare, threatened, or endangered may meet the CEQA definition of rare or endangered.

Species of Special Concern

SSC are defined by the CDFW as a species, subspecies, or distinct population of an animal native to California that are not legally protected under FESA, the CESA, or the California Fish and Game Code, but currently satisfies one or more of the following criteria:

- The species has been completely extirpated from the state or, as in the case of birds, it has been extirpated from its primary seasonal or breeding role.
- The species is listed as federally (but not state) threatened or endangered or meets the state definition of threatened or endangered species but has not formally been listed.
- This species has or is experiencing serious (nonscyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for state threatened or endangered status.
- The species has naturally small populations that exhibit high susceptibility to risk from any factor that if realized, could lead to declines that would qualify it for state threatened or endangered status.
- SSC are typically associated with habitats that are threatened.

Depending on the policy of the Lead Agency, projects that result in substantial impacts to SSC may be considered significant under CEQA.

California Rare Plant Ranks

The CNPS maintains the Inventory of Rare and Endangered Plants of California (CNPS 2023), which provides a list of plant species native to California that are threatened with extinction, have limited distributions, and/or low populations. Plant species meeting one of these criteria are assigned to one of six CRPRs. The rank system was developed in collaboration with government, academia, non-governmental organizations, and private sector botanists, and is jointly managed by CDFW and the CNPS. The CRPRs are currently recognized in the CNDDDB. The following are definitions of the CNPS CRPRs:

- Rare Plant Rank 1A – presumed extirpated in California and either rare or extinct elsewhere.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Biological Resources

- Rare Plant Rank 1B – rare, threatened, or endangered in California and elsewhere.
- Rare Plant Rank 2A – presumed extirpated in California, but more common elsewhere.
- Rare Plant Rank 2B – rare, threatened, or endangered in California but more common elsewhere.
- Rare Plant Rank 3 – a review list of plants about which more information is needed.
- Rare Plant Rank 4 – a watch list of plants of limited distribution.

Additionally, CNPS has defined Threat Ranks that are added to the CRPR as an extension. Threat Ranks designate the level of threat on a scale of 1 through 3, with 1 being the most threatened and 3 being the least threatened. Threat Ranks are generally present for all plants ranked 1B, 2B, or 4, and for the majority of plants ranked 3. Plant species ranked 1A and 2A (presumed extirpated in California), and some species ranked 3, which lack threat information, do not typically have a Threat Rank extension. The following are definitions of the CNPS Threat Ranks:

- Threat Rank 0.1 – Seriously threatened in California (over 80 percent in occurrences threatened/high degree and immediacy of threat).
- Threat Rank 0.2 – Moderately threatened in California (20-80 percent of occurrences threatened/moderate degree and immediacy of threat).
- Threat Rank 0.3 – Not very threatened in California (<20 percent of occurrences threatened/low degree and immediacy of threat or no current threats known).

Factors, such as habitat vulnerability and specificity, distribution, and condition of occurrences, are considered in setting the Threat Rank; and differences in Threat Ranks do not constitute additional or different protection (CNPS 2023).

Depending on the policy of the Lead Agency, substantial impacts to plants ranked 1A, 1B, or 2 and 3 are typically considered significant under CEQA Guidelines Section 15380. Significance under CEQA is typically evaluated on a case-by-case basis for plants ranked 4 and at the discretion of the CEQA Lead Agency.

Local

San Joaquin County General Plan

The County's General Plan presents a vision for the County's future, looking ahead to 2035. This long-range planning document includes a comprehensive framework for the County's physical, economic, and social development and environmental resources preservation, as well as policies to guide day-to-day decisions. The County's General Plan emphasizes that future development must occur in a way that makes the most of existing infrastructure and public facilities, minimizes impacts to natural resources, expands opportunities for job growth, restores and revitalizes unincorporated communities, and provides greater opportunities to all County residents.

The County's General Plan includes the following goals and policies related to biological resources that are applicable to the Project (San Joaquin County 2016):



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Biological Resources

Goal NCR-1: To conserve and enhance the County's open space resources.

- **Policy NCR-1.1: Preserve Natural Areas.** The County shall protect, preserve, and enhance important natural resource habitat, biological diversity, and the ecological integrity of natural systems in the County.

Goal NCR-2: To preserve and protect wildlife habitat areas for the maintenance and enhancement of biological diversity and ecological integrity.

- **Policy NCR-2.1: Protect Significant Biological and Ecological Resources.** The County shall protect significant biological and ecological resources including: wetlands; riparian areas; vernal pools; significant oak woodlands and heritage trees; and rare, threatened, and endangered species and their habitats.
- **Policy NCR-2.2: Collaboration for Species Protection.** The County shall collaborate with the California Department of Fish and Wildlife during the review of new development proposals to identify methods to protect listed species.
- **Policy NCR-2.3: San Joaquin County Multi-Species Habitat Conservation and Open Space Plan.** The County shall continue to implement the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan to mitigate biological impacts resulting from open space land conversion.
- **Policy NCR-2.4: Preservation of Significant Oak Groves.** The County shall require new development in the vicinity of significant oak groves to be designed and sited to maximize the long-term preservation of the trees and the integrity of their natural setting.
- **Policy NCR-2.5: No Net Loss of Wetlands.** The County shall not allow development to result in a net loss of riparian or wetland habitat.
- **Policy NCR-2.6: Criteria for Development Impacts to Wetlands.** The County shall not approve new development projects that have the potential to fill wetlands, unless:
 - no suitable alternative site exists for the land use, and the use is considered necessary to the public;
 - there is no degradation of the habitat or numbers of any rare, threatened, or endangered plant or animal species as a result of the project; and
 - habitat of greater quantity and superior or comparable quality will be created or restored to compensate for the loss.
- **Policy NCR-2.8: Natural Open Space Buffer.** The County shall require a natural open space buffer to be maintained along any natural waterway to provide nesting and foraging habitat and to protect waterway quality.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Biological Resources

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

The San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP), administered by the San Joaquin Council of Governments (SJCOG), is the largest habitat mitigation program in the County. Adopted in 2001, the SJMSCP is centrally concerned with the preservation of habitat land to satisfy the species protection requirements of federal and state law. The key purpose of the SJMSCP is to:

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

The plan also has had other indirect benefits, including the protection of agricultural resources. The 2001 SJMSCP calls for the preservation of about 100,000 acres, including 57,000 agricultural acres, over a 50-year period for the protection of a variety of biological species (SJCOG 2000). Many agricultural conservation easements in the County are the product of the SJMSCP.

The SJMSCP, in accordance with FESA Section 10(a)(1)(B) and CESA Section 2081(b) Incidental Take Permits, provides compensation for the Conservation of Open Space to non-Open Space uses that affect the plant, fish, and wildlife species covered by the SJMSCP. Among other activities, the SJMSCP compensates for conversions of open space for urban development.

San Joaquin County Tree Ordinance

San Joaquin County's natural resources regulations contain provisions to preserve county tree resources (San Joaquin County 2016). The removal of a native oak, heritage oak tree, or historical tree requires an approved improvement plan application (Chapter 9-1505.3), which requires replacement of the tree subject to requirements described in Chapter 9-1505.4. These provisions do not cover horticultural or orchard trees proposed for removal. Native oaks are defined as valley oaks with stem diameters of 15.2–81.3 centimeters (6–32 inches) for single-trunk trees and a minimum combined trunk diameter of 20.3 centimeters (8 inches) for multi-trunk trees and interior live oaks or blue oaks with stem diameters of 10.2–81.3 centimeters (4–32 inches) for single-trunk trees and a minimum combined diameter of 15.2 centimeters (6 inches) for multi-trunk trees. Heritage oaks are defined as native oaks with a single-trunk diameter of 81.3 centimeters (32 inches) or more (all stem diameters are measured 1.4 meters [4.5 feet] above the average ground elevation of the tree). Historical trees are defined as any trees or groups of trees given special recognition by the San Joaquin County Planning Commission because of size, age, location, or history.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Biological Resources

San Joaquin County Riparian Habitat Ordinance

San Joaquin County's natural resources regulations also contain provisions to preserve county riparian habitat resources (San Joaquin County 2016). Measures to avoid, protect, and mitigate for riparian habitat are presented in Section 9-1510.1 through 9-1510.5 of Chapter 9 in the San Joaquin County Development Title. Included in these sections is a description for a Riparian Habitat Mitigation Plan. The creation of this plan would be part of the conditions for approval which would be required when an action is proposed that had the potential to destroy, eliminate, or degrade riparian habitat in the county. Components of this plan would include a description of on-site riparian habitat (as well as protection measures), mitigation sites, contribution to existing off-site habitat site, replacement vegetation, maintenance, and conservation easements. This plan would address the potential impacts to or loss of existing riparian habitat in addition to a planning approach for habitat restoration or replacement, as necessary.

The establishment of natural bank buffers is also part of this provisions (Section 9-1510.5). This would require that a natural open space for riparian habitat and waterway protection be established parallel to any natural bank of a waterway approximately 100 feet from the mean high water level. This requirement would provide protection for potential wildlife habitat and water quality.

3.4.3 Environmental Impacts

This section analyzes the Project's potential to result in significant impacts related to biological resources. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid impacts.

Methodology

Consistent with the requirements of CEQA the significance of potential impacts is evaluated through the application of the significance criteria described below. The objective of the biological resources analysis is to identify potential adverse effects and/or significant impacts on biological resources. While avoidance is the preferred approach for the management of biological resources it is not always possible to completely avoid impacts to biological resources. If impacts can be avoided through Project design, establishment of exclusion zones, or other means, then specific mitigation measures may be unnecessary. However, appropriate mitigation measures to avoid or minimize impacts are identified, as appropriate, including procedures to be followed if significant biological resources are discovered during construction.

Direct and Indirect Impacts

The CEQA Guidelines define direct impacts as those impacts that result from the Project and occur at the same time and place. These include but are not limited to the removal of vegetation, disturbance to wildlife from construction activities, or the crushing of burrows. Indirect impacts are caused by the Project but can occur later in time or are farther removed in distance while still reasonably foreseeable and related to the Project. Indirect impacts can include the disruption of the native seed bank, the spread of invasive plant species, alterations in light regimes (i.e., shade from buildings, solar modules, nighttime lights), changes to soil or hydrology that adversely affect native species over time, and the disruption of prey base or increased predation through alterations of the physical landscape from Project features (i.e.,



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Biological Resources

fencing, power poles, solar modules) that provide perch sites or shelter for predators. Indirect impacts may also include increased traffic and human disturbance.

Permanent and Temporary Impacts

Project impacts are generally considered permanent if they involve the conversion of land to a new use, such as with the construction of new roads or buildings and the foundations of solar modules. Temporary impacts are usually considered to be those activities that are of short duration (i.e., 6 to 12 months) and that do not result in a permanent land use conversion. Temporary impacts are those effects that include ground disturbance activities restricted solely to the construction phase, such as crushing or driving over vegetation, grading of temporary roads and clearing vegetation within staging areas. These effects would be considered temporary provided the areas are subject to restoration at the conclusion of construction. Noise, human disturbance, vehicle traffic, and construction activities are also considered temporary impacts.

As described by the Applicant, construction of the Project would occur in phases over a 10-year period. This would exceed the typical definition of temporary impacts as it relates to certain species of plants or wildlife. For example, construction activity that results in repeated disturbance to an area for a period of three years may result in permanent effects to plants or wildlife that are fragile, short lived, or have unique dispersal/nesting requirements. The Applicant has indicated that construction of Phase 1 and Phase 2 of the Project will include the build out of the northern portion of the site and all site infrastructure while Phase 3 would include buildout of the southern portion of the site.

Operational Impacts

Operational impacts include both direct and indirect impacts to biological resources. Ongoing operations and maintenance impacts would occur during the expected routine use of the Project facilities. Operational impacts would also include activities related to landscaping maintenance, including but not limited to physical removal or herbicide treatment. These impacts would remain an ongoing source of disturbance for many plants and wildlife species that may occur within the Project site and adjacent areas.

Impacts of Proposed Mitigation

Mitigation measures proposed for the protection of biological resources may result in potential secondary impacts to other resources such as agricultural resources. For example, to mitigate habitat loss for special status species, restoration to natural conditions or limitations on use may be placed on agricultural lands resulting in reduced agricultural potential.

Biological Assessment Methodologies

Prior to the initial field survey in 2021, Moore Biological Consultants conducted a search of CNDDDB to identify documented occurrences of special-status species, 5 miles beyond the Project site boundary, which includes portions of the USFS 7.5-minute Clifton Court Forebay, Union Island, Midway, and Tracy topographic quadrangles, an area of approximately 240 square miles surrounding the site. Updated CNDDDB sea Updated CNDDDB searches were completed in 2023 and 2025. The USFWS IPaC Trust Resource Report of Federally Threatened and Endangered species that may occur in or be affected by



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Biological Resources

projects in the project vicinity was also reviewed. This database information was used to identify wildlife and plant species that have been documented in the project vicinity area or that may have the potential to occur if suitable habitat is present. Moore Biological Consultants also reviewed the USFWS, NWI, and NMFS on-line-maps of designated critical habitat. Moore Biological Consultants also reviewed the SJMSCP maps and the 2025 fee schedule. As discussed in further detail below, the field surveys were conducted to document site-specific observations.

On July 28, 2021, October 31, 2023, and September 19, 2025, Moore Biological Consultants conducted field surveys which consisted of walking and driving throughout the Project site making observations of habitat conditions and noting surrounding land uses, habitat types, plant and wildlife species, and taking representative photographs. The fieldwork included an assessment of potentially jurisdictional Waters of the U.S., as defined by the USACE, and/or Waters of the State, including wetlands.

The site was evaluated for special-status species and suitable habitat for special-status species (e.g., blue elderberry shrubs, vernal pools). Additionally, trees on and near the site were assessed for the potential use by nesting raptors, especially Swainson's hawk. The grassland areas on the Project site were searched for burrowing owls (*Athene cunicularia*) and ground squirrel burrows with evidence of past occupancy. Aquatic habitats in the site were also assessed for potential to support special-status species such as California red-legged frog (*Rana draytonii*) and western pond turtle (*Emys marmorata*).

Thresholds of Significance

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purposes of this EIR, implementation of the Project would be considered to have a significant adverse impact on biological resources if it would:

- 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 regulated by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and 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 HCP, Natural Community Conservation Plan, or other approved local, regional, or state HCP?



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Biological Resources

Project Impacts and Mitigation Measures

Impacts to Special-Status Species

Impact BIO-1	The Project would not 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 regulated by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

Impact Analysis

A search of CDFW's CNDDDB was conducted, as well as a review of the USFWS IPaC Trust Resource Report of Federally Threatened and Endangered species that may occur in or be affected on the Project site and its vicinity. A review of the SJMSCP was also conducted, in addition to field surveys in 2021, 2023, and 2025. As the Project site has been developed with agricultural uses as early as 1957, the likelihood of occurrence of listed, candidate and other special-status species on the Project site is generally low (Moore 2025).

Due to a lack of suitable habitat, no special-status plants were found or are expected to occur on the Project site. The orchard floors and narrow strips of grasslands along the farm roads of the Project site are highly disturbed and do not provide suitable habitat for any plants identified in the CNDDDB search.

With respect to special-status wildlife, the potential for intensive use of habitats within the Project site is low. Of the wildlife species identified in the CNDDDB, Swainson's hawk and burrowing owl are the only species with potential to occur within the Project site on more than a transitory or occasional basis. These species could be adversely affected by conversion of habitat development and/or disturbed by construction occurring in close proximity to active nests.

Swainson's Hawks

The Project site is within the nesting range of Swainson's hawks, and there are several occurrences of nesting Swainson's hawks in the CNDDDB search area within a few miles of the Project site, with the nearest nest occurring approximately 0.5 miles east of the site. None of the trees on the Project site are large enough to support nesting Swainson's hawks, but there is a cluster of trees directly adjacent to the east of the Project site that could be used for nesting. Alfalfa fields and open grassland areas adjacent to the site provide suitable foraging habitat. As implementation of the Project would require participation in the SJMSCP, payment of fees and compliance with standard Incidental Take Minimization Measures related to Swainson's hawks would be required for the Project. Mitigation Measure BIO-1, which requires the participation and compliance with the SJMSCP, would be implemented to reduce potential impacts to Swainson's hawks to less than significant levels.

Burrowing Owl

Burrowing owls are year-long residents of a variety of grasslands and scrub lands, and their primary habitat requirement is small mammal burrows for nesting. Burrowing owls usually nest in abandoned ground squirrel burrows. A few burrows were found along farm roads abutting the Project site and at the



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Biological Resources

bases of some almond trees along the south edge of the site near the railroad tracks, but no ground squirrels were observed at the Project site. No sign of burrowing owls, past or present, was observed within any of burrows within the Project site; however, burrowing owls are known to occur in the past in this area of the County and may nest on the Project site in the future. As implementation of the Project would require participation in the SJMSCP, measures related to minimization of impacts to burrowing owls would be required for the Project. Mitigation Measure BIO-2, which requires implementation of burrowing owl avoidance measures, would be implemented to reduce impacts to burrowing owls to less than significant levels.

Other Special-Status Species

The Project site does not provide highly suitable habitat for other special-status wildlife species. While other special-status birds may fly over the area on occasion, they would not be expected to nest or roost in or immediately adjacent to the Project site, primarily due to the lack of habitat. The site does not provide suitable habitat for American badger or San Joaquin kit fox, nor does it provide suitable aquatic or riparian habitat for any type of fish and a number of amphibians and reptiles. The site is not designated as critical habitat for any California or federally listed species, except for Delta smelt, which does not have the potential to occur on-site.

Implementation of Mitigation Measures BIO-1, BIO-2 and BIO-3 would minimize potential impacts to special-status species and potential impacts to migratory birds that are protected under the MBTA. Implementation of Mitigation Measures BIO-1, BIO-2 and BIO-3 would ensure that impacts to special-status and protected species are avoided or minimized, in accordance with the SJMSCP, and impacts would be less than significant with mitigation.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

- MM BIO-1 Swainson's Hawk Avoidance.** The Project will participate and comply with the requirements of the SJMSCP, which involves the payment of fees and compliance with standard Incidental Take Minimization Measures that would be issued for the Project. Pursuant to the SJMSCP, if construction is scheduled to commence during the nesting season (i.e., between March 1 and August 31) and Swainson's hawks are nesting in or near the Project site, a construction setback of twice the diameter of the drip-line of the nest tree (as measured from under the nest) shall be required until nesting is complete. The Project will implement Standard Take Avoidance Measures for Swainson's hawk:
- Perform pre-construction surveys for nesting Swainson's hawks within 14 days prior to the commencement of construction, for construction activities occurring between March 1 and September 15.
 - In the event a nest is found, then all construction activities shall remain a distance of twice the diameter of the drip-line of the nest tree (as measured from under the nest) until nesting is complete.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Biological Resources

- If a nest tree becomes occupied during construction activities, then all construction activities shall remain a distance of twice the diameter of the drip-line of the nest tree (as measured from under the nest) until nesting is complete.
- Any nest tree removal must occur between September 1 and February 15, when the nests are unoccupied.

MM BIO-2

Burrowing Owl Avoidance. Pursuant to the requirements of the SJMSCP, if construction is scheduled to commence outside of the nesting season (i.e., if construction starts between September 1 and January 31) and burrowing owls are present on the Project site, they shall be passively relocated. In the event that construction commences during the nesting season and burrowing owls are present on the Project site, a 250-foot construction setback from the natal burrow (the burrow where owls lay eggs and raise their young) shall be required until nesting is complete. The Project will implement Standard Take Avoidance Measures for burrowing owl:

- Perform pre-construction surveys for burrowing owls within 14 days prior to the commencement of construction. The survey area shall include the Project site and accessible and visible areas within 250 feet of the site. If project activities are delayed or suspended for more than 15 days during the breeding season (February 1 through August 31) an updated survey shall be performed.
- In the event that active nests are found during the breeding season (February 1 through August 31), establish a 75-meter no construction setback around each occupied burrow. The setback shall remain in place until a biologist confirms that either egg laying has not commenced, or the young are capable of foraging independently and are capable of independent survival.
- If the owls remain on-site after nesting is complete, they may be passively relocated. Prior to relocation, a Burrowing Owl Exclusion Plan (BOEP) shall be prepared and submitted to the SJCOG Habitat Technical Advisory Committee (HTAC) for review and approval.
- In the event that owls are found during the non-breeding season (September 1 and January 31), they may be passively relocated. Prior to relocation, a BOEP shall be prepared and submitted to the HTAC for review and approval.

Level of Significance After Mitigation

Less Than Significant Impact with Mitigation.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Biological Resources

Riparian Habitats or Other Sensitive Natural Communities

Impact BIO-2	The Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

Impact Analysis

The Project site consists of almond orchards and sparse amounts of ruderal grassland vegetation. There are no riparian habitats or other sensitive natural communities such as vernal pool grasslands or oak woodlands in the Project Site. There is no designated critical habitat for any federally listed species on or adjacent to the Project site, except for the Delta smelt, which does not have the potential to occur on-site (Moore 2025). Therefore, Project implementation would not have substantial adverse effects on riparian habitats or other sensitive natural communities, and impacts would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Wetland Impacts

Impact BIO-3	The Project would not 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.

Impact Analysis

There are no potentially jurisdictional wetlands, Waters of the U.S., or Waters of the State on the Project site. The only aquatic habitat on the Project site is the WSID Upper Main Canal. The WSID Upper Main Canal is mapped as a "Riverine" feature on the NWI map and is depicted as a "blue-line stream" on the USGS topographic map. The WSID Upper Main Canal was constructed in uplands and is managed for agricultural purposes. Water in the WSID Upper Main Canal is pumped out of Old River, several miles northwest of the Project site and conveys water in a southeast direction to service agricultural lands; however, the WSID Upper Main Canal does not meet the technical and regulatory criteria of Waters of the U.S. No vernal pools, seasonal wetlands, marshes, creeks, lakes or other areas meeting the technical and regulatory criteria of jurisdictional Waters of the U.S. or Waters of the State were observed on the Project site (Moore 2025). Therefore, Project implementation would not have substantial adverse effects on state or federally protected wetlands, and impacts would be less than significant.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Biological Resources

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Migratory Species

Impact BIO-4	The Project would not 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.

Impact Analysis

Trees and grasslands in and around the Project site could be used by birds protected by the MBTA and/or the California Fish and Game Code. However, there are no wildlife movement corridors or native wildlife nurseries located on the Project site (Moore 2025). The Project would be required to comply with the requirements of the SJMSCP, which include protections for Swainson's hawks, which are migratory, as well as other protected avian and non-avian species. There are no aquatic habitats on the Project site that could support any native resident or migratory fish species. Mitigation Measure BIO-4 would be implemented to further reduce impacts to migratory birds that may use the trees and grasslands in and around the Project site. Therefore, with implementation of Mitigation Measures BIO-1, BIO-2, and BIO-3, , as well as compliance with other policies identified to reduce impacts to wildlife movement, Project implementation would not interfere substantially with the movement of wildlife species or impede the use of native wildlife nursery sites, and impacts would be less than significant.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

MM BIO-3	Pre-Construction Surveys during Nesting Season. If vegetation removal or construction commences during the general avian nesting season (March 1 through July 31), a pre-construction survey for all species of nesting birds shall be required. In the event active nests are found, work in the vicinity of the nests shall be delayed until the young fledge. The distance between the nest and work would depend on the type of nest found. Distances shall be consistent with the recommendations under the SJMSCP or a qualified biologist.

Level of Significance After Mitigation

Less Than Significant Impact with Mitigation.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Biological Resources

Tree Preservation Policies

Impact BIO-5	The Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Impact Analysis

Other than the almond orchard on the Project site, the only trees are several fan palms and a few volunteer almonds in the east portion of the Project site. No other trees, protected or not, were observed on the Project site (Moore 2025). Therefore, Project implementation would not conflict with local policies and ordinances protecting biological resources, such as General Plan's 2035 Natural and Cultural Resources Element, the San Joaquin County Tree Ordinance, and the San Joaquin County Riparian Habitat Ordinance, and impacts would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Conflicts with Habitat Conservation Plans

Impact BIO-6	The Project would not conflict with the provisions of an adopted HCP, Natural Community Conservation Plan, or other approved local, regional, or state HCP.

Impact Analysis

As discussed above, the County is a participant in the SJMSCP, a comprehensive, multi-jurisdictional plan that addresses biological and ecological diversity by conserving species and associated habitats while allowing approval of development in San Joaquin County. The Project would participate and comply with the requirements of the SJMSCP, which involves the payment of fees and compliance with standard Incidental Take Minimization Measures that would be issued for the Project, to avoid impacts on nesting birds and other avian species (Moore 2025). Therefore, Project implementation would not conflict with provisions of an adopted HCP, Natural Community Conservation Plan, or other approved local, regional, or state HCP, and impacts would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.



3.4.4 Notice of Preparation Comments Related to Biological Resources

As discussed in Section 1.0, Introduction, the County distributed a NOP of the Draft EIR for the Project beginning on March 31, 2023. The NOP was distributed for a 30-day comment period that ended on May 1, 2023. The Public Scoping Meeting on the Draft EIR for the Project was held on April 10, 2023. The comments received on the NOP and during the Public Scoping Meeting were considered in the preparation of this Draft EIR. No comments related to biological resources were submitted. See Table 1.2-1 in Section 1.0, Introduction for a summary of all comments made during the NOP scoping period.



3.5 CULTURAL RESOURCES

This section describes the environmental setting for cultural and historic resources, including the existing Project site conditions, regulatory setting, and potential impacts that could result from the Project, and, if significant impacts are identified, the mitigation measures that would reduce these impacts. Additional detail and background on cultural resources are based, in part, on the Cultural Resources Inventory and Evaluation Report prepared by Solano Archeological Services, LLC (Solano), September 2025, included in Appendix F to this EIR.

3.5.1 Environmental Setting

Prehistoric Context

Human occupation in the Sacramento-San Joaquin Delta region may have occurred as early as 12,000 years ago, during the Paleo-Indian period or later during the Lower Archaic, but few archaeological sites, pre-dating 5,000 years before the present day (BP) have been documented in the Delta or the broader Central Valley. It is possible that Holocene alluvial deposits buried many prehistoric sites, and the dynamic nature of the Delta and Central Valley waterways have also likely obscured and destroyed archaeological remains. For example, there are estimates that as much as 10 meters of sediment accumulated along the lower stretch of the Sacramento River drainage system during the last 5,000–6,000 years. One of the few early sites documented in the general region is CA-CCo-637 in eastern Contra Costa County; the site dates to approximately 8,500 BP and was located in an alluvial fan near present-day Kellogg Creek.

Prehistoric material culture found in central California subsequent to the Paleo-Indian and Lower Archaic periods has been categorized according to “horizons” or “patterns” that define broad technological, economic, social, and ideological elements over long periods of time and large areas. Three regional patterns are defined that are most relevant to the Project site and surrounding area, three of which are specific to the prehistory of the Tracy region. Referred to as the Windmill, Berkeley, and Augustine patterns, each represents a general pattern of resource exploitation and cultural manifestations that occurred between about 4,500 BP and Euro-American contact around the year 1800 (Solano 2025).

Ethnographic Context

The Project site is situated within the traditional lands of the Northern Valley Yokuts whose range extended from the Calaveras River to the southern extent of the San Joaquin River. They were one of Foothill, and Southern Valley Yokuts. Each ethnolinguistic group was composed of autonomous, culturally and linguistically related tribes or tribelets.

The Northern Valley Yokuts, who lived along the San Joaquin River and its tributaries and within the vicinity of the Project site, are one of the least-known of the California Indian groups. This is due to the almost complete destruction of their traditional lifeways by the early 19th century. What can be gleaned from the diaries and reports of Spanish soldiers and priests who encountered the native populations during the late 18th and early 19th centuries is that fish, waterfowl, and acorns were important food resources for the Northern Valley Yokuts. The local rivers and their tule marshes contained salmon, sturgeon, perch, suckers, and pike, which were caught using weighted nets and bone harpoons. Waterfowl, such as geese, ducks, and other aquatic birds, were abundant in the marshes and probably



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cultural Resources

played a major role in the Northern Valley Yokuts subsistence base. Dogs were domesticated and may have been raised for food, a taboo to some tribes, but not the Yokuts. Wild plant resources, especially acorns, were of prime importance and in a good year a valley oak could produce hundreds of pounds of acorns, which were then ground into meal and cooked into porridge. Tule reed roots were likewise gathered and ground into meal that was traditionally served as porridge.

Several northern Yokut tribelets inhabited the present-day Tracy area. These consisted of the *Chulamni* to the north of the City of Tracy, and the *Hoyima* to the southeast. The *Chulamni* tribelet built their villages near Tracy, along the banks of the Old River and San Joaquin River and along creeks in the Diablo Range. The largest *Chulamni* village site near Tracy was Cholbon, named “Pescadero” in Father Jose Viader’s 1810–1811 San Joaquin River expedition diary for the intensive fishing that apparently occurred at this location. Cholbon could also have been placed in the general vicinity of Tracy, either to the east or to the west, although other candidate locations are also offered. Regardless of the site’s specific location, its general placement in the vicinity of the Project site and surrounding area indicates that intensive Native American/Yokuts occupation and land-use occurred in the vicinity.

Euro-American contact with the Northern Valley Yokuts began with periodic incursions by Spanish explorers traveling through the Sacramento-San Joaquin Valleys in the late 18th and early 19th centuries. It was during this time that significant impacts to traditional lifeways began. Many Yokuts were lured or captured by missionaries and taken to Mission San Jose or Mission Santa Clara. A probable malaria epidemic in 1833 decimated the indigenous population, killing thousands. The influx of Europeans during the Gold Rush era further reduced the Yokuts population because of disease and violent encounters with the miners. Though little or no gold was found in the Yokuts territory, miners passing through on their way to the rich diggings in the Sierra Nevada foothills caused a significant degree of cultural upheaval. Former miners, who had seen the richness of the San Joaquin Valley on their way east to the diggings, later returned to settle and farm the former Yokuts lands (Solano 2025).

Historic Context of the Central Valley

The historic period in the Central Valley can be discussed under three distinct periods that affected the overall economic, social, and cultural development of California. These consist of the Spanish, Mexican, and American periods, which are summarized below.

Spanish Period

In 1772, Captain Pedro Fages, a Spanish soldier, entered the San Joaquin Valley area searching for military deserters. His diary was one among many that documented the environmental landscape and the cultural setting of the San Joaquin Valley. Fages entered the area from the south, and as he emerged from the lower portion of Tejon Pass, he saw the beautiful lakes, rivers, and plains and named the most prominent lake Buena Vista. Another early journey was undertaken in 1776 by Padre Francisco Garcés who traveled through the San Joaquin Valley in hopes of discovering a more direct route to Monterey, Spain’s Alta California capital at the time.

The most drastic and permanent change to the local Northern Valley Yokuts’ way of life was the establishment of the Spanish mission system. By the early 1800s, the mission fathers began a process of cultural change that forced the majority of the local Native Americans into mission complexes and surrounding lands. Spanish missionaries traveled into the San Joaquin Valley to recapture escaped



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cultural Resources

neophytes and recruit inland Native Americans for the coastal missions. At the expense of traditional skills, the Native Americans were taught the pastoral and horticultural skills of the Hispanic tradition.

Mexican Period

With the declaration of Mexican independence in 1821, Spanish control of Alta California ended, although little political or economic change actually occurred. Political change did not take place until mission secularization in 1834, when Native Americans were released from missionary control and the mission lands were granted to private individuals. Some researchers state that mission secularization removed the social protection and support on which Native Americans had come to rely. It exposed them to further exploitation by outside interests, often forcing them into a marginal existence as laborers for large ranchos.

Following mission secularization, the Mexican population grew as the Native American population continued to decline. Euro-American settlers began to arrive in California during this period and often married into Mexican families, becoming Mexican citizens, which made them eligible to receive land grants. In 1846, on the eve of the Mexican-American War, the estimated population of California was 8,000 non-natives and 10,000 Native Americans. However, these estimates have been debated. Cook (1976) suggests the Native American population was 100,000 in 1850; the U.S. Census of 1880 reports the Native American population at 20,385.

Regardless of the specific demographic makeup of California during the early-middle decades of the 19th century, numerous land grants were awarded to both Mexican and American citizens alike. The Project site is situated within the bounds of one of these grants: the *Rancho el Pescadero*. Rancho Pescadero was a 35,446-acre Mexican land grant in present-day Stanislaus and San Joaquin counties that was awarded in 1843 by Mexican Governor Manuel Micheltorena to Valentin Higuera and Rafael Feliz. The grant extended along the west bank of the San Joaquin River from about Banta in the north, to Del Puerto Creek and Rancho Del Puerto in the south and encompassed present-day Grayson. Higuera eventually sold the rancho to Hiram Grimes, Francis W. Grimes, and William H. McKee in 1849.

With the cession of California to the United States following the Mexican-American War (1846 to 1848), the Treaty of Guadalupe Hidalgo provided that the land grants would be honored. As required by the Land Act of 1851, a claim for Rancho Pescadero was filed with the Public Land Commission in 1852, and the grant was patented to Hiram Grimes, Francis W. Grimes, and William H. McKee in 1858. However, according to the 1865 General Land Office patent, the entire rancho (plus an additional 77 acres) was patented to Henry M. Naglee and Antonio Maria Pico.

American Expansion

In 1826, Jedediah Smith was among the first trappers to explore the San Joaquin Valley, but other fur trapping expeditions soon followed. In 1848, as a result of the Treaty of Guadalupe Hidalgo, California became a United States territory. Also in 1848, John Marshall found gold at Sutter's Mill in present-day El Dorado County, which marked the start of the Gold Rush. The influx of miners and entrepreneurs increased the population of California, not including native Californians, from 14,000 to 224,000 in just four years. This, in turn, stimulated commercial growth in the San Joaquin Valley as entrepreneurs set up business to support the miners and mining operations. When the Gold Rush was over, many of the miners settled in the San Joaquin Valley and established farms, ranches, and lumber mills (Solano 2025).



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cultural Resources

Historic Context of the City of Tracy

The permanent settlement within what is now the City of Tracy began with the construction of the Central Pacific Railroad through the Altamont Pass in 1869. The Southern Pacific laid a second rail line to the north in 1878, connecting San Joaquin County with Martinez. In 1887, a third line was extended south from the junction of these two railways, connecting the San Francisco Bay Area with Los Angeles. This strategic location led to early prosperity in the area as a commercial and service center. The “Town of Tracy” was incorporated in 1910, and was named after Lathrop J. Tracy, an Ohio railroad man and grain merchant.

The City was unique because it was planned along symmetrical arc-shaped streets located on either side of the railroad junction. There are several buildings within Tracy that have local historical significance, and many are currently listed on the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR). Since incorporation, Tracy has continued to grow, particularly over the past 50 years. The establishment of the Tracy Defense Depot during World War II created thousands of jobs and brought new residents to the area. Following the war, Tracy continued to be a hub for major agricultural industries as well as large shipping and distribution facilities thanks to its proximity to several major interstates and relatively inexpensive land. Today, Tracy is the second most populous city in San Joaquin County, with a population of over 83,000.

Project Site

The Project site is currently in agricultural use as an almond orchard. Most of the site is unpaved, with the exception of West Schulte Road, which bisects the site horizontally. The West Side Irrigation District (WSID) Canal, which is earthen-lined, also extends through the site. There are no buildings on the Project site. Archival research indicated that no previously documented cultural resources were present within the Project site. A Sacred Lands File search conducted by the Native American Heritage Commission (NAHC) indicated that no culturally significant properties were known to exist in or near the Project site (Solano 2025). In addition, an intensive field survey conducted in 2021 documented two previously unrecorded cultural resources: a single isolated prehistoric resource, which was a single bead; and a segment of a 1940s irrigation canal. Neither of these resources is recommended as eligible for listing on the CRHR due to a lack of significant associations or characteristics and a lack of data potential.

3.5.2 Regulatory Setting

Federal

No federal regulations related to cultural resources are relevant to the Project.

State

The following state regulations pertaining to cultural resources apply to the Project. Please refer to Section 3.17, Tribal Cultural Resources, for a list of state regulations that specifically pertain to tribal cultural resources.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cultural Resources

California Environmental Quality Act (Public Resources Code 21000 *et seq.*)

Under CEQA, a project that would cause a substantial adverse change in the significance of an “historical resource” is a project that may have a significant effect on the environment. (CEQA Guidelines Section 15064.5[b]). An “historical resource” is a resource that meets one of the following criteria (CEQA Guidelines Section 15064.5[a]):

- The resource is listed in or determined eligible for listing in the California Register of Historical Resources.
- The resource is included in a local register of historical resources, as defined in Section 5020.1(k) of the PRC,
- The resource is identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the PRC, unless the preponderance of evidence demonstrates that it is not historically or culturally significant; or
- The Lead Agency determines the resource to be significant as supported by substantial evidence in light of the whole record.

CEQA also requires consideration of impacts on “unique archeological sites” (CEQA Guidelines Section 15064.5([c],[f])). Most archeological sites that meet the definition of a unique archeological site also meet the definition of an “historical resource.”

California Register of Historical Resources

On September 27, 1992, Assembly Bill 2881 (Statutes of 1992, Chapter 1075) was signed into law amending the PRC as it affects historical resources (PRC Section 4850 *et seq.*) This legislation, which became effective on January 1, 1993, also created the CRHR. A historical resource must be significant at the national, state, or local level, under one or more of the following four CRHR criteria:

- It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
- It is associated with the lives of persons important to local, California, or national history;
- It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; or
- It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

Integrity is the authenticity of a historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance. All resources nominated for listing on the CRHR must have integrity. Resources, therefore, must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. It must also be judged with reference to the particular criteria under which a



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cultural Resources

resource is proposed for eligibility. Alterations over time to a resource or historic changes in its use may themselves have historical, cultural, or architectural significance.

It is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the NRHP, but they may still be eligible for listing in the CRHR. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if it maintains the potential to yield significant scientific or historical information or specific data.

Section 15064.5 of the CEQA Guidelines states: “Generally, a project that follows the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, shall be considered as mitigated to a level of less than a significant impact on the historical resource.”

Native American Heritage Commission

This commission, established in 1976, was created in response to demands from Native Americans to protect their burial grounds from destruction. NAHC authorizes California’s Most Likely Descendants (MLDs) the right to determine the treatment, disposition, and analysis of Native American human remains. The NAHC and its authority were established by California PRC 5097.9.

Local

San Joaquin County General Plan

The General Plan presents a vision for the County’s future, looking ahead to 2035. This long-range planning document includes a comprehensive framework for the County’s physical, economic, and social development and environmental resources preservation, as well as policies to guide day-to-day decisions. The General Plan emphasizes that future development must occur in a way that makes the most of existing infrastructure and public facilities, minimizes impacts to natural resources, expands opportunities for job growth, restores and revitalizes unincorporated communities, and provides greater opportunities to all County residents.

The General Plan includes the following goals and policies related to cultural resources that are applicable to the Project (San Joaquin County 2016):

Goal NCR-6: To protect San Joaquin County’s valuable architectural, historical, archeological, and cultural resources.

- **Policy NCR-6.1: Protect Historical and Cultural Resources.** The County shall protect historical and cultural resources and promote expanded cultural opportunities for residents to enhance the region’s quality of life and economy.
- **Policy NCR-6.2: No Destruction of Resources.** The County shall ensure that no significant architectural, historical, archeological, or cultural resources are knowingly destroyed through County action.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cultural Resources

- **Policy NCR-6.5: Protect Archeological and Historical Resources.** The County shall protect significant archeological and historical resources by requiring an archeological report be prepared by a qualified cultural resource specialist prior to the issuance of any discretionary permit or approval in areas determined to contain significant historic or prehistoric archeological artifacts that could be disturbed by project construction.
- **Policy NCR-6.6: Tribal Consultation.** The County shall consult with Native American tribes regarding proposed development projects and land use policy changes consistent with the State's Local and Tribal Intergovernmental Consultation requirements.

3.5.3 Environmental Impacts

This section analyzes the Project's potential to result in significant impacts related to cultural resources. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid impacts.

Methodology

Consistent with the requirements of CEQA, the significance of potential impacts is evaluated through the application of the significance criteria described below. The objective of the cultural resources analysis is to identify potential adverse impacts and/or significant impacts on cultural, historical and archaeological resources. While avoidance is the preferred approach for the management of cultural resources, it is not always possible to completely avoid impacts to cultural resources. If impacts cannot be avoided through Project design, establishment of exclusion zones, or other means, then specific mitigation measures may be unnecessary. However, appropriate mitigation measures to avoid or minimize impacts are identified, as appropriate, including procedures to be followed if significant cultural resources are discovered during construction.

Direct and Indirect Impacts

The CEQA Guidelines define direct impacts as those impacts that result from the Project and occur at the same time and place. These include, but are not limited to, the removal of historic structures or culturally sensitive resources and ground disturbing activities which may unearth or damage unknown buried resources or remains. Indirect impacts are caused by the Project but can occur later in time or are farther removed in distance while still reasonably foreseeable and related to the Project. Indirect impacts can include the disruption of landform or area of cultural significance.

Permanent and Temporary Impacts

Project impacts are generally considered permanent if they involve the conversion of land to a new use, such as with the construction of new roads or buildings. Temporary impacts are usually considered to be those activities that are of short duration (i.e., 6 to 12 months) and that do not result in a permanent land use conversion. Temporary impacts are those effects that include ground disturbance activities restricted solely to the construction phase, such as grading of temporary roads or trenching for installation of utilities. These effects would be considered temporary provided the areas are subject to restoration at the conclusion of construction. Noise, human disturbance, vehicle traffic, and construction activities are also considered temporary impacts.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cultural Resources

As described by the Applicant, construction of the Project would occur in phases over a 10-year period. This would exceed the typical definition of temporary impacts. For example, construction activity that results in repeated disturbance to an area for a period of three years may result in permanent effects to fragile resources. The Applicant has indicated that construction of Phase 1 and Phase 2 of the Project will include construction of the northern portion of the site including all utilities over the first 5 years of construction. Phase 3 will construct the southern portion of the site with full operation within 10 years.

The greatest extent of potential impacts to subsurface cultural resources would occur during the construction phase of the Project and, specifically, during grading. Any operational impacts, such as landscaping and routine facility maintenance, would not result in greater ground disturbance than what had already occurred on-site from construction. As a result, operational impacts would not occur and are not evaluated herein.

Record Search and Literature Review Methods and Results

Information Center Record Search Results

On July 16, 2021, the Central California Information Center (CCIC), at California State University, Stanislaus, provided Solano Archaeological Resources with the results of a review of the CCIC archives for information on previously known or recorded cultural resources, studies, and isolates within the Project site and a half-mile radius extending from the Project site boundaries. The CCIC research included, but was not necessarily restricted to, a review of the following sources:

- The National Register of Historic Places (Historic Properties Directory, California Office of Historic Preservation);
- The California Register of Historic Places (Historic Properties Directory, California Office of Historic Preservation);
- The California Historical Landmarks (California Office of Historic Preservation);
- The California Points of Historical Interest (California Office of Historic Preservation); and
- The California Inventory of Historic Resources (California Department of Parks and Recreation).

The results from the CCIC search (IC No. 11836L) indicated that one cultural resource consisting of a historic-era barbed wire and wood post fence line (P-39-004287) had been documented in the search area; however, Solano noted that this fence did not extend into the current Project site but only came close to the Project site boundary. An additional six resources were identified outside the Project site but within the half-mile search radius, see Table 3.5-1.

Table 3.5-1. Previously Recorded Resources Within a Half-Mile Radius of the Project Site

Site No. (P-39-)	Association	Site Description	Date First Recorded	Recorder
P-39-000002	Historic Era	Southern Pacific RR alignment	1975	San Joaquin County Historical Society
P-39-000089	Historic Era	Delta Mendota Canal	1995	Woodward-Clyde Consultants



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Cultural Resources

Site No. (P-39-)	Association	Site Description	Date First Recorded	Recorder
P-39-004288	Historic Era	Telegraph pole alignment	2001	URS Corporation
P-39-004289	Historic Era	Electric transmission towers	2001	URS Corporation
P-39-004358	Historic Era	Trash scatter, fence line, misc.	2002	MACTEC
P-39-004388	Historic Era	Isolated trash deposit	2002	MACTEC

Source: Solano 2025

The CCIC records search also indicated that eight previous cultural resources studies have included at least portions of the current Project site resulting in 100 percent survey coverage. An additional nine studies have been conducted outside the Project site but within the half-mile search radius.

Additional Archival Research

In order to ascertain patterns of public-private land ownership within the Project site and identify potential undocumented cultural resources and sensitive landforms, Solano conducted additional archival research focused on historic mapping and federal land transfer records. This research consisted of reviews of the Bureau of Land Management's General Land Office (GLO) archives, including patent records, plat maps, historical USGS topographic quadrangle maps, and other archival sources.

A review of the 1857 GLO plat map of Township 2 South, Range 4 East, does not show any developments within or adjacent to the Project site, with the exception of two un-named road alignments extending west-east through Section 25. GLO patent records indicate that no private individuals held land patents within or near the Project site, although the Western Pacific Railroad (WPRR), and the State of California both obtained grants in Sections 25, and 36 under two separate federal acts. In 1870, the WPRR obtained acreage in Section 25 as part of a far larger grant under the 1866 Oregon and California Railroad Act (14 Stat. 239). As part of the U.S. government's desire to foster settlement and economic development in the western states, Congress passed this Act, which made 3,700,000 acres of land available to support the construction of a railroad from Portland, Oregon to San Francisco. The land was distributed in 12,800-acre land grants for each mile of track completed.

Land within the Project site (Section 36) was granted to the State of California in 1857 under the 1853 California Enabling Act (10 Stat. 244). Enabling Acts for each of the public-land states admitted into the Union since 1802 included grants of designated sections of federal lands for the purpose of supporting public schools. The lands were not literally meant to be sites for school buildings. Instead, the state was able to sell and lease these lands to fund its school system. On March 3, 1853, "An Act to Provide for the Survey of the Public Lands in California, the Granting of Pre-Emption Rights Therein, and for Other Purposes" was adopted by the U.S. Congress. This Act provided that public lands in California,



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cultural Resources

specifically, Sections 16 and 36 in each Township, other than those claimed by recipients of Spanish or Mexican land grants, could be granted to the state for public schools or reserved as mineral lands.

USGS topographic mapping of the Project site and surrounding area dates to as early as 1916 at which time a single building was depicted just north of West Schulte Road within the Project site. This building is shown on subsequent printings of the Tracy quadrangle until 1955 when it no longer appears. No other developments appear in the Project site until 1942 when the alignment of the Upper Main Canal is depicted. Aerial photos show a comparable lack of development in the Project site, although the building shown on USGS mapping does not appear on the earliest (1949) aerial, indicating that the building had been demolished sometime prior to that date despite its still appearing on USGS mapping into the early 1950s. Based on an examination of USGS mapping, and historic aerial photographs, it appears that the entire Project site has been open space and/or agricultural land use since at least the early 20th century.

Field Methods

On July 28 and 29, 2021, Solano archaeologists conducted an intensive pedestrian survey of the Project site. Eroded embankments, rodent burrows, and other areas of exposed mineral soil were thoroughly inspected, and the Project area and findings were documented with digital photography and video recordings. A sub-meter accurate Trimble GPS unit was utilized to verify the Project site boundaries and locate existing built environment features.

Thresholds of Significance

The significance criteria used to identify cultural and historical resource impacts is from PRC Sections 21083.2 and 21084.1, and Section 15064.5 and Appendix G of the CEQA Guidelines. For the purposes of this EIR, implementation of the Project would cause a significant impact on cultural and historical resources if it would do the following:

- a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?
- b. Cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5?
- c. Disturb any human remains, including those interred outside of formal cemeteries?

CEQA Guidelines Section 15064.5 defines *substantial adverse impact* as physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource is materially impaired.

CEQA Guidelines Section 15064.5(b)(2) defines materially impaired for purposes of the definition of substantial adverse change as follows:

The significance of an historical resource is materially impaired when a project:

1. *Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or*



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cultural Resources

2. *Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or*
3. *Demolishes or materially alters in an adverse manner those physical characteristics of a Historical Resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.*

CEQA requires that if a project would result in an effect that may cause a substantial adverse change in the significance of a historical resource or would cause significant effects on a unique archaeological resource, then alternative plans or mitigation measures must be considered. Therefore, prior to assessing effects or developing mitigation measures, the significance of cultural resources must first be determined. The steps that are normally taken in a cultural resources investigation for CEQA compliance are as follows:

- Identify potential historical resources and unique archaeological resources;
- Evaluate the significance of the potential historical resources; and
- Evaluate the effects of the project on eligible (significant) historical resources and unique archaeological resources.

Project Impacts and Mitigation Measures

Historical Resources

Impact CUL-1	The Project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

Impact Analysis

In order to evaluate potential impacts to historical resources in and around the Project site, a records search was conducted by the CCIC, at California State University Stanislaus. This review provided information on previously known or recorded cultural resources, studies, and isolates within the Project site and a one-half-mile radius around it. As noted previously, based on the CCIC results, Solano determined that known cultural resources do not exist on the Project site.

The field survey of the Project site conducted by Solano in 2021 resulted in the documentation of two previously unrecorded cultural resources, consisting of a single isolated prehistoric stone bead, and a segment of the WSID Upper Main Canal.

The WSID Upper Main Canal is an important component of a larger water conveyance system dating to the early 20th century. While the WSID Upper Main Canal represents the broad patterns of history in California, archival research does not suggest that the overall canal or the segment within the Project site is associated with any specific historically significant event (CRHR Criterion 1). Similarly, research does



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cultural Resources

not indicate that any historically important individual was directly associated with the WSID Upper Main Canal, or was involved in its inception, design, or construction (CRHR Criterion 2). In addition, irrigation canals of this type are ubiquitous throughout the Central Valley and the WSID Upper Main Canal does not retain any unique characteristics and is not the earliest or necessarily best example of its type (CRHR Criterion 3). Lastly, although additional research could reveal further details on the exact date and methods of design and construction of the WSID Upper Main Canal segment in the Project site, it is unlikely that any new information could be obtained directly from the canal itself, and any new data is unlikely to elevate the WSID Upper Main Canal to a significant level per CRHR criteria. Consequently, the data potential of this resource appears to have been exhausted (CRHR Criterion 4). Due to a lack of significant historical associations and characteristics, and a lack of significant data potential, the WSID Upper Main Canal is not eligible for CRHR listing.

The isolated prehistoric or possibly ethnographic-period stone bead measured approximately 12 millimeters (mm) in diameter and about 3 mm thick. The center hole (for stringing) is approximately 2 mm in diameter. Due to a heavy patina, it was not possible to determine the specific material used in this artifact's manufacture but based on the color, it may be a type of steatite. Although the bead is largely intact, about half of the circumference has been broken away. No other prehistoric or ethnographic period artifacts were found in the Project site. Due to heavy agricultural disturbances that have occurred within and around the Project site throughout the 20th century, this artifact could have been brought in in a load of fill from an unknown location. As an isolated artifact, the bead retains no potentially significant associations (CRHR criteria A, B) or characteristics (CRHR Criterion C). In addition, the research potential (CRHR Criterion 4) of this artifact has been exhausted through the current level of documentation. Due to a lack of associations, characteristics, and data potential, this artifact is not eligible for CRHR listing.

Based on the archival research conducted by the CCIC, the 2021 field survey conducted by Solano, and the lack of significant historical associations, unique characteristics, and data potential, the WSID Upper Main Canal and the isolated artifact (stone bead) are not eligible for CRHR listing (Solano 2025). Therefore, Project implementation would not result in a substantial adverse change in the significance of a historical resource. The impact would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cultural Resources

Archaeological Resources

Impact CUL-2	The Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

Impact Analysis

Archaeological sites are protected by a wide variety of state policies and regulations under the California PRC, and cultural resources receive protection under both the California PRC and CEQA. The Project could affect archaeological resources and buried remains, as it would allow for grading and construction activities such as earth moving, that could potentially unearth previously unrecorded resources. A Sacred Lands File search and a list of appropriate Native American tribal contacts were requested from the NAHC for the Project. The Sacred Lands File search was negative, and 15 individuals and tribes identified by the NAHC were notified of the search to solicit information (Solano 2025).

In the unlikely event that a buried, unforeseen archaeological resource is discovered, the Project would be required to comply with policies, laws, and regulations related to reducing impacts to documented archaeological and cultural resources. Additionally, the Project would implement Mitigation Measure CUL-1, which would reduce potential impacts to unknown archaeological resources. With the implementation of Mitigation Measure CUL-1 and compliance with existing laws and regulations, impacts to archaeological resources would be less than significant.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

MM CUL-1 Archaeological Resources. Should buried, unforeseen archaeological deposits be encountered during any Project construction activity, work shall cease within a 50-foot radius of the discovery. The County, and the Project proponent shall ensure that a qualified professional archaeologist who meets the federal Secretary of the Interior's Standards in archaeology is retained to assess the significance of the find and recommend avoidance or treatment measures. Ground-disturbing work shall not resume within the 50-foot area until appropriate treatment has been completed.

Level of Significance After Mitigation

Less Than Significant Impact with Mitigation.

Unknown Buried Remains

Impact CUL-3	The Project would not be expected to disturb any human remains, including those interred outside of formal cemeteries.

Impact Analysis

Project construction activities could result in unknown human remains being unearthed during earth moving activities. California Health and Safety Code, Section 7050.5; CEQA Section 15064.5; and PRC Section 5097.98, mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery, which is provided in Mitigation Measure



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cultural Resources

CUL-2. Although construction activities associated with development of the Project could result in the discovery of human remains, compliance with existing law and Mitigation Measure CUL-2 would ensure that impacts would remain less than significant.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

MM CUL-2 Unknown Buried Resources. In the event that human remains, or any associated funerary artifacts are discovered during Project construction, all ground-disturbing work within 50 feet of the discovery shall cease and, in accordance with requirements of the PRC Section 15064.5(e), PRC Section 5097.98, and the California Health and Safety Code (Section 7050.5), the San Joaquin County Sheriff/Coroner shall be contacted immediately. If the remains are deemed to be of Native American origin, the Sheriff/Coroner will notify the NAHC, which will in turn appoint an MLD to act as a tribal representative. The MLD will work with the Project proponent and a qualified archaeologist to develop a plan for the proper treatment of the human remains and any associated funerary objects. Ground-disturbing activities shall not resume within 50 feet of the discovery until treatment has been completed.

Level of Significance After Mitigation

Less Than Significant Impact with Mitigation.

3.5.4 Notice of Preparation Comments Related to Cultural Resources

As discussed in Section 1.0, Introduction, the County distributed a NOP of the Draft EIR for the Project beginning on March 31, 2023. The NOP was distributed for a 30-day comment period that ended on May 1, 2023. The Public Scoping Meeting on the Draft EIR for the Project was held on April 10, 2023. The comments received on the NOP and during the Public Scoping Meeting were considered in the preparation of this Draft EIR. No comments related to cultural resources were submitted, comments related to tribal cultural resources are discussed in Section 3.17. See Table 1.2-1 in Section 1.0, Introduction for a summary of all comments made during the NOP scoping period.



3.6 ENERGY

This section describes the environmental setting for energy, including the existing site conditions, regulatory setting, and potential impact that would result from the Project, and, if significant impacts are identified, the mitigation measures that would reduce these impacts. Additional details and background information on energy resources are based, in part, on the Air Quality, Health Risk Assessment, and Greenhouse Gas Summary Methodology Memorandum prepared by Stantec in December 2023 (Stantec 2023a), included in Appendix C to this EIR and the Energy Calculations prepared by Stantec in December 2023 (Stantec 2023b), included in Appendix G to this EIR.

3.6.1 Environmental Setting

Energy Sources

Within San Joaquin County, energy is provided in the form of petroleum fuel (gasoline and diesel), electricity, and natural gas. Pacific Gas and Electric (PG&E) provides electricity and natural gas services to the Project area. PG&E is one of the largest combination natural gas and electric utilities in the United States. PG&E provides service to approximately 16 million people throughout a 70,000-square-mile service area in northern and central California (PG&E 2025a). PG&E and other utilities within California are regulated by the California Public Utilities Commission (CPUC). CPUC was created to ensure consumers within California have access to safe, reliable utility services and infrastructure at reasonable rates.

Petroleum

According to the U.S. Energy Information Administration (EIA), California used approximately 648 million barrels of petroleum in 2023. This total annual consumption equates to a daily use of approximately 1.78 million barrels of petroleum in the State. By sector, 86 percent (555,413 thousand barrels) of the State's petroleum was used by transportation, 10 percent from industrial uses (67,161 thousand barrels), 3 percent from commercial uses (19,242 thousand gallons), and 1 percent from residential uses (6,423 thousand barrels) (EIA 2025a).

Electricity

According to the EIA, California utilities sold approximately 239,480,452 megawatt hours (MWh) of electricity in 2023. By sector in 2023, 47 percent (112,935,566 MWh) of the State's electricity was used by commercial uses, 35 percent (82,820,898 MWh) for residential uses, 18 percent (42,998,557 MWh) for industrial uses, and 0.3 percent (725,431 MWh) for transportation (EIA 2024). In 2023, San Joaquin County consumed approximately 6,029 gigawatt hours (GWh) of electricity, which constitutes approximately 2.5 percent of the State's total electricity sold that year (CEC 2025a).

In 2024, PG&E's electricity power mix included 98 percent greenhouse gas (GHG) free sources. Specifically, approximately 23 percent of the electricity provided came from renewable sources (solar, small hydroelectric, wind, geothermal, biomass and waste), 63 percent came from nuclear power, 12 percent from large hydroelectric plants, and the remaining 2 percent from natural gas (PG&E 2025b).



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Energy

Natural Gas

Natural gas is used for cooking, space heating, generating electricity, and as an alternative transportation fuel. The majority of California's natural gas customers are residential and small commercial customers. According to the EIA, California used approximately 2,085 billion cubic feet of natural gas in 2023. Residential and commercial uses accounted for approximately 35 percent (720 billion cubic feet) of the natural gas delivered by California utilities in 2023. Other large consumers of natural gas within California include electric power generators, which account for approximately 30 percent (633 billion cubic feet) of the natural gas use in 2023. The remaining natural gas use comes from the industrial sector which accounts for 32 percent (676 billion cubic feet), and the transportation sector which accounts for 3 percent (55 billion cubic feet) (EIA 2025b). In 2023, San Joaquin County consumed approximately 20.1 billion cubic feet of natural gas, which accounted for approximately 1 percent of the State's total annual natural gas consumption (CEC 2025b).

3.6.2 Regulatory Setting

Federal

Federal Energy Regulatory Commission

The Federal Energy Regulatory Commission is an independent agency that regulates the interstate transmission of electricity, natural gas, and oil. The Federal Energy Regulatory Commission also reviews proposals to build liquefied natural gas terminals and interstate natural gas pipelines as well as licensing hydropower projects. Licensing of hydroelectric facilities under the authority of the Federal Energy Regulatory Commission includes input from State and federal energy and power generation, environmental protection, fish and wildlife, and water quality agencies.

National Energy Conservation Policy Act

The National Energy Conservation Policy Act (42 USC Section 8201 *et seq.*) serves as the underlying authority for federal energy management goals and requirements and is the foundation of most federal energy requirements. The National Energy Conservation Policy Act also established fuel economy standards for on-road motor vehicles in the United States. The National Highway Traffic Safety Administration (NHTSA) is responsible for establishing additional vehicle standards and for revising existing standards. NHTSA and the USEPA are taking coordinated steps to enable the production of clean energy vehicles with improved fuel efficiency. NHTSA sets the Corporate Average Fuel Economy (CAFE) levels, which are rapidly increasing over the next several years to improve energy security and reduce fuel consumption. In March 2022, the NHTSA finalized CAFE standards for model years 2024 to 2026. The standards require an industry-wide fleet average of approximately 49 miles per gallon for passenger cars and light trucks by model year 2026. The NHTSA projects that the foregoing standards will avoid the consumption of approximately 234 billion gallons of gasoline between model years 2030 to 2050 (NHTSA 2022).

Energy Independence and Security Act of 2007

The Energy Independence and Security Act (EISA) aimed to increase U.S. energy security, increased CAFE standards for motor vehicles, and included provisions related to energy efficiency, such as



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Energy

renewable fuel standards (RFS), appliance and lighting efficiency standards, and building energy efficiency standards. The EISA required increasing levels of renewable fuels to replace petroleum. The USEPA is responsible for developing and implementing regulations to ensure transportation fuel sold into the U.S. contains a minimum volume of renewable fuel.

The RFS programs regulations were developed in collaboration with refiners, renewable fuel products, and other stakeholders and were created under the Energy Policy Act of 2005. The RFS program established the first renewable fuel volume mandate in the U.S. As required under the EISA, the original RFS program required 7.5 billion gallons of renewable fuel to be blended into gasoline by 2012. The RFS program was expanded in several ways that laid the foundation for achieving significant reductions of GHG emissions through the use of renewable fuels, for reducing imported petroleum, and for encouraging the development and expansion of the nation's renewable fuels sector. The updated program is referred to as RFS2, and includes the following:

- EISA expanded the RFS program to include diesel, in addition to gasoline;
- EISA increased the volume of renewable fuel required to be blended into transportation fuel from 9 billion gallons in 2008 to 36 billion gallons by 2022;
- EISA established new categories of renewable fuel and set separate volume requirements for each one; and
- EISA required by the USEPA to apply lifecycle GHG performance threshold standards to ensure that each category of renewable fuel emits fewer GHGs than the petroleum fuel it replaces.

Additional provisions of the EISA address energy savings in government and public institutions, promoting research for alternate energy, additional research in carbon capture, international energy programs, and the creation of “green jobs.”

Federal Vehicle Standards

The Energy Policy and Conservation Act of 1975 (EPCA) mandated that the NHTSA establish and implement a regulatory program for motor vehicle fuel economy, known as the CAFE program, to reduce national energy consumption. As codified in Chapter 329 of Title 49 of the USC and as amended by the EISA, EPCA sets forth specific requirements concerning the establishment of average fuel economy standards for passenger cars and light trucks. The EISA, discussed above, amended the EPCA CAFE program requirements by providing the Department of Transportation additional rulemaking authority and responsibilities.

Consistent with its statutory authority in rulemaking to establish CAFE standards for model year 2017 and beyond, NHTSA developed two phases of standards. The first phase included final standards for model years 2017–2021. The second phase, covering model years 2022–2025, included standards that were not final, due to the statutory requirement that NHTSA set average fuel economy standards not more than five model years at a time. Rather, NHTSA wrote that those standards were augural, meaning that they represented its best estimate, based on the information available at that time, of what levels of stringency might be maximum feasible in those model years. In 2012, the agencies jointly adopted more stringent Phase 2 standards for light duty cars and trucks, which would cover model years 2017 through 2025. In



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Energy

August of 2016, the agencies adopted more stringent Phase 2 standards for medium- and heavy-duty vehicles, which would cover model years 2018 through 2027 for certain trailers and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks.

On March 31, 2020, NHTSA and the USEPA released a new rule, the final Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, setting CAFE and carbon dioxide emissions standards for model years 2021 through 2026 passenger cars and light trucks. The rule rolls back the 2012 standards for model years 2021 through 2026 for passenger cars and light trucks, which had required an average fleetwide fuel economy equivalent of 54.5 miles per gallon in model year 2025 with a 5 percent annual increase to an average fuel economy of about 40 miles per gallon in model year 2025 with annual increases of 1.5 percent starting in 2021. As a part of issuing the new SAFE rule, NHTSA issued a Final Environmental Impact Statement which found that the relaxed standards would result in increased petroleum consumption which in turn would result in increases to GHG and criteria pollutant emissions known to contribute to adverse health impacts (NHTSA 2020). The estimated increases from the roll back of the 2012 standards were expected to result in more than a billion metric tons additional climate pollution through 2040 as determined by calculating the difference from the reduction of 2 billion metric tons the 2012 rule was expected to accomplish compared to the standards of the 2020 rule (NHTSA 2020). On January 20, 2021, Executive Order 13990, Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis, requires a review of the Part One Rule by April 2021 and review of the Part Two Rule by July 2021. In response to the Part One Rule, in December 2021, the Department of Transportation withdrew its portions of the SAFE rule. As a result, states are now allowed to issue their own GHG emissions standards and zero-emissions vehicle (ZEV) mandates. In addition, the Part Two Rule was adopted to revise the existing national GHG emission standards for passenger cars and light trucks through model year 2026. These standards are the strongest vehicle emissions standards ever established for the light-duty vehicle sector and will result in avoiding more than three billion tons of GHG emissions through 2050.

State

California Public Utilities Commission

The CPUC is a State agency created by a constitutional amendment to regulate privately-owned utilities providing telecommunications, electric, natural gas, water, railroad, rail transit, and passenger transportation services and in-State moving companies. The CPUC is responsible for ensuring that California utility customers have safe, reliable utility services at reasonable rates, while protecting utility customers from fraud. The CPUC regulates the planning and approval for the physical construction of electric generation, transmission, or distribution facilities, and local distribution pipelines of natural gas.

California Energy Code

Compliance with the California Energy Code (Title 24, Part 6, of the CCR, California's Energy Efficiency Standards) and Title 20, Public Utilities and Energy, standards must occur for all new buildings constructed in California. These efficiency standards apply to new construction of both residential and nonresidential buildings, and they regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local building permit processes, and local government agencies may adopt and enforce energy standards for new buildings provided that these standards meet or exceed those provided in the Title 24 guidelines.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Energy

Warren-Alquist Energy Resources Conservation and Development Act

Initially passed in 1974 and amended since, the Warren-Alquist Energy Resources Conservation and Development Act (Warren-Alquist Act) created the California Energy Commission (CEC), California's primary energy policy and planning agency. The seven responsibilities of the CEC are forecasting future energy needs, promoting energy efficiency and conservation through setting standards, supporting energy-related research, developing renewable energy resources, advancing alternative and renewable transportation fuels and technologies, certifying thermal power plants 50 megawatts or larger, and planning for and directing State response to energy emergencies. The CEC regulates energy resources by encouraging and coordinating research into energy supply and demand problems to reduce the rate of growth of energy consumption. Additionally, the Warren-Alquist Act acknowledges the need for renewable energy resources and encourages the CEC to explore renewable energy options that would be in line with environmental and public safety goals (Warren-Alquist Act PRC section 25000 *et seq.*)

California Integrated Energy Policy

The California Integrated Energy Policy, SB 1389, requires the CEC to "conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices. The CEC shall use these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the State's economy, and protect public health and safety." (PRC Section 25301[a]). The CEC adopts an Integrated Energy Policy Report every two years and an update every other year. The most recent version is the 2024 Integrated Energy Policy Report Update (CEC 2024).

California Renewables Portfolio Standard

California's Renewable Portfolio Standard (RPS) was initially established in 2002 by SB 1078, with the initial requirement that 20 percent of electricity retail sales be served by renewable resources by 2017. The program was accelerated in 2006 under SB 107, which required that the 20 percent mandate be met by 2010. In April 2011, SB 2 was signed into law, requiring electricity retailers in the State to procure 33 percent of their energy sources from renewable energy sources by the end of 2020 (CPUC 2021). SB 350, passed in 2015, directs California utilities to further increase the amount of renewable energy delivered to customers to 50 percent by 2030. Finally, in 2018 SB100 increased the RPS to 60 percent by 2030 and established a goal for 100 percent of the State's electricity to come from renewable and carbon-free resources by 2045.

CPUC implements and administers RPS compliance rules for California's retail sellers of electricity, which include large and small investor-owned utilities, publicly owned utilities, electric service providers, and community choice aggregators. The CEC is responsible for the certification of electrical generation facilities as eligible renewable energy resources and adopting regulations for the enforcement of RPS procurement requirements of public owned utilities.

Senate Bill 350 and Senate Bill 100

Under SB 350, the state of California committed to reaching 50 percent renewable energy by December 31, 2030. SB 100 revises these goals to achieve 50 percent renewable resources by December 31, 2026, and achieve a 60 percent target by December 31, 2030, in order to plan for 100 percent of total retail



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Energy

sales of electricity in California to come from eligible renewable energy and zero carbon resources by December 31, 2045.

Executive Order B-48-18

The executive order (EO) was designed to boost the use of zero-emission vehicles (ZEVs), electric vehicle charging infrastructure, and hydrogen refueling infrastructure in California. The order will implement the Governor's target of 5 million ZEVs on the road by 2030 and 250,000 vehicle charging stations and 200 hydrogen refueling stations by 2025.

Local

San Joaquin County 2035 General Plan

The General Plan presents a vision for the County's future, looking ahead to 2035. This long-range planning document includes a comprehensive framework for the County's physical, economic, and social development and environmental resources preservation, as well as policies to guide day-to-day decisions. The General Plan emphasizes that future development must occur in a way that makes the most of existing infrastructure and public facilities, minimizes impacts to natural resources, expands opportunities for job growth, restores and revitalizes unincorporated communities, and provides greater opportunities to all County residents.

The General Plan includes the following goals and policies related to energy that are applicable to the Project (San Joaquin County 2016):

- **Goal PHS-5:** To protect public health, agricultural crops, scenic resources, and the built and natural environments from air pollution.
 - **PHS-5.14: Energy Consumption Reduction.** The County shall encourage new development to incorporate green building practices and reduce air quality impacts from energy consumption.
- **Goal PHS-6:** To reduce greenhouse gas emissions as part of the Statewide effort to combat climate change.
 - **PHS-6.6: Business-Related GHG Reduction Strategies.** The County shall encourage all businesses to help reduce GHG emissions by: replacing high mileage fleet vehicles with more efficient and/or alternative fuel vehicles; increasing the energy efficiency of facilities; transitioning toward the use of renewable energy instead of non-renewable energy sources; adopting purchasing practices that promote emissions reductions and reusable materials; and increasing recycling.
- **Goal NCR-5:** To increase energy independence through the use of renewable energy sources and improved energy conservation and efficiency.
 - **NCR-5.1: Nonrenewable Energy and Energy Efficiency.** The County shall support the efforts of residents, businesses, and energy providers to reduce the consumption of nonrenewable energy and shall promote energy providers' programs to increase energy efficiency and implement demand response programs.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Energy

- **NCR-5.2: Alternative Energy.** The County shall encourage residents, businesses, and energy providers to develop and use alternative, renewable energy sources, including but not limited to, biomass, solar, wind, and geothermal.
- **NCR-5.9: Shaded Parking Lots.** The County shall require parking lots to be shaded in the summertime but allow winter solar access to adjacent buildings and sidewalks.
- **NCR-5.11: Green Building Practices.** The County shall encourage green building practices in new construction.
- **NCR-5.12: Energy Efficient Industry.** The County shall support energy efficiency of industrial processes.
- **NCR-5.13: Solar Heating in Industrial Operations.** The County shall encourage industrial operations that require large amounts of hot water to incorporate active solar systems in the design of buildings.
- **NCR-5.14: Natural Daylighting in Commercial Operations.** The County shall encourage commercial and employment operations to incorporate natural daylighting by the use of windows and skylights to reduce energy demand for lighting.

3.6.3 Environmental Impacts

This section analyzes the Project's potential to result in significant impacts related to energy. If an impact is determined to be significant, mitigation measures are identified that would reduce or avoid impacts.

Methodology

The potential effect of construction and operation of the Project related to energy resources are quantitatively evaluated and presented below. Project energy demand during construction and operations was determined based on the modeling that was conducted for the Project using CalEEMod and using vehicle and equipment emission factors from the CARB's EMFAC2021 (v1.0.2) and EMFAC OFFROAD2021 (v1.0.5). The energy calculations are included as Appendix G to this EIR.

Thresholds of Significance

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purposes of this EIR, implementation of the Project may result in a potentially significant impact on energy if it would do the following:

- a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or
- b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.



Project Impacts and Mitigation Measures

Wasteful, Inefficient or Unnecessary Consumption of Energy Resources

Impact ENG-1	The Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation.

Impact Analysis

The energy requirements for the Project were determined using the construction and operational estimates generated from the calculation worksheets for energy consumption (Appendix G). This impact addresses the energy consumption from both construction and operations, discussed separately below.

Construction Energy Demand

During construction of the Project, energy resources would be consumed in the form of diesel and gasoline fuel from the use of off-road equipment (i.e., tractors, excavators, cranes) and on-road vehicles (i.e., construction employee commutes, vendor, haul trucks).

Temporary electricity may be required to provide as-necessary lighting and electric equipment; such electricity demand would be met by portable generator sets and, possibly, local distribution. Fuel demand associated with portable generators is incorporated in the off-road equipment estimate provided below. The amount of electricity used during construction would be minimal. Natural gas is not anticipated to be required during construction of the Project. Construction was assumed to occur over a 10-year period.

Off-Road Equipment

Construction activities associated with the Project, including site preparation, grading, paving, building construction, and architectural coating, was estimated to consume 1,224,265 gallons of diesel fuel from the use of off-road equipment. For comparison, in 2024, approximately 2.99 billion gallons of diesel fuel was purchased within California (CDTFA 2025). Therefore, the diesel fuel required to power the off-road equipment during one-year of construction of the Project would represent approximately 0.004 percent of the State's annual diesel demand. Construction equipment would be subject to fuel efficiency regulations including CARB's Pavley Phase II standards and anti-idling regulations in 13 CCR Section 2485. The anti-idling regulations would limit off-road construction equipment over 25 horsepower to a maximum idling time of five minutes. While this regulation was aimed to reduce air quality emissions, it would in turn result in a greater fuel efficiency during Project construction.

On-Road Vehicles

On-road vehicles for construction workers, vendors, and haulers would require fuel for travel to and from the site during construction. Vendor trips reflect the use of water trucks, and the haul trips reflect the removal of the existing orchard trees. Table 3.6-1 provides an estimate of the total on-road vehicle fuel usage during construction.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Energy

Table 3.6-1. Construction On-Road Vehicle Fuel Consumption (10- Year Totals)

Project Component	Gasoline Consumption (Gallons)		Diesel Consumption (Gallons)		Electricity Consumption (kWh)	
	Phase 1/ Phase 2	Phase 3	Phase 1/ Phase 2	Phase 3	Phase 1/ Phase 2	Phase 3
Worker Trips	1,552,455.06	882,911.49	6,199.56	3,083.82	632,883	606,346.70
Vendor Trips	300,983.61	154,163.36	1,632,182.94	969,663.69	199,283.89	778,971.28
Haul Trips	7.22	4.81	121,223.96	66,841.10	13,743.00	47,269.33
<i>Subtotals</i>	<i>1,853,446</i>	<i>1,037,080</i>	<i>1,759,606</i>	<i>1,039,589</i>	<i>845,910</i>	<i>1,432,587</i>
Project Total	2,890,526		2,799,195		2,278,498	

Notes: Calculations use unrounded numbers; totals may not appear to sum exactly due to rounding.

Source: Stantec 2023b.

As shown above, construction of the Project was estimated to consume 2,890,526 gallons of gasoline, 2,799,195 gallons of diesel, and 2,278,498 kWh of electricity associated with the use of on-road vehicles. For comparison, in 2024, approximately 13.4 billion gallons of gasoline and approximately 2.99 billion gallons of diesel fuel for motor vehicles was purchased within California (CDTFA 2025). Thus, the annual fuel required to power the on-road motor vehicles during construction of the Project would represent approximately 0.002 percent and 0.009 percent of the State's annual gasoline and diesel demand, respectively.

Project construction equipment would be subject to CARB's In-Use Off-Road Diesel Vehicle Regulation that applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The In-Use Off-Road Diesel Vehicle Regulation imposes the following: limits on idling; reporting of all vehicles to CARB; restricts adding older vehicles into fleets; and requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Emission Control Strategies.

Additionally, construction equipment would be subject to fuel efficiency regulations including CARB's Pavley Phase II standards and anti-idling regulations in 13 CCR Section 2485. The anti-idling regulations would limit commercial vehicles over 10,000 pounds and off-road construction equipment over 25 horsepower to a maximum idling time of five minutes. While this regulation was aimed to reduce air quality emissions, it would in turn result in a greater fuel efficiency during Project construction.

Overall, construction activities associated with the Project would result in the consumption of petroleum-based fuels. However, there are no unusual Project characteristics that would necessitate the use of construction equipment or vehicles that would be less energy efficient than at comparable construction sites in other parts of the State.

Operational Energy Demand

As noted previously, the Project would involve the construction of warehouse and distribution facilities on the Project site, as well as parking areas, outdoor storage, and water and wastewater treatment facilities. Therefore, energy demand during Project operations would be derived from operations of the buildings, fueling the vehicles travelling to and from the site, and fueling the off-road equipment used on-site. A



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Energy

summary of energy demand during operations is presented in Table 3.6-2 and described in further detail below.

Table 3.6-2. Operational Energy Use Summary

Project Component	Fuel Type	Annual Energy Consumption (Unmitigated)	Annual Energy Consumption (Mitigated)	Units
Industrial Building Energy	Electric	68,000,246	61,663,530	kWh
	Natural Gas	58,322,343	58,322,343	kBTU
Water and Wastewater Treatment	Electric	135,443	135,443	kWh
Transportation Energy ¹	Gasoline	3,209,770	3,209,770	gallons
	Diesel	4,110,188	4,110,188	gallons
	Electric	14,497,278	14,497,278	kWh
Off-Road Equipment	Diesel	54,818	0	gallons
	Electric	0	1,804,031	kWh
Emergency Generators	Diesel	329	329	gallons

Source: Stantec 2023b.

Notes:

¹ Fuel consumption would be reduced with implementation of Mitigation Measures TRANS-1 and TRANS-2. Implementation of these measures was not incorporated into the energy calculations. Both Mitigation Measures TRANS-1 and TRANS-2 would reduce vehicle miles traveled from employees to the Project site and would lower transportation gasoline, diesel, and electricity demand from the project.

Industrial Building Energy

During operation, the Project's would demand energy in the form of electricity and natural gas from the industrial buildings, water and wastewater treatment, generators, and on-site equipment. The proposed industrial buildings would require energy for typical operations, such as lighting and temperature controls. Over the course of a year, operational electricity consumption would total approximately 68,000 MWh, and natural gas consumption would total approximately 58,322 million BTU. It is noted that the proposed buildings would be constructed in compliance with the energy efficiency standards set forth in the applicable California Building Standards Code at the time of construction and would incorporate several sustainability features within the Project design. This would include installing energy efficient lighting and cooling systems, installing clerestory windows to provide natural light, light colored cool roofs, and timed outdoor lighting. A list of sustainability features is included in Section 2.4. Additionally, the Project would be constructed to meet LEED Silver standards with Mitigation Measure AQ-7, would install solar paneling to ensure a portion of the industrial building's energy demand is met by renewable energy sources with Mitigation Measure AQ-9, and would construct the roofs of the future buildings to be able support the installation of solar panels with Mitigation Measure AQ-8. Under Mitigation Measure AQ-8, future tenants would be able to install additional solar paneling depending on the electricity needs of the use. Implementation of regulatory requirements, sustainable project design features, and mitigation would reduce the energy demand of the industrial buildings. Specifically, with the implementation of some of these features, the industrial buildings' total electricity demand was reduced to approximately 61,700 MWh/year.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Energy

As such, the mitigated energy intensity (electricity and natural gas) of the Project's is approximately 14.69 kWh/square foot (50.15 kBTU/square foot). Energy Star has created benchmarks of energy intensity for developments by land use type. According to Energy Star, a distribution center/unrefrigerated warehouse has a median energy intensity of 15.5 kWh/square foot (52.9 kBTU/square foot) (Energy Star 2025).

Therefore, the Project's energy intensity, which includes all Project land use types (warehousing, manufacturing, refrigerated warehouse, and unrefrigerated warehouse), would be less than the Energy Star median energy intensity for a distribution center/unrefrigerated warehouse and the Project would not be any less energy efficient when compared to other industrial developments. Therefore, the Project's total energy consumption and would not result in the inefficient, wasteful, or unnecessary use of energy.

Water and Wastewater Treatment Systems

The water and wastewater treatment systems would require energy to pump, treat, and recycle water on the site. The water and wastewater treatment systems would be electric and would require approximately 135 MWh per year. Water and wastewater treatment systems use electricity to source, treat, and distribute water. Water sourcing would occur from raw water wells on the Project site and wastewater would be recycled for re-use on the Project site. Therefore, the on-site water and wastewater treatment facilities would have reduced energy demands from sourcing and distribution in comparison to other water and wastewater treatment facilities. As discussed above, the Project's total energy demand (including from water and wastewater treatment systems) would represent less than 0.03 percent of the State's electricity sales in 2023. Therefore, the Project's total energy consumption and would not result in the inefficient, wasteful, or unnecessary use of energy.

Transportation Energy

During normal operations, Project staff would travel to and from the Project site. In addition, heavy trucks are expected to travel to and from the site for material pick-up and delivery. The heavy trucks that would provide deliveries to the cold storage buildings are assumed to include diesel fueled TRUs for this analysis. As part of the wastewater treatment facility, brine would be hauled off-site in approximately 14 truckloads per year. Table 3.6-3 provides an estimate of the annual fuel consumed by vehicles traveling to and from the Project site. These estimates were derived using the same assumptions used in the operational criteria pollutant and GHG analysis for the Project.

Table 3.6-3. Operational Vehicle Fuel Consumption

Trip Type	Vehicle Type	Percent of Vehicle Trips ¹	Gasoline Consumption (Gallons)	Diesel Consumption (Gallons)	Electricity Consumption (kWh)
Daily Staff and Delivery Trips	Passenger Cars (LDA)	74.04	3,001,737	1,555	4,738,202
	Medium Duty Trucks (MHD)	12.59	207,846	1,452,921	5,685,388
	Heavy-Heavy Diesel Trucks (HHDT)	13.36	187	2,652,761	4,073,553
Brine Trucks	Heavy-Heavy Diesel Trucks (HHDT)	100	0	88	134
TRU Idling	TRU Trailers ²	100	0	2,864	0
Total		-	3,209,770	4,110,188	14,497,278

Notes:

Calculations use unrounded numbers; totals may not appear to sum exactly due to rounding.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Energy

Trip Type	Vehicle Type	Percent of Vehicle Trips ¹	Gasoline Consumption (Gallons)	Diesel Consumption (Gallons)	Electricity Consumption (kWh)

¹ The fleet mix is the average mix of vehicles by industrial land use type derived from the Transportation Impact Analysis prepared by Fehr & Peers in 2024.

² The fuel use from TRU Trailers assumes 3.3 hours of idling per truck per day. This value does not account for implementation of Mitigation Measure AQ-18, which requires cold storage warehouses to include electric hook ups for TRU trucks.

VMT = vehicle miles traveled

Source: Stantec 2023b.

As shown in the table, annual vehicular fuel consumption is estimated to be 3,209,770 gallons of gasoline, 4,110,188 gallons of diesel, and 14,497,278 kWh of electricity. These calculations do not account for the reduction in fuel use associated with implementation of Mitigation Measures TRANS-1 and TRANS-2. Mitigation Measures TRANS-1 and TRANS-2 would reduce vehicle traffic and VMT associated with the Project and, as a result, reduce the amount of petroleum fuel required during Project operation. Therefore, The Project would not result in vehicle use that is any more inefficient, wasteful, or unnecessary than other vehicle uses in the region.

Off-Road Equipment and Emergency Generators

During Project operations, tenants are anticipated to use off-road equipment on the Project site, primarily yard trucks. If the equipment was diesel fueled, use of the off-road equipment would consume an estimated 54,818 gallons of diesel fuel per year. However, the Project is required to implement Mitigation Measure AQ-12 and Mitigation Measure AQ-24, which requires that all off-road forklifts, yard trucks, and yard equipment used during operations to be zero-emission. Therefore, with implementation of Mitigation Measure AQ-12 and Mitigation Measure AQ-24, the Project's off-road operational equipment would not require any diesel fuel. It was assumed that the off-road equipment would be electric. The electricity demand associated with the off-road equipment was estimated to be approximately 1,804 MWh per year. As discussed above, the Project's total energy demand (including from electric off-road equipment) would represent less than 0.03 percent of the State's electricity sales in 2023.

Additionally, each building is anticipated to include a diesel-powered emergency generator. Outside of emergency situations, the generators would only be used for testing and maintenance, and would consume approximately 329 gallons of diesel fuel per year. This is a negligible contribution to the consumption of diesel fuel compared to the State's 2.99 billion gallons of diesel fuel purchased in 2024. Therefore, the Project's total energy consumption and would not result in the inefficient, wasteful, or unnecessary use of energy.

Conclusion

Based on the analysis above, the Project would not result in a potential significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources with mitigation.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measures AQ-7, AQ-8, AQ-9, AQ-12, AQ-24, TRANS-1, and TRANS-2 are required.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report
Energy

Level of Significance After Mitigation

Less than Significant with Mitigation.

Conflicts with Renewable Energy Plans

Impact ENG-2	The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Impact Analysis

Construction

Project construction equipment would be subject to CARB's In-Use Off-Road Diesel Vehicle Regulation that applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The In-Use Off-Road Diesel Vehicle Regulation imposes the following: limits on idling; reporting of all vehicles to CARB; restricts adding older vehicles into fleets; and requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Emission Control Strategies.

Additionally, construction equipment would be subject to fuel efficiency regulations including CARB's Pavley Phase II standards and anti-idling regulations in 13 CCR Section 2485. The anti-idling regulations would limit commercial vehicles over 10,000 pounds and off-road construction equipment over 25 horsepower to a maximum idling time of five minutes. While this regulation was aimed to reduce air quality emissions, it would in turn result in a greater fuel efficiency during Project construction.

Operation

Projects located within California and San Joaquin County are subject to a series of plans for renewable energy and energy efficiency. These plans include RPS, California Building Energy Efficiency Standards (California Code of Regulations Title 24, Part 6), the CALGreen Code (California Code of Regulations Title 24, Part 11), and SB 743 to reduce electricity and natural gas consumption. The Project would comply or exceed the requirements of all pertinent energy efficiency plans. Specifically, per Mitigation Measure AQ-7, the Project would be constructed to meet LEED Silver standards, per Mitigation Measure AQ-8, all buildings would be constructed to support rooftop solar paneling, and per Mitigation Measure AQ-9, a portion of all industrial buildings would be built with solar panels.

The Project would also be designed with elements to increase sustainability, minimize GHG emissions, reduce water and energy consumption, and decrease impacts related to construction activities and waste generation. All Project sustainability measures are listed in the Project Description, see Section 2.0. Measures directly related to energy consumption include the following:

- Energy efficient lighting and control systems utilized as integral part of lighting systems in all buildings.
- Encourage the use of daylight of clerestory windows to provide natural light and reducing the need for lighting during daylight hours.
- Light colored "cool" roofs required for all new buildings.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Energy

- Tree species would be chosen based on their large canopy characteristics at maturity and will be strategically placed on the west and east portions of the site to shade paving areas and building elevations to minimize heat gain.
- Canopies, awnings, and architectural shade structures are encouraged as part of the design guidelines, strategically sized to shade paved areas and building elevations and to minimize heat gain.
- High efficiency lighting, such as LED, would be utilized for traffic, street, and other outdoor lighting.
- Lighting levels for outdoor illumination must meet the minimum standards required for safety. All exterior lighting will be required to be controlled by timers, and unless otherwise enforced, only nighttime lighting required for parking lot security and safety will be provided.
- Building construction within the Project shall meet applicable standards for energy efficiency such as energy efficient heating and cooling systems, appliances, equipment, and HVAC control systems.

In regard to petroleum fuel during operation, vehicle and trucking fleets would comply with CARB's rules and regulations as well as the SAFE vehicle rules. The Project would also limit petroleum fuel use by enforcing idling to three minutes per Mitigation Measure AQ-13; implementing programs to reduce employee VMT including a rideshare program Mitigation Measures AQ-25; designing internal transportation facilities to accommodate future bus service per Mitigation Measure TRANS-1; and a transportation demand management plan per Mitigation Measures TRANS-2.

Conclusion

The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency with mitigation.

Level of Significance Before Mitigation

Less than Significant Impact.

Mitigation Measures

Mitigation Measures AQ-7, AQ-8, AQ-9, AQ-12, AQ-13, AQ-24, AQ-25, TRANS-1, and TRANS-2 are required.

Level of Significance After Mitigation

Less than Significant Impact.

3.6.4 Notice of Preparation Comments Related to Energy

As discussed in Section 1.0, Introduction, the County distributed a NOP of the Draft EIR for the Project beginning on March 31, 2023. The NOP was distributed for a 30-day comment period that ended on May 1, 2023. The Public Scoping Meeting on the Draft EIR for the Project was held on April 10, 2023. The comments received on the NOP and during the Public Scoping Meeting were considered in the preparation of this Draft EIR. Comments related to energy and where they are addressed in this section



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Energy

are provided in Table 3.6-4. Additionally, each comment includes a brief summary of how the concern was addressed, the impact, or why additional analysis is not required. Commenters may have made comments addressing multiple EIR sections, but only specific energy comments are provided in Table 3.6-4. See Table 1.2-1 in Section 1.0, Introduction for a summary of all comments made during the NOP scoping period.

Table 3.6-4. Comments Received on the NOP for Energy

Affiliation	Signatory	Date	Comment Description	Location Addressed in Energy Chapter	Response to Comment
Private Parties – Written Comments Received					
California Air Resources Board	Robert Krieger	April 28, 2023	CARB included a recommended construction measure to implement and plan for the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating on site.	Subsection 3.6.3, Environmental Impacts, Project Impacts and Mitigation Measures	The Project would be constructed to meet CALGreen Building standards and would be required to comply with Mitigation Measure AQ-8, AQ-12, AQ-17, AQ-18, and AQ-24 that will require the Project applicant to design the Project to be solar ready; provide infrastructure to power on-site, zero emission forklifts, yard trucks, and yard equipment; provide electric truck charging sufficient to charge all domiciled trucks; and electric docking plugs at cold storage. Project consistency with CARB recommended measures are evaluated in Section 3.3, Table 3.3-36.
California Department of Justice	Christie Vosburg	April 11, 2023	Recommendation to use Attorney General's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document, to reduce impacts to sensitive receptors.	- Subsection 3.3.3, Environmental Impacts, Project Impacts and Mitigation Measures - Section 3.3, Table 3.3-37	Energy impacts including a discussion of sustainability measures and mitigation applicable to reduce energy emissions is discussed in Section 3.6. Project consistency with the best practices and recommended mitigation in the AG's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document is evaluated in Section 3.3, Table 3.3-37.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Energy

Affiliation	Signatory	Date	Comment Description	Location Addressed in Energy Chapter	Response to Comment
Mitchell Tsai, on behalf of Nor Cal Carpenters	Mitchell Tsai	May 1, 2023	Commenter seeks to require the use of a local workforce to reduce energy impacts. The comment included as Exhibit A, a letter from Soil Water Air Protection Enterprise that summarizes the default worker trip parameters in CalEEMod and provides a conceptual emissions calculation of potential GHG emissions that may be saved from locally hiring construction workers within 10 miles of the Project site.	Subsection 3.6.3, Environmental Impacts, Project Impacts and Mitigation Measures	The modeling parameters used within this analysis are provided in Section 3.3.3. As discussed, the default number of construction worker trips were applied within the modeling and the trip distance for workers was increased from 11.89 miles to 15.5 miles in order to account for workers that may travel from other nearby urban areas. The analysis is intended to provide a conservative estimate of the potential petroleum fuel demand that construction workers may require to travel to and from the Project site. It is acknowledged that reducing the distance traveled would reduce petroleum fuel demand, however reducing the distance traveled in the EIR's analysis would be speculative and less conservative. Additionally, mitigation has been incorporated into the Project that would reduce the demand for petroleum based energy, including Mitigation Measure AQ-7, AQ-8, AQ-11, AQ-12, and AQ-24, TRANS-1, and TRANS-2. As a result, no other mitigation or reduction measures are required to reduce this impact.
			Commenter seeks to require the use of a local workforce to improve air quality. The comment included as Exhibit A, a letter from Soil Water Air Protection Enterprise that summarizes the default worker trip parameters in CalEEMod and	Subsection 3.3.3, Environmental Impacts, Methodology and Impact AQ-2.	The modeling parameters used within this analysis are provided in Section 3.3.3. As discussed, the default number of construction worker trips were applied within the modeling and the trip distance for workers was increased from 11.89 miles to 15.5 miles in order to account for



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Energy

Affiliation	Signatory	Date	Comment Description	Location Addressed in Energy Chapter	Response to Comment
			provides a conceptual emissions calculation of potential GHG emissions that may be saved from locally hiring construction workers within 10 miles of the Project site.		workers that may travel from other nearby urban areas. The analysis is intended to provide a conservative estimate of the potential air quality emissions that may be generated during Project construction. As shown in Tables 3.3-15, with the implementation of Tier 4 construction equipment, the Project's construction emissions would fall below SJVAPCD guidelines and no other mitigation would be required, including the use of a local workforce.
Sierra Club	Margo Praus	May 1, 2023	List of conditions of approval including measures related to air quality, greenhouse gas emissions and project setbacks, as well as the Attorney General's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document.	- Subsection 3.6.3, Environmental Impacts, Project Impacts and Mitigation Measures - Section 3.3, Table 3.3-37 - Section 3.3, Table 3.3-38	Energy impacts including a discussion of sustainability measures and mitigation applicable to reduce energy emissions is discussed in Section 3.6. Project consistency with the best practices and recommended mitigation in the AG's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document is evaluated in Table 3.3-37. Consistency with the other recommended conditions of approval related to air quality from Sierra Club are provided in Table 3.3-38.
San Joaquin Valley Air Pollution Control District	Brian Clements	May 1, 2023	SJVAPCD includes a series of industrial and warehouse emission reduction strategies, including strategies aimed at reducing energy use from petroleum fuel.	- Subsection 3.6.3, Environmental Impacts, Methodology. - Appendix C	Mitigation has been incorporated into the Project that would reduce the demand for gasoline and diesel fuel, including Mitigation Measure AQ-12, AQ-13, AQ-24, and AQ-25, TRANS-1, and TRANS-2.
Private Parties – Comment Cards at Scoping Meeting					
Interested Individual	Dotty Nygard	April 10, 2023	Request to follow Attorney General's "Warehouse Projects:	Subsection 3.6.3, Environmental	Energy impacts including a discussion of sustainability measures



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Energy

Affiliation	Signatory	Date	Comment Description	Location Addressed in Energy Chapter	Response to Comment
			Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act” document.	Impacts, Project Impacts and Mitigation Measures • Section 3.3, Table 3.3-37	and mitigation applicable to reduce energy emissions is discussed in Section 3.6. Project consistency with the best practices and recommended mitigation in the AG’s “Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act” document is evaluated in Section 3.3, Table 3.3-37.



3.7 GEOLOGY AND SOILS

This section describes the environmental setting for geology and soils, including the existing Project site conditions, regulatory setting, and potential impacts that could result from the Project, and, if significant impacts are identified, the mitigation measures that would reduce these impacts. Additional detail and background on geology and soils resources are based, in part, on the Preliminary Geotechnical Exploration Report (Geotech report) prepared by ENGEO on November 4, 2021, revised on January 29, 2024, included in Appendix H to this EIR.

3.7.1 Environmental Setting

San Joaquin County lies within the Great Valley geomorphic province which is characterized by a long alluvial plain that extends approximately 400 miles through central California (San Joaquin County 2014). The Great Valley is an elongated, northwest trending structural trough bound by the Coast Range on the west and the Sierra Nevada to the east (ENGEO 2021). The Great Valley can be further divided into the northern Sacramento Valley and the southern San Joaquin Valley with the County being located within the San Joaquin Valley portion of the province.

Project Site

The Geotech report identified that the Project site is mapped as Alluvial Fan Deposits, which is described as Pleistocene-aged alluvial fan deposits generally consisting of interbedded clay, silt, sand, and gravel. The Project site is located within a seismically active region; however, the site is not located within an Alquist-Priolo Earthquake Fault Zone. The two nearest earthquake faults designated as active seismic sources to the Project site are the Great Valley Fault, located approximately one mile south of the Project site, and the Greenville Fault, located approximately ten miles west of the Project site (ENGEO 2021).

Through laboratory testing on onsite soils, the Geotech report identified that the onsite soils have moderately to highly expansive surficial soils with high shrink/swell potential. Additionally, the Geotech report identified that the Project site's risk of liquefaction during a seismic event is low. The Project site is also identified to be within Zone X, an area of minimal flood hazard, by the Federal Emergency Management Agency's (FEMA) flood zone maps for the site (ENGEO 2021).

3.7.2 Regulatory Setting

Federal

Earthquake Hazards Reduction Act

The Earthquake Hazards Reduction Act was enacted in 1997 to "reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards and reduction program." To accomplish this, the Act established the National Earthquake Hazards Reduction Program (NEHRP). This program was significantly amended in November 1990, and refined the description of agency responsibilities, program goals, and objectives.

NEHRP's mission includes improved understanding, characterization, and prediction of hazards and vulnerabilities; improvement of building codes and land use practices; risk reduction through post-



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Geology and Soils

earthquake investigations and education; development and improvement of design and construction techniques; improvement of mitigation capacity; and accelerated application of research results. The NEHRP designates the FEMA as the Lead Agency of the program and assigns it several planning, coordinating, and reporting responsibilities. Programs under NEHRP help inform and guide planning and building code requirements such as emergency evacuation responsibilities and seismic code standards such as those to which the proposed Project would be required to adhere.

State

California Building Code

The State of California provides minimum standards for building design through the California Building Code (CBC, California Code of Regulations [CCR], Title 24). Where no other building codes apply, Chapter 29 regulates excavation, foundations, and retaining walls. The CBC applies to building design and construction in the state and is based on the federal UBC but is modified for California conditions with numerous more detailed and/or more stringent regulations.

The state earthquake protection law (California Health and Safety Code Section 19100 *et seq.*) requires that structures be designed to resist stresses produced by lateral forces caused by wind and earthquakes. Specific minimum seismic safety and structural design requirements are set forth in Chapter 16 of the CBC. The CBC identifies seismic factors that must be considered in structural design. Chapter 18 of the CBC regulates the excavation of foundations and retaining walls, construction on unstable soils, such as expansive soils and areas subject to liquefaction, and Chapter 04 regulates grading activities, including drainage and erosion control.

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (PRC Division 2, Chapter 7.5) provides policies and criteria to assist cities, counties, and state agencies in the exercise of their responsibility to prohibit the location of developments and structures for human occupancy across the trace of active faults. In order to assist cities and counties, the State Geologist delineates and compiles maps of earthquake fault zones to encompass all potentially and recently active traces of fault.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (PRC Division 2, Chapter 7.8 and CCR Title 14, Article 10) provides for a statewide seismic hazard mapping and technical advisory program to assist cities and counties in fulfilling their responsibilities for protecting the public health and safety from the effects of strong ground shaking, liquefaction, landslides or other ground failure and other seismic hazards caused by earthquakes.

National Pollutant Discharge Elimination System Permit

In California, the State Water Resources Control Board (SWRCB) administers the USEPA promulgated regulations (55 CFR 47990) requiring the permitting of stormwater-generated pollution under the National Pollutant Discharge Elimination System (NPDES). In turn, the SWRCB's jurisdiction is administered through Regional Water Quality Control Boards (RWQCBs). The NPDES permit system was established as part of the Federal Clean Water Act to regulate both point source discharges and non-point source



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Geology and Soils

discharges to surface water of the United States, including the discharge of soils eroded from construction sites.

Pursuant to these federal regulations, an operator must obtain a General Permit under the NPDES Stormwater Program for all construction activities with ground disturbance of 1 acre or greater. The General Permit requires the implementation of best management practices (BMPs) to reduce pollutant loads into the waters of the State and measures to reduce sediment and erosion control. In addition, a Stormwater Pollution Prevention Plan (SWPPP) must be prepared. The SWPPP addresses water pollution control during construction. SWPPPs require that all stormwater discharges associated with construction activity, where clearing, grading, and excavating results in soil disturbances, must by law be free of site pollutants.

Local

San Joaquin County Building Code Ordinance

San Joaquin County passed Ordinance No. 4616, adopting the 2022 California Building Code (CBC) with amendments into San Joaquin County Code. This is reflected in San Joaquin County Code Title 8, Division 1. City and county general plans typically incorporate the provisions of the CBC by reference and add additional safety factors for critical structures and to meet local conditions.

San Joaquin County General Plan

The General Plan presents a vision for the County's future, looking ahead to 2035. This long-range planning document includes a comprehensive framework for the County's physical, economic, and social development and environmental resources preservation, as well as policies to guide day-to-day decisions. The General Plan emphasizes that future development must occur in a way that makes the most of existing infrastructure and public facilities, minimizes impacts to natural resources, expands opportunities for job growth, restores and revitalizes unincorporated communities, and provides greater opportunities to all County residents.

The General Plan includes the following goals and policies related to geology and soils that are applicable to the Project (San Joaquin County 2016):

Goal PHS-1: To maintain a level of disaster preparedness necessary for the protection of public and private property, and the health, safety, and welfare of people living and working in San Joaquin County.

- **Policy PHS-1.7: Emergency Response Facilities Location.** The County shall ensure that emergency response facilities and other critical facilities (e.g., hospitals, health care facilities, emergency shelters, Sheriff substations, fire stations) are located to avoid hazardous areas (see Seismic and Geologic and Flood Hazards) and designed to remain functional following a major disaster.

Goal PHS-3: To protect life and property from seismic and geologic hazards.

- **Policy PHS-3.1: Consider Geologic Hazards for New Development.** The County shall consider the risk to human safety and property from seismic and geologic hazards in designating



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Geology and Soils

the location and intensity for new development and the conditions under which that development may occur.

- **Policy PHS-3.2: Location of Sensitive Land Uses.** The County shall not approve any of the following land uses if they are located within one-eighth of a mile of any active fault or on soil that is highly susceptible to liquefaction: facilities necessary for emergency services; major utility lines and facilities; manufacturing plants using or storing hazardous materials; high occupancy structures, such as multifamily residences and large public assembly facilities; and facilities housing dependent populations, such as prisons, schools, and convalescent centers.
- **Policy PHS-3.3: Emergency Service Facilities.** The County shall require emergency service facilities to be capable of withstanding earthquakes per the California Building Code, Chapter 16, Volume 2, and remain operational to provide emergency response.
- **Policy PHS-3.4: Liquefaction Studies.** The County shall require proposals for new development in areas determined by the County to have high liquefaction potential to include detailed site-specific liquefaction studies.
- **Policy PHS-3.5: Subsidence or Liquefaction.** The County shall require that all proposed structures, utilities, or public facilities within County-recognized areas of near-surface subsidence or liquefaction be located and constructed in a manner that minimizes or eliminates potential damage.
- **Policy PHS-3.6: Subsidence in the Delta.** The County shall promote regional and local efforts to reduce subsidence in the Delta.
- **Policy PHS-3.7: Erosion Control.** The County shall encourage the planting of vegetation to decrease loss of soil by erosion.

Goal NCR-6: To protect San Joaquin County's valuable architectural, historical, archeological, and cultural resources.

- **Policy NCR-6.2: No Destruction of Resources.** The County shall ensure that no significant architectural, historical, archeological, or cultural resources are knowingly destroyed through County action.
- **Policy NCR-6.5: Protect Archaeological and Historical Resources.** The County shall protect significant archeological and historical resources by requiring an archeological report be prepared by a qualified cultural resource specialist prior to the issuance of any discretionary permit or approval in areas determined to contain significant historic or prehistoric archeological artifacts that could be disturbed by Project construction.

3.7.3 Environmental Impacts

This section analyzes the Project's potential to result in significant impacts related to geology and soils. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid impacts.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Geology and Soils

Methodology

For purposes of this EIR, available USGS and CGS topographical and seismic maps, NRCS soils reports, and other studies that included relevant geologic data, were reviewed, and used to determine whether geological impacts could occur from the construction and operation of the Project. Additionally, the following analysis is based on information provided in the Geotech Report prepared by ENGEO in 2021 (Appendix H).

Thresholds of Significance

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For purposes of this EIR, implementation of the Project has a significant impact on geology and soils if it would do any of the following:

- a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:
 - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?
 - 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 a substantial direct or indirect risk 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 geological feature?



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Geology and Soils

Project Impacts and Mitigation Measures

Alquist-Priolo earthquake Fault Zoning Map

Impact GEO-1a	The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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.

Impact Analysis

As identified by the Geotechnical report prepared for the Project, the Project site is not located within an Alquist-Priolo Earthquake Fault Zone and therefore, the Project site is not at risk of rupture of a known earthquake fault. Therefore, the Project would not directly or indirectly cause potential substantial adverse effects involving the rupture of a known earthquake fault, and there would be no impact.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.

Strong Seismic Ground Shaking

Impact GEO-1b	The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.

Impact Analysis

The Project site is located within a seismically active region and an earthquake of moderate to high magnitude generated within the region could cause considerable ground shaking at the site. The Project would be required to be designed and constructed in accordance with CBC requirements to ensure that Project structures would be able to withstand ground shaking from an earthquake event. In addition to compliance with CBC requirements, the Project would be required to implement design recommendations included in the Geotech report as required by Mitigation Measure GEO-1. The Geotech report includes preliminary design recommendations for structures to withstand seismic events as well as the recommendation for the preparation of a design-level geotechnical report. Conformance with County requirements and applicable seismic design measures outlined by the CBC, and implementation of Mitigation Measure GEO-1, would ensure that the Project would be designed and constructed to withstand strong seismic ground shaking. Therefore, the Project would not directly or indirectly cause potential substantial adverse effects involving strong seismic ground shaking and impacts would be less than significant with mitigation.

Level of Significance Before Mitigation

Potentially Significant Impact.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Geology and Soils

Mitigation Measures

MM GEO-1 Implement Geotechnical Design Recommendations. Prior to the issuance of grading permits, the Applicant shall incorporate all design specifications and recommendations contained within the Preliminary Geotechnical Exploration Report prepared for the Project by ENGEO into relevant projects plans and specifications. These specifications pertain to but are not limited expansive soils, building foundations, foundation drainage, and backfill of excavations. The Applicant shall comply with all recommendations identified in the Preliminary Geotechnical Exploration Report. The Project site plans shall include any geotechnical design specification and recommendations required within the Preliminary Geotechnical Exploration Report and be submitted to the County and reviewed as part of the building permit review process.

Level of Significance After Mitigation

Less Than Significant Impact with Mitigation.

Ground Failure and Liquefaction

Impact GEO-1c	The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.

Impact Analysis

The Geotech report identified that risk of liquefaction at the Project site is low during a seismic event. However, the site does have the potential for moderately to highly expansive surficial soils with moderate to high shrink/swell potential. The Geotech report includes recommendations on construction considerations and foundation designs for the Project to reduce the potential impacts related to seismic-related ground failure. Additionally, as the Geotech report prepared is based on preliminary field investigations, it recommends a design-level geotechnical report be prepared with supplemental field investigations prior to final design to ensure that the Project is constructed and designed to withstand potential seismic-related ground failure. Implementation of recommendations included within the Geotech report and the preparation of a design-level geotechnical report would be required under Mitigation Measure GEO-1. Additionally, the Project would be required to be constructed and designed in accordance with most current CBC seismic design guidelines. Therefore, with implementation of Mitigation Measure GEO-1 and compliance with CBC guidelines, the Project would not directly or indirectly cause potential substantial adverse effects involving seismic-related ground failure and impacts would be less than significant with mitigation.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure GEO-1 is required.

Level of Significance After Mitigation

Less Than Significant Impact with Mitigation.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Geology and Soils

Landslides

Impact GEO-1d	The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.

Impact Analysis

The Project site is relatively flat and slopes from an elevation of 149 feet above sea level at the southwest corner of the Project area to an elevation of 95 feet at the northeast corner. Additionally, the Geotech report identified that based on topographic and lithologic data, the risk of landslides at the Project site is considered low to negligible (ENGEO 2021). The Project site is not located in a landslide hazard area and is not at risk of landslides. Therefore, the Project would not directly or indirectly cause potential substantial adverse effects involving landslides and impacts would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Erosion or Loss of Topsoil

Impact GEO-2	The Project would not result in substantial soil erosion or the loss of topsoil.

Impact Analysis

Construction

Construction activities associated with the Project would involve grading and excavation activities which could expose soils to sources of wind or water, resulting in the potential for erosion and sedimentation on and off the Project site. The Project would disturb more than one acre and would require coverage under the NPDES General Construction Permit. The NPDES Permit is obtained through the SWRCB and requires the preparation and implementation of a SWPPP, which requires implementation of standard construction BMPs to minimize erosion and loss of topsoil. As discussed in further detail in Section 3.10, Hydrology and Water Quality, preparation of a SWPPP would be ensured through MM HYD-1. With implementation of BMPs required by the SWPPP under the NPDES Permit and as ensured by Mitigation Measure HYD-1, Project construction would not result in substantial soil erosion or loss of topsoil and impacts would be less than significant.

Operation

Once constructed, the Project would be landscaped and/or covered in buildings or hardscape features and would not result in soil erosion or loss of topsoil. New previous areas created as part of the Project would include landscaped areas, vegetated bioswales, vegetated detention basins and pervious paving. The Project includes the construction of detention basins and stormwater systems to serve the new development. Storm drainage for the Project would consist of a system of inlets, piping, and bio-treatment



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Geology and Soils

and detention ponds that would provide for stormwater conveyance and treatment and the stormwater discharged to these basins would percolate into the ground. Operation of the Project would not result in substantial soil erosion or loss of topsoil and there would be no impact related to soil erosion from operation of the Project.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Unstable Soils

Impact GEO-3	The Project would not be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

Impact Analysis

As discussed above under Impact s GEO-1c and GEO-1d, the Project site is not located in an area of landslide hazard and the potential for liquefaction at the site is low. Additionally, the Geotech report identified that the Project site's risk of subsidence and lateral spreading are considered low to negligible at the site (ENGEO 2021). However, the Project does have the potential to be located on a geologic unit or soil that is unstable as the Project site is identified as having the potential for moderately to highly expansive surficial soils with moderate to high shrink/swell potential.

As identified previously, the Project would be required to be designed and constructed in accordance with the most current CBC guidelines and requirements to ensure that Project site soils and conditions are considered during Project design. Additionally, the Project would be required to implement Mitigation Measure GEO-1 which requires implementation of recommendations included within the Geotech report and the preparation of a design-level geotechnical report. The Geotech report includes recommendations on construction considerations and foundation designs for the Project to reduce the potential impacts related to unstable soils. Additionally, as the Geotech report prepared is based on preliminary field investigations, it recommends a design-level geotechnical report be prepared with supplemental field investigations prior to final design to ensure that the Project is not located on unstable soils or soils that would become unstable as a result of the Project. Therefore, with implementation of Mitigation Measure GEO-1 and compliance with CBC guidelines, the Project would not be located on a geologic unit or soils that is unstable or that would become unstable as a result of the Project and impacts would be less than significant with mitigation.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Geology and Soils

Mitigation Measure GEO-1 is required.

Level of Significance After Mitigation

Less Than Significant Impact with Mitigation.

Expansive Soils

Impact GEO-4	The Project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.

Impact Analysis

As identified previously, the Project site is identified as having the potential for moderately to highly expansive surficial soils with moderate to high shrink/swell potential. The Project would be required to be designed and constructed in accordance with the most current CBC guidelines and requirements to ensure that expansive soils at the Project site are considered during Project design. Additionally, the Project would be required to implement Mitigation Measure GEO-1, which requires implementation of recommendations included within the Geotech report and the preparation of a design-level geotechnical report. Recommendations included in the Geotech report include, but are not limited to, expansive soil mitigation, fill compaction and backfill recommendations for expansive soils, and building pad and foundation recommendations. Implementation of Mitigation Measure GEO-1 and compliance with CBC guidelines and requirements would ensure that that Project would not be located on expansive soils creating substantial direct or indirect risks to life or property and impacts would be less than significant with mitigation.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure GEO-1 is required.

Level of Significance After Mitigation

Less Than Significant Impact with Mitigation.

Alternative Wastewater Disposal Systems

Impact GEO-5	The Project would not 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.

Impact Analysis

The Project would not include the construction or use of septic tanks. The Project is preparing an application to the Central Valley RWQCB for the development of a wastewater treatment system and sludge drying ponds onsite. The wastewater treatment site would be centrally located on the northern portion of the Project site and would be constructed in the lowest elevation to allow for the majority of the Project's wastewater to gravity feed to the proposed wastewater treatment facility. The plant would have a



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Geology and Soils

MBR treatment system that produces Title 22 compliant effluent, recycled water. The wastewater treatment system would be connected to the first building on the site and expanded to subsequent buildings as they are constructed. The wastewater treatment plant site would also house the proposed recycled water facilities, to provide water for landscape irrigation of the site via a proposed on-site “purple pipe” system. Permitting requirements for the site soils would be assessed to ensure they are capable of adequately supporting the wastewater treatment system and sludge drying ponds. As such, impacts would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Paleontological Resources

Impact GEO-6	The Project would not directly or indirectly destroy a unique paleontological resource or site or unique geological feature.

Impact Analysis

There are no known unique paleontological resources or site or unique geologic features present at the Project site. However, the County’s General Plan EIR identified that paleontological resources have been discovered in the County, with the vast majority of paleontological specimens from the County being found in rock formations in the foothills of the Diablo Mountain Range. 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 2014). Given the paleontological sensitivity of the County and Project excavation activities during construction, there is potential for undiscovered or unknown paleontological resources to be discovered during construction activities. Construction activities required for the Project could cause affect a unique paleontological resources or unique geological feature if they are disturbed during construction, potentially resulting in a significant impact.

In the event that an unknown paleontological resource is discovered, the Project would be required to comply with existing laws and regulations pertaining to paleontological resources. Additionally, the Project would implement Mitigation Measure GEO-2 which outlines procedures for inadvertent discovery of paleontological resources. With the implementation of Mitigation Measure GEO-2 and compliance with existing laws and regulations, impacts to paleontological resources would be less than significant with mitigation.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Geology and Soils

MM GEO-2 Procedures for Inadvertent Discovery of Paleontological Resources. In the event that unknown paleontological resources are discovered during earth-moving activities, the construction crew shall immediately cease work in the vicinity of the find and notify the County. Work shall be halted until a qualified paleontologist can evaluate the find and make recommendations.

If the deposits of paleontological materials cannot be avoided by project activities, the County shall confirm that the Project Applicant has retained a qualified paleontologist to evaluate the potential historic significance of the resource. If the deposits are determined to be non-significant by a qualified paleontologist, avoidance is not necessary. If the deposits are determined to be potentially significant, the resource shall be avoided if feasible. If avoidance is not feasible, the qualified paleontologist shall make recommendations and prepare a recovery plan. The recovery plan may include, but is not limited to, a field survey, construction monitoring, sampling and data recovery procedures, museum curation for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the County to be necessary would be implemented before construction activities can resume at the site where the paleontological resources were discovered.

Level of Significance After Mitigation

Less Than Significant Impact with Mitigation.

3.7.4 Notice of Preparation Comments Related to Geology and Soils

As discussed in Section 1.0, Introduction, the County distributed a NOP of the Draft EIR for the Project beginning on March 31, 2023. The NOP was distributed for a 30-day comment period that ended on May 1, 2023. The Public Scoping Meeting on the Draft EIR for the Project was held on April 10, 2023. The comments received on the NOP and during the Public Scoping Meeting were considered in the preparation of this Draft EIR. Comments related to geologic resources and where they are addressed in this section are provided in Table 3.7-1. Additionally, each comment includes a brief summary of how the concern was addressed, the impact, or why additional analysis is not required. Commenters may have made comments addressing multiple EIR sections, but only specific geologic resources comments are provided in Table 3.7-1. See Table 1.2-1 in Section 1.0, Introduction for a summary of all comments made during the NOP scoping period.

Table 3.7-1. Comments Received on the NOP for Geologic Resources

Affiliation	Signatory	Date	Comment Description	Location Addressed in Geologic Resources Chapter	Response to Comment
Private Parties – Written Comments Received					
Hazen Brown, on behalf of Byron-Bethany	Adam Brown	May 1, 2023	The commenter recommends that a complete detailed geotechnical report be provided to assure	• Appendix H	A geotechnical report was prepared by ENGEO in 2021 and is included as Appendix H.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Geology and Soils

Affiliation	Signatory	Date	Comment Description	Location Addressed in Geologic Resources Chapter	Response to Comment
Irrigation District			protection of the WSID canal.		



3.8 GREENHOUSE GAS EMISSIONS

This section describes the environmental setting for GHG emissions, including the existing site conditions, regulatory setting, and potential impact that would result from the Project, and, if significant impacts are identified, the mitigation measures that would reduce these impacts. Additional detail and background on GHGs are based, in part, on the Air Quality, Health Risk Assessment, Greenhouse Gas Summary Methodology Memorandum prepared by Stantec (Stantec 2023), included as Appendix C to this EIR.

3.8.1 Environmental Setting

To fully understand global climate change, it is important to recognize the naturally occurring “greenhouse effect” and to define the GHGs that contribute to this phenomenon. Various gases in the earth’s atmosphere, classified as atmospheric GHGs, play a critical role in determining the earth’s surface temperature. Solar radiation enters the earth’s atmosphere from space and a portion of the radiation is absorbed by the earth’s surface. The earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation. GHGs, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, this radiation that otherwise would have escaped back into space is now retained, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect.

Greenhouse Gases

Among the prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), nitrogen trifluoride (NF₃), and sulfur hexafluoride (SF₆). Primary GHGs attributed to global climate change are discussed in the following subsections.

Carbon Dioxide. CO₂ is a colorless, odorless gas. CO₂ is emitted in a number of ways, both naturally and through human activities. The largest source of CO₂ emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, industrial facilities, and other sources. A number of specialized industrial processes, such as mineral production and metal production, and the use of petroleum-based products can also lead to CO₂ emissions. The atmospheric lifetime of CO₂ is variable because it is so readily exchanged in the atmosphere (USEPA 2025a).

Methane. CH₄ is a colorless, odorless gas, and is the primary component of natural gas (about 87 percent by volume). It is also formed and released to the atmosphere by biological processes occurring in anaerobic environments. CH₄ is emitted from a variety of both human-related and natural sources. Human-related sources include fossil fuel production, animal husbandry (enteric fermentation in livestock and manure management), rice cultivation, biomass burning, and waste management. These activities release significant quantities of CH₄ to the atmosphere. Natural sources of CH₄ include wetlands, gas hydrates, permafrost, termites, oceans, freshwater bodies, non-wetland soils, and other sources such as wildfires. The atmospheric lifetime of CH₄ is about 12 years (USEPA 2025a).

Nitrous Oxide. N₂O is a clear, colorless gas with a slightly sweet odor. N₂O is produced by both natural and human-related sources. Primary human-related sources of N₂O are agricultural soil management,



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

animal manure management, sewage treatment, mobile and stationary combustion of fossil fuels, adipic acid production, and nitric acid production. N_2O is also produced naturally from a wide variety of biological sources in soil and water, particularly microbial action in wet tropical forests and the oceans. The atmospheric lifetime of N_2O is approximately 120 years (USEPA 2025a).

Hydrofluorocarbons. HFCs are man-made chemicals, many of which have been developed as alternatives to ozone-depleting substances for industrial, commercial, and consumer products. The only significant emissions of HFCs before 1990 were of the chemical HFC-23, which is generated as a byproduct of the production of HCFC-22 (or Freon 22, used in air conditioning applications). The atmospheric lifetime for HFCs varies from just over a year for HFC-152a to 260 years for HFC-23. Most of the commercially used HFCs have atmospheric lifetimes of less than 15 years (e.g., HFC-134a, which is used in automobile air conditioning and refrigeration, has an atmospheric life of 14 years) (USEPA 2025a).

Perfluorocarbons. PFCs are colorless, highly dense, chemically inert, and nontoxic. There are seven PFC gases: perfluoromethane (CF_4), perfluoroethane (C_2F_6), perfluoropropane (C_3F_8), perfluorobutane (C_4F_{10}), perfluorocyclobutane (C_4F_8), perfluoropentane (C_5F_{12}), and perfluorohexane (C_6F_{14}). Natural geological emissions have been responsible for the PFCs that have accumulated in the atmosphere in the past; however, the largest current source is aluminum production, which releases CF_4 and C_2F_6 as byproducts. The estimated atmospheric lifetimes for CF_4 and C_2F_6 are 50,000 and 10,000 years, respectively (USEPA 2025a).

Nitrogen Trifluoride. NF_3 is an inorganic, colorless, odorless, toxic, nonflammable gas used as an etchant in microelectronics. NF_3 is predominantly employed in the cleaning of the plasma-enhanced chemical vapor deposition chambers in the production of liquid crystal displays and silicon-based thin film solar cells. In 2009, NF_3 was listed by California as a potential GHG to be listed and regulated under AB 32 (Section 38505 Health and Safety Code). NF_3 has an atmospheric lifetime of 740 years (USEPA 2025a).

Sulfur Hexafluoride. SF_6 is an inorganic compound that is colorless, odorless, nontoxic, and generally nonflammable. SF_6 is primarily used as an electrical insulator in high voltage equipment. The electric power industry uses roughly 80 percent of all SF_6 produced worldwide. Leaks of SF_6 occur from aging equipment and during equipment maintenance and servicing. SF_6 has an atmospheric life of 3,200 years (USEPA 2025b).

Black Carbon. Black carbon is the most strongly light-absorbing component of PM emitted from burning fuels such as coal, diesel, and biomass. Black carbon contributes to climate change both directly by absorbing sunlight and indirectly by depositing on snow and by interacting with clouds and affecting cloud formation. Black carbon is considered a short-lived species, which can vary spatially and, consequently, it is very difficult to quantify the associated global warming potential. The main sources of black carbon in California are wildfires, off-road vehicles (locomotives, marine vessels, tractors, excavators, dozers, etc.), on-road vehicles (cars, trucks, and buses), fireplaces, agricultural waste burning, and prescribed burning (planned burns of forest or wildlands). California has been an international leader in reducing emissions of black carbon, including programs that target reducing PM from diesel engines and burning activities (CARB 2013).



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

Global Warming Potential

Each GHG differs in its ability to absorb heat in the atmosphere based on the lifetime, or persistence, of the gas molecule in the atmosphere. Often, estimates of GHG emissions are presented in carbon dioxide equivalents (CO₂e), which standardizes each gas by its global warming potential (GWP).

Expressing GHG emissions in CO₂e takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO₂ were being emitted. Based on a 100-year time horizon, CH₄ traps over 25 times more heat per molecule than CO₂, and N₂O absorbs roughly 298 times more heat per molecule than CO₂. Additional GHGs with high GWP include NF₃, SF₆, PFCs, and black carbon.

Sources of Greenhouse Gas Emissions

On a global scale, GHG emissions are predominantly associated with activities related to energy production; changes in land use, such as deforestation and land clearing; industrial sources; agricultural activities; transportation; waste and wastewater; and commercial and residential land uses. Energy production including the burning of coal, natural gas, and oil for electricity and heat is the largest single source of global GHG emissions.

United States of America

In 2022, GHG emissions in the U.S. totaled 6,343 million metric tons (MMT) of CO₂e. Within the U.S., the largest contributor to GHG emissions is the transportation sector (28 percent). The next largest contributors are from electricity production (25 percent) and industry (23 percent), followed by the commercial and residential sector (13 percent) and the agricultural sector (10 percent). Transportation emissions primarily come from burning fossil fuels for cars, trucks, ships, trains, and planes. Over 90 percent of the fuel used for transportation is petroleum-based, which includes primarily gasoline and diesel. The bulk of emissions generated from energy production come from burning fossil fuels, mostly coal and natural gas. Industry emissions are also primarily generated from fossil fuels burned for heat, the use of certain products that contain GHGs, and the handling of waste. Similar to industry sector emissions, commercial and residential uses arise primarily from fossil fuels for heat, the use of certain products that contain GHGs, and the handling of waste. Agricultural emissions come from livestock such as cows, agricultural soil, and rice production. The land use and forestry sector within the U.S. serves as a carbon sink. Carbon sinks absorb CO₂ from the atmosphere. Land areas across the U.S. absorbed approximately 13 percent of the 2022 GHG emissions (USEPA 2025c). In 2023, GHG emissions in the United States totaled 6,197 MMTCO₂e, while this data has been released via a Freedom of Information request, the USEPA has not formally adopted the 2023 emissions report (USEPA 2025d).

California

In 2022, GHG emissions within California totaled 371.1 MMT of CO₂e. Similar to national emissions, in California, the transportation sector is the largest contributor. Transportation emissions account for approximately 39 percent of the total Statewide GHG emissions. The majority of transportation emissions are derived from passenger vehicles and heavy-duty trucks. Emissions associated with industrial uses are the second largest contributor, totaling roughly 23 percent. Industrial emissions are driven by fuel combustion from sources that include refineries, oil and gas extraction, cement plants, and the portion of



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

cogeneration emissions attributed to thermal energy output. Electricity generation (in-State and imports) totaled roughly 16 percent. Emissions from the electricity generation sector have declined over the years due to the increase in renewable electricity generation that continues to replace fossil power (CARB 2024).

Effects of Global Climate Change

There are uncertainties as to exactly what the climate changes will be in various local areas of the earth. There are also uncertainties associated with the magnitude and timing of other consequences of a warmer planet: sea level rise, spread of certain diseases out of their usual geographic range, the effect on agricultural production, water supply, sustainability of ecosystems, increased strength and frequency of storms, extreme heat events, increased air pollution episodes, and the consequence of these effects on the economy.

Within California, climate changes would likely alter the ecological characteristics of many ecosystems throughout the State. Such alterations would likely include increases in surface temperatures and changes in the form, timing, and intensity of precipitation. For instance, historical records are depicting an increasing trend toward earlier snowmelt in the Sierra Nevada mountain range. This snowpack is a principal supply of water for the State, providing roughly 50 percent of State's annual runoff. If this trend continues, some areas of the State may experience an increased danger of floods during the winter months and possible exhaustion of the snowpack during spring and summer months. An earlier snowmelt would also impact the State's energy resources. An early exhaustion of the Sierra snowpack may force electricity producers to switch to more costly or non-renewable forms of electricity generation during spring and summer months. A changing climate may also impact agricultural crop yields, coastal structures, and biodiversity. As a result, changes in climate will likely have detrimental effects on some of California's largest industries, including agriculture, wine, tourism, skiing, recreational and commercial fishing, and forestry.

3.8.2 Regulatory Setting

There are considerable regulatory actions regarding GHGs and climate change at the State, regional, and local level. The following includes the key regulations applicable to the Project.

State

Assembly Bill 32 and Senate Bill 32

AB 32 requires that GHGs emitted in California be reduced to 1990 levels by the year 2020. GHGs, as defined under AB 32, include CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆. Since AB 32 was enacted, a seventh chemical, NF₃, has also been added to the list of GHGs. CARB is the State agency charged with monitoring and regulating sources of GHGs. AB 32 states the following:

Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems.

CARB approved the 1990 GHG emissions level of 427 MMTCO₂e on December 6, 2007. Therefore, to meet the State's target, emissions generated in California in 2020 were required to be equal to or less than 427 MMTCO₂e. In order to set a framework for the State to meet this target, CARB was tasked with creating a Scoping Plan (described further below). California announced in July 2018 that the State emitted 427 MMTCO₂e in 2016 and achieved AB 32 goals (CARB 2018).

SB 32 was signed into law on September 8, 2016. SB 32 states that, "In adopting rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions authorized by this division, the State [air resources] board shall ensure that Statewide GHG emissions are reduced to at least 40 percent below the Statewide GHG emissions limit no later than December 31, 2030."

Assembly Bill 1279: The California Climate Crisis

AB 1279 was signed into law in 2022 and establishes the policy of the State to achieve carbon neutrality as soon as possible, but no later than 2045, and maintain net negative GHG emissions thereafter. AB 1279 would also ensure that by 2045 the Statewide anthropogenic GHG emissions are reduced by at least 85 percent below 1990 levels. The bill would require CARB to ensure that an updated Scoping Plan identifies and recommends measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO₂ removal and carbon capture, utilization, and storage technologies to complement AB 1279's emissions reduction requirements.

2022 Climate Change Scoping Plan

The CARB's 2022 Scoping Plan was approved in December 2022 and assesses progress toward achieving the SB 32 2030 target and laying out a path to achieve carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities (CARB 2022a).

Cap-and-Trade Program

CARB administers the State's cap-and-trade program, which covers GHG sources that emit more than 25,000 metric tons of carbon dioxide equivalent (MTCO₂e) per year, such as refineries, power plants, and industrial facilities. This market-based approach to reducing GHG emissions provides economic incentives for achieving GHG emission reductions.

Assembly Bill 398

The governor signed AB 398 on July 25, 2017, to extend the Cap-and-Trade Program to 2030. The legislation includes provisions to ensure that offsets used by sources are limited to 4 percent of their compliance obligation from 2021 to 2025 and 6 percent of their compliance obligation from 2026 through 2030. AB 398 also prevents air districts from adopting or implementing emission reduction rules from stationary sources that are also subject to the Cap-and-Trade Program (CARB 2022b).



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

Senate Bill 375: The Sustainable Communities and Climate Protection Act of 2008

SB 375 was signed into law on September 30, 2008. According to SB 375, the transportation sector is the largest contributor of GHG emissions, which emits more than 40 percent of the total GHG emissions in California. SB 375 states, “Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32.” SB 375 does the following: (1) requires metropolitan planning organizations to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, (2) aligns planning for transportation and housing, and (3) creates specified incentives for the implementation of the strategies.

CARB has prepared a Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets in 2018 which set updated GHG reduction targets for metropolitan planning organizations for 2020 and 2035 (CARB 2023b). Pursuant to SB 375, the Central Valley/San Joaquin reduction targets for per capita vehicular emissions were 6 to 13 percent by 2020 and are 13 to 16 percent by 2035.

Assembly Bill 1493: Pavley Regulations and Fuel Efficiency Standards

AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations and fuel efficiency standards that reduce GHGs emitted by passenger vehicles and light duty trucks. Implementation of the regulation was delayed by lawsuits filed by automakers and by USEPA’s denial of an implementation waiver. USEPA subsequently granted the requested waiver in 2009, which was upheld by the by the U.S. District Court for the District of Columbia in 2011.

The standards were phased in during the 2009 through 2016 model years. When fully phased in, the near-term (2009–2012) standards resulted in an approximately 22 percent reduction in emissions compared with the 2002 fleet, and the mid-term (2013–2016) standards resulted in about a 30 percent reduction. Several technologies stand out as providing significant reductions in emissions at favorable costs. These include discrete variable valve lift or camless valve actuation to optimize valve operation, rather than relying on fixed valve timing and lift as has historically been done; turbocharging to boost power and allow for engine downsizing; improved multi-speed transmissions; and improved air conditioning systems that operate optimally, leak less, and/or use an alternative refrigerant.

The second phase of the implementation for AB 1493 was incorporated into Amendments to the Low-Emission Vehicle Program, referred to as LEV III or the Advanced Clean Cars program. The Advanced Clean Cars program combines the control of smog-causing pollutants and GHG emissions into a single coordinated package of requirements for model years 2017 through 2025. The regulation would reduce GHGs from new cars by 34 percent from 2016 levels by 2025. The rules would reduce pollutants from gasoline and diesel-powered cars and would deliver increasing numbers of zero-emission technologies, such as full battery electric cars, newly emerging plug-in hybrid electric vehicles (EVs), and hydrogen fuel cell cars. The regulations would also ensure that adequate fueling infrastructure is available for the increasing numbers of hydrogen fuel cell vehicles planned for deployment in California.

In August 2022, CARB adopted the Advanced Clean Cars II regulations, imposing the next level of low-emission and zero-emission vehicle standards for model years 2026-2035 that contribute to meeting federal ambient air quality ozone standards and California’s carbon neutrality targets. The Advanced Clean Cars II regulations will rapidly scale down light-duty passenger car, pickup truck and SUV emissions starting with the 2026 model year through 2035.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

In June 2025, Congress passed and Trump signed joint resolutions to revoke three waivers previously granted to California by the Biden administration. These waivers allowed California to implement its Advanced Clean Cars II, Advanced Clean Trucks, and Omnibus Low NO_x regulations (the Advanced Clean Fleets [ACF] regulation). California, joined by 10 other states, filed a lawsuit asserting that the waivers are not subject to congressional review and the revocation violates the Constitution. The lawsuit is ongoing, and the waivers remain in effect while this legal action is being resolved. However, in June 2025, CARB repealed the elements of the ACF regulations applicable to high-priority, federal, and drayage fleets (CARB 2025a).

Advanced Clean Truck Act

To reduce emissions, the ACT requires original equipment manufacturers of medium- and heavy-duty vehicles to sell ZEVs or NZEVs, such as plug-in electric hybrids, at an increasing percentage of their annual sales from 2024 to 2035. A ZEV is a vehicle that produces zero tail-pipe emissions, including BEVs and hydrogen fuel cell vehicles. A NZEV is a vehicle with an internal combustion engine and an electric energy storage system, including plug-in hybrid vehicles and hydrogen internal combustion engine vehicles. The ACT includes a cap-and-trade system, capping the number of fossil fuel vehicles sold by stipulating annual sales percentage requirements. Manufacturers can comply with the ACT by generating compliance credits through the sale of ZEVs or NZEVs or through the trading of compliance credits.

As discussed above, Congress and the Trump administration are attempting to revoke waivers that would allow for the implementation of this program. The lawsuit is ongoing, and the waivers remain in effect while this legal action is being resolved. Senate Bill 1368: Emission Performance Standards

Enacted in 2006, SB 1368 directs the California Public Utilities Commission to adopt a performance standard for GHG emissions for the future power purchases of California utilities. SB 1368 seeks to limit CO₂ emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than five years from resources that exceed the emissions of a relatively clean, combined cycle natural gas power plant.

Because of the carbon content of its fuel source, a coal-fired plant cannot meet this standard because such plants emit roughly twice as much CO₂ as combined cycle natural gas power plants. Accordingly, the law effectively prevents California's utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. The California Public Utilities Commission adopted the regulations required by SB 1368 on August 29, 2007. The regulations implementing SB 1368 establish a standard for baseload generation owned by, or under long-term contract to publicly owned utilities, of 1,100 pounds of CO₂ per megawatt-hour.

Senate Bill 1078: Renewable Electricity Standards

SB 1078 (September 12, 2002) required California to generate 20 percent of its electricity from renewable sources by 2017. In 2007, SB 107 changed the due date to 2010 instead of 2017. On November 17, 2008, the governor signed EO S-14-08, which established the RPS target for California requiring that all retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. EO S-21-09 directed CARB to adopt a regulation by July 31, 2010, requiring the State's load serving entities to meet a 33 percent renewable energy target by 2020. CARB approved the Renewable Electricity Standard on



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

September 23, 2010, by Resolution 10-23. In 2011, the State legislature adopted this higher standard in SB X1-2. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas.

Senate Bill 350: Clean Energy and Pollution Reduction Act of 2015

The legislature approved and the governor then signed SB 350 on October 7, 2015, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the RPS, higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for EV charging stations.

Senate Bill 100: California Renewables Portfolio Standard Program

SB 100 (September 10, 2018) revised the RPS goals to achieve the 50 percent renewable resources target by December 31, 2026, and to achieve a 60 percent target by December 31, 2030. The bill requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours of those products sold to their retail end-use customers achieve 44 percent of retail sales by December 31, 2024; 52 percent by December 31, 2027; and 60 percent by December 31, 2030. The bill also establishes a State policy that eligible renewable energy resources and zero-carbon resources shall supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under the bill, the State cannot increase GHG emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Executive Order S-01-07: Low Carbon Fuel Standard

EO S-01-07 was signed on January 18, 2007. The EO mandates that a Statewide goal shall be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. In particular, the EO established a Low Carbon Fuel Standard (LCFS) and directed the Secretary for Environmental Protection to coordinate the actions of the California Energy Commission, CARB, the University of California, and other agencies to develop and propose protocols for measuring the "life-cycle carbon intensity" of transportation fuels. This analysis supporting development of the protocols was included in an implementation plan for the State Alternative Fuels Plan adopted by California Energy Commission on December 24, 2007, and was submitted to CARB for consideration as an "early action" item under AB 32. CARB adopted the LCFS on April 23, 2009.

The LCFS was subject to legal challenge in 2011. Ultimately, CARB was required to bring a new LCFS regulation for consideration in February 2015. The proposed LCFS regulation was required to contain revisions to the 2010 LCFS and new provisions designed to foster investments in the production of the low-carbon fuels, offer additional flexibility to regulated parties, update critical technical information, simplify and streamline program operations, and enhance enforcement. The Office of Administrative Law approved the regulation on November 16, 2015. The regulation was last amended in 2019, and approved on May 27, 2020. The 2019 amendments provide clarification related to the Clean Fuel Reward program costs, credit transactions, fuels transactions and compliance reporting (CARB 2020). The 2024 amendments strengthen the carbon intensity benchmark for both pre- and post-2030 to support the State's GHG reduction goals. The amendments would require a 30 percent reduction in fuel carbon intensity by 2030 and a 90 percent reduction in fuel carbon intensity by 2045 from a 2010 baseline (CARB



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

2024b). Finally, the 2025 proposed amendments would allow for the book and claim accounting of renewable natural gas to produce electricity for EV charging in order to increase the near-term availability of low carbon intensity electricity for electric truck refueling in high demand freight corridors (CARB 2025b).

Executive Order S-13-08: Climate Adaptation Strategy

EO S-13-08 states that, “climate change in California during the next century is expected to shift precipitation patterns, accelerate sea level rise and increase temperatures, thereby posing a serious threat to California’s economy, to the health and welfare of its population and to its natural resources.” Pursuant to the requirements in this EO, the 2009 California Climate Adaptation Strategy was adopted, which is the, “... first statewide, multi-sector, region-specific, and information-based climate change adaptation strategy in the United States.” Objectives include analyzing risks of climate change in California, identifying and exploring strategies to adapt to climate change, and specifying a direction for future research.

Executive Order B-48-18

In January 2018, Governor Brown signed EO B-48-18 requiring all State entities to work with the private sector to have at least 5 million ZEVs on the road by 2030, as well as install 200 hydrogen fueling stations and 250,000 EV charging stations by 2025. It specifies that 10,000 of the EV charging stations should be direct current fast chargers. This order also requires all State entities to continue to partner with local and regional governments to streamline the installation of ZEV infrastructure. The Governor’s Office of Business and Economic Development is required to publish a Plug-in Charging Station Design Guidebook and update the 2015 Hydrogen Station Permitting Guidebook to aid in these efforts. All State entities are required to participate in updating the 2016 Zero-Emissions Vehicle Action Plan to help expand private investment in ZEV infrastructure with a focus on serving low-income and disadvantaged communities. Additionally, all State entities are to support and recommend policies and actions to expand ZEV infrastructure at residential land uses through the LCFS Program and recommend how to ensure affordability and accessibility for all drivers.

Executive Order N-79-20

In September 2020, Governor Newsom signed EO N-79-20, which sets the following goals for the State: 100 percent of in-State sales of new passenger cars and trucks shall be zero-emission by 2035; 100 percent of medium- and heavy-duty vehicles in the State shall be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks; and 100 percent of off-road vehicles and equipment in the State shall be zero-emission by 2035, where feasible.

California Energy Code

Compliance with the California Energy Code (Title 24, Part 6, of the California Code of Regulations [CCR], California’s Energy Efficiency Standards) and Title 20, Public Utilities and Energy, standards must occur for all new buildings constructed in California. These efficiency standards apply to new construction of both residential and nonresidential buildings, and they regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

building permit processes, and local government agencies may adopt and enforce energy standards for new buildings provided that these standards meet or exceed those provided in the Title 24 guidelines.

Regional

San Joaquin Council of Governments

The San Joaquin Council of Governments (SJCOG) is one of California's 38 regional planning agencies, comprised of San Joaquin County as well as the cities of Stockton, Lodi, Manteca, Tracy, Ripon, Escalon, and Lathrop. The SJCOG serves as the Regional Transportation Planning Agency and the Metropolitan Planning Organization for the region. Following the passage of SB 375, metropolitan planning organizations are required to prepare a sustainable communities strategy which demonstrates a plan for land use development and transportation infrastructure to work towards the goal of reducing GHG emissions from cars and light trucks. In 2022, the SJCOG Board of Directors approved the 2022 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which is a long-range vision and investment plan for the future transportation needs in the County through the year 2046. The following policies and strategies from the RTP/SCS may be applicable to the Project (SJCOG 2022):

- **Policy:** Enhance the Environment for Existing and Future Generations and Conserve Energy
 - **Strategy 1:** Encourage efficient development patterns that maintain agricultural viability and natural resources.
 - **Strategy 2:** Encourage preservation of natural resources.
 - **Strategy 3:** Enhance the connection between land use and transportation choices through projects supporting energy and water efficiency.
 - **Strategy 4:** Improve air quality by reducing transportation-related emissions.
- **Policy:** Maximize Mobility and Accessibility
 - **Strategy 5:** Optimize the public transportation system to provide efficient and convenient access for users of all income levels.
 - **Strategy 6:** Encourage infill development and development near transit, including transit-oriented development to maximize existing transit investments.
 - **Strategy 7:** Provide transportation improvements to facilitate nonmotorized travel, including incorporation of complete streets elements as appropriate.
 - **Strategy 9:** Promote safe and efficient strategies to improve the movement of goods by air, water, rail, and roadway.
- **Policy:** Preserve the Efficiency of the Existing Transportation System
 - **Strategy 12:** Prioritize projects that make more efficient use of the existing road network.
 - **Strategy 13:** Support the continued maintenance and preservation of the existing transportation system.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

- **Policy:** Support Economic Vitality
 - **Strategy 17:** Support transportation improvements that improve economic competitiveness, revitalize commercial corridors and strategic economic centers, and enhance travel and tourism opportunities.
 - **Strategy 19:** Encourage and/or strengthen small business while supporting large employer recruitment.
- **Policy:** Improve the Quality of Life for Residents
 - **Strategy 30:** Enhance public health through active transportation projects.

Local

San Joaquin County 2035 General Plan

San Joaquin County prepared the 2035 General Plan as a comprehensive, long-term planning framework to protect the County's agricultural, natural, and cultural resources while developing the County. The 2035 General Plan contains the following goals and policies applicable to the Project (San Joaquin County 2016):

- **Goal PHS-6:** To reduce greenhouse gas emissions as part of the Statewide effort to combat climate change.
 - **Policy PHS-6.3: GHG Reduction Strategies.** The County shall promote GHG emission reductions by encouraging efficient farming methods (e.g., no-till farming, crop rotation, cover cropping); supporting the installation of renewable energy technologies; and protecting grasslands, open space, oak woodlands, riparian forest and farmlands from conversion to urban uses.
 - **Policy PHS-6.5: Diversion, Recycling, and Reuse.** The County shall achieve a 75 percent diversion of landfilled waste based on 1990 levels by 2020, and shall achieve a diversion rate of 90 percent by 2035.
 - **Policy PHS-6.6: Business-related GHG Reduction Strategies.** The County shall encourage all businesses to help reduce GHG emissions by: replacing high mileage fleet vehicles with more efficient and/or alternative fuel vehicles; increasing the energy efficiency of facilities; transitioning toward the use of renewable energy instead of non-renewable energy sources; adopting purchasing practices that promote emissions reductions and reusable materials; and increasing recycling.
 - **Policy PHS-6.7: New Development.** The County shall require new development to incorporate all feasible mitigation measures to reduce construction and operational GHG emissions.



3.8.3 Environmental Impacts

This section analyzes the Project's potential to result in significant impacts related to GHG emissions. If an impact is determined to be significant, mitigation measures are identified that would reduce or avoid impacts.

Methodology

The assessment of potential impact presented below is based on a comparison of existing site setting with defined or anticipated conditions that would occur as a result of the Project. A summary of the methodology and modeling software used to quantify and analyze air pollutant emissions and potential health risk effects are provided below. Modeling output files are provided in Appendix C.

Greenhouse Gas Emission Calculations

GHG emissions were quantified with the CalEEMod version 2022.1.1.21 and EMFAC2021 version 1.2. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential emissions associated with construction and operation of a land use project. EMFAC2021 is a tool developed by CARB to provide vehicle emission rates by vehicle type, fuel type, fleet year, and geography across California. Modeling inputs are summarized in Section 3.3, Air Quality.

Consistency with Greenhouse Gas Reduction Plans

The analysis includes a consistency analysis with applicable GHG reduction plans including CARB's 2022 Scoping Plan and SJCOG RTP/SCS. Consistency with these plans is based on the estimated emissions of the Project, Project mitigation, design features, and regulatory measures.

Thresholds of Significance

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purpose of this EIR, implementation of the Project may result in a potentially significant impact related to GHG emissions if it would do any of the following:

- 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?

The SJVAPCD's Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA has adopted guidance documents for assessing and mitigating GHG impacts on global climate change. However, rather than establishing specific numeric thresholds of significance, the SJVAPCD guidance uses a tiered approach to assess cumulative impacts on global climate change. Project GHG emissions are considered less than significant if they can meet any of the following conditions, evaluated in the order presented (SJVAPCD 2009):

- Project is exempt from CEQA requirements;



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

- Project complies with an approved GHG emission reduction plan or GHG mitigation program;
- Project implements Best Performance Standards (BPS); or
- Project demonstrates that specific GHG emissions would be reduced or mitigated by at least 29 percent compared to Business-as-Usual (BAU), including GHG emission reductions achieved since the 2002-2004 baseline period.

The Project is not exempt from CEQA. Thus, the threshold of significance used for this analysis tiers from the second bullet listed above, wherein SJVAPCD considers project GHG emissions to be less than significant if the project complies with an approved GHG emission reduction plan or GHG mitigation program. The SJVAPCD establishes that a project can demonstrate compliance with an approved GHG emissions reduction program (such as CARB's statewide GHG Cap-and-Trade Program) to determine significance of the proposed project's GHG emissions. With regard to whether the proposed project would conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs, the GHG analysis presented herein will be based on consistency with the SJCOG RTP/SCS, 2022 CARB Scoping Plan, and San Joaquin County General Plan.

With regard to whether the proposed project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, the analysis presented herein is based on an assessment of the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting (CEQA Guidelines Section 15064.4[b][1]) and whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project (CEQA Guidelines Section 15064.4[b][2]). As shown in the fourth bullet, SJVAPCD adopted quantitative thresholds based on BAU thresholds. However, on November 20, 2015, the California Supreme Court issued its decision on the Center for Biological Diversity v. California Department of Fish and Wildlife on the Newhall Ranch project case. The Court determined that there is not substantial evidence to link a specific project's achievement of CARB's Scoping Plan's Statewide average reduction below BAU to the conclusion that the project's reduction would meet AB 32's 2020 goals. Furthermore, since the release of SJVAPCD's guidance, SB 32 and AB 1279 have been issued, which requires the State to further reduce GHG emissions beyond the goals laid out in AB 32. As a result, the 29 percent reduction in emissions as compared to a BAU standard are outdated and were not used for this analysis.

Given the scope of the Project, San Joaquin County has determined to utilize a numeric threshold to evaluate the cumulative significance of the increase in GHG emissions associated with the Project. However, as stated above, SJVAPCD's numeric thresholds are not suitable. Instead Placer County Air Pollution Control District (Placer APCD) thresholds were used within the analysis. Placer APCD covers portions of 3 different air basins: Sacramento Valley Air Basin, Mountain Counties Air Basin, and Lake Tahoe Air Basin. Covering the counties of Fresno, Kings, Madera, Merced, San Joaquin, Stanislaus, and Tulare and portions of Kern County, the San Joaquin Valley Air Basin is adjacent to the Sacramento Valley Air Basin and the Mountain Counties Air Basin. The San Joaquin Valley Air Basin and the Sacramento Valley Air Basin share similar characteristics.

In 2016, Placer County APCD adopted a bright-line 10,000 MTCO₂e/year GHG threshold for all land use projects. Placer County APCD justified and supported the adopted thresholds of significance with a Threshold Justification Report. In developing the 10,000 MTCO₂e/year GHG threshold, Placer APCD



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

expressly considered general industrial (Placer County APCD 2016). In the absence of an applicable local numeric threshold, San Joaquin County, in its discretion as the Lead Agency, has determined it is appropriate to utilize Placer County APCD's bright-line 10,000 MTCO₂e/year GHG threshold to evaluate the cumulative significance of the increase in GHG emissions associated with the proposed project.

Project Impacts and Mitigation Measures

Generation of GHG Emissions

Impact GHG-1	The Project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Impact Analysis

Project GHG emissions were quantified using CalEEMod and EMFAC2021. Construction and operational emissions are discussed separately below.

Constructions Emission Inventory

GHGs would be emitted during construction by the off-road construction equipment and vehicle travel by workers and material deliveries to the Project site. The estimated construction GHG emissions are shown in Table 3.8-1. Because construction GHG emissions are temporary and reduction measures are limited, a common professional practice is to amortize the construction emissions over the life of the project (SCAQMD 2008, SLOAPCD 2021). The Project was conservatively assumed to have a life of 30 years.

Table 3.8-1. Construction Greenhouse Gas Emissions

Construction Year	Emissions (MTCO ₂ e)
Phases 1 and 2	
2026	5,602
2027	6,160
2028	6,066
2029	5,942
2030	2,988
Phase 3	
2031	3,243
2032	3,506
2033	3,429
2034	3,369
2035	1,707
Applicable Threshold of Significance (MT CO₂e/year)	10,000
Exceed Threshold?	No
Project Construction Total	42,012
Project Construction Total Amortized Over 30 Years	1,400



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

As shown in Table 3.8-1, the Project's annual construction emissions would not exceed PCAPCD thresholds. Regardless, Mitigation Measures AQ-1 through AQ-5 would be applied to the Project which would further reduce construction emissions.

Operational Emission Inventory

Operational GHGs would be emitted from mobile sources (cars and trucks); area sources (consumer products, cleaning products, architectural coatings/paints, and landscaping equipment); building energy use; water use and wastewater treatment; solid waste management; building refrigeration; off-road equipment use; and TRU idling. Detailed emissions modeling assumptions are provided in Appendix C. Unmitigated operational GHG emissions are shown in Table 3.8-2.

Table 3.8-2. Operational Greenhouse Gas Emissions (Unmitigated)

Source	Emissions (MTCO ₂ e per year)
Baseline Conditions	
Mobile	-934
Water	-480
Off-Road Equipment	-4,421
<i>Subtotal</i>	-5,835
Full Project Operation (Phase 1, 2, and 3)	
Mobile	69,766
Area	79
Energy	9,457
Water	33
Waste	1,648
Refrigeration	2,400
Off-Road Equipment	629
Stationary	19
TRUs	11
Vegetation ¹	428
Brine Trucks	1
<i>Subtotal</i>	84,471
Amortized Construction Emissions	1,400
Net Project Total²	80,036
Applicable Threshold of Significance	10,000
Exceed Threshold?	Yes

Notes:

¹ Vegetation accounts for the change in available carbon sequestration from removing the on-site almond orchard and planting new trees on-site.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

Source	Emissions (MTCO ₂ e per year)

² Project Total is the sum of the Full Project Operation Subtotal and the Amortized Construction Emissions, minus the Baseline Conditions Subtotal.

As demonstrated in Table 3.8-2, implementation of the Project would result in a net increase of 80,036 MTCO₂e per year as compared to the existing conditions, which would exceed the 10,000 MTCO₂e per year threshold used in this analysis. However, implementation of Mitigation Measures AQ-6 through AQ-26, although intended to reduce air quality emissions, would also reduce operational GHG emissions. Similarly, implementation of Mitigation Measures TRANS-1 and TRANS-2, although required to reduce impacts to the transportation system, would have the co-benefit of reducing mobile source GHG emissions. However, the level of GHG reduction associated with several measures cannot be quantified within this analysis. For example, the GHG reductions that would occur from the VERA would be based on the SJVAPCD measures implemented in the future, and GHG reductions associated with the reduction in VMT from the TDM Plan is speculative at this time. Operational GHG emissions after implementation of the required mitigation measures that result in quantifiable reductions in GHGs are shown in Table 3.8-3.

Table 3.8-3. Operational Greenhouse Gas Emissions (Mitigated)

Source	Emissions (MTCO ₂ e per year)
Baseline Conditions	
Mobile	-934
Water	-480
Off-Road Equipment	-4,421
<i>Subtotal</i>	<i>-5,835</i>
Full Project Operation with Mitigation (Phase 1, 2, and 3)	
Mobile ¹	66,976
Area ²	0
Energy ³	8,954
Water	33
Waste	1,648
Refrigeration	2,400
Off-Road Equipment ⁴	0
Stationary ⁵	19
TRUs ⁶	11
Vegetation	428
Brine Trucks	1
Reductions from MM AQ-13	-258
Reductions from MM AQ-18	-153
Reductions from MM TRANS-2	-7
<i>Subtotal</i>	<i>80,052</i>



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

Source	Emissions (MTCO ₂ e per year)
Amortized Construction Emissions	1,400
Mitigated Net Project Total⁶	75,617
Applicable Threshold of Significance	10,000
Exceed Threshold?	Yes

Notes:

¹ Mobile air emissions include reductions from Mitigation Measure AQ-21, Employee Transit Route Information.

² Area source emissions include reductions from Mitigation Measure AQ-10, Architectural Coatings and MM AQ-23, Low to Zero VOC Cleaning Products,

³ Energy source emissions include reductions from Mitigation Measure AQ-9, On-Site Solar, and MM AQ-22, Electric Water Pumps.

⁴ Off-Road emissions include reductions from Mitigation Measure AQ-12, Zero Emission Forklifts and Yard Trucks and MM AQ-24, Zero Emission Landscaping Equipment.

⁵ Stationary source emissions include reductions from MM AQ-20, Diesel Generators.

⁶ MM AQ-19 requires all TRUs visiting the site to be plug in capable. The reduction in emissions would be based on the time trucks spent plugged in using on-site electricity as compared to non-plug in capable trucks idling. The reduction was not accounted for in the mitigation emissions as it would be speculative to estimate the number of plug in versus non-plug in capable trucks that would have visited the site without mitigation. Therefore, to provide a conservative estimate, the GHG emission reductions were not accounted for.

Tpy = tons per year

TRUs = transportation refrigeration units

The quantifiable mitigation measures result in 75,617 MT CO₂e/year. As stated above, the Project will implement a VERA with the SJVAPCD as part of the Project. A VERA is an air quality mitigation measure by which a developer can voluntarily enter into a contractual agreement with the SJVAPCD to mitigate a development project's impact on air quality. Under the agreement, the developer provides funds to the District to administer the implementation of the VERA. The District then identifies emissions reductions projects, funds those projects, and verifies that the specified emission reductions have been successfully achieved. The District considers implementation of a VERA to be a feasible mitigation measure under CEQA, effectively achieving emissions reductions necessary to reduce impacts to a less than significant level (SJVAPCD 2023).

Greenhouse gas and criteria air pollutant emissions generally come from similar sources including transportation, area, industrial, and energy sectors. VERA projects have included replacement of older, higher-emitting agricultural tractors with new latest-tier tractors, replacement of older, higher-emitting agricultural irrigation water pump engines with electric motors, retrofit of residential open-hearth fireplaces with certified natural gas burning inserts, rebates to Valley residents and businesses for the purchase or lease of new clean-air vehicles, new zero-emission railcar moving equipment to replace an existing switcher locomotive for use within the Valley and a dairy feed mixer electrification project (SJVAPCD 2023). At the time of the analysis, the Project applicant intends to enter into a VERA to reduce Project emissions, as discussed in Mitigation Measure AQ-27. The Project applicant has engaged in conversations with the SJVAPCD and will continue to have future discussions with SJVAPCD staff in order to determine the specific terms of the VERA. While the VERA is designed to reduce criteria air pollutants, the projects it funds would in turn reduce GHG emissions. SJVAPCD does not quantify the GHG emission reductions achieved through the VERA, however it can be assumed that GHG emissions would be greatly reduced as compared to Table 3.8-3 with implementation of Mitigation Measure AQ-27.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

As presented in Table 3.8-3, even after implementation of Mitigation Measures AQ-7 through AQ-27, TRANS-1, and TRANS-2, Project GHG emissions would exceed the 10,000 MTCO₂e per year threshold of significance. Other mitigation measures considered for air quality that might also reduce GHG emissions are discussed in Tables 3.3-39 through 3.3-41. Other mitigation measures considered for transportation that might also reduce GHG emissions are discussed in Section 3.17. As detailed in each of those tables and sections, the other potential mitigation measures that might reduce GHG emissions were considered but were determined to be infeasible due to economic, environmental, social, or technological challenges.

All feasible measures have been implemented to reduce GHG emissions from Project construction and operation. As discussed above, not all measures could be quantified at this time and therefore actual emissions would likely be lower than what is presented in Table 3.8-3. As a result, the Project would generate GHG emissions that may have a significant impact on the environment, and the impact would be significant and unavoidable.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measures AQ-1 through AQ-26, TRANS-1, and TRANS-2 would be required.

Level of Significance After Mitigation

Significant and Unavoidable.

Conflicts with Plans to Reduce Emissions of GHGs

Impact GHG-2	The Project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Impact Analysis

Pursuant to Appendix G of the CEQA Guidelines, a significant GHG impact is identified if a project could conflict with applicable GHG reduction plans, policies, or regulations. Project consistency with the applicable GHG reduction plans, including the CARB's 2022 Scoping Plan, the SJCOG RTP/SCS, and the County General Plan, is evaluated below.

Consistency with the 2022 Scoping Plan

CARB approved the 2022 Scoping Plan in December 2022. The 2022 Scoping Plan builds upon previous iterations of State scoping plans to achieve carbon neutrality and reduce anthropogenic GHG emissions 85 percent below 1990 no later than 2045, as directed by AB 1279. Table 3.8-4 identifies the Scoping Plan policies that may be applicable to the Project.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

Table 3.8-4. Project Consistency with 2022 Scoping Plan Greenhouse Gas Reduction Strategies

Measure	Consistency Determination
Deploy ZEVs and reduce driving demand	Consistent. The Project proposes to develop 5.36 million square feet of industrial space in an area that is transitioning from agriculture to industrial uses. With the rise of e-commerce, warehousing demand across the country has increased. San Joaquin County's transportation and warehousing economic sector is anticipated to grow in employment by 32.5 percent from 2025 to 2050, the largest increase of any industry in the County (SJCOG 2025). The increase in transportation and warehousing employment can be attributed to many factors. First off, the County is among the fastest growing in the State in terms of population and employment. By 2028, there are expected to be approximately 24,000 manufacturing employees and approximately 56,000 transportation and warehousing employees (San Joaquin County 2023). As such, the County would see increases in demand for goods from the increase in population and an increase job demand. Siting warehouses in the County, places these land uses closer to future end customers such as retailers that would supply the future population as well as future employees that will require jobs as population grows in the County. Second, the County has an extensive transportation network. Highway 99 and Interstate 5 are the main arteries to connect the County to the northern and southern portion of the state while I-580 and I-205 provide direct access to the Silicon Valley and San Francisco Bay Area. The Project site is located near both I-580 and I-205. This direct access to other counties would reduce vehicle miles traveled as compared to industrial uses located elsewhere further from the main freeway arteries resulting in additional vehicle miles. Additionally, the Project would include an employee trip reduction program consistent with SJVAPCD Rule 9410; owners, operators, and tenants would be required to implement a ride share program (see Mitigation Measure AQ-25); and the Project would implement a Transportation Demand Plan (see Mitigation Measure TRANS-2). Implementation of these programs and mitigation measures would reduce employee VMT. Therefore, while the Project would result in approximately 14,698 new vehicle trips per day, the average mileage per trip is expected to be lower than other areas of the State due to the central location of the County and the growing population and employment. Additionally, hauling trips would be made by trucks subject to increasingly more stringent CARB regulation to limit air quality and GHG emissions. Therefore, the Project would reduce overall driving demand and associated GHG emissions.
Coordinate supply of liquid fossil fuels with declining CA fuel demand	Not Applicable. This measure is aimed at the State to work with fuel manufacturers. However, the Project would not interfere with this measure, as the Project would comply with all State rules and regulations to reduce fossil fuels. Additionally, the Project would include an employee trip reduction program consistent with SJVAPCD Rule 9410; owners, operators, and tenants would be required to implement a ride share program (see Mitigation Measure AQ-25); and the Project would implement a Transportation Demand Plan (see Mitigation Measure TRANS-2). Implementation of these programs and mitigation measures would reduce employee VMT.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

Measure	Consistency Determination
Generate clean electricity	Consistent. Consistent with Mitigation Measure AQ-8, the Project would construct each building to be able to support solar paneling, and Mitigation Measure AQ-9 requires each building include enough solar paneling to power its industrial office space. Depending on the electricity needs of future occupants, they would be able to install additional solar paneling. As such, owners, tenants, and end users of the Project site would be able to generate clean electricity on-site.
Decarbonize Buildings	Consistent. The Project would comply with a series of sustainability measures, see Section 2.4, IPCP2 Specific Plan Sustainability of the Project Description, that would promote efficient development. Additionally, the Project would implement Mitigation Measures AQ-6 through AQ-8, which would require the Project to be constructed to meet LEED silver standards, include enough solar paneling to power any office uses, and design the industrial buildings to be able to support solar paneling.
Decarbonize Industrial Energy Supply	Consistent. Electricity and natural gas would be provided to the Project site by PG&E. In 2021, PG&E's electric power mix included 98 percent GHG free sources (PG&E 2025). PG&E would be subject to California's RPS and would be required to have a power mix from 100 percent GHG free sources by 2045. Additionally, the Project would implement Mitigation Measures AQ-6 through AQ-8, which would require the Project to be constructed to meet LEED silver standards, include enough solar paneling to power any office uses, and design the industrial buildings to be able to support solar paneling.
Reduce non-combustion emissions (Methane)	Not Applicable. The Project would not produce any fossil fuels and would not include any livestock or agricultural practices that would produce methane.
Reduce non-combustion emissions (Hydrofluorocarbons [HFCs])	Consistent. CARB has issued a series of HFC prohibitions for aerosols, foams, refrigerants, cold storage warehouses, vending machines, and chillers (CARB 2025c). The Project would be required to adhere to all HFC prohibitions.
Compensate for remaining emissions	Consistent. Under Mitigation Measure AQ-27, the Project Applicant is entering into a VERA agreement with SJVAPCD to reduce air quality emissions to thresholds. Implementation of the VERA and programs to reduce air quality emissions would in turn reduce GHG emissions.

Source: CARB 2022a.

This analysis finds that the Project would be consistent with the measures outlined within the CARB's 2022 Scoping Plan. While the Project would emit approximately 78,478 MTCO₂e per year which would generally be inconsistent with the 2022 Scoping Plan's overall goal of reducing GHG emissions to net zero by 2045, the Project applicant is entering into a VERA with SJVAPCD to reduce criteria air pollutant emissions to less than significant levels. The VERA is aimed at reducing criteria air pollutants, but since GHG emissions are generated from many of the same sources, implementation of the VERA would also result in decreases in GHG emissions. SJVAPCD does not quantify the GHG emission reductions achieved through the VERA, however it can be assumed that GHG emissions would be greatly reduced as compared to Table 3.8-3 with implementation of Mitigation Measure AQ-27.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

Consistency with the SJCOG RTP/SCS

The SJCOG Board of Directors approved the RTP/SCS in 2022. Table 3.8-5 identifies the RTP/SCS policies and strategies that may be applicable to the Project.

Table 3.8-5. Project Consistency with SJCOG RTP/SCS Greenhouse Gas Reduction Strategies

Measure	Consistency Determination
Policy: Enhance the Environment for Existing and Future Generations and Conserve Energy	
Strategy 1: Encourage efficient development patterns that maintain agricultural viability and natural resources.	Partially Consistent. The Project would construct 5.36 million square feet of warehousing space in the unincorporated portion of the County, near existing urban areas including the City of Tracy, Lammersville, and Mountain House. The Project site is also located near existing or planned industrial development, including IPC Phase 1, Westside Specific Plan, Owen Brockway Glass Container Manufacturing Facility, and LBA III Industrial Project. The Project would provide approximately 4,377 new jobs within the County and place industrial uses near existing freeways (I-210 and I-580). Thus, the Project would be consistent with the surrounding land uses and would promote efficient development patterns. However, development of the site would convert 284 acres of agricultural lands to industrial uses and, thus, the Project would not maintain agricultural viability on the Project site. Impacts from the conversion of agriculture are evaluated within Section 3.1, Agricultural Resources. While the Project will remove the site from agricultural use, its location consistent with existing and planned urban development avoids leapfrog growth that might interfere with other existing agricultural activity. Additionally, Project impacts to natural resources (including biological resources, paleontological resources, and water) are evaluated in Sections 3.4, Biological Resources; 3.7, Geology and Soils; and 3.10, Hydrology and Water Quality, of this EIR.
Strategy 2: Encourage preservation of natural resources.	Consistent. The Project is being constructed adjacent or near existing urban areas including the City of Tracy, Lammersville, and Mountain House, and other existing or planned industrial development. The impacts to natural resources have been evaluated in other sections of this EIR. The biological analysis, see Section 3.4, Biological Resources, concluded that the Project site is not located on any aquatic resources or other sensitive habitats. The geologic analysis, see Section 3.7, Geology and Soils, concluded that the Project does not have any known unique paleontological resources or unique geologic features. Finally, the hydrology analysis, see Section 3.10, Hydrology and Water Quality, concluded that the Project would not have a significant impact on groundwater or surface water resources. As a result, implementation of the Project would not conflict with the goal to preserve natural resources.
Strategy 3: Enhance the connection between land use and transportation choices through projects supporting energy and water efficiency.	Consistent: The Project would construct new industrial space adjacent to other existing or planned industrial uses near I-580 and I-205. Thus, the Project is appropriately sited to enhance the connection between land use and transportation choices. In



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

Measure	Consistency Determination
	addition, the Project would comply with a series of sustainability measures, see Section 2.4, IPCP2 Specific Plan Sustainability, of the Project Description, that would promote efficient development. This would include an employee trip reduction program consistent with SJVAPCD Rule 9410 and owners, operators, and tenants would be required to implement a ride share program (see Mitigation Measure AQ-25). Additionally, the Project would implement Mitigation Measure AQ-8 which would require the Project to construct each building to be able to support solar paneling and Mitigation Measure AQ-9 installing enough solar paneling on each building to serve its industrial office space electricity needs. The Project would be constructed with water efficient features as required by CALGreen standards and landscaped with drought tolerant plants to reduce water demand. The Project would supply water to industrial end-users through new, on-site water and wastewater treatment facilities that would pull raw water from the Tracy Subbasin and recycle wastewater for irrigation. As compared to the existing almond orchard, the Project would result in a net reduction in use of 1,422 AFY per year, resulting in additional water resources in the region. As a result, the Project would support energy and water efficiency measures as well as enhance the connection between land use and transportation choices.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

Measure	Consistency Determination
Strategy 4: Improve air quality by reducing transportation-related emissions.	Consistent. The Project proposes to develop 5.36 million square feet of industrial space in an area that is transitioning from agriculture to industrial uses. With the rise of e-commerce, warehousing demand across the country has increased. San Joaquin County's transportation and warehousing economic sector is anticipated to grow in employment by 32.5 percent from 2025 to 2050, the largest increase of any industry in the County (SJCOG 2025). The increase in transportation and warehousing employment can be attributed to many factors. First off, the County is among the fastest growing in the State in terms of population and employment. By 2028, there are expected to be approximately 24,000 manufacturing employees and approximately 56,000 transportation and warehousing employees (San Joaquin County 2023). As such, the County would see increases in demand for goods from the increase in population and an increase job demand. Siting warehouses in the County, places these land uses closer to future end customers such as retailers that would supply the future population as well as future employees that will require jobs as population grows in the County. Second, the County has an extensive transportation network. Highway 99 and Interstate 5 are the main arteries to connect the County to the northern and southern portion of the state while I-580 and I-205 provide direct access to the Silicon Valley and San Francisco Bay Area. The Project site is located near both I-580 and I-205. This direct access to other counties would reduce vehicle miles traveled as compared to industrial uses located elsewhere further from the main freeway arteries resulting in additional vehicle miles. Additionally, the Project would include an employee trip reduction program consistent with SJVAPCD Rule 9410; owners, operators, and tenants would be required to implement a ride share program (see Mitigation Measure AQ-25); and the Project would implement a Transportation Demand Plan (see Mitigation Measure TRANS-2). Implementation of these programs and mitigation measures would reduce employee VMT. Therefore, while the Project would result in approximately 14,698 new vehicle trips per day, the average mileage per trip is expected to be lower than other areas of the State due to the central location of the County and the growing population and employment. Additionally, hauling trips would be made by trucks subject to increasingly more stringent CARB regulation to limit air quality and GHG emissions. Therefore, the Project would reduce overall driving demand and associated GHG emissions.
Policy: Maximize Mobility and Accessibility	
Strategy 5: Optimize the public transportation system to provide efficient and convenient access for users of all income levels.	Consistent. The new roadways and roadway improvements proposed as part of the Project would include bus turnouts for future bus routes. As such, the Project would optimize and promote the public transportation system.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

Measure	Consistency Determination
Strategy 6: Encourage infill development and development near transit, including transit-oriented development to maximize existing transit investments.	Consistent. Infill developments development on unused or underutilized lands within existing development patterns (LUCI 2025). The Project site is surrounded by existing and planned industrial uses and located near other urban areas. The character of the Project vicinity is shifting from agricultural uses to industrial uses to take advantage of existing transportation investments, including I-580 and I-205. Additionally, the Project site would take advantage of planned transportation investments, including the South Lammers Road/I-205 interchange. In terms of transit, the Project would construct bus turnouts on all new and upgraded roadways that would allow public transit to access the Project site. Moreover, the City of Tracy bus system (TRACER) has stops near the Project site. Specifically, Commuter Route H stop 27, along South Lammers Road west of Kimball High, is located 1 mile northeast of the Project site, and Route D stop 26, 11th Street & South Lammers Road north of John C, Kimball High, is located 1.25 miles northeast of the Project site (City of Tracy 2023). In addition, Mitigation Measure TRANS-1 ensure internal transportation facilities are designed to accommodate future bus service in coordination with San Joaquin RTD and TRACER.
Strategy 7: Provide transportation improvements to facilitate nonmotorized travel, including incorporation of complete streets elements as appropriate.	Consistent. The Project would include improvements to West Schulte Road and would construct the new Promontory Parkway and Pavilion Parkway. Each of the foregoing roadways would include new bike lanes and pedestrian pathways that would facilitate nonmotorized travel.
Strategy 9: Promote safe and efficient strategies to improve the movement of goods by air, water, rail, and roadway.	Consistent. The Project would construct new industrial space near I-580 and I-205, which places the Project near existing roadways for efficient goods movement. Additionally, the Project would construct Promontory Parkway and Pavilion Parkway, which are new roadways that would improve the connectivity between the Project site to other planned industrial uses and County and City roadways.
Policy: Preserve the Efficiency of the Existing Transportation System	
Strategy 12: Prioritize projects that make more efficient use of the existing road network.	Consistent. The Project site would place employment-generating, industrial uses near I-580 and I-205 to maximize the efficient use of the existing road network.
Strategy 13: Support the continued maintenance and preservation of the existing transportation system.	Consistent. The Project would support the continued maintenance and preservation of the existing transportation system by improving West Schulte Road, see Section 2.0. The Project would generate additional tax revenues which could be used to maintain and improve local roads.
Policy: Support Economic Vitality	
Strategy 17: Support transportation improvements that improve economic competitiveness, revitalize commercial corridors and strategic economic centers, and enhance travel and tourism opportunities.	Consistent. The Project would construct improvements along West Schulte Road. In addition, the Project would construct Promontory Parkway and Pavilion Parkway, both of which would enhance travel to strategic economic centers including the Project site and the IPC Phase 1 site.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

Measure	Consistency Determination
Strategy 19: Encourage and/or strengthen small business while supporting large employer recruitment.	Consistent. At full buildout, the Project would create job opportunities for approximately 4,733 employees and, as a result, would support large employer recruitment. Future tenants of the Project and the associated business sizes are unknown at this time.
Policy: Improve the Quality of Life for Residents	
Strategy 30: Enhance public health through active transportation projects.	Consistent. The Project would construct new pedestrian and Class II bicycle pathways along Promontory Parkway, Pavilion Parkway, and West Schulte Road.

Source: SJCOG 2022.

This analysis finds that the Project would be consistent with the measures outlined within the SJCOG 2022 RTP/SCS. The Project applicant is entering into a VERA with SJVAPCD to reduce criteria air pollutant emissions to less than significant levels. The VERA is aimed at reducing criteria air pollutants, but since GHG emissions are generated from many of the same sources, implementation of the VERA would also result in decreases in GHG emissions. SJVAPCD does not quantify the GHG emission reductions achieved through the VERA, however it can be assumed that GHG emissions would be greatly reduced as compared to Table 3.8-3 with implementation of Mitigation Measure AQ-27.

Consistency with the 2035 General Plan

The San Joaquin County Board of Supervisors approved the 2035 General Plan in 2016. Table 3.8-6 identifies the General Plan goals and policies that may be applicable to the Project.

Table 3.8-6. Project Consistency with 2035 General Plan Greenhouse Gas Reduction Strategies

Measure	Consistency Determination
Goal PHS-6: To reduce greenhouse gas emissions as part of the Statewide effort to combat climate change.	
Policy PHS-6.3: GHG Reduction Strategies. The County shall promote GHG emission reductions by encouraging efficient farming methods (e.g., no-till farming, crop rotation, cover cropping); supporting the installation of renewable energy technologies; and protecting grasslands, open space, oak woodlands, riparian forest and farmlands from conversion to urban uses.	Partially Consistent. The Project would support the installation of renewable energy technologies through implementation of Mitigation Measure AQ-8, which requires solar-ready rooftops, and Mitigation Measure AQ-9 requiring solar panels for industrial office space electrical needs. However, development of the site would convert 284 acres of agricultural lands to industrial uses. Impacts from the conversion of agriculture are evaluated within Section 3.1, Agricultural Resources, which reduces their impact by requiring 1:1 conservation of other agricultural land through Mitigation Measure AGR-1.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

Measure	Consistency Determination
Policy PHS-6.5: Diversion, Recycling, and Reuse. The County shall achieve a 75 percent diversion of landfilled waste based on 1990 levels by 2020, and shall achieve a diversion rate of 90 percent by 2035.	Consistent. The Project would comply with all County diversion, recycling, and reuse programs. All developers would be required under San Joaquin County Ordinance No. 4370 to reuse and recycle construction and demolition waste, including soil, vegetation, concrete, lumber, metal, and cardboard, to the extent feasible. Individual owners and tenants would be encouraged to provide adequate storage bins for recyclables and green waste in public areas. During operation, the Project would receive solid waste services from Tracy Delta Solid Waste Management, and would be required to comply with all County regulations pertaining to solid waste diversion.
Policy PHS-6.6: Business-related GHG Reduction Strategies. The County shall encourage all businesses to help reduce GHG emissions by: replacing high mileage fleet vehicles with more efficient and/or alternative fuel vehicles; increasing the energy efficiency of facilities; transitioning toward the use of renewable energy instead of non-renewable energy sources; adopting purchasing practices that promote emissions reductions and reusable materials; and increasing recycling.	Consistent. The Project would comply with a series of sustainability measures, see Section 2.4, IPCP2 Specific Plan Sustainability, of the Project Description, that would promote efficient development such as “cool roofs” and constructing a purple pipe system. The Project would be subject to CARB’s ACT Rule and ACF Regulation that would reduce mobile-source emissions, and would provide infrastructure to support EV fleets as required by Mitigation Measure AQ-17, Electric Truck Charging. Finally, the Project would implement Mitigation Measures AQ-2 through AQ-27 to further reduce emissions.
Policy PHS-6.7: New Development. The County shall require new development to incorporate all feasible mitigation measures to reduce construction and operational GHG emissions	Consistent. The Project would implement Mitigation Measures AQ-1 through AQ-27, TRANS-1, and TRANS 2, which would reduce construction and operational GHG emissions.

Source: San Joaquin County 2016.

This analysis finds the Project would be generally consistent with the applicable strategies recommended in the County’s General Plan.

Conclusion

This analysis finds that the Project would be consistent with the measures outlined within the 2022 Scoping Plan, SJCOG 2022 RTP/SCS, and General Plan. Overall, the Project incorporates sustainable design features including cool roofs, high efficiency lighting, native landscaping, and a purple pipe system. The Project would also incorporate mitigation that would require the Project to be constructed to meet LEED silver standards, include enough solar to power any warehousing offices, design the industrial buildings to be able to support solar, and include electric hook-up at all cold storage truck bays. Additionally, the Project applicant is entering into a VERA with SJVAPCD to reduce criteria air pollutant emissions to less than significant levels. The VERA is aimed at reducing criteria air pollutants, but since GHG emissions are generated from many of the same sources, implementation of the VERA would also result in decreases in GHG emissions. SJVAPCD does not quantify the GHG emission reductions achieved through the VERA, however it can be assumed that GHG emissions would be greatly reduced as compared to Table 3.8-3 with implementation of Mitigation Measure AQ-27. Therefore, the impact would be less than significant with mitigation.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measures AQ-1 through AQ-27 and Mitigation Measures TRANS-1 and TRANS-2 would be required.

Level of Significance After Mitigation

Less than Significant with Mitigation

3.8.4 Notice of Preparation Comments Related to Greenhouse Gas Emissions

As discussed in Section 1.0, Introduction, the County distributed a NOP of the Draft EIR for the Project beginning on March 31, 2023. The NOP was distributed for a 30-day comment period that ended on May 1, 2023. The Public Scoping Meeting on the Draft EIR for the Project was held on April 10, 2023. The comments received on the NOP and during the Public Scoping Meeting were considered in the preparation of this Draft EIR. Comments related to greenhouse gas and where they are addressed in this section are provided in Table 3.8-7. Additionally, each comment includes a brief summary of how the concern was addressed, the impact, or why additional analysis is not required. Commenters may have made comments addressing multiple EIR sections, but only specific GHG comments are provided in Table 3.8-7. See Table 1.2-1 in Section 1.0, Introduction for a summary of all comments made during the NOP scoping period.

Table 3.8-7. Comments Received on the NOP for Greenhouse Gas

Affiliation	Signatory	Date	Comment Description	Location Addressed in GHG Chapter	Response to Comment
Private Parties – Written Comments Received					
California Air Resources Board	Robert Krieger	April 28, 2023	The comment included a list of recommended construction measures for warehouse and distribution center projects.	- Subsection 3.8.3, Environmental Impacts, Project Impacts and Mitigation Measures - Section 3.3, Table 3.3-39	CARB recommends that if the Project does not use cold storage, then the tenant lease agreements should prohibit tenants from operating TRUs. Cold storage is anticipated on the site, therefore these measures would not be applicable. TRU emissions were calculated consistent with CARB guidance and are disclosed in Table 3.8-2. The Project also include mitigation that aligns with many of CARB's recommended operation measures including Mitigation Measure AQ-1, AQ-3, AQ-12, AQ-18, and AQ-19. Additionally, Project construction would require the use of Tier 4



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

Affiliation	Signatory	Date	Comment Description	Location Addressed in GHG Chapter	Response to Comment
					construction equipment, see Mitigation Measure AQ-1. Overall, Mitigation Measures AQ-1 through AQ-27, TRANS-1, and TRANS-2 would reduce GHG emissions from the Project. Project consistency with CARB recommended measures are evaluated in Section 3.3, Table 3.3-39.
Interested Individual	Dale and Patricia Brandes	April 24, 2023	The commenters request that impacts related to air quality be included in the EIR.	Subsection 3.3.3, Environmental Impacts, Project Impacts and Mitigation Measures	The EIR addressed all CEQA Appendix G questions related to GHGs and with the implementation of Mitigation Measures AQ-1 to AQ-27, impacts were found to be less than significant.
California Department of Justice	Christie Vosburg	April 11, 2023	Recommendation to use Attorney General's (AG) "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document, to reduce impacts to sensitive receptors.	- Subsection 3.3.3, Environmental Impacts, Project Impacts and Mitigation Measures - Section 3.3, Table 3.3-40	Project consistency with the best practices and recommended mitigation in the AG's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document is evaluated in Table 3.3-40.
Mitchell Tsai, on behalf of Nor Cal Carpenters	Mitchell Tsai	May 1, 2023	Commenter seeks to require the use of a local workforce to reduce GHG emissions from worker trips.	Subsection 3.8.3, Environmental Impacts, Project Impacts and Mitigation Measures	GHG emissions from construction, including from worker vehicle trips, are provided in Table 3.8-1.
Sierra Club	Margo Praus	May 1, 2023	List of conditions of approval including measures related to air quality, GHG emissions and project setbacks, as well as the AG's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California	- Subsection 3.8.3, Environmental Impacts, Project Impacts and Mitigation Measures - Section 3.3, Table 3.3-40 - Section 3.3, Table 3.3-41	Project consistency with the best practices and recommended mitigation in the AG's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document is evaluated in Table 3.3-40. Consistency with the other recommended conditions of approval related to air



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Greenhouse Gas Emissions

Affiliation	Signatory	Date	Comment Description	Location Addressed in GHG Chapter	Response to Comment
			Environmental Quality Act" document.		quality from Sierra Club are provided in Table 3.3-41.
San Joaquin Valley Air Pollution Control District	Brian Clements	May 1, 2023	Restatement of Air District's standard requirements and rules that must be complied with, as well as a recommendation to enter into a Voluntary Emissions Reduction Agreement.	- Subsection 3.8.3, Environmental Impacts, Project Impacts and Mitigation Measures - Appendix C	SJVAPCD was provided methodology and assumption memorandums for CalEEMod modeling on September 1, 2023. The comments received on the memorandum were incorporated. Please see Appendix C for those memos and SJVAPCD's responses. Additionally, GHG emissions were disclosed in Table 3.8-1 and Table 3.8-2. The Project would implement Mitigation Measures AQ-1 through AQ-27, TRANS-1, and TRANS-2 to reduce emissions. This includes implementation of a VERA that would result in the reduction of GHG emissions. A letter from SJVAPCD confirming the Project Applicant's ongoing discussion of the VERA is provided in Appendix D.
Interested Individual	Wendy Tocchini	April 30, 2023	The commenter requests that impacts related to GHGs be included in the EIR.	Subsection 3.8.3, Environmental Impacts, Project Impacts and Mitigation Measures	The EIR addressed all CEQA Appendix G questions related to GHGs and with the implementation of Mitigation Measures AQ-1 to AQ-27, TRANS-1, and TRANS-2, impacts were found to be less than significant.
Private Parties – Comment Cards at Scoping Meeting					
Interested Individual	Dale and Patricia Brandes	April 10, 2023	The commenters request that impacts related to GHGs be included in the EIR.	Subsection 3.8.3, Environmental Impacts, Project Impacts and Mitigation Measures	The EIR addressed all CEQA Appendix G questions related to GHGs and with the implementation of Mitigation Measures AQ-1 to AQ-27, TRANS-1, and TRANS-2, impacts were found to be less than significant.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Greenhouse Gas Emissions

Affiliation	Signatory	Date	Comment Description	Location Addressed in GHG Chapter	Response to Comment
Interested Individual	Dotty Nygard	April 10, 2023	Request to follow AG's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document.	• Subsection 3.8.3, Environmental Impacts, Project Impacts and Mitigation Measures • Section 3.3, Table 3.3-40	Project consistency with the best practices and recommended mitigation in the AG's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document is evaluated in Table 3.3-40.
Interested Individual	Keith Vanderveen	April 10, 2023	The commenters request that impacts related to GHGs be included in the EIR.	• Subsection 3.8.3, Environmental Impacts, Project Impacts and Mitigation Measures	The EIR addressed all CEQA Appendix G questions related to GHGs and with the implementation of Mitigation Measures AQ-1 to AQ-27, TRANS-1, and TRANS-2, impacts were found to be less than significant.



3.9 HAZARDS AND HAZARDOUS MATERIALS

This section describes the environmental setting for hazards and hazardous materials including the existing Project site conditions, regulatory setting, and potential impacts that could result from the Project, and, if significant impacts are identified, the mitigation measures that would reduce these impacts. Additional detail and background on hazards and hazardous materials are based, in part, on the Phase I and Phase II Environmental Site Assessments (ESAs) prepared by Farallon Consulting LLC (Farallon) in 2021, included in Appendix I to this EIR.

3.9.1 Environmental Setting

Project Site

The Project is located approximately 70 miles south of Sacramento and approximately 60 miles east of San Francisco on the eastern slope of the Altamont Pass, adjacent to the City of Tracy and outside of its SOI within an unincorporated area of the County.

The 284-acre Project site is bisected by West Schulte Road. The Project site consists of four parcels identified as APN 209-240-36, APN 209-240-37, APN 209-250-10, and APN 209-250-37. APNs 209-240-36 and 209-240-37 comprise the southern portion of the site, south of West Schulte Road, while APNs 209-250-10 and APNs 209-250-37 make up the northern portion of the site. APNs 290-250-10 and 209-250-37 are bisected by the WSID Canal. The Project site is currently in agricultural use, with almond orchards planted across the site. The WSID Canal cuts through the northern portion of the Project site. The Project site appeared to be used for agricultural purposes as early as 1937, with no evidence of development. The site was drawn as an orchard in the 1954 and 1968 topographic maps and as unimproved land in 1916, 1922, 1942, 1981, and 2015. Transient farm equipment, including fertilizer mixing trailers, is depicted on the site periodically and no buildings were ever present on the site. Based on the Project site's historical use, residual fertilizers and pesticides are potentially present in site soils.

Within the state, the California Environmental Protection Agency (Cal EPA) regulates the use and handling of hazardous materials and hazardous wastes. The California Department of Toxic Substances Control (DTSC) is a division of Cal EPA and works in conjunction with the USEPA to enforce and implement hazardous materials laws and regulations.

Phase I and Phase II ESAs were prepared by Farallon to identify and analyze potentially hazardous materials onsite. The results of the Phase I and Phase II ESAs are described below.

Phase I Environmental Site Assessments

Phase I ESAs were prepared for the Project by Farallon and the results were summarized in three separate Phase I ESA reports: the *Phase I Environmental Site Assessment Report, IPC Park 32, San Joaquin County Assessor Parcel No. 209-025-037, Tracy, California* dated March 3, 2021, prepared by Farallon (IPC Park 32 Phase I report) (Farallon 2021a); the *Phase I Environmental Site Assessment Report, IPC Park 33, 14501 West Schulte Road, Tracy, California* dated April 6, 2021, prepared by Farallon (IPC Park 33 Phase I report) (Farallon 2021b); and the *Phase I Environmental Site Assessment Report, IPC Park 35, 14100 and 14320 West Schulte Road, Tracy, California* dated April 6, 2021, prepared by Farallon (IPC Park 35 Phase I report) (Farallon 2021c).



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hazards and Hazardous Materials

The Phase I ESAs were prepared to determine if any recognized environmental conditions associated with past and present activities, are present within the boundaries of the Project area, or in its vicinity. The Phase I ESAs were conducted in conformance with ASTM Standard E1527-13 “Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process”. Site reconnaissance surveys were conducted for the preparation of the Phase I ESAs to observe the site for physical evidence of recognized environmental conditions.

Three separate Phase I reports were prepared that cover the entire development area of Project site. The IPC Park 32 Phase I and IPC Park 33 Phase I cover the portion of the Project site north of West Schulte Road. The IPC Park 35 Phase I covers the portion of the Project site south of West Schulte Road. Table 3.9-1 provides the area and APNs evaluated within each Phase I report. While the Project site totals 284 acres, a total of 278.33 acres were evaluated in the Phase I reports. The 278.33 acres does not include the approximate six acres of the WSID canal.

Table 3.9-1. Phase I Evaluation Areas

Report	APN(s)	Size (acres)
IPC Park 32 Phase I	209-25-037	49.83
IPC Park 33 Phase I	209-25-010	122.06
IPC Park 35 Phase I	209-24-036 209-24-037	106.44

The Phase I ESA reports identified that residual fertilizers and pesticides are potentially present in the soils as the Project site is currently developed with an almond orchard that has historically used pesticides. Construction workers and nearby receptors may be exposed to pesticides during the removal of the almond trees and grading operations. The risks posed by pesticides are evaluated within the Phase I ESA. The potential presence of residual fertilizers in site soils were determined to represent a de minimis condition as there is an absence of evidence of concentrated long-term fertilizer use and the planned use would not include any residential or school uses (Farallon 2021a, Farallon 2021b, Farallon 2021c), see Appendix I. Additionally, the Project would be required to comply with SJVAPCD Regulation VIII which would limit fugitive dust emissions that may contain traces of pesticides. The IPC Park 35 ESA noted that a pile of railroad ties was observed along the southern boundary of the Project site which are assumed to be in the railway easement to the south of the site (Farallon 2021c). Additionally, IPC Park 35 ESA identified potential hazards from the Owens Brockway Glass Container Manufacturing Facility immediately west of the Project site. Further evaluation for soils associated with the pesticide use and hazardous impacts from the Owens Brockway Glass Container Manufacturing Facility at the site and at the railroad tie pile if determined to be located on the site, may be warranted for any soil planned to be disturbed or removed from the site to determine whether special handling practices are required (Farallon 2021a, 2021b, 2021c). Soil evaluation was conducted during the Phase II ESA (see below for discussion).

The IPC Park 32 Phase I report identified one plugged dry hole exploratory oil and gas well on the northeastern portion of the site. According to well records, the borehole was abandoned in October 1967 because oil and gas were not encountered. A certification of abandonment was issued by the California Department of Conservation Division of Oil and Gas in November 1967. The California Department of Conservation, Geological Energy Management Division (CalGEM) recommends that wells be abandoned



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hazards and Hazardous Materials

to current standards and that access to the well located on a property be maintained in the event abandonment or re-abandonment of the well becomes necessary in the future. The presence of an oil and gas well on Project site with the potential to require re-abandonment (including possibly requiring permission from any mineral rights owners) is considered a business environmental risk, which can have a material environmental or environmentally driven impact on the business associated with the current or planned use of a parcel of commercial real estate. Based on the findings of the IPC Park 32 Phase I report, Farallon recommended no further assessment of the site is warranted; however, CalGEM may require the re-abandonment of the former oil and gas dry well should future development occur on the site (Farallon 2021a).

The Phase I ESAs prepared for the Project identified the following recognized environmental conditions in connection with the site:

- The potential for historical releases of crude oil associated with the two former Shell pipelines that traverse the southwestern corner and the central portion of the site; and
- the potential for impacts from the west-adjacent Owens Brockway Glass Container Manufacturing Facility property based on proximity to the site, length of operations, and the nature of the manufacturing process at the facility.

The IPC Park 33 and IPC Park 35 Phase I reports identified that a pipeline easement is depicted in topographic maps and aerial photographs across the southwestern corner and central portion of the Project site between at least 1954 and 1981 and have since been removed. Although no longer in use, two crude oil pipelines were apparent within the easement reportedly owned by Shell. The pipeline easement depicted in historical records consists of one out-of-use 8-inch-diameter crude oil pipeline and one out-of-use 10-inch-diameter crude oil pipeline. According to the *Amended Soil Management Plan, Former Shell Central Valley Crude Oil Pipelines, Cordes Ranch, Tracy, California* dated September 30, 2019, prepared by GHD (2019 Soil Management Plan), which is associated with the pipeline easement, the easement is identified as land within 50 feet of the pipelines, along the entire length of the former pipeline system. Impacts to soil have been identified along other areas of the easement located approximately 0.75 mile northwest of the Project site. The portion of the easement that underlies the site does not appear to have undergone assessment within the 2019 Soil Management Plan. The potential for impacts from the former pipelines represents a recognized environmental condition in connection with the Project site. Based on findings in the IPC Park 33 and IPC Park 35 Phase I reports, Farallon recommends that a soil management plan be prepared for the site to address the handling of any planned excavation activities within the Shell easement to ensure proper adherence to the 2019 Soil Management Plan in the event that contaminated soil is discovered (Farallon 2021b, 2021c). Further evaluation of the pipeline was evaluated within the Phase II.

As identified in the IPC Park 35 Phase I report, an Environmental Risk Information Services (ERIS) Database Report was prepared for the site dated January 31, 2021. Offsite and adjacent properties were noted on multiple databases within the ERIS report, including those for the southwest-adjacent Tracy Combined-Cycle Power Plant, the west-adjacent Owens Brockway Glass Container Manufacturing Facility, and the northwest-adjacent former Tracy Biomass Plant which was demolished in 2019. Listings for the Tracy Combined-Cycle Power Plant and former Tracy Biomass Plant were not considered environmental concerns for the site due to a lack of listings, indicative of environmental spills or releases



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hazards and Hazardous Materials

that may have impacted the Project site and operational status with regulatory oversight. However, the Owens Brockway Glass Container Manufacturing Facility is associated with long-term industrial use, current and former hazardous materials storage and use, a historical leaking underground storage tank case (closed in 2002), fugitive dust impacts, and on-site waste discharge with monitoring. Groundwater monitoring data associated with the waste discharge monitoring activities indicate that impacts of chlorinated volatile organic compounds are below present maximum contaminant levels; however, the long-term use of the property for glass manufacturing, historical fugitive dust concerns, and nature of the onsite manufacturing operations at the Owens Brockway Glass Container Manufacturing Facility represents a recognized environmental condition with regard to the Project site. Based on the findings of IPC Park 35 Phase I report, Farallon recommended that a subsurface investigation to identify potential impacts from the adjacent Owens Brockway Glass Container Manufacturing Facility be conducted (Farallon 2021c). Further evaluation of the Owens Brockway Glass Container Manufacturing Facility was evaluated within the Phase II.

Phase II Environmental Site Assessment

A Phase II ESA was prepared for the Project site by Farallon on September 10, 2021, which included the performance of the subsurface investigation activities recommended by the Phase 1 Reports. The Phase II ESA was conducted to assess the potential presence of selected constituents of concern (COCs) from potential historical releases at the Project site and potential impacts from adjacent properties. The COCs assessed included total petroleum hydrocarbons (TPH), metals, and pesticides in soil; volatile organic compounds (VOCs) and methane in soil gas; and VOCs in groundwater. Potential sources of COCs include historical and current on-site agricultural activities, the presence of a former onsite oil production exploratory well ("dry hole"), the presence of former crude oil pipelines beneath the site, the storage of railroad ties, and possible releases from offsite manufacturing operations, which were identified as recognized environmental conditions or business environmental risks in connection with the site during environmental due diligence activities performed by Farallon, summarized in three separate Phase I ESA reports described above.

Farallon conducted subsurface investigation activities to analyze the potential presence of hazardous materials in soil, soil gas, and groundwater at the Project site. Based on the analytical results from this Phase II ESA, COCs were not present in soil, soil gas, or groundwater at concentrations indicative of a significant release or exceeding commercial/industrial screening criteria, or, in the case of arsenic and vanadium, exceeding background concentrations for California soils. Several of the compounds detected in soil gas, such as benzene and PCE, were at concentrations less than Tier 1 unrestricted land use screening criteria and are potentially related to regional conditions from soil and air contaminants. The origins of these compounds could not be determined with any degree of certainty from the limited data set. Given the historical use of the site exclusively for agricultural purposes, sources of these industrial constituents are not anticipated to be present on the site. The scope of work for the Phase II ESA concluded that any unlikely, but theoretically possible releases from the Owens Brockway Glass Container Facility or the crude oil pipelines would not adversely affect future commercial/industrial use of the Project site since COCs, benzene, PCE and other contaminants in the soil did not exceed commercial/industrial screening criteria thresholds (Farallon 2021d).



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hazards and Hazardous Materials

3.9.2 Regulatory Setting

Federal

United States Environmental Protection Agency

The USEPA is the primary federal agency responsible for enforcement and implementation of federal laws and regulations pertaining to hazardous materials. Applicable federal regulations pertaining to hazardous materials are contained mainly in the Code of Federal Regulations (CFR) Titles 29, 40, and 49. Hazardous materials, as defined in the CFR, are listed in 49 CFR 172.101. These laws and associated regulations include specific requirements for facilities that generate, use, store, treat, and/or dispose of hazardous materials. USEPA also provides oversight and supervision of Federal Superfund investigation/remediation projects, evaluates remediation technologies, and develops hazardous materials disposal restrictions and treatment standards. Management of hazardous materials is governed by the following laws:

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

CERCLA (commonly known as Superfund) established prohibitions and requirements concerning closed and abandoned hazardous waste sites; provided for liability of persons responsible for releases of hazardous waste at these sites; and established a trust fund to provide for cleanup when no responsible party could be identified. Under CERCLA, USEPA has the authority to hold parties responsible for releases of hazardous substances and require their cooperation in site remediation. Superfund Amendments and Reauthorization Act (SARA Title III), the Emergency Planning and Community Right-to-Know Act, requires companies to declare potential toxic hazards to ensure that local communities can plan for chemical emergencies. USEPA maintains a National Priority List of uncontrolled or abandoned hazardous waste sites identified for priority remediation under the Superfund program. USEPA also maintains the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) database, which contains information on hazardous waste sites, potential hazardous waste sites, and remedial activities across the nation.

CERCLA was amended in 1986 under the Superfund Amendments and Reauthorization Act (SARA) which emphasized the importance of permanent remedies and innovative treatment technologies to clean up hazardous waste sites. SARA also required Superfund actions to consider the standards and requirements found in other state and federal environmental laws and regulations; provided new enforcement authorities and settlement tools; increased involvement of the states in every phase of the Superfund program; increased the focus on human health problems posed by hazardous waste sites; encouraged greater citizen participation in making decisions on how sites should be cleaned up; and increased the size of the trust fund.

Resource Conservation and Recovery Act (RCRA)

Hazardous wastes, although included in the definition of hazardous materials and hazardous substances, are regulated separately under the Resource Conservation and Recovery Act (RCRA) that was initially adopted in 1976. A waste can legally be considered hazardous if it is classified as ignitable, corrosive, reactive, toxic, or if it is a "listed" waste by the USEPA. RCRA also gives USEPA or an authorized state the authority to conduct inspections to ensure that individual facilities are in compliance with regulations,



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hazards and Hazardous Materials

and to pursue enforcement action if a violation is discovered. USEPA can delegate its responsibility to a state if the state's regulations are at least as stringent as the federal ones. RCRA was updated in 1984 by the passage of the Federal Hazardous and Solid Waste Amendments, which required phasing out land disposal of hazardous waste. Title 22, Section 66261.24 of the California Code of Regulations (CCR) (i.e., 22 CCR 66261.24) defines characteristics of toxicity. Under RCRA, USEPA regulates hazardous waste from the time that the waste is generated until its final disposal ("cradle to grave").

1984 Hazardous and Solid Waste Amendment Act

RCRA was amended by the 1984 Hazardous and Solid Waste Amendment Act, which prohibited the use of certain techniques for the disposal of certain hazardous wastes. The Emergency Planning and Community Right-to-Know Act of 1986 imposes safety requirements to protect local communities in the event of accidental release of hazardous substances. The requirements provide measures so that the risks from interaction with hazardous materials, such as handling, storage, and disposal, are mitigated or prevented. This law protects human health and the environment if the unintended release of hazardous materials was to occur. The USEPA has delegated fulfillment of many of RCRA's requirements to the DTSC.

Toxic Substances Control Act of 1976

The Toxic Substances Control Act of 1976 (TSCA) (15 USC 2601) gave the USEPA the authority to require reporting, record-keeping, and testing requirements, and restrictions related to chemical substances that pose risk to the public. The TSCA addresses the manufacturing, processing, distribution, and use of specific chemicals including Polychlorinated Biphenyl (PCBs), asbestos, and lead based paints. The TSCA was amended in 2016 by the Frank R. Lautenberg Chemical Safety for the 21st Century Act. The amendment mandated that existing chemicals be evaluated, all chemicals are assessed under a risk based safety standard, and unreasonable risks be eliminated.

Occupational Health and Safety Administration (OSHA)

The Occupational Safety and Health Administration (OSHA) of the U.S. Department of Labor is responsible for enforcement and implementation of Federal laws and regulations pertaining to worker health and safety. Workers at hazardous waste sites must receive specialized training and medical supervision according to the Hazardous Waste Operations and Emergency Response (HAZWOPER) regulations (29 CFR 1910.120).

Hazardous Waste Operations and Emergency Response (HAZWOPER)

HAZWOPER requirements include federal regulations that involve procedures for clean-up operations required by a governmental body, whether Federal, state local or other involving hazardous substances that are conducted at uncontrolled hazardous waste sites. This includes the USEPA's National Priority Site List (NPL), state priority site lists, sites recommended for the USEPA NPL, and other initial investigations of government identified sites which are conducted before the presence or absence of hazardous substances has been ascertained. A person who is engaged in work with any potential for exposure to hazardous substances would need to comply with HAZWOPER regulations.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hazards and Hazardous Materials

Hazardous Materials Transportation Act

The transportation of hazardous materials is regulated by the Hazardous Materials Transportation Act (HMTA), which is administered by the Research and Special Programs Administration (RSPA) of United States Department of Transportation (USDOT). HMTA provides USDOT with a broad mandate to regulate the transport of hazardous materials, with the purpose of adequately protecting the nation against risk to life and property, which is inherent in the commercial transportation of hazardous materials. The HMTA governs the safe transportation of hazardous materials by all modes, excluding bulk transportation by water. RSPA carries out these responsibilities by prescribing regulations and managing a user-funded grant program for planning and training grants for states and Indian tribes. USDOT regulations that govern the transportation of hazardous materials are applicable to any person who transports, ships, causes to be transported or shipped, or who is involved in any way with the manufacture or testing of hazardous materials packaging or containers. USDOT regulations pertaining to the actual movement govern every aspect of the movement, including packaging, handling, labeling, marking, placarding, operational standards, and highway routing. Additionally, USDOT is responsible for developing curriculum to train for emergency response and administers grants to states and Indian tribes for ensuring the proper training of emergency responders. HMTA was enacted in 1975 and was amended and reauthorized in 1990, 1994, and 2005.

International Fire Code

The International Fire Code (IFC), created by the International Code Council, is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The IFC has been adopted by most states throughout the country including California. The IFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The IFC and the International Building Code (IBC) use a hazard classification system to determine what protective measures are required for fire and life safety. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, the IFC employs a permit system based on hazard classification. The IFC is updated every three years, and is the basis for the California Fire Code (also updated triennially).

National Fire Plan

The Department of the Interior's National Fire Plan is intended to ensure an appropriate federal response to severe wildland fires, reduce fire impacts to rural communities, and ensure sufficient firefighting capacity in the future. The Rural Fire Assistance program is funded to enhance the fire protection capabilities of rural fire districts and safe and effective fire suppression in the wildland/urban interface. The program promotes close coordination among local, state, tribal, and federal firefighting resources by conducting training, equipment purchase, and prevention activities on a cost-shared basis.

State

In California, both federal and state community right-to-know laws are coordinated through the California Governor's Office of Emergency Services (Cal OES). The federal law, SARA Title III or EPCRA, described above, encourages and supports emergency planning efforts at the state and local levels and to provide local governments and the public with information about potential chemical hazards in their



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hazards and Hazardous Materials

communities. The provisions of EPCRA apply to four major categories: emergency planning, emergency release notification, reporting of hazardous chemical storage, and inventory of toxic chemical releases. Information gathered in these four categories helps federal, state, and local agencies and communities understand the chemical hazards in a particular location or area and what chemicals individual facilities are using, storing, or producing on site.

The Department of Toxic Substance Control (DTSC), a division of the California Environmental Protection Agency, has primary regulatory responsibility over hazardous materials in California, working in conjunction with USEPA to enforce and implement hazardous materials laws and regulations, including use of the Universal Hazardous Waste Manifest system.

Transport of Hazardous Materials and Hazardous Materials Emergency Response Plan

The State of California has adopted U.S. Department of Transportation regulations for the movement of hazardous materials originating within the state and passing through the state; state regulations are contained in 26 CCR. State agencies with primary responsibility for enforcing state regulations and responding to hazardous materials transportation emergencies are the California Highway Patrol and the Caltrans. Together, these agencies determine container types, placarding, and signage used, and license hazardous waste haulers to transport hazardous waste on public roads. California has developed an emergency response plan to coordinate emergency services provided by federal, state, and local governments and private agencies. Response to hazardous materials incidents is one part of the plan. The plan is managed by Cal OES, which coordinates the responses of other agencies in the Project area.

Porter-Cologne Water Quality Act

Through the Porter-Cologne Water Quality Act and the NPDES program, the RWQCB has authority to require proper management of hazardous materials during Project construction. For a detailed description of the Porter-Cologne Water Quality Act, the NPDES program, and the role of the RWQCB, see Draft EIR Section 3.10, Hydrology and Water Quality.

California Occupational Safety and Health Administration

The California Occupational Safety and Health Administration (Cal/OSHA) assumes primary responsibility for developing and enforcing workplace safety regulations within the state. Cal/OSHA standards are typically more stringent than federal OSHA regulations and are presented in Title 8 of the CCR. Cal/OSHA conducts on-site evaluations and issues notices of violation to enforce necessary improvements to health and safety practices.

California Geologic Energy Management Division (CalGEM)

CalGEM oversees the drilling, operation, maintenance, and plugging and abandonment of oil, natural gas and geothermal wells. The regulatory program emphasizes the wise development of oil, natural gas, and geothermal resources in the state through sound engineering practices that protect the environment, prevent pollution, and ensure public safety. Sections 3208 and 3255(a) (3) of the Public Resources Code give CalGEM the authority to order the abandonment or re-abandonment of any well that is hazardous, or that poses a danger to life, health, or natural resources. Responsibility for abandonment and or reabandonment costs for any well may be affected by the choices made by the local permitting agency,



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hazards and Hazardous Materials

property owner, and/or developer. The Project site contains the “North Stockton Unit A” 1 well (API: 0407700519) which is a former gas well converted to water well. The future disposition of this well is subject to the above Public Resources Code sections and is under the authority of CalGEM.

California Fire Code

The 2010 California Fire Code is published by the California Building Standards Commission and incorporates by adoption the 2009 International Fire Code of the International Code Council. San Joaquin County has adopted the California Fire Code with amendments.

Local

County Office of Emergency Services (OES)

The responsibility of the San Joaquin County Office of Emergency Services (OES) includes effective planning for emergencies OES provides training for governmental agencies, including California Department of Public Health (CDPH), the County Public Works Department and SJCEHD.

The OES is also responsible for preparing a Local Hazardous Mitigation Plan (LHMP) that meets the state and federal requirement of the Disaster Mitigation Act of 2000, to develop an on-going process for mitigating disaster damages both prior to and following a disaster.

San Joaquin County Environmental Health Department (SJCEHD)

The SJCEHD, under the Certified Unified Program Agencies (CUPA) Program, enforces state regulations governing hazardous materials storage, hazardous waste generators, hazardous waste treatment and hazardous substance underground storage tanks (USTs). The CUPA is authorized to carry out various hazardous materials regulatory programs administered at the state and local levels. The SJCEHD also inspects aboveground petroleum storage tanks (ASTs) for compliance with the Spill Prevention Countermeasures and Control Program (SPCC). The SJCEHD has a responsibility to assess the compliance of regulated facilities through monitoring and enforcement and respond to issued complaints. The SJCEHD uploads Compliance, Monitoring, and Enforcement (CME) data at least quarterly to CERS.

The Local Oversight Program (LOP) within the SJCEHD ensures adequate and appropriate cleanup of petroleum contamination associated with leaks from USTs. The SJCEHD performs oversight of investigation and cleanup activities at soil and groundwater contaminated sites under a contract with the State Water Resources Control Board (SWRCB).

The SJCEHD also oversees the investigation and mitigation of contamination from UST releases that are relatively minor, so the responsible parties prefer to expedite the corrective action activities with the local program pursuant to authority found in the California Underground Storage Regulations. Other sites have responsible parties that request to enter into remedial action agreement with the SJCEHD as authorized by the Health and Safety Code Section 101480 for the cleanup of simple contamination. The SJCEHD also issues permits and conducts inspections of well installations and destructions at local, state and federal Cleanup sites and Environmental Assessment sites.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hazards and Hazardous Materials

San Joaquin County Toxic Enforcement Task Force

The San Joaquin County District Attorney's Office and SJCEHD jointly conduct monthly meetings as an open forum for any regulatory agency to discuss issues concerning hazardous materials or wastes enforcement and strategies for obtaining compliance with current regulations. Agencies that participate in these meetings include SJCEHD (CUPA) California Department of Fish and Wildlife, the Regional Water Quality Control Board, the Department of Toxic Substances Control, USEPA, the San Joaquin Valley Air Pollution Control District, the San Joaquin County Sheriff's Office, the San Joaquin County Agricultural Commissioner's Office, and municipal utility districts.

San Joaquin County Airport Land Use Plan (1997)

The 1997 San Joaquin County Airport Land Use Plan (ALUP) establishes Airport Land Use Zones for each airport in the plan. The zones are based on Federal Part 77 airspace standards. Within each zone, the airport land use guidelines control both the heights of structures and the type of land uses. The plan also includes intensity restrictions which limit the number of people that may congregate within a specific area. These restrictions are meant to both reduce risk to people on the ground in the event of an aircraft accident and to minimize hazards to aircraft flight.

San Joaquin County Airport Land Use Commission

The San Joaquin Council of Governments serves as the Airport Land Use Commission (ALUC) for San Joaquin County. The Commission is updating its ALUP. As part of the update, the safety compatibility criteria and policies will be modified to reflect current legislation; anticipated growth in aircraft operations at the airports in the County; and mitigate future safety impacts.

San Joaquin County General Plan

The County's General Plan presents a vision for the County's future, looking ahead to 2035. This long-range planning document includes a comprehensive framework for the County's physical, economic, and social development and environmental resources preservation, as well as policies to guide day-to-day decisions. The County's General Plan emphasizes that future development must occur in a way that makes the most of existing infrastructure and public facilities, minimizes impacts to natural resources, expands opportunities for job growth, restores and revitalizes unincorporated communities, and provides greater opportunities to all County residents.

The County's General Plan includes the following goals and policies related to hazards and hazardous materials that are applicable to the Project (San Joaquin County 2016):

Goal PHS-1: To maintain a level of disaster preparedness necessary for the protection of public and private property, and the health, safety, and welfare of people living and working in San Joaquin County.

- **Policy PHS-1.10: Emergency Vehicles Access.** The County shall require all new developments to provide, and existing developments to maintain, adequate primary and alternative access for emergency vehicles.

Goal PHS-7: To protect County residents, visitors, and property from hazardous materials and waste.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hazards and Hazardous Materials

- **Policy PHS-7.1: Minimize Hazardous Materials and Wastes.** The County shall discourage the use of hazardous materials and the creation of hazardous wastes.
- **Policy PHS-7.2: Avoid Contamination of Resources.** The County shall strive to ensure that hazardous materials and wastes do not contaminate air, water, or soil resources.
- **Policy PHS-7.3: Control Hazardous Materials.** The County shall require the use, storage, and disposal of hazardous materials and wastes to comply with local, State, and Federal safety standards.
- **Policy PHS-7.6: Require Hazardous Materials Management Plans.** The County shall require businesses that use or store materials and wastes on-site to prepare Hazardous Materials Management Plans (Business Plans) that map and inventory all hazardous materials and contain contingency plans for accidents, designate an individual or individuals as emergency coordinator(s), and ensure that all employees understand the potential for accidents and the appropriate response. Plans must follow the requirements for Federal, State, and/or local defined special flood hazard areas.
- **Policy PHS-7.8: Consistency with Hazardous Waste Management Plan.** The County shall require all new development to be consistent with the County Hazardous Waste Management Plan (CHWMP). Any proposed hazardous waste facility, or expansion of an existing hazardous waste facility, shall be consistent with the CHWMP.
- **Policy PHS-7.9: Require Disclosure of Hazardous Materials and Waste.** The County shall require public disclosure of hazardous materials and wastes for existing and proposed businesses.

3.9.3 Environmental Impacts

This section analyzes the Project's potential to result in significant impacts related to hazards and hazardous materials. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid impacts.

Methodology

The following analysis is based on a review of documents pertaining to the Project site, including the General Plan, General Plan EIR, Phase I and Phase II ESAs and online regulatory compliance databases. Phase I and Phase II ESAs are included as Appendix I of this EIR.

Thresholds of Significance

The significance criteria used to identify hazards and hazardous waste impacts is from Appendix G of the CEQA Guidelines. For the purposes of this EIR, implementation of the Project may result in a potentially significant impact associated with hazards and hazardous materials if it would do any of the following:

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



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hazards and 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?

Project Impacts and Mitigation Measures

Hazards due to Transport or Reasonably Foreseeable Upset or Accidents

Impact HAZ-1	The Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
Impact HAZ-2	The Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Impact Analysis

The discussion below applies to both Impact HAZ-1 and Impact HAZ-2.

Construction

Construction activity required for development of the Project is anticipated to include demolition, grading, and construction of new structures. During the construction phase, limited amounts of hazardous materials would be used, including standard construction materials such as concrete, paints, solvents, and heavy construction equipment which would contain diesel fuels and oils. Therefore, construction activities could cause potential significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and accidental release of hazardous materials. The Project would be required to comply with applicable federal, state, and local regulations pertaining to the safe handling, storage, and transport of hazardous materials. As required by Mitigation Measure HYD-1 identified in Section 3.10 of this EIR, the Project would be required to obtain a National Pollution Discharge Elimination System (NPDES) General Construction Permit prior to the start of construction



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hazards and Hazardous Materials

activities. As required by the NPDES General Construction Permit, the Project would be required to implement a Stormwater Pollution Prevention Plan (SWPPP) as part of MM HYD-1, which would include construction best management practices (BMPs) that would minimize potential impacts related to the use of hazardous materials and prevent accidental spills of hazardous materials during construction. Implementation of a SWPPP would ensure any contaminated runoff would not leave the Project site during construction and ensure there would be no accidental release of hazardous materials into the environment. With adherence to applicable federal, state and local regulations, and implementation of construction BMPs in the SWPPP as required by Mitigation Measure HYD-1, the use of hazardous materials during Project construction would be reduced and impacts would be less than significant.

As identified under Section 3.9.1 above, Phase I and Phase II ESAs were prepared for the Project which determined that a former pipeline easement used from the 1940s until the 1980s is located within the Project site and the potential for impacts from the out-of-use pipeline represents a recognized environmental condition in connection with the Project site. However, Shell is the identified responsible party for the pipelines and any associated impacts; therefore, if the pipelines or impacts from the pipelines are encountered during Project construction, the procedures for evaluation outlined in the 2019 Soil Management Plan should be followed to determine whether removal actions by Shell are required. The limitations imposed by the 2019 Soil Management Plan represent a business environmental risk in association with development of the Site and based on findings in the IPC Park 33 and IPC Park 35 Phase I reports, Farallon recommends that a soil management plan be prepared for the site to address the handling of any planned excavation activities within the Shell easement to ensure proper adherence to the 2019 Soil Management Plan (Farallon 2021b, 2021c). Therefore, the Project would be required to implement Mitigation Measure HAZ-1 which would require the preparation of a soil management report to ensure there would be no impacts related to the business environmental risk identified for the out-of-use pipelines that underlie the Project site. With implementation of a soil management plan as required by Mitigation Measure HAZ-1, impacts related to the business environmental risk would be reduced. With implementation of Mitigation Measure HAZ-1, impacts related to the potential release of hazardous materials from the out-of-use pipelines during Project construction would be less than significant. Additionally, the Phase I and Phase II ESAs noted an abandoned dry well on the northwestern portion of the Project site. According to the Phase I ESA CalGEM may require re-abandonment of the dry well in the event of development on the site. As such, the Project would implement Mitigation Measure HAZ-2 which would require the Applicant to work with CalGEM prior to the approval of a tentative map to ensure the well is properly abandoned. With implementation of Mitigation Measure HAZ-2, impacts related to any potential risks posed from the dry well would be less than significant.

With the implementation of Mitigation Measures HAZ-1 and HAZ-2, and adherence to applicable federal, state, and local regulations and standards, construction of the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or accidental release of hazardous materials and impacts would be less than significant.

Operation

The Project would develop new warehouse and distribution facilities that would introduce new industrial uses to the site. Additionally, the Project would develop onsite water and wastewater treatment facilities. The wastewater treatment facility would disinfect effluent with UV lighting; therefore, chemicals for disinfection would not be used. Chemicals proposed for use as part of the proposed improvements to the



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hazards and Hazardous Materials

wastewater treatment facility include cleaning products. Additionally, as discussed above the Project evaluated within is a theoretical maximum buildout based on conservative land use estimates from the TIA. As shown in Table 2.2-1, the Project may construct and operate a Battery Energy Storage System (BESS) on the Project site. BESS facilities are equipped with lithium-ion batteries which are classified by USDOT as Class 9 Miscellaneous Dangerous Goods. As such, the Project would require the use or storage of hazardous materials and waste onsite.

The Project would be required to comply with all General Plan policies including General Plan Policy PHS-7.3 requiring the use, storage, and disposal of hazardous materials and wastes to comply with local, state, and federal safety standards; and, General Plan Policy PHS-7.6 requiring any uses that would store hazardous materials and/or waste on its site to submit a Hazardous Material Management Plan (HMMP) in accordance with federal, state, and local requirements. Therefore, the Project would implement Mitigation Measure HAZ-3 which requires the preparation and implementation of a HMMP prior to start of operational activities of the Project. The HMMP would be revised as needed as occupants of the Project change. The Project would be required to operate in accordance with federal, state, and local safety standards and requirements related to hazardous materials and waste including USDOT regulations on the transport of lithium-ion batteries. Additionally, General Plan Policy PHS-7.8 requires all new developments to be consistent with the County Hazardous Waste Management Plan, and Policy PHS-7.9 requires public disclosure of hazardous materials and waste for proposed businesses.

As such, the chemicals used within the wastewater treatment facility will be included in the required HMMP for the wastewater operations. Therefore, while the Project would increase the amount of chemicals used at the Approved WWTF, the use of standard regulatory controls and safety practices would reduce the potential for accidental releases of such chemicals.

With the implementation of Mitigation Measure HAZ-2 and applicable General Plan policies, and adherence to applicable federal, state, and local regulations and standards, operation of the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or accidental release of hazardous materials and impacts would be less than significant.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

MM HAZ-1 Soil Management Plan. Prior to the issuance of any construction permits, the Applicant shall prepare a Soil Management Plan for the site to address the handling of any planned excavation within the out-of-use Shell pipeline easement to ensure proper adherence to the 2019 Soil Management Plan. The Soil Management Plan shall outline protocol for ensuring the proper handling and/or disposal of impacted soil and/or subsurface features of concern that may be encountered during excavation activities on the out-of-use Shell pipeline easement area. The Soil Management Plan shall be implemented during all construction activities within the Shell pipeline easement area.

MM HAZ-2 Dry Well Re-abandonment. Prior to the approval of a tentative map on APN 209-250-37, the Applicant shall work with the California Department of Conservation, Geologic



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Hazards and Hazardous Materials

Energy Management Division (CalGEM) to ensure that the dry well has been properly abandoned per CalGEM standards.

MM HAZ-3 Hazardous Materials Management Plan. Prior to building occupancy, the Applicant shall prepare a Hazardous Materials Management Plan (HMMP) and ensure that the plan is implemented prior to the start of operational activities. The HMMP shall include a map and inventory of all hazardous materials located at the site and contain contingency plans for accidents, designate an individual or individuals as emergency coordinator(s), and ensure that all employees understand the potential for accidents and the appropriate response. The HMMP shall be prepared in accordance with federal, state, and local laws pertaining to hazardous materials and waste. The HMMP shall be updated and revised as needed to reflect changes in Project occupancy or activities by Project occupants.

Implementation of Mitigation Measure HYD-1 is required.

Level of Significance After Mitigation

Less Than Significant Impact with Mitigation.

Hazards Near Schools

Impact HAZ-3	The Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Impact Analysis

The Project site is located in unincorporated San Joaquin County and is located in an area developed with agricultural and industrial uses. The closest existing school to the Project site is the John C. Kimball High School, located approximately 0.75 mile away, in the City of Tracy. Additionally, there are no schools currently proposed within one-quarter mile of the Project site. Therefore, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and there would be no impact.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hazards and Hazardous Materials

Hazards to the Public or Environment

Impact HAZ-4	The Project would not 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.

Impact Analysis

The Phase I and Phase II ESAs reviewed the SWRCB's GeoTracker database and DTSC's EnviroStor database for records related to the Project site and found no listing. The IPC Park 35 Phase I report identified that a portion of the Project site is listed in the HAZNET database as a facility with CalEPA. The IPC Park 35 Phase I report identified that the registration was obtained in December 2014 and was inactive by March 2015 and there was no indication of the reason the registration was obtained and there are no associated waste disposal manifests for the address or facility identification number to indicate that hazardous waste had been removed from the Project site. At the time of registration, the Project site was undeveloped and used for agriculture. The IPC Park 35 Phase I report identified that based on the lack of an indication of hazardous materials disposal from Project site, the listing is not expected to represent a concern for the Project site (Farallon 2021c).

Additionally, the IPC Park 35 Phase I report identified that immediately west of the Project site, the Owens Brockway Glass Container Manufacturing Facility was identified within regulatory databases in association with long-term industrial use, current and former hazardous materials storage and use, a historical LUST case, fugitive dust impacts, and waste discharge monitoring (Farallon 2021c). The IPC Park 35 Phase I report identified that there may be potential impacts from the Owens Brockway Glass Container Manufacturing Facility, and therefore, a Phase II ESA was completed to analyze potential impacts. The Phase II ESA identified that COCs were not present in soil, soil gas, or groundwater at concentrations indicative of a significant release or exceeding screening criteria and determined that the analysis contained within the Phase II ESA determined that potential for releases from the Owens Brockway Glass Container Manufacturing Facility would not adversely affect future commercial/industrial uses of the Project site (Farallon 2021d). Therefore, the Project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would not create a significant hazard to the public or the environment, and impacts would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hazards and Hazardous Materials

Airport Land Use Plans

Impact HAZ-5	The Project would not be 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.

Impact Analysis

The nearest airport to the Project site is the Tracy Municipal Airport, located approximately 3.14 miles southeast of the site. According to the San Joaquin County Airport Land Use Compatibility Plan (ALUCP), the Project site is not located within the Airport Influence Area (AIA), safety zones, or noise contour zones for the Tracy Municipal Airport or any other airport located in the area (San Joaquin County 2018). Therefore, the Project would not result in a safety hazard or excessive noise for people working in the Project area, and impacts would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Emergency Response or Evacuation Plans

Impact HAZ-6	The Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Impact Analysis

The County updated its latest Emergency Operations Plan (EOP) in February 2022 and the San Joaquin County Office of Emergency Services is responsible for reviewing and revising the plan at least once every two years or when key changes occur. The County does not have an adopted emergency evacuation plan; however, the EOP identified that major highway/freeway routes including I-5, I-205, I-580 and Highways 99, 12, 88, 4, 120, 132, and 26 would be highly utilized by both County residents and tourists as possible evacuation routes in the event of an emergency (San Joaquin County 2022). The Project would not include development that would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation. The Project would be required to comply with County General Plan Policy PHS-1.10 which requires all new developments to provide adequate primary and alternative access for emergency vehicles. The Project would be designed and constructed to comply with these requirements and provide adequate ingress and egress throughout the Project site for emergency vehicles. The Project would include improvements to West Schulte Road, which is an existing roadway, as well as the construction of two new roadways identified as Pavilion Parkway and Promontory Parkway. The construction of new roadways and improvements to the existing roadway would be designed and completed in accordance with County roadway requirements and would not result in interference with emergency response to the Project site and surrounding areas. Construction may require temporary closure of select sidewalks or roadways and a construction traffic management plan



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hazards and Hazardous Materials

would be prepared that would identify alternate routing in the area to ensure construction would not impair emergency response. Therefore, the Project would not impair implementation of or physically interfere with an adopted emergency response plane or emergency evacuation and impacts would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Wildland Fires

Impact HAZ-7	The Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Impact Analysis

The Project site is identified by CALFIRE as being located within a Locally Responsible Area and is not located in a Very High Fire Hazard Severity Zone (CAL FIRE 2025a, 2025b). Additionally, the USFS Wildfire Hazard Potential Map identified the Project site's wildfire hazard potential as Very Low to Low as well as Non-burnable (USFS 2023). Therefore, the Project site is not identified as having a high risk of wildland fires. Furthermore, the Project would be constructed to comply with all applicable California Building Code and California Fire Code standards to protect its structures and people from potential wildland fire hazards and the Project would be constructed to include onsite fire suppression measures to reduce fire risk. Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, and impacts would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

3.9.4 Notice of Preparation Comments Related to Hazards and Hazardous Materials

As discussed in Section 1.0, Introduction, the County distributed a NOP of the Draft EIR for the Project beginning on March 31, 2023. The NOP was distributed for a 30-day comment period that ended on May 1, 2023. The Public Scoping Meeting on the Draft EIR for the Project was held on April 10, 2023. The comments received on the NOP and during the Public Scoping Meeting were considered in the preparation of this Draft EIR. Comments related to hazards and where they are addressed in this section



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hazards and Hazardous Materials

are provided in Table 3.9-2. Additionally, each comment includes a brief summary of how the concern was addressed, the impact, or why additional analysis is not required. Commenters may have made comments addressing multiple EIR sections, but only specific hazards comments are provided in Table 3.9-2. See Table 1.2-1 in Section 1.0, Introduction for a summary of all comments made during the NOP scoping period.

Table 3.9-2. Comments Received on the NOP for Hazards

Affiliation	Signatory	Date	Comment Description	Location Addressed in Air Quality Chapter	Response to Comment
Private Parties – Written Comments Received					
Interested Individual	Dale and Patricia Brandes	April 24, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related to toxic runoff from the Project.	Subsection 3.9.3, Environmental Impacts, Project Impacts and Mitigation Measures	The Project would implement a SWPPP as part of Mitigation Measure HYD-1 that would ensure that contaminated runoff would not leave the Project site during construction. During operation, the Project would comply with all federal, State, and local regulations pertaining to hazards. Additionally, the Project would implement Mitigation Measure HAZ-3 that requires the Project applicant to develop a Hazardous Materials Management Plan. Cumulative impacts are evaluated in Section 4.0.
Interested Individual	Vannie Dart	April 30, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related to illegal dumping of motor oil and runoff	Subsection 3.9.3, Environmental Impacts, Project Impacts and Mitigation Measures	The Project would implement a SWPPP as part of Mitigation Measure HYD-1 that would ensure that contaminated runoff would not leave the Project site during construction. During operation, the Project would comply with all federal, State, and local regulations pertaining to hazards. Additionally, the Project would implement Mitigation Measure HAZ-3 that requires the Project applicant to develop a Hazardous Materials Management Plan. Cumulative impacts are evaluated in Section 4.0.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Hazards and Hazardous Materials

Affiliation	Signatory	Date	Comment Description	Location Addressed in Air Quality Chapter	Response to Comment
Private Parties – Comment Cards at Scoping Meeting					
Interested Individual	Shawn Strickland	April 10, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related to illegal dumping of oil and chemicals.	Subsection 3.9.3, Environmental Impacts, Project Impacts and Mitigation Measures	The Project would implement a SWPPP as part of Mitigation Measure HYD-1 that would ensure that contaminated runoff would not leave the Project site during construction. During operation, the Project would comply with all federal, State, and local regulations pertaining to hazards. Additionally, the Project would implement Mitigation Measure HAZ-3 that requires the Project applicant to develop a Hazardous Materials Management Plan. Cumulative impacts are evaluated in Section 4.0.



3.10 HYDROLOGY AND WATER QUALITY

This section describes the environmental setting for hydrology and water quality, including the existing Project site conditions, regulatory setting, and potential impacts that could result from the Project, and, if significant impacts are identified, the mitigation measures that would reduce these impacts. Additional detail and background on hydrology and water quality resources are based, in part, on the Water Management Plan prepared by Kier and Wright on August 24, 2023, included in Appendix J to this EIR; the Stormwater Public Improvement Plan prepared by Kier and Wright on August 24, 2023 and revised on January 10, 2025, included in Appendix K to this EIR; the Water Supply Assessment prepared by Kier and Wright on May 11, 2023, included in Appendix L to this EIR; and the Title 22 Engineering Report prepared by Kier and Wright on January 31, 2023 included in Appendix M to this EIR.

3.10.1 Environmental Setting

Regional Hydrology and Drainage

The San Joaquin River is the most prominent drainage feature in the region, draining the portion of the Central Valley south of the Sacramento-San Joaquin Delta and north of the Tulare Lake Basin. The San Joaquin River watershed is over 15,880 square miles in area, discharging to the Sacramento-San Joaquin Delta, approximately 25 miles to the north of the Project area. Within the watershed, the Cosumnes, Mokelumne, Calaveras, Stanislaus, Tuolumne, Merced, Chowchilla, and Fresno Rivers are the principal tributaries to the San Joaquin River. Major lakes and reservoirs within the watershed include Camanche, Pardee, New Hogan, New Melones, Don Pedro, McClure, and Millerton.

The Project site is located on transitional slopes extending between the Coastal Range to the southwest that separate the San Joaquin Valley from the San Ramon Valley and the San Joaquin Valley floor to the north. Drainage from the Project site discharges to the agricultural drainage to the north, northeast of the Project and eventually into the San Joaquin River near the Sacramento-San Joaquin Valley further north (RWQCB 2004).

Local Hydrology and Drainage

Climate and Precipitation

Like much of the San Joaquin Valley, this portion of the County has two distinct weather seasons: wet and cool winters along with dry and hot summers. Average high temperatures in the coolest months in the winter are in the mid-50s, and average high temperatures in the hottest months of the summer are in the low 90s.

Precipitation records obtained from various rain gages monitored by the California Department of Water Resources and the Western Regional Climate Center in this portion of the County at elevations ranging from 61 feet to 625 feet indicate that the amount of normal annual rainfall averages less than 12 inches per year. Approximately 95 percent of this rainfall typically occurs from early fall through mid-spring (generally October through May), although infrequent summer showers do occur. Storm events during the rainy season consist of either individual storms or clusters of storms. Major storms of greater magnitude and duration generally occur during the rainy season; however, high intensity thunderstorms (though relatively infrequent) can occur in any season.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

Topography

The Project site is located within a transitional topographic zone between adjacent hillsides to the southwest and the broad valley floor of the San Joaquin Valley to the north. Generally, the Project area slopes from southwest to northeast at an average topographic gradient ranging from 1 to 2 percent. The Project site is relatively flat and slopes from an elevation of 149 feet above mean sea level at the southwest corner of the Project site to an elevation of 95 feet above mean sea level at the northeast corner.

Major Drainage Features

There are a number of major drainage features within or near the Project area that are relevant to the impact analysis on hydrology and water resources. These major drainage features are described as follows:

California Aqueduct. The California Aqueduct traverses across the drainage slopes upstream of the Specific Plan Area, perpendicular to the direction of drainage flow dictated by topography. Storm runoff is collected on the upstream side of the aqueduct and is delivered to over chutes that cross over the aqueduct or culverts that pass underneath the aqueduct. The California Aqueduct tends to consolidate runoff to fewer locations and often limits the flow rates discharged to lands below the aqueduct.

Delta Mendota Canal. The Delta Mendota Canal runs generally parallel to and just downslope from the California Aqueduct. It passes through the southwest quadrant of the Specific Plan Area and further reduces the number of locations where storm runoff is concentrated. Storm runoff passes over or under the canal via overchutes and culverts and further limits the rates discharged to lands below the canal. The Delta Mendota Canal also contains a significant number of locations where local drainage flow that is collected on the upstream side of the canal simply enters the canal directly via drain inlets and is not released to downstream lands.

WSID Upper Main Canal. Similar to the California Aqueduct and the Delta Mendota Canal, though considerably smaller in size and capacity, the WSID Upper Main Canal extends along an alignment that is perpendicular to the direction of drainage flow dictated by topography. Local drainage flows are intercepted by the WSID Upper Main Canal and existing tailwater ponds discharge to the canal at several locations. The WSID Upper Main Canal extends through the northeast portion of the Specific Plan Area. The WSID Upper Main Canal is operated by BBID.

Byron-Bethany Irrigation District. The BBID provides water to approximately 14,174 acres of land located in the southwestern portion of San Joaquin County, in the Tracy and Mountain House Planning Areas, extending from the Old River north of Mountain House south to Highway 132. Approximately 20,600 acre-feet per year (AFY) of water are purchased through the Central Valley Project for delivery to agricultural and domestic users. The BBID provides water to the existing almond orchard on the Project site.

Off-site Watersheds. Certain watersheds with headwaters in the hills to the southwest of the Project site drain toward the Project area. Flows generated within these applicable off-site watersheds enter the Project area at locations dictated by culverts and over chutes that cross the existing aqueducts and



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

canals. Some flow paths are well defined as they pass through the Project area and some lose definition as they continue downstream.

WSID Tailwater Ditches. WSID retains several tailwater ditches downstream of the Project area that collect irrigation tailwater and urban runoff from designated portions of Tracy and convey it to their intake area connecting to Old River at Wicklund Road. The main tailwater ditch is the WSID Main Drain, and a secondary ditch, the WSID Sub-Main Drain, is a significant tributary to the WSID Main Drain.

Patterson Run. In the west portion of the Project area, west of Mountain House Parkway, a generally well-defined drainage channel/ corridor collecting runoff generated from a large off-site watershed that extends upstream to the southwest enters the Project area via an existing culvert underneath the Delta Mendota Canal and extends through and then exits the Project area at an existing culvert crossing under Interstate 205. Downstream to the north of I-205, Patterson Run discharges into agricultural properties and downstream storm drainage facilities operated by the Mountain House Community Services District (CSD).

Old River. Old River is located to the north of the Project area and is a part of the San Joaquin River system of interconnected waterways that eventually connect to the San Joaquin Delta.

Natural Drainage Swale/Channel. An existing natural drainage swale/channel extends from the Delta Mendota Canal toward the approximate center of the Project area. Drainage then generally follows the swale from the southern Project area boundary to the mid-portion of the site, terminating at a small basin. From the basin, a series of ditches convey stormwater to the east to Hansen Road, and then north along Hansen Road to a pumping station, which pumps the stormwater to the north side of Interstate 205.

Local Watershed

San Joaquin County lies entirely within the San Joaquin River Basin. Within the County, the San Joaquin River Basin is made up of the Calaveras River Watershed, Mokelumne River Watershed, Stanislaus River Watershed, and San Joaquin River Watershed. These watersheds were delineated based on topography, physical features, land use, and existing and proposed locations of future discharge of stormwater. The Project site lies west of South Lammers Road and is located in the San Joaquin River Watershed. The San Joaquin Watershed is approximately 15,600 square miles and is located between the Sacramento River Watershed to the north and Tulare Basin Watershed to the south. The San Joaquin River Watershed is bordered on the east by the Sierra Nevada Mountains and on the west by the Coast Range Mountains (USEPA 2025).

Groundwater Basin

A portion of the San Joaquin Valley relies in part on groundwater for agricultural purposes. Much of the groundwater pumped in the Central Valley comes from the San Joaquin Valley Groundwater Basin (SJVB). The SJVB is bounded by the Sierra Nevada Mountains, Coastal Ranges, City of Sacramento, and Los Padres National Forest. The SJVB is made up of 19 groundwater subbasins that are categorized into three significant hydrologic zones – the Sacramento River, the San Joaquin River, and Tulare Lake. The Project site lies within the San Joaquin Hydrologic Region 5-02215, also known as the Tracy Subbasin (Kier and Wright 2023c). The Tracy Subbasin is primarily bounded by the San Joaquin River to



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

the north and east and the San Joaquin County line on the south and west, with a portion of the basin extending into Alameda County (Tracy Subbasin 2025).

The Tracy Subbasin is drained by the San Joaquin River and one of its major westside tributaries, Corral Hollow Creek. The San Joaquin River flows northerly into the Sacramento and San Joaquin Delta and discharges into the San Francisco Bay (Kier and Wright 2023c).

Water Quality

Surface and groundwater contamination within San Joaquin County typically comes from pollutants generated from agricultural, mine, urban, and industrial runoff. These pollutants include pesticides, metals, salts, pathogens, fertilizers, and industrial chemicals. Water quality within the Project area is governed by the Central Valley Regional Water Quality Control Board (CVWQCB). The CVWQCB does this by issuing permits to businesses, industries, public agencies, and districts that conduct activities that may have a harmful impact on water resources in the region.

Project Site

The Project site is currently in agricultural use, with almond orchards planted across the Project site. The water supply for the almond orchards is surface water from BBID. BBID estimates that the existing Project site uses about 1,500 AFY of water (Kier and Wright 2023c).

The existing Project site slopes approximately one percent to the northeast and does not include any existing storm drain infrastructure. Under existing conditions, off-site stormwater ponds to the south of West Schulte Road and during a 100-year, 24-hour storm event, the stormwater overtops the roadway and ponds onto an 128.5 acre portion of the Project site in the southwestern corner, north of West Schulte Road. This portion of the Project site is bermed by WSID Upper Main canal causing off-site stormwater flows to pond onsite until it overtops the canal bank and drain into the canal (Kier and Wright 2023b).

The Project site is not within the service area of the City of Tracy. Therefore, the Project would include the construction and operation of a public water system at the Project site to serve Project end users. The potable water demands, and a portion of the non-water potable water demands (i.e., fire suppression) would be met using groundwater drawn from the Tracy Subbasin. The irrigation system would be supplied by treated wastewater (referred to as recycled water) generated on-site and supplemented during recycled water shortfalls by secondary sources including water from the BBID, recycled stormwater, fire water, and raw well water (Kier and Wright 2023a). The Project would include the construction of three new on-site wells (two potable water wells and one fire water well). The fire facilities would include the well, a fire storage tank, a pump station, and the fire distribution system. The raw water facilities would include the construction of two potable water wells and pipelines to transport the raw well water to the potable water treatment plant. The treated water facilities include the potable water treatment system, water storage tanks, and potable water distribution system. In addition, the Project would include the construction of a recycled water system that would be used to dispose of treated wastewater and would provide irrigation to all landscaping within the Project site. The discharge from the wastewater treatment system would be stored in a recycled water tank that has been tentatively sized to store 50 days of wastewater production, approximately 2.3 million gallons. The tank would fill during the non-irrigation season (winter) and drain when irrigation demands go up in the summer months. A recycled water pump



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

station would pull water from the storage tank to the recycled water distribution system and maintain a minimum pressure of 60 psi.

Detention basins are proposed to serve the Project. Other approved stormwater treatment measures may be considered during the design development and, if so, would be designed per the Multi-Agency Post-Construction Stormwater Standards Manual for San Joaquin County (Kier and Wright 2023b). The primary need for detention basins is to provide significant stormwater quality enhancement at the site. The stormwater generated at the site by the Project would pass through a series of water quality basins and then flow into detention basins. The stormwater detention basin adjacent to the water and wastewater facility facilities for the Project would be the source water for supplemental stormwater deliveries to the recycled water storage tank. These deliveries are anticipated to only occur in the winter and would be used to help reduce Total Dissolved Solids (TDS) concentrations in the recycled water prior to use (Kier and Wright 2023a). When supplemental stormwater is not needed, water stored within the detention basins would be discharged to the WSID channel. Each detention basin would have an outflow to the WSID channel with two of the detention basins to be constructed with gravity outfalls and the other two detention basins equipped with a pump to discharge water detained in the basin.

3.10.2 Regulatory Setting

Federal

Clean Water Act

The federal Clean Water Act (CWA) was enacted with the primary purpose of restoring and maintaining the chemical, physical, and biological integrity of the Nation's waters. The CWA also directs states to establish water quality standards for all "Waters of the United States" and to review and update such standards on a triennial basis. Section 319 mandates specific actions for the control of pollution from nonpoint sources.

The USEPA has delegated responsibility for implementation of portions of the CWA, including water quality control planning and control programs, such as the NPDES Program, to the State Water Resources Control Board (SWRCB) and the RWQCB.

Section 303(c)(2)(b) of the CWA requires states to adopt water quality standards for all surface waters of the United States based on the water body's designated beneficial use. Where multiple uses exist, water quality standards must protect the most sensitive use. Water quality standards are typically numeric, although narrative criteria based upon biomonitoring methods may be employed where numerical standards cannot be established or where they are needed to supplement numeric standards. Water quality standards applicable to the Project are listed in the Basin Plan (RWQCB 2016).

National Pollutant Discharge Elimination System

The goal of the NPDES diffuse source regulations is to improve the quality of stormwater discharged to receiving waters to the "maximum extent practicable" through the use of best management practices (BMPs). The NPDES permit system was established in the CWA to regulate point source discharges (a municipal or industrial discharge at a specific location or pipe) and certain types of diffuse source dischargers. As defined in the federal regulations, nonpoint sources are generally exempt from federal NPDES permit program requirements. Nonpoint pollution sources are diffuse and originate over a wide



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

area rather than from a definable point. Nonpoint pollution often enters receiving water in the form of surface runoff and is not conveyed by way of pipelines or discrete conveyances. Urban stormwater runoff and construction site runoff, however, are diffuse-sources regulated under the NPDES permit program because they discharge to receiving waters at discrete locations in a confined conveyance system. Sections 401 and 402 of the CWA contain general requirements regarding NPDES permits.

Section 307 of the CWA describes the factors that the USEPA must consider in setting effluent limits for priority pollutants. For diffuse-source discharges (e.g., municipal stormwater and construction runoff), the NPDES program establishes a comprehensive stormwater quality program to manage urban stormwater and minimize pollution of the environment to the maximum extent practicable. The NPDES program consists of (1) characterizing receiving water quality, (2) identifying harmful constituents, (3) targeting potential sources of pollutants, and (4) implementing a Comprehensive Stormwater Management Program. State implementation of the NPDES program as it relates to the Project is discussed below under State and Regional regulations.

Federal Emergency Management Agency

The Federal Emergency Management Agency (FEMA) is the Federal agency that oversees floodplains and manages the National Flood Insurance Program (NFIP), adopted under the National Flood Insurance Act of 1968, to make available federally-subsidized flood insurance to property owners within communities that participate in the program. Since 1973 San Joaquin County and incorporated cities within the county have participated in the NFIP. The continued availability of flood insurance to county residents requires that the county and incorporated cities within the county manage floodplains in ways that meet or exceed flood protection and management standards set by FEMA. Any failure to adhere to the FEMA regulations can result in suspension from the program.

FEMA prepares Flood Insurance Rate Maps (FIRMs) for communities participating in the NFIP. The FIRMs indicate the regulatory floodplain to assist communities with land use and floodplain management decisions so that the requirements of the national flood insurance program are met in the event of damaging floods. However, FIRMs are not necessarily an accurate, up-to-date reflection of the physical flood risk or hazards and they may not reflect localized flooding. In the case of San Joaquin County, many areas were mapped more than 26 years ago and some formerly rural areas (which are now developed) were never mapped in detail. Over time, natural forces, changes in land use, and erosion can change drainage patterns, requiring new analyses and updates to the FIRMs.

Under the Map Modernization Program, FEMA also added new levee certification requirements including submittals of as-builts, protection documentation, stability and drainage analyses, and operation and maintenance manuals in order to qualify for NFIP. Only areas behind FEMA-certified levees qualify as protected from flooding; although recent changes to FEMA modeling approaches do recognize that non-accredited levees can nonetheless provide some level of flood protection.

United State Army Corps of Engineers

The United States Army Corps of Engineers (USACE) is the federal agency that studies, constructs, and operates regional-scale flood protection systems in partnership with state and local agencies. While the USACE also has regulatory authority over wetlands, water of the United States, and other related topics, its role in flooding and flood management has been generally as an engineer for regional systems,



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

technical advisor for evaluations, and responder to damaging floods. Specific agreements between the USACE and its state and local partners on projects are used to define shared financial responsibilities and regulations that affect the local partners. In the San Joaquin County region, USACE is the federal agency responsible for the Lower San Joaquin River Flood Control Project, constructed in the 1960s. In the last couple of decades, the USACE has helped with emergency flood fighting and the recovery and maintenance of navigation channels.

The USACE continues to coordinate with the State and its Delta Risk Management Study (DRMS) in exploring long-term strategies to address levee stability and flood management. USACE also coordinates with DWR in development of comprehensive hydrologic modeling of the San Joaquin River Basin.

Rivers and Harbors Appropriation Act of 1899

Section 10 of the Rivers and Harbors Appropriation Act of 1899 prohibits obstructions, alternations, and modifications to any navigable waters of the United States.

Federal Drinking Water Regulations re Per- and Polyfluoroalkyl Substances

Under the Safe Drinking Water Act, USEPA has the authority to set enforceable National Primary Drinking Water Regulations (NPDWRs) for drinking water contaminants and require monitoring of public water systems. In April 2024, USEPA issued a final rule establishing legally enforceable levels, called Maximum Contaminant Levels (MCLs), for six per- and polyfluoroalkyl substances (PFAS) in drinking water. Under this final rule, public water systems must complete initial monitoring and provide the public with information on the levels of these PFAS in their drinking water by 2027, and, starting in 2029, must implement solutions to reduce these PFAS (and provide notification to the public of a violation) if monitoring shows that drinking water levels exceed these MCLs.

State

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act is California's statutory authority for the protection of water quality. Under the act, California must adopt water quality policies, plans, and objectives (synonymous with the term "criteria" used by USEPA) that ensure beneficial uses of state waters are reasonably protected. The Porter-Cologne Water Quality Control Act requires the nine RWQCBs to adopt water quality control plans that define the beneficial uses of the water bodies throughout the region to be protected, the water quality objectives necessary for reasonable protection of the beneficial uses, and a program of implementation for achieving the water quality objectives. In addition, the act authorizes the SWRCB and RWQCBs to issue and enforce waste discharge requirements for discharges of waste to surface waters and land. The San Joaquin River is within the jurisdiction of the Central Valley RWQCB.

Water Quality Control Plan for the Sacramento River and San Joaquin River Basins

The Water Quality Control Plan for the Sacramento River Basin and San Joaquin River Basin (Basin Plan) (RWQCB 2019) defines the beneficial uses, water quality objectives, implementation programs, and surveillance and monitoring programs for waters of the Sacramento River and San Joaquin River basins. The Basin Plan contains specific numeric water quality objectives for bacteria, dissolved oxygen, pH, pesticides, electrical conductivity, temperature, turbidity, and trace elements, as well as numerous



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

narrative water quality objectives, which are applicable to certain water bodies or portions of water bodies.

State Water Resources Control Board Resolution No. 68-16: Statement of Policy with Respect to Maintaining High Quality Waters in California

The goal of SWRCB Resolution No. 68-16 (Statement of Policy with Respect to Maintaining High Quality Waters in California) is to maintain high quality waters where they exist in the state. Resolution No. 68-16 states, in part:

1. Whenever the existing quality of water is better than the quality established in policies as of the date on which such policies become effective, such existing high quality will be maintained until it has been demonstrated to the State that any change will be consistent with maximum benefit to the people of the State, will not unreasonably affect present and anticipated beneficial use of such water and will not result in water quality less than that prescribed in the policies.
2. Any activity which produces or may produce a waste or increased volume or concentration of waste and which discharges or proposes to discharge to existing high quality waters will be required to meet waste discharge requirements which will result in the best practicable treatment or control of the discharge necessary to assure that (a) a pollution or nuisance will not occur and (b) the highest water quality consistent with maximum benefit to the people of the State will be maintained.

The SWRCB has interpreted Resolution No. 68-16 to incorporate and be consistent with the federal antidegradation policy (RWQCB 2016).

Statewide National Pollutant Discharge Elimination System Stormwater Permit for General Construction Activity

The SWRCB has issued a general NPDES permit for stormwater discharges associated with construction activity greater than one acre in size – Order 2022-0057--DWQ (General Construction Permit). The General Construction Permit requires the preparation of a SWPPP that identifies and describes the BMPs to be implemented at construction site to control pollution from stormwater runoff. Coverage is obtained by submitting a Notice of Intent (NOI), risk assessment, post-construction calculations, a site map, the SWPPP, and a signed certification statement by the legally responsible person to the SWRCB prior to construction.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) ensures the long-term sustainable management of the state's groundwater resources. SGMA requires agencies throughout California to form new groundwater sustainability agencies (GSAs), develop and adopt a groundwater sustainability plan (GSP), update the plan every five years, and achieve sustainability by 2042. The Tracy Subbasin was designated as a "medium priority" subbasin by the Department of Water Resources and therefore is subject to SGMA. There are six GSAs in the Project area that have collaborated to adopt a single GSP for the Tracy Subbasin. The agencies are: Byron Bethany Irrigation District GSA, Banta Carbona Irrigation District



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

GSA, City of Lathrop GSA, City of Tracy GSA, County of San Joaquin GSA and Stewart Tract GSA. The GSP was adopted in 2022 and approved by DWR in January 2024.

State Drinking Water Regulations re Per- and Polyfluoroalkyl Substances

In accordance with USEPA's final rule setting NPDWRs for six PFAS, California has until 2027 to develop its own drinking water standards for those PFAS that are no less stringent than the federal standards. The SWRCB, through the Division of Drinking Water (DDW), is prioritizing standards for perfluorooctanoic acid (PFOA), perfluorooctanesulfonic acid (PFOS), perfluorohexanesulfonic acid (PFHxS), perfluorononanoic acid (PFNA), hexafluoropropylene oxide-dimer acid (HFPO-DA [GenX]), perfluorobutanesulfonic acid (PFBS), and other PFAS as it undertakes the rulemaking process. Consistent with this process, on April 5, 2024, OEHHA adopted Public Health Goals (PHGs) for two PFAS: PFOA and PFOS. PHGs are concentrations of drinking water contaminants that pose no significant health risk, based on current risk assessment principles, practices, and methods. OEHHA establishes PHGs pursuant to Health & Safety Code (HSC) § 116365(c) for contaminants with MCLs, and for those for which MCLs will be adopted. HSC §116365(a) requires a contaminant's MCL to be established at a level as close to its' PHG as is technologically and economically feasible, placing primary emphasis on the protection of public health.

California has additional PFAS drinking water regulations. Since 2020, DDW has issued several general monitoring orders to public water systems, requiring the monitoring of as many as 25 different PFAS. HSC § 116378 requires that if monitoring results in a confirmed detection, then a water system must report that detection in an annual Consumer Confidence Report (CCR). Finally, between February 2020 and October 2022, DDW established Notification Levels and Response Level for four PFAS (PFOA, PFOS, PFBS, PFHxS). NLs represent the concentration level of a contaminant in drinking water that does not pose a significant health risk but warrants notification. Water systems that receive a monitoring order and detect levels of PFAS that exceed the RLs shall take a water source out of use, treat the water delivered, or provide public notification.

Local

Central Valley Flood Protection Board

Any project encroaching into rivers, waterways, and floodways within and adjacent to federal- and state-authorized flood control projects or within designated floodways must receive approval from the Central Valley Flood Protection Board (CVFPB). Under Water Code §§ 8534, 8608, and 8710–8723, the CVFPB is required to enforce, within its jurisdiction, on behalf of the State of California, appropriate standards for the construction, maintenance, and protection of adopted flood control plans that will best protect the public from floods. The area of CVFPB jurisdiction includes the entire Central Valley, including all tributaries and distributaries of the Sacramento and San Joaquin rivers and Tulare and Buena Vista basins.

In 2009, the CVFPB was reconstructed, re-named, and given the responsibility to review and adopt the historic 2012 Central Valley Flood Protection Plan (CVFPP). The CVFPP is a comprehensive framework for systemwide flood management and flood risk reduction in the Sacramento and San Joaquin River Basins. The adoption of the CVFPP, as modified by CVFPB Resolution 2012-25, fulfills a legislative mandate outlined in the Central Valley Flood Protection Act of 2008 to provide conceptual guidance to



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

reduce the risk of flooding for about one million people and \$70 billion in infrastructure, homes and businesses with a goal of providing 200-year (1 chance in 200 of flooding in any year) protection to urban areas, and reducing flood risks to small communities and rural agricultural lands. It is the intent of the state that all major flood management programs and projects in the Central Valley be planned and implemented consistent with the vision, overall goals, and provisions of the evolving CVFPP.

San Joaquin Area Flood Control Agency

The San Joaquin Area Flood Control (SJFAC) is a Joint Powers Authority established in 1995 between the City of Stockton, San Joaquin County, and the San Joaquin County Flood Control and Water Conservation District. The purpose of the SJFAC is to address flood control projection for the City of Stockton and the County. In 2017, the SJFCA was expanded to include Lathrop and Manteca.

Tracy Subbasin Groundwater Sustainability Plan

Pursuant to SGMA, six GSAs were formed to manage groundwater in the Tracy Subbasin and adopted a single GSP in 2022 in order to achieve sustainability of the basin's groundwater resources and prevent undesirable results in the following areas: chronic lowering of groundwater levels, reduction of groundwater storage, land subsidence, seawater intrusion, degradation of water quality, and surface water depletion. The GSP must be updated every five years.

City of Stockton and County of San Joaquin Stormwater Quality Control Criteria Plan

The 2020 Stormwater Quality Control Criteria Plan (2020 SWQCCP) for the City of Stockton and San Joaquin County is an update to the 2009 SWQCP. The 2020 SWQCCP reflects the most recent Phase I municipal stormwater NPDES permit requirements and new statewide trash control requirements.

The 2020 SWQCCP was prepared to accomplish the following goals:

- Protect water resources of the City of Stockton and the County from adverse impacts from urban stormwater runoff;
- Ensure that the implementation of the measures in the SWQCCP is consistent with the NPDES permit and other State requirements, including trash control;
- Provide clear development standards for developers, design engineers, agency engineers, and planners to use in the selection and implementation of appropriate control measures;
- Emphasize the implementation of low impact development (LID)-based strategies; and
- Provide maintenance procedures to ensure that the selected control measures will be maintained to provide effective, long-term pollution control.

San Joaquin County General Plan

The General Plan presents a vision for the County's future, looking ahead to 2035. This long-range planning document includes a comprehensive framework for the County's physical, economic, and social development and environmental resources preservation, as well as policies to guide day-to-day decisions. The General Plan emphasizes that future development must occur in a way that makes the



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

most of existing infrastructure and public facilities, minimizes impacts to natural resources, expands opportunities for job growth, restores and revitalizes unincorporated communities, and provides greater opportunities to all County residents.

The General Plan includes the following goals and policies related to hydrology that are applicable to the Project (San Joaquin County 2016):

Goal NCR-3: To ensure the quality of water for municipal and industrial uses, agriculture, recreation, and fish and wildlife.

- **Policy NCR-3.1: Preserve Groundwater Recharge Areas.** The County shall strive to ensure that substantial groundwater recharge areas are maintained as open space.
- **Policy NCR-3.2: Groundwater Recharge Projects.** The County shall encourage the development of groundwater recharge projects of all scales within the County and cities to increase groundwater supplies.
- **Policy NCR-3.3: Multi-Jurisdictional Groundwater Management Evaluation.** The County shall support multi-jurisdictional groundwater management that involves adjacent groundwater basins.
- **Policy NCR-3.4: Eliminate Pollution.** The County shall support efforts to eliminate sources of pollution and clean up the County's waterways and groundwater.
- **Policy NCR-3.5: Low Impact Development.** The County shall require new development to minimize or eliminate stormwater quality and hydro-modification impacts through site design, source controls, runoff reduction measures, best management practices (BMPs), and Low Impact Development (LID).
- **Policy NCR-3.7: Septic Tank Regulation.** The County shall enforce its septic tank and on-site system regulations consistent with Central Valley Regional Water Quality Control Board policy that recognizes the County as the responsible agency to protect the water quality of surface water and groundwater.

Goal PHS-2: To protect people and property from flood damage.

- **Policy PHS-2.3: New Development.** The County shall require evaluation of potential flood hazards prior to approval of development projects to determine whether the proposed development is reasonably safe from flooding, and shall approve such development consistent with applicable State and Federal laws.

3.10.3 Environmental Impacts

This section analyzes the Project's potential to result in significant impacts related to hydrology and water quality. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid impacts.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

Methodology

The assessment of potential impact presented below is based on a comparison of the existing site setting with defined or anticipated conditions that would occur as a result of the Project. Where available, Project-specific studies prepared by the applicant's technical consultants are used to identify Project-related conditions (Kier and Wright 2023a, 2023b, 2023c). In the absence of such documentation, available information from the relevant regulatory agency (e.g., RWQCB) is used to assess the potential difference between existing, or baseline, conditions and Project-related conditions.

Thresholds of Significance

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purposes of this EIR, implementation of the Project may result in a potentially significant impact on hydrology and water quality if it would do any of the following:

- a. Violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?
- b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
 - i. Result in substantial erosion or siltation on- or off-site;
 - ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or 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; or
 - iv. Impede or redirect flood flows.
- d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?
- e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report
Hydrology and Water Quality

Project Impacts and Mitigation Measures

Water Quality Standards

Impact HYD-1	The Project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Impact Analysis

Construction

Construction of the Project would include construction activities and earthwork activities that could potentially result in erosion and sedimentation, which could degrade downstream receiving waters and violate water quality standards. Specifically, construction would clear the entire 284-acre site of the existing almond orchard to be graded and compacted. The grading activities would require 1.45 million CY of material movement throughout Project construction that would be balanced on-site.

These activities have the potential to generate stormwater runoff that contains silt and debris as well as hazardous substances such as oils, fuel, paints, and solvents that could be inadvertently spilled on the Project site and conveyed via stormwater to nearby drainages, watersheds, and groundwater. The Project would disturb more than one acre of land and therefore, would require coverage under the NPDES General Construction Permit. The NPDES Permit is obtained through the SWRCB and requires the preparation and implementation of a SWPPP, which is required to include and specify water quality BMPs designed to prevent pollutants from contacting stormwater and keep erosion from moving off-site into receiving waters. The SWPPP requires the construction contractor to implement water quality BMPs to ensure that water quality standards are met and that stormwater runoff from the construction work areas does not cause degradation of water quality in receiving water bodies. Preparation and implementation of a SWPPP and applicable BMPs would be implemented through Mitigation Measure HYD-1. With implementation of BMPs required by the SWPPP under the NPDES Permit and as ensured by Mitigation Measure HYD-1, Project construction would not result in violation of water quality standards or waste discharge requirements. Short-term construction impacts associated with water quality would be less than significant with implementation of Mitigation Measure HYD-1.

Operation

Once constructed, the Project could lead to an increase in stormwater runoff that may lead to degradation of surface or groundwater quality. Additionally, the Project would operate water and wastewater treatment facilities that provide potable and non-potable water throughout the Project site and would be subject to water quality standards. The impacts from stormwater and water and wastewater treatment facilities are discussed separately below:

Stormwater

Once constructed, future uses on the site that could contribute pollutants to stormwater runoff in the long term include uncovered parking areas (through small fuel and/or fluid leaks), uncovered refuse storage/management areas, landscape/open space areas (if pesticides/herbicides and fertilizers are improperly applied), and general litter and debris. During storm events, rainfall could wash a majority of pollutants from the paved areas where, without proper stormwater controls and BMPs, it could enter the storm drain system before eventually being discharged to adjacent waterways. Individual tenants that



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

would include vehicle maintenance, cleaning equipment, mechanical repairs, painting, or fueling would be required to obtain coverage under the NPDES Industrial General Permit as part of Mitigation Measure HYD-2. The implementation of Mitigation Measure HYD-2 would require the Applicant and individual tenants to avoid unauthorized non-stormwater discharges.

Additionally, the anticipated tenants would store equipment, vehicles, and equipment containing hazardous substances (e.g., fuels, oils, solvents) that could release pollutants into stormwater. As discussed in Impact HAZ-1, sites that would store hazardous materials and/or waste would be required to submit a HMMP in accordance with federal, state, and local requirements. The Project would implement Mitigation Measure HAZ-3, which requires the preparation and implementation of a HMMP prior to start of operational activities of the Project.

Stormwater quality in the County is regulated by the San Joaquin County Flood Control and Water Conservation District's Stormwater Quality Control Criteria Plan (SWQCCP), which sets forth standards that apply to all new developments and significant redevelopment projects falling under the priority land use and/or priority project categories. Priority projects include commercial and industrial developments greater than or equal to 5,000 square feet; therefore, the Project is considered a priority project under the SWQCCP. The primary strategy employed by the SWQCCP is to require development to manage and treat stormwater flows to the maximum extent practicable to control pollutants, pollutant loads, and runoff volume by minimizing the impervious surface area and implementing source control measures, controlling runoff from impervious surfaces using structural BMPs (e.g., infiltration, bioretention, and/or rainfall harvest and re-use), and ensuring all structural BMPs are monitored and maintained for the life of the development. These measures are often referred to as low-impact development principles (City of Stockton and County of San Joaquin 2025). Additionally, the Project would be required to comply with the County's Stormwater Management Program (SWMP), which is designed to limit, to the maximum extent practicable, any discharge of pollutants to receiving waters, through measures which can include incorporation of LID strategies, such as stormwater reuse, on-site infiltration, pervious paving, and evapotranspiration (San Joaquin County 2014).

Detention and treatment basins are proposed to serve new development on the Project site. The primary need for detention basins is due to limitations in downstream outfalls and discharge capacities and to provide significant stormwater quality enhancement at the Project site. The proposed detention basins would attenuate peak flows to meter downstream releases of stormwater to reduced rates. All proposed detention basins would be sized to accommodate the 100-year 24-hour storm under build-out conditions. Storm drainage for the Project would consist of a system of inlets, piping, and bio-treatment and detention ponds that would provide for stormwater conveyance and treatment as well as transport to the recycled water tank as necessary. The treatment basins would be designed to treat water from small storm events (less than 1 inch of rainfall) before discharging to the detention basins. Four detention basins would be constructed on the northern side of the Project site and an additional four treatment basins would be constructed on the southern side of the Project site. BMPs in the SWQCCP would be implemented in the design of the Project, as appropriate, to reduce the directly connected impervious areas and to promote a higher level of stormwater quality. The majority of the treated runoff volumes would be stored in detention basins and ponds as well as in the recycled water tank to serve as irrigation water for the site. The remaining treated runoff not available to be stored on-site would be discharged into the existing WSID canal, through an agreement with BBID, that bisects the northern portion of the Project site that would be undergrounded and replaced with two 42-inch pipelines during construction of the Project. In the event



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

stormwater cannot be discharged off-site into the WSID canal, the Project Applicant has prepared a stormwater optionality design that would size up the detention basins to fully capture and contain two consecutive 10-year, 48-hour storms for infiltration and treatment. The proposed detention basins on the northern side of the Project site under this stormwater optionality would remain in the same locations, see Figure 7, but would be sized up to account for the two 10-year, 48-hour storm events. The increase in size of detention basins 1 through 3 would not impact the site. The increase in size of detention basin 4 would result in the removal of a portion of the surface parking on the eastern side of the site adjacent to Building 3. The stormwater optionality would not change any of the proposed building sizes. Additionally, the water treatment basins under this option would be constructed deeper than the clay soils found within the upper five feet of the Project site, allowing for on-site percolation.

Under existing conditions, off-site stormwater ponds to the south of West Schulte Road and during a 100-year, 24-hour storm event, the stormwater flows across West Schulte Road and ponds on the Project site. Eventually, the ponded water on the existing site overtops the WSID canal bank and the water drains to WSID. Once operational, off-site stormwater from the western hills would continue to pond south of West Schulte Road then be redirected to the east and west of Pavilion Parkway and to the north side of West Schulte Road. Off-site stormwater flows would be directed to an existing, off-site drainage basin or would continue into the WSID Upper Main canal via pipes and an inlet system designed to intercept flow. In the event of a 100-year, 24-hour event then the off-site stormwater would be redirected into the onsite detention basins which would be designed for this flow. The Project's stormwater capture and treatment system would be designed to meet the requirements of the SWQCCP, which would ensure that the Project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface water or groundwater quality. Therefore, with adherence to SWQCCP standards for post-construction stormwater management, the SWMP, and Mitigation Measures HYD-2 and HAZ-3, stormwater runoff during operation would not result in an impact associated with water quality standards, waste discharge requirements, and surface water and groundwater quality impacts would be less than significant.

Water and Wastewater Systems

The Project site is not within the service area of the City of Tracy. As a result, the Project would create a new public utility service to meet potable and non-potable water demand on the Project site. The utilities would include fire water systems, raw water wells, potable water system, and a wastewater system.

The Project would include the construction of three new on-site wells (two potable water wells and one fire water well). Water for the fire system is non-potable and would be used for emergency response only. The raw water wells would pump water to be treated in the on-site potable water treatment system. The water treatment process would be finalized once the raw water wells are drilled and pumped. Preliminary water quality testing demonstrates elevated levels of salt, which will be removed during the treatment process, but no contaminants that exceed state and federal drinking water standards.

Wastewater at the site would be collected and treated to create recycled water effluent that is suitable for landscape irrigation use. It is anticipated that treated wastewater would make up the majority of the Project's irrigation demands. Non-potable water would be supplemented from the BBID, stormwater, raw water through a bypass pipeline, or the fire system.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

The water and wastewater systems at the site would be monitored and maintained by the operator to assure compliance with the operational parameters set by the San Joaquin Environmental Health Department (EHD) and the Regional Water Quality Control Board (RWQCB). The water system would be operated by the permittee or a qualified entity pursuant to the California Health & Safety Code. The permittee or qualified entity would operate the system as well as perform ongoing monitoring, sampling, and analysis required under all federal, state, and local codes (Kier and Wright 2023a). Therefore, with implementation of water standards set by regulatory agencies, water and wastewater generated during operation would not result in an impact associated with water quality standards or waste discharge requirements, and surface water and groundwater quality impacts would be less than significant.

Therefore, with implementation of Mitigation Measure HYD-1, HYD-2, and HAZ-3 as well as adherence to SWQCCP standards for post-construction stormwater management, the SWMP, and EHD and RWQCB standards, the Project's impacts associated with water quality standards, waste discharge requirements, and surface water and groundwater quality would be less than significant with mitigation.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

MM HYD-1: Prepare and Implement a SWPPP. Prior to the issuance of any construction-related permits, the applicant shall prepare and submit a Notice of Intent (NOI) to the SWRCB and prepare a SWPPP in compliance with the NPDES General Construction Permit. The SWPPP shall include a detailed, site-specific listing of the potential sources of stormwater pollution; pollution prevention measures (erosion and sediment control measures and measures to control non-stormwater discharges and hazardous spills); description of the type and location of erosion and sediment control BMPs to be implemented at the project site; and a BMP monitoring and maintenance schedule to determine the amount of pollutants leaving the project site. A copy of the SWPPP must be current and remain on-site. Water quality BMPs identified in the SWPPP could include but are not limited to the following:

- A) Surface water runoff shall be controlled by directing flowing water away from critical areas and by reducing runoff velocity. Diversion structures, such as terraces, dikes, and ditches, shall collect and direct runoff water around vulnerable areas to prepared drainage outlets.
- B) Surface roughening, berms, check dams, hay bales, or similar devices shall be used to reduce runoff velocity and erosion.
- C) Sediment shall be contained when conditions are too extreme for treatment by surface protection. Temporary sediment traps, filter fabric fences, inlet protectors, vegetative filters and buffers, or settling basins shall be used to detain runoff water long enough for sediment particles to settle out. Construction materials, including topsoil and chemicals, shall be stored, covered, and isolated to prevent runoff losses and contamination of groundwater.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

- D) Topsoil removed during construction shall be carefully stored and treated as an important resource. Berms shall be placed around topsoil stockpiles to prevent runoff during storm events.
- E) Fuel and vehicle maintenance areas shall be established away from all drainage courses, and these areas shall be designed to control runoff.
- F) Temporary erosion control measures, such as silt fences, staked straw bales, and temporary revegetation, shall be employed for disturbed areas. No disturbed surfaces will be left without erosion control measures in place during the winter and spring months.
- G) A spill prevention and countermeasure plan shall be developed to identify proper storage, collection, and disposal measures for potential pollutants (such as fuel, fertilizers, pesticides, etc.) used on-site. The plan will also require the proper storage, handling, use, and disposal of petroleum products.
- H) Construction activities shall be scheduled to reduce land disturbance during peak runoff periods and to the immediate area required for construction. Soil conservation practices shall be completed during the fall or late winter to reduce erosion during spring runoff. Existing vegetation will be retained where possible. To the extent feasible, grading activities shall be limited to the immediate area required for construction.
- I) The Applicant shall implement all BMPs and comply with any other conditions identified in the approved SWPPP.

MM HYD-2: Obtain Industrial General Permit. Per the requirements of the State Water Resources Control Board, industrial activities involving vehicle maintenance, cleaning equipment, mechanical repairs, painting, or fueling shall obtain coverage under the NPDES Industrial General Permit (Order No. 2014-0057-DWQ). The Applicant and individual tenants shall prepare and implement an operational SWPPP, eliminate unauthorized non-stormwater discharges, and perform monitoring of stormwater discharges and authorized non-stormwater discharges. The post-operational SWPPP shall also include a spill prevention and countermeasure plan that identifies the proper storage, collection, and disposal measures for potential pollutants used onsite.

Implementation of Mitigation Measure HAZ-3 is required.

Level of Significance After Mitigation

Less than Significant Impact with Mitigation.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

Groundwater Supplies

Impact HYD-2	The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

Impact Analysis

The Project site currently operates as an almond orchard with 36,270 almond trees. The water supply for the existing orchards is surface water from BBID, not groundwater taken by onsite wells. BBID estimates that the existing site uses approximately 1,500 AFY of water (Kier and Wright 2023c).

The Project site is not within the service area of the City of Tracy. As a result, the Project would create a new public utility service to meet potable and non-potable water demand on the Project site that would extract water from the Tracy Subbasin from three groundwater wells (two for potable water and one for fire water) on the Project site. The Project would extract approximately 58 AFY from the Tracy Subbasin for potable water and non-potable water for the fire system. The Project would recycle up to 53 AFY of that water for irrigation on the site and make up the remaining irrigation needs through water supplied by the BBID, recycled stormwater, fire water, and raw well water (Kier and Wright 2023a). In total, the Project would require 78 AFY of water. Therefore, the Project would result in a net surplus of 1,422 AFY of water per year, compared to existing conditions. It is important to note that the surplus would be in surface water as the Project would extract local groundwater.

In 2021, there were 2,400 groundwater wells across the Tracy Subbasin that extracted approximately 12,000 AFY for drinking water and irrigation (Kier and Wright 2023c). The Project's water demands would require the groundwater wells to extract 58 AFY of water from the Tracy Subbasin, increasing the subbasin's annual groundwater extraction by 0.4 percent. The Tracy Subbasin is designated as a medium priority subbasin with a sustainable yield of 178,000 AFY of water (Kier and Wright 2023d). Therefore, the addition of 58 AFY of water extraction is well within the subbasin's capacity. The WSA, prepared by Kier and Wright, included an analysis of the past, present, and future groundwater conditions of the Tracy Subbasin. The analysis concluded that the Tracy Subbasin would continue to operate at a surplus of groundwater and would be within the water budget even with implementation of the Project (Kier and Wright 2023c).

In order to determine if the Project would have any indirect effects on groundwater uses, Kier and Wright evaluated how the Project's groundwater demand would impact other Tracy Subbasin users, including nearby private well owners and the City of Tracy Water District, the largest municipal water service in proximity of the Project site. Kier and Wright tested groundwater at three test wells across the Project site and determined that the highest quality water from the Tracy Subbasin at the Project site is at depths of 440 to 490 feet, within the confined zone of the lower aquifer. Therefore, the Project would pump groundwater from the confined zone. The closest private wells to the Project site are approximately 700 feet away and pump groundwater from depths of 305 to 330 feet, within the unconfined zone of the upper aquifer (Kier and Wright 2023d). The vertical separation between the Project and private groundwater wells would limit the hydraulic interference (Kier and Wright 2023d). Additionally, the City of Tracy Water District supplies a portion of the City's water from the Tracy Subbasin. The closest groundwater well owned by the City of Tracy Water District lies approximately one mile east of the Project site (Kier and Wright 2023e). In 2024, the City of Tracy supplied six percent, approximately 1,166 AF, of the City's water



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

demand from groundwater (City of Tracy 2024). The Project would pump 58 AFY of water, approximately five percent of the City's groundwater extraction. Based on the distance of private and municipal wells from the Project site and the relatively small amount of groundwater the Project requires, the Project's potable water wells are not anticipated to result in any groundwater supply shortages or well interference to other groundwater users. The Project would additionally pump groundwater for the fire system; however, the fire well would require a one-time extraction of groundwater for storage on the Project site. Any additional fire well pumping would occur after emergency situations that required the use of the fire system and, as a result, are anticipated to be rare (Kier and Wright 2023e). Based on these facts, the addition of the Project's water demands would not exceed the Tracy Subbasin's capacity and the Project would not substantially decrease groundwater supplies.

The Project would add impervious surfaces to the site that may interfere with groundwater recharge. However, as discussed in the Preliminary Geotechnical Exploration report prepared by ENGEO on November 4, 2021, the Project's soil type generally consists of very stiff to hard lean clay (ENGEO 2021). Clay soils are not suitable for groundwater recharge (Kier and Wright 2023d). Therefore, under existing conditions, groundwater recharge is insignificant. It should be noted that the clay soils are only found within the upper five feet of the soil on the Project site (ENGEO 2021). The water treatment basins as well as the detention basins under the stormwater optionality would be constructed to be deeper than five feet (Kier & Wright 2025). As such, groundwater infiltration not substantially change under the Project due to impervious surfaces as compared to existing conditions.

Additionally, groundwater use within the Tracy Subbasin GSP is projected to decrease by approximately 1,000 AFY between 2023 and 2030 as a result of expanded surface water services (Kier and Wright 2023c). The Project would result in a net surplus of 1,422 AFY of water compared to the current agricultural use at the project site. The Project would cease almond orchard operations that used 1,500 AFY of surface water from the WSID canal. The BBID surface water previously allocated to the Project site would become available for other uses in the area. Therefore, implementation of the Project would increase the amount of available surface water in the region, which would help meet the GSP's groundwater use reduction goal. Therefore, implementation of the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge and the impact is less than significant.

Level of Significance Before Mitigation

Less than Significant Impact.

Mitigation Measures

None required.

Level of Significance After Mitigation

Less than Significant Impact.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

Substantial Erosion or Siltation

Impact HYD-3a	The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- of off-site.

Impact Analysis

The Project site is currently developed as an almond orchard and does not include any storm drain infrastructure on the Project site. The WSID canal bisects the northern portion of the Project site and is used for regional irrigation.

Construction would clear the entire 284-acre site of the existing almond orchard to be graded and compacted. The grading activities would require 1.45 million cubic yards (CY) of material movement throughout Project construction that would be balanced on-site. Construction activities could expose unprotected soils to stormwater runoff, causing erosion impacts. However, the Project would implement Mitigation Measure HYD-1 and prepare a SWPPP in accordance with the NPDES General Construction Permit. The SWPPP requires the construction contractor to implement water quality BMPs to ensure that water quality standards are met and that stormwater runoff from the construction work areas do not cause degradation of water quality in receiving water bodies.

Development of the Project would result in changes to the existing drainage pattern of the Project site by undergrounding the existing canal and adding impervious surfaces to the Project site. Construction of the Project would include undergrounding the WSID canal by replacing the earthen canal with two 42-inch pipelines. Undergrounding the canal would not alter the course of the irrigation ditch or result in the alteration of the course of a stream or river. Development of the Project would also add impervious surfaces to the Project site. However, it would not result in substantial erosion or siltation on or off-site as the Project would include development of a new stormwater drainage system on-site to handle the increased runoff. Four detention basins would be constructed on the northern side of the Project site and an additional four treatment basins would be constructed on the southern side of the Project site. The water treatment basins would be designed per the Multi-Agency Post-Construction Stormwater Standards Manual for San Joaquin County and would be located adjacent to parking areas to promote the treatment and infiltration of water during small storm events prior to discharge to the stormwater basins on the northern portion of the Project site. The stormwater detention basins located within the northern portion of the Project site would treat stormwater falling on and flowing into the northern parcels via a system of inlets and piping before ultimately discharging into the canal. The stormwater detention basins would be designed to detain a 100-year 24-hour storm. The Project's storm drainage system would include bio-treatment of runoff from the site to ensure that stormwater runoff is treated for pollutants including those resulting from erosion and siltation. The Project's drainage systems would be designed such that any potential sediment collected on-site would be captured and treated so that it would not be conveyed to downstream waters and result in siltation (Kier and Wright 2023b).

Under existing conditions, off-site stormwater ponds to the south of West Schulte Road and during a 100-year, 24-hour storm event, the stormwater ponds on the Project site. Eventually, the ponded water on the existing site overtops the WSID canal bank and the water drains to WSID. Once operational, off-site stormwater from the western hills would continue to pond south of West Schulte Road then be redirected



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

to the east and west of Pavilion Parkway and to the north side of West Schulte Road. Off-site stormwater flows would be directed to an existing, off-site drainage basin or would continue into the WSID canal via pipes and an inlet system designed to intercept flow. In the event of a 100-year, 24-hour event then the off-site stormwater would be redirected into the onsite detention basins which would be designed for this flow. A detailed description of the stormwater system is provided in Appendix K. The Project's storm drainage system would be designed to conform with applicable federal, state, and local requirements related to drainage, hydrology, and water quality, including the County's SWQCCP.

Once constructed, future uses on the site that include vehicle maintenance, cleaning equipment, mechanical repairs, painting, or fueling would be required to obtain coverage under the NPDES Industrial General Permit as required by Mitigation Measure HYD-2. Therefore, alteration to the on-site drainage pattern required for the Project would be conducted in a manner consistent with all applicable standards related to the collection and treatment of stormwater as well as Mitigation Measure HYD-1 and HYD-2 such that it would not result in substantial erosion or siltation on or off-site and impacts would be less than significant with mitigation.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measures HYD-1 and HYD-2 required.

Level of Significance After Mitigation

Less than Significant Impact.

Surface Runoff Resulting in Flooding

Impact HYD-3b	The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

Impact Analysis

Construction would clear the entire 284-acre site of the existing almond orchard to be graded and compacted. Development of the Project would result in changes to the existing drainage pattern of the Project site by undergrounding the existing canal and adding impervious surfaces to the Project site. As discussed under Impact HYD-3a, undergrounding the canal would not alter the course of the irrigation ditch or result in the alteration of the course of a stream or river. Development of the Project site would also add impervious surfaces to the Project site that could increase the rate or amount of surface runoff. However, the Project would include the development of a new storm drainage system to ensure that surface runoff would not result in flooding. Storm drainage for the Project would consist of a system of inlets, piping, and bio-treatment and detention ponds that would provide for stormwater conveyance and treatment as well as transport to the recycled water tank as necessary. Treated stormwater runoff would be stored in the on-site detention basins and ponds for on-site use as irrigation water. Water from the stormwater basins would be pumped into the recycled water tank for irrigation purposes for all of the



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

landscaping withing the Project site. The proposed detention basins would attenuate peak flows to meter the release of stormwater into the on-site wastewater treatment system to reduced rates and all proposed detention basins would be sized to accommodate the 100-year 24-hour storm under build-out conditions. If the detention basins, ponds, and recycled water tank does not have remaining capacity to store treated runoff and there is an excess of treated runoff, the excess runoff would be discharged to the new 42-inch pipelines that would replace the existing WSID canal that bisects the northern portion of the Project site (Kier and Wright 2023b). Each detention basin would have an outflow to the WSID canal with two of the detention basins to be constructed with gravity outfalls and the other two detention basins equipped with a pump to discharge water detained in the basin. The WSID canal has sufficient capacity to accommodate the anticipated Project drainage.

Under existing conditions, off-site stormwater ponds to the south of West Schulte Road and during a 100-year, 24-hour storm event, the stormwater ponds on the northern portion of the Project site. Eventually, the ponded water on the existing site overtops the WSID canal bank and the water drains to WSID. Once operational, off-site stormwater from the western hills would continue to pond south of West Schulte Road then be redirected to the east and west of Pavilion Parkway and to the north side of West Schulte Road. Off-site stormwater flows would be directed to an existing, off-site drainage basin or would continue into the WSID canal via pipes and an inlet system designed to intercept flow. In the event of a 100-year, 24-hour event then the off-site stormwater would be redirected into the onsite detention basins which would be designed for this flow. A detailed description of the stormwater system is provided in Appendix K. The Project's storm drainage system would be designed to conform with applicable federal, state, and local requirements related to drainage, hydrology, and water quality, including the County's SWQCCP. Alteration of the on-site drainage pattern would be conducted in a manner consistent with all applicable standards related to the collection and treatment of stormwater. Therefore, the Project would not result in impacts associated with altering the existing drainage pattern of the Project site and subsequent flooding and impacts would be less than significant.

Level of Significance Before Mitigation

Less than Significant Impact.

Mitigation Measures

None required.

Level of Significance After Mitigation

Less than Significant Impact.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

Stormwater Drainage

Impact HYD-3c	The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would 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.

Impact Analysis

Construction would clear the entire 284-acre site of the existing almond orchard to be graded and compacted. The grading activities would require 1.45 million CY of material movement throughout Project construction that would be balanced on-site. Construction activities could expose unprotected soils to stormwater runoff, causing erosion impacts. However, the Project would implement Mitigation Measure HYD-1 and prepare a SWPPP in accordance with the NPDES General Construction Permit. The SWPPP requires the construction contractor to implement water quality BMPs to ensure that water quality standards are met and that stormwater runoff from the construction work areas do not cause degradation of water quality in receiving water bodies.

Development of the Project would result in changes to the existing drainage pattern of the Project site by undergrounding the existing canal and adding impervious surfaces to the Project site. As discussed under Impact HYD-3a, undergrounding the canal would not alter the course of the irrigation ditch or result in the alteration of the course of a stream or river. Development of the Project site would also add impervious surfaces to the Project site; however, the Project would include construction of a new, on-site storm drainage system that would be designed to conform with applicable federal, state, and local requirements related to drainage, hydrology, and water quality, including the SWQCCP. Storm drainage for the Project would consist of a system of inlets, piping, and bio-treatment and detention ponds that would provide for stormwater conveyance and treatment as well as transport to the recycled water tank as necessary. Moreover, as discussed in Section 2.4.5, the Project would encourage the use of pervious pavement.

Treated, on-site stormwater runoff would be stored in the on-site detention basins and ponds as well as the recycled water tank. The proposed detention basins would attenuate peak flows to meter downstream releases of stormwater to reduced rates and all proposed detention basins would be sized to accommodate the 100-year 24-hour storm under build-out conditions. If the detention basins, ponds, and recycled water tank does not have remaining capacity to store treated runoff and there is an excess of treated runoff, through an agreement with BBID, the excess runoff would be discharged to the new 42-inch pipelines that would replace the existing WSID canal that bisects the northern portion of the Project site. The WSID canal has sufficient capacity to accommodate the anticipated Project drainage and the pipes used to underground the WSID canal would be able accommodate current peak flows plus Project addition. In the event stormwater cannot be discharged off-site into the WSID canal, the Project Applicant has prepared a stormwater optionality design that would size up the detention basins to fully capture and contain two consecutive 10-year, 48-hour storms for infiltration and treatment. The proposed detention basins on the northern side of the Project site under this stormwater optionality would remain in the same locations, see Figure 7, but would be sized up to account for the two 10-year, 48-hour storm events. The increase in size of detention basins 1 through 3 would not impact the site. The increase in size of



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

detention basin 4 would result in the removal of a portion of the surface parking on the eastern side of the site adjacent to Building 3. The stormwater optionality would not change any of the proposed building sizes. Additionally, the water treatment basins under this option would be constructed deeper than the clay soils found within the upper five feet of the Project site, allowing for on-site percolation. A detailed description of the stormwater system is provided in Appendix K. Once constructed, future uses on the site that include vehicle maintenance, cleaning equipment, mechanical repairs, painting, or fueling would be required to obtain coverage under the NPDES Industrial General Permit as required by Mitigation Measure HYD-2.

Under existing conditions, off-site stormwater ponds to the south of West Schulte Road and during a 100-year, 24-hour storm event, the stormwater ponds on the northern portion of the Project site. Eventually, the ponded water on the existing site overtops the WSID canal bank and the water drains to WSID. Once operational, off-site stormwater from the western hills would continue to pond south of West Schulte Road then be redirected to the east and west of Pavilion Parkway and to the north side of West Schulte Road. Off-site stormwater flows would be directed to an existing, off-site drainage basin or would continue into the WSID canal via pipes and an inlet system designed to intercept flow. In the event of a 100-year, 24-hour event then the off-site stormwater would be redirected into the onsite detention basins which would be designed for this flow. The total off-site stormwater flow during a 100-year, 24-hour storm event under the existing conditions is approximately 14 AF. As stated above, the Project's soil type generally consists of very stiff to hard lean clay that would not be suitable for groundwater recharge. As such, the stormwater flows across the site then drains into the WSID canal. Under post-construction conditions, the off-site stormwater volume directed to onsite detention basins would continue to be 14 AF despite the increase in impervious surfaces.

Therefore, the Project would not result in runoff that would exceed the capacity of the drainage system. Additionally, the Project would treat all stormwater runoff prior to it being conveyed to one of the storage areas or conveyed to the new pipelines for discharge into the County's stormwater system to ensure that it would not result in polluted runoff. As such, development of the Project would not result in runoff water that would exceed the capacity of the drainage system or provide additional sources of polluted runoff and impacts would be less than significant with mitigation.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measures HYD-1 and HYD-2 required.

Level of Significance After Mitigation

Less than Significant Impact.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

Altering Existing Drainage Patterns and Redirecting Flows

Impact HYD-3d	The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flows.

Impact Analysis

Development of the Project would result in changes to the existing drainage pattern of the Project site or Project area by undergrounding the existing canal and adding impervious surfaces to the Project site. As discussed under Impact HYD-3a, undergrounding the canal would not alter the course of the irrigation ditch or result in the alteration of the course of a stream or river. Development of the Project site would also add impervious surfaces to the Project site; however, the Project's proposed storm drain system would be designed to conform with applicable federal, state, and local requirements related to drainage, hydrology, and water quality, including the County's SWQCCP. As such, alteration of the on-site drainage pattern would be conducted in a manner consistent with all applicable standards related to the collection and treatment of stormwater.

According to Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map No. 06077C0730F (FEMA 2025) for the Project area, the Project site is located within Zone X, which is defined as an area of minimal flood hazard located outside of the 100-year and 500-year flood plains. Therefore, impacts associated with altering the existing drainage pattern of the Project site and resulting in the redirection of flood flows would be less than significant.

Level of Significance Before Mitigation

Less than Significant Impact.

Mitigation Measures

None required.

Level of Significance After Mitigation

Less than Significant Impact.

Flood Hazard Inundation

Impact HYD-4	The Project would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones.

Impact Analysis

As identified by FEMA's Flood Insurance Rate Map No. 06077C0730F (FEMA 2025) for the Project vicinity, the Project site is located within Zone X, which is defined as an area of minimal flood hazard located outside of the 100-year and 500-year flood plains. Therefore, the Project is not at risk of release of pollutants due to project inundation resulting from a flood hazard. Additionally, the Project site is 36 miles from the San Francisco Bay and 55 miles from the ocean; as a result there are no potential impacts from tsunamis or seiches. As identified in the General Plan EIR, the County is located far enough inland that the threat of tsunami waves reaching the County is unlikely and no seiche waves have ever been recorded in the County (San Joaquin County 2014). Therefore, the Project would not risk release of



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

pollutants due to project inundation in flood hazard, tsunami, or seiche zones and there would be no impact.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

None required.

Level of Significance After Mitigation

No Impact.

Water Quality Plans

Impact HYD-5	The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Impact Analysis

The Project would comply with applicable water quality regulatory requirements, including implementation of a SWPPP and BMPs, which would minimize potential off-site surface water quality impacts. As outlined in the General Plan EIR, land use changes from agricultural to industrial uses could potentially provide some benefits through providing a more controlled drainage and treatment system as opposed to the overland flow regime associated with agricultural overland flow that can carry various pollutants (San Joaquin County 2014). The Project would comply with all water quality regulations and requirements during construction and operation of the Project and would construct the proposed storm drainage system to conform with applicable federal, state, and local requirements related to drainage, hydrology, and water quality. The water and wastewater treatment plants will be operated in accordance with San Joaquin EHD and the RWQCB permit requirements. Therefore, the Project would not conflict with or obstruct implementation of a water quality control plan.

With respect to groundwater management, the Project would comply with applicable water quality regulatory requirements and would construct the proposed storm drainage system in accordance with applicable federal, state, and local requirements. The Project would include construction of new groundwater wells that would extract approximately 58 AFY from the Tracy Subbasin; however, as discussed in Impact HYD-2, the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. Six GSAs formed in the Tracy Subbasin are working cooperatively to implement a GSP. The Project would be within the jurisdiction of the Byron-Bethany Irrigation District GSA. The Tracy Subbasin GSP was adopted in 2022 and approved by DWR in January 2024. The GSP identifies a water budget for the Tracy Subbasin, goals to achieve sustainability of the Tracy Subbasin's groundwater resources, and projects and actions to continue the reliability of the region's groundwater supplies (GEI Consultants 2021). An analysis of the Tracy Subbasin groundwater under past, present, and future conditions indicates that there would continue to be a surplus of groundwater even with implementation of the Project (Kier and Wright 2023c).

Additionally, Project would be required to implement Mitigation Measure HYD-1 and obtain coverage under the NPDES Construction General Permit requiring preparation of a SWPPP. Additionally, any industrial activities involving vehicle maintenance, cleaning equipment, mechanical repairs, painting, or



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

fueling would obtain coverage under the NPDES Industrial General Permit as required by Mitigation Measure HYD-2. Compliance with these regulations would require the Project to prepare a construction SWPPP and post-operation SWPPP that includes BMPs that meet the requirements of the RWQCB's Water Quality Control Plan. Therefore, the Project would not conflict with or obstruct implementation of the Water Quality Control Plan for the RWQCB or the Tracy Subbasin GSP. Impacts would be less than significant with mitigation.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measures HYD-1 and HYD-2 required.

Level of Significance After Mitigation

Less than Significant Impact.

3.10.4 Notice of Preparation Comments Related to Hydrology

As discussed in Section 1.0, Introduction, the County distributed a NOP of the Draft EIR for the Project beginning on March 31, 2023. The NOP was distributed for a 30-day comment period that ended on May 1, 2023. The Public Scoping Meeting on the Draft EIR for the Project was held on April 10, 2023. The comments received on the NOP and during the Public Scoping Meeting were considered in the preparation of this Draft EIR. Comments related to hydrology and water quality and where they are addressed in this section are provided in Table 3.10-1. Additionally, each comment includes a brief summary of how the concern was addressed, the impact, or why additional analysis is not required. Commenters may have made comments addressing multiple EIR sections, but only specific hydrology comments are provided in Table 3.10-1. See Table 1.2-1 in Section 1.0, Introduction for a summary of all comments made during the NOP scoping period.

Table 3.10-1. Comments Received on the NOP for Hydrology and Water Quality

Affiliation	Signatory	Date	Comment Description	Location Addressed in Hydrology Chapter	Response to Comment
Private Parties – Written Comments Received					
Central Valley Regional Water Quality Control Board	Peter Minkel	May 2, 2023	Requests adherence with Basin plan, including list of standard permitting and compliance measures.	- Subsection 3.10.2, Regulatory Setting - Subsection 3.10.3, Environmental Impacts, Project Impacts and Mitigation Measures	A description of the Basin Plan is provided in Section 3.10.2. The Project would be subject to the NPDES Permit and the preparation of a SWPPP (as required under Mitigation Measure HYD-1), NPDES Industrial General Permit (as required under Mitigation Measure HYD-2), San Joaquin County Flood Control and Water Conservation District's



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

Affiliation	Signatory	Date	Comment Description	Location Addressed in Hydrology Chapter	Response to Comment
					SWQCCP, County's SWMP, County EHD, and RWQCB.
Interested Individual	Dale and Patricia Brandes	April 24, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related to water drainage and toxic runoff.	Subsection 3.10.3, Environmental Impacts, Project Impacts and Mitigation Measures	A description of the Basin Plan is provided in Section 3.10.2. The Project would be subject to the NPDES Permit and the preparation of a SWPPP (as required under Mitigation Measure HYD-1), NPDES Industrial General Permit (as required under Mitigation Measure HYD-2), San Joaquin County Flood Control and Water Conservation District's SWQCCP, County's SWMP, County EHD, and RWQCB. Additionally, the Project would implement Mitigation Measure HAZ-3 that requires the Project applicant to develop a Hazardous Materials Management Plan. Cumulative impacts are evaluated in Section 4.0.
Hazen Brown, on behalf of Byron-Bethany Irrigation District	Adam Brown	May 1, 2023	Concerns related to stormwater detention basins being constructed near the Upper Main Canal and water resources and supplies.	Subsection 3.10.3, Environmental Impacts, Project Impacts and Mitigation Measures	The proposed detention basins would be sized to accommodate the 100-year 24-hour storm under build-out conditions. If the detention basins, ponds, and recycled water tank does not have remaining capacity to store treated runoff and there is an excess of treated runoff, through an agreement with BBID, the excess runoff would be discharged to the new 42-inch pipelines that would replace the existing WSID canal that bisects the northern portion of the Project site. In the event stormwater cannot be discharged off-site into the WSID canal,



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

Affiliation	Signatory	Date	Comment Description	Location Addressed in Hydrology Chapter	Response to Comment
					the Project Applicant has prepared a stormwater optionality design that would size up the detention basins to fully capture and contain two consecutive 10-year, 48-hour storms for infiltration and treatment. The proposed detention basins on the northern side of the Project site under this stormwater optionality would remain in the same locations, see Figure 7, but would be sized up to account for the two 10-year, 48-hour storm events. The increase in size of detention basins 1 through 3 would not impact the site. The increase in size of detention basin 4 would result in the removal of a portion of the surface parking on the eastern side of the site adjacent to Building 3. The stormwater optionality would not change any of the proposed building sizes. Additionally, the water treatment basins under this option would be constructed deeper than the clay soils found within the upper five feet of the Project site, allowing for on-site percolation. In terms of water resources, there is a net decrease in water required on the Project site as compared to existing conditions. Under existing conditions, the Project site uses approximately 1,500 AFY of surface water supplied by BBID. Under the Project, the Project site would require 58 AFY of groundwater.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

Affiliation	Signatory	Date	Comment Description	Location Addressed in Hydrology Chapter	Response to Comment
San Joaquin County Mosquito and Vector Control District	John Fritz	April 6, 2023	Requirement to incorporate mosquito prevention best management practices.	Subsection 3.10.3, Environmental Impacts, Project Impacts and Mitigation Measures	The Project would be subject to the NPDES Permit and the preparation of a SWPPP (as required under Mitigation Measure HYD-1), NPDES Industrial General Permit (as required under Mitigation Measure HYD-2), San Joaquin County Flood Control and Water Conservation District's SWQCCP, County's SWMP, County EHD, and RWQCB.
Interested Individual	Vannie Dart	April 30, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related to water drainage and illegal dumping of motor oil runoff.	Subsection 3.10.3, Environmental Impacts, Project Impacts and Mitigation Measures	The Project would be subject to the NPDES Permit and the preparation of a SWPPP (as required under Mitigation Measure HYD-1), NPDES Industrial General Permit (as required under Mitigation Measure HYD-2), San Joaquin County Flood Control and Water Conservation District's SWQCCP, County's SWMP, County EHD, and RWQCB. Additionally, the Project would implement Mitigation Measure HAZ-3 that requires the Project applicant to develop a Hazardous Materials Management Plan. Cumulative impacts are evaluated in Section 4.0.
City of Tracy	Kris Balaji	September 14, 2023	The comment notes that the most appropriate method to ensure adequate infrastructure for the development would be to enter into a pre-annexation agreement with the City to address the provision of utilities including the supply	Subsection 3.10.3, Environmental Impacts, Project Impacts and Mitigation Measures	The water infrastructure on the Project site, including the water and wastewater treatment facilities, storm basins, and the fire wells are described in detail in Appendices J, K, and L. The Project's impact on groundwater is discussed in Impact HYD-2. Additionally, Impact HYD-



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

Affiliation	Signatory	Date	Comment Description	Location Addressed in Hydrology Chapter	Response to Comment
			of potable and non-potable water and groundwater recharge. The commenter also wants additional details on the wastewater treatment facilities and stormwater infrastructure.		2 discusses the impact the Project may have on the Tracy Subbasin and the City of Tracy Water District's groundwater supplies. As discussed above, the Project would only extract 58 AFY of water per year, which is well within the Subbasin's capacity. Moreover, the groundwater wells on the Project site would be placed over a mile from the closest City of Tracy Water District wells. The Project would recycle wastewater on the site for irrigation and, as such, the Project would not impact the City's Wastewater Master Plan. The Project would also comply with the NDPES permit and prepare a SWPPP. The Project site include detention basins sized to accommodate the 100-year 24-hour storm under build-out conditions. If the detention basins, ponds, and recycled water tank does not have remaining capacity to store treated runoff and there is an excess of treated runoff, through an agreement with BBID, the excess runoff would be discharged to the new 42-inch pipelines that would replace the existing WSID canal that bisects the northern portion of the Project site. The WSID canal has sufficient capacity to accommodate the anticipated Project drainage. In the event stormwater cannot be discharged off-site into the WSID canal, the Project Applicant has



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

Affiliation	Signatory	Date	Comment Description	Location Addressed in Hydrology Chapter	Response to Comment
					prepared a stormwater optionality design that would size up the detention basins to fully capture and contain two consecutive 10-year, 48-hour storms for infiltration and treatment. The proposed detention basins on the northern side of the Project site under this stormwater optionality would remain in the same locations, see Figure 7, but would be sized up to account for the two 10-year, 48-hour storm events. The increase in size of detention basins 1 through 3 would not impact the site. The increase in size of detention basin 4 would result in the removal of a portion of the surface parking on the eastern side of the site adjacent to Building 3. The stormwater optionality would not change any of the proposed building sizes. Additionally, the water treatment basins under this option would be constructed deeper than the clay soils found within the upper five feet of the Project site, allowing for on-site percolation. Therefore, the Project would not impact the City's Storm Drainage Master Plan. Finally, water and wastewater services would be managed on the Project site. However, consistent with the State Water Resources Control Board, in the event that the Project site is rezoned to be within the City's limit or SOL, the



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

Affiliation	Signatory	Date	Comment Description	Location Addressed in Hydrology Chapter	Response to Comment
					Project would be required to secure a drinking water connection to the City of Tracy Water District within 18 months.
Private Parties – Written Comments Received					
Interested Individual	Dale and Patricia Brandes	April 10, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related water drainage and runoff.	Subsection 3.10.3, Environmental Impacts, Project Impacts and Mitigation Measures	The Project would be subject to the NPDES Permit and the preparation of a SWPPP (as required under Mitigation Measure HYD-1), NPDES Industrial General Permit (as required under Mitigation Measure HYD-2), San Joaquin County Flood Control and Water Conservation District's SWQCCP, County's SWMP, County EHD, and RWQCB. Cumulative impacts are evaluated in Section 4.0.
Interested Individual	Keith Vanderveen	April 10, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related to groundwater impacts and water drainage.	Subsection 3.10.3, Environmental Impacts, Project Impacts and Mitigation Measures	The Project would be subject to the NPDES Permit and the preparation of a SWPPP (as required under Mitigation Measure HYD-1), NPDES Industrial General Permit (as required under Mitigation Measure HYD-2), San Joaquin County Flood Control and Water Conservation District's SWQCCP, County's SWMP, County EHD, and RWQCB. In terms of groundwater, the Project would require 58 AFY. The Project was determined to not substantially reduce groundwater within the Tracy Subbasin. Cumulative impacts are evaluated in Section 4.0.
Interested Individual	Shawn Strickland	April 10, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns	Subsection 3.10.3, Environmental Impacts,	The Project would be subject to the NPDES Permit and the preparation of a SWPPP



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

Affiliation	Signatory	Date	Comment Description	Location Addressed in Hydrology Chapter	Response to Comment
			related to illegal dumping of oil and chemicals.	Project Impacts and Mitigation Measures	(as required under Mitigation Measure HYD-1), NPDES Industrial General Permit (as required under Mitigation Measure HYD-2), San Joaquin County Flood Control and Water Conservation District's SWQCCP, County's SWMP, County EHD, and RWQCB. Additionally, the Project would implement Mitigation Measure HAZ-3 that requires the Project applicant to develop a Hazardous Materials Management Plan. Cumulative impacts are evaluated in Section 4.0.
Interested Individual	Wendy Tocchini	April 10, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related flooding and stormwater basins.	Subsection 3.10.3, Environmental Impacts, Project Impacts and Mitigation Measures	The proposed detention basins would be sized to accommodate the 100-year 24-hour storm under build-out conditions. If the detention basins, ponds, and recycled water tank does not have remaining capacity to store treated runoff and there is an excess of treated runoff, through an agreement with BBID, the excess runoff would be discharged to the new 42-inch pipelines that would replace the existing WSID canal that bisects the northern portion of the Project site. In the event stormwater cannot be discharged off-site into the WSID canal, the Project Applicant has prepared a stormwater optionality design that would size up the detention basins to fully capture and contain two consecutive 10-year, 48-hour storms for infiltration and treatment. The proposed detention



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Hydrology and Water Quality

Affiliation	Signatory	Date	Comment Description	Location Addressed in Hydrology Chapter	Response to Comment
					basins on the northern side of the Project site under this stormwater optionality would remain in the same locations, see Figure 7, but would be sized up to account for the two 10-year, 48-hour storm events. The increase in size of detention basins 1 through 3 would not impact the site. The increase in size of detention basin 4 would result in the removal of a portion of the surface parking on the eastern side of the site adjacent to Building 3. The stormwater optionality would not change any of the proposed building sizes. Additionally, the water treatment basins under this option would be constructed deeper than the clay soils found within the upper five feet of the Project site, allowing for on-site percolation.



3.11 LAND USE AND PLANNING

This section describes the environmental setting for land use and planning, including the existing site conditions, regulatory setting, and potential impact that would result from the Project, and, if significant impacts are identified, the mitigation measures that would reduce these impacts.

3.11.1 Environmental Setting

Regional Setting

The Project is located within San Joaquin County, which makes up the northern portion of the San Joaquin Valley. The County is bordered by Sacramento County to the north; Amador, Calaveras, and Stanislaus Counties to the east; Stanislaus County to the south; and Alameda and Contra Costa Counties to the west.

The County is geographically diverse with the Sierra Nevada range framing its eastern region and the San Joaquin Valley floor on the western region. Approximately 90 percent of land within the County is unincorporated, with the majority of that land designated as General Agriculture (A/G) (San Joaquin County 2014). Land uses within the County are provided in Table 3.11-1.

Table 3.11-1. Summary of Land Uses within Unincorporated San Joaquin County

Generalized Land Use Category	Acres	Percentage
Agricultural	681,212	74.6
Residential	27,781	3.0
Commercial, Industrial, and Mining	9,907	1.0
Public/Quasi-Public	14,168	1.1
Open Space and Recreation	82,564	9.0
Other (i.e., rights-of-way, roads, and mixed use land)	495	0.05
Unincorporated County Subtotal	816,127	89.4
Incorporated Cities	96,653	10.6
Total County	912,780	100

Source: San Joaquin County 2014

Project Site Setting

The Project is located adjacent to the City of Tracy, outside of its SOI within an unincorporated area of the County. The 284-acre Project site is comprised of four parcels identified as APNs 209-240-36, 209-240-37, 209-250-10, and 209-250-37. The Project site is bisected by West Schulte Road and the WSID Canal cuts through the northern portion of the Project site. APNs 209-240-36 and 209-240-37 comprise the southern portion of the Project site, south of West Schulte Road, and APNs 209-250-10 and 209-250-37 make up the northern portion of the Project site, north of West Schulte Road.

The Project site is located within an area of the County that is utilized for both agricultural and industrial uses. The Project site is currently utilized for agricultural uses and is developed with an almond orchard.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Land Use and Planning

The majority of the site is unpaved, with the exception of West Schulte Road, and there are no existing buildings or structures onsite.

Surrounding Land Uses

There are a variety of land uses and facilities within the vicinity of the Project site. To the north of the Project site is the Westside Specific Plan (formally called the Gateway Specific Plan), a 535-acre development that would construct a variety of commercial, institutional, and residential land uses. The 421-acre Lammersville community (in unincorporated San Joaquin County) is located to the northwest of the Project site. To the north of Lammersville is the Mountain House Community, which at buildout would be comprised of 16,105 residential units, 275 acres of commercial uses, 441 acres of industrial uses, 759.5 acres of open space, 285 acres of school, and 499.5 acres of public facilities. To the west of the Project site lies the Cordes Ranch Specific Plan (also referred to as IPC Phase 1) which covers approximately 1,780 acres and envisions commercial, office, business park industrial, and park uses. Additionally, to the immediate west of the Project site is the Owens Brockway Glass Container Manufacturing Facility and the proposed LBA III Industrial Project. To the south of the site is land zoned for general agriculture uses and the proposed 14800 West Schulte Road Logistics Center. Agricultural lands and residential and urban development uses are located to the east of the Specific Plan Area. To the east of the Project site is the City of Tracy.

General Plan Land Use Designation

The General Plan designates the Project site as A/G. This designation provides for large-scale agricultural production and associated processing, sales, and support uses. The Project would request a GPA map change to amend the General Plan land use from A/G to General Industrial (I-G).

Zoning

The County Zoning Map categorizes the parcels within the Project site as AG 40-acres Zoning District (AG-40). The purpose of the General Agriculture 40-acres District is to identify agricultural lands for the continuation of commercial agricultural enterprises, as long as such operations are feasible. The Project would request a rezoning classification of the property from AG-40 to General Industrial/Specific Plan-1 (I-G/SP-1) which would be consistent with the County's General Industrial zoning.

3.11.2 Regulatory Setting

Federal

No federal regulations related to land use are relevant to the Project.

State

General Plans

The land use planning and zoning authority of local jurisdictions in California is set forth in the state's planning laws. California Government Code Section 65300, *et seq.* obliges cities and counties to adopt and implement general plans. The general plan is a comprehensive, long-term, and general document



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Land Use and Planning

that describes plans for the physical development of a city or county and of any land outside its boundaries that, in the city's or county's judgment, bears relation to its planning. The general plan addresses a broad range of topics including, at a minimum, land use, circulation, housing, conservation, open space, noise, and safety. In addressing these topics, the general plan identifies the goals, objectives, policies, principles, standards, and plan proposals that support the city or county's vision for the area. The general plan is a long-range document that typically addresses the physical character of an area over a 20-year period. Although the general plan serves as a blueprint for future development and identifies the overall vision for the planning area, it remains general enough to allow flexibility in the approach taken to achieve the general plan's goals.

State Zoning Law

The State Zoning Law (California Government Code Section 65800, *et seq.*) establishes that zoning ordinances, which are laws that define allowable land uses within a specific district, are required to be consistent with the general plan. When amendments to a general plan are made, corresponding changes in the zoning ordinance may be required within a reasonable time to ensure the land uses designated in the general plan would also be allowable by the zoning ordinance (Government Code Section 65860, sub.[c]). When adopted in accordance with the Government Code, specific plans serve as the applicable zoning for the area of land covered by the specific plan.

California Government Code Section 65451

California Government Code Section 65451 includes the statutory requirements that a specific plan must follow. All specific plans must provide a statement of the relationship of the specific plan to the general plan and include the following details:

- Distribution, location, and extent of the land uses within the specific plan area;
- Proposed distribution, location, and extent and intensity of major components of public and private transportation, sewage, water, drainage, solid waste disposal, energy, and other essential facilities proposed to be located within the Specific Plan Area and needed to support the land uses described in the plan;
- Standards and criteria by which development will proceed, and standards for the conservation, development, and utilization of natural resources, where applicable; and
- A program of implementation measures including regulations, programs, public works projects, and financing measures needed.

Subdivision Map Act

The State of California Subdivision Map Act's (Government Code 66410-66499.58) purpose is to regulate and control design and improvement of subdivisions with proper consideration for their relation to adjoining areas; require subdividers to install streets and other improvements; prevent fraud and exploitation; and protect both the public and purchasers of subdivided lands. Regulation and control of the design and improvement of subdivisions are vested in the legislative bodies of local agencies and each local agency shall, by ordinance, regulate and control the initial design and improvement of common interest developments as defined in Section 4100 or 6534 of the Civil Code and subdivisions for which this division requires a tentative and final or parcel map.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Land Use and Planning

Senate Bill 375

Senate Bill (SB) 375 is one of the most important recent pieces of legislation affecting land use within the State of California. It was enacted in 2008 and is formally referred to as “The Sustainable Communities and Climate Protection Act of 2008.” SB 375 relates to regional land use and transportation policies, with an emphasis on policies to reduce statewide GHG emissions. The law requires the state’s 18 metropolitan planning organizations adopt sustainable communities strategies that, if implemented, would help each region achieve their respective targets for reducing GHG emissions from automobiles and light trucks. The targets are established by the CARB. The San Joaquin Council of Governments (SJCOG), San Joaquin County’s metropolitan planning organization, adopted an updated Regional Transportation Plan and Sustainable Communities Strategy in August of 2022 to address the requirements of SB 375.

Local

San Joaquin County Development Title

The County’s Development Title was adopted in 1992. The Development Title contains information on land use zones, development application requirements, and standards and regulations relating to such issues as infrastructure, roads, natural resources, safety, and signs. A specific section of the Development Title also addresses the Mountain House development, an unincorporated community northwest of Tracy approved prior to adoption of the Development Title.

San Joaquin County Airport Land Use Plan (1997)

The 1997 San Joaquin County Airport Land Use Plan (ALUP) establishes Airport Land Use Zones for each airport in the plan. The zones are based on Federal Regulation Title 14 Part 77 airspace standards. Within each zone, the airport land use guidelines control both the heights of structures and the type of land uses. The plan also includes intensity restrictions which limit the number of people that may congregate within a specific area. These restrictions are meant to both reduce risk to people on the ground in the event of an aircraft accident and to minimize hazards to aircraft flight.

San Joaquin County Airport Land Use Commission

The SJCOG serves as the Airport Land Use Commission (ALUC) for San Joaquin County. The Commission is updating its ALUP. As part of the update, the safety compatibility criteria and policies will be modified to reflect current legislation; update anticipated growth in aircraft operations at the airports in the County; and mitigate future safety impacts.

San Joaquin County General Plan

The General Plan presents a vision for the County’s future, looking ahead to 2035. This long-range planning document includes a comprehensive framework for the County’s physical, economic, and social development and environmental resources preservation, as well as policies to guide day-to-day decisions. The General Plan emphasizes that future development must occur in a way that makes the most of existing infrastructure and public facilities, minimizes impacts to natural resources, expands



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Land Use and Planning

opportunities for job growth, restores and revitalizes unincorporated communities, and provides greater opportunities to all County residents.

The General Plan includes the following goals and policies related to land use and planning that are applicable to the Project (San Joaquin County 2016):

Goal LU-1: Direct most urban development towards cities and urban and rural communities within the unincorporated county to promote economic development, while preserving agricultural lands and protecting open space resources.

Goal LU-2: Promote efficient development and land use practices in new development that provide for the protection of vital resources and enhancement of communities.

- **Policy LU-2.1: Compatible and Complimentary Development.** The County shall ensure that new development is compatible with adjacent uses and complements the surrounding natural or agricultural setting.
- **Policy LU-2.8: Environmental Assessments and Mitigation.** The County shall evaluate proposed new development projects for their potential environmental impacts and shall require all feasible mitigation of identified significant impacts. The County shall require, as appropriate, that projects for which an EIR is prepared the consideration of infill locations for new development in the alternatives evaluation.
- **Policy LU-2.14: General Plan Land Use Amendments.** When reviewing proposed General Plan amendments to change or modify land use designations or the land use diagram or a zoning reclassification, the County shall consider the following:
 - consistency of the proposal with the Vision and Guiding Principles and the goals and policies of the General Plan
 - new physical, social, or economic factors that were not present when the time of General Plan was adopted;
 - reasonable alternative sites in the vicinity that are already planned for the use and can accommodate the proposal;
 - potential for an undesirable, growth-inducing precedent or premature conversion of agricultural land;
 - the availability of infrastructure and services; and
 - the effect on the fiscal health of the County.
- **Policy LU-2.15: Agricultural Conversions.** When reviewing proposed General Plan amendments to change a land use diagram or zoning reclassification to change from an agricultural use to non-agricultural use, the County shall consider the following:
 - potential for the project to create development pressure on surrounding agricultural lands;



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Land Use and Planning

- potential for the premature conversion of prime farmland, farmland of statewide importance, unique farmland, farmland of local importance, and confined animal agriculture;
- potential for impacts on surrounding farming operations and practices; and
- provision of infrastructure and services to the new use and the potential impact of service demands or on the surrounding area.

Goal LU-3: Preserve and enhance the character and scale of San Joaquin County's communities and rural areas, including their architectural heritage and historic character.

Goal LU-6: Promote the development of new industrial and employment uses in the unincorporated areas of the County that are compatible with surrounding land uses and meet the present and future needs of County residents.

- **Policy LU-6.1: Employment Centers.** The County shall encourage the development of carefully planned employment centers and industrial uses in areas with suitable topography and adequate public infrastructure, including water, sewer, and transportation access.
- **Policy LU-6.3: Employment Center Access.** Where appropriate, the County shall direct new employment centers and industrial developments to locate near existing or future freeway interchanges and major highway intersections and along existing or future transit, bicycle, and pedestrian and trail corridors.
- **Policy LU-6.5: Industrial Grouping.** The County shall group employment centers, industrially designated areas, and truck terminals to reduce conflicts with surrounding land uses and to make efficient use of infrastructure and services.
- **Policy LU-6.6: Industrial Lot Coverage.** The County shall limit the lot coverage of developments in the Limited Industrial (I/L) and General Industrial (I/G) designations to 60 percent of the total development area, except in areas zoned Warehouse Industrial where they shall be limited to no more than 40 percent of the total development area. The County shall discourage the creation of flag lots for industrial uses.
- **Policy LU-6.7: Industrial Development.** The County shall require new industrial development provide adequate access, parking, landscaping, loading and storage areas, and buffers. The County shall ensure that industrial uses and employment center developments include appropriate transit, bicycle, and pedestrian facilities.
- **Policy LU-6.8: Sustainable Technologies.** The County shall encourage all employment and industrial projects to incorporate sustainable technologies including energy and water efficient practices.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report
Land Use and Planning

3.11.3 Environmental Impacts

This section analyzes the Project's potential to result in significant impacts related to land use and planning. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid impacts.

Methodology

The analysis of potential land use impacts considers the Project's consistency with adopted plans and policies that regulate land use on the Project site, and the Project's compatibility with surrounding land uses. The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning documents that regulate land use or guide land use decisions pertaining to the Project site. CEQA Guidelines section 15125(d) requires that an EIR discuss inconsistencies with applicable plans that the decision-makers should address. Evaluations are made to determine whether a project is consistent with such plans. Projects are considered consistent with regulatory plans if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The intent of the consistency evaluation is to determine if noncompliance with regulatory plans would result in a significant impact. The impact analysis was based on a review of the County's General Plan to identify planned land uses and policies applicable to the Project. Existing land uses were determined from site reconnaissance and General Plan designations. The County's zoning regulations were also reviewed to determine the Project's consistency with existing zoning.

Thresholds of Significance

The significance criteria used to identify land use impacts is from Appendix G of the CEQA Guidelines. For the purposes of this EIR, implementation of the Project would cause a significant impact on land uses if it would do the following:

- a. Physically divide an established community; and/or
- b. Conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Project Impacts and Mitigation Measures

Physically Dividing a Community

Impact LU-1	The Project would not physically divide an established community.

Impact Analysis

The Project would involve the development of approximately 284 acres of land with new warehouse and distribution facilities with internal traffic circulation and vehicle, truck, trailer parking and outdoor storage as well as onsite water and wastewater treatment facilities. The Project site is currently used for agriculture and is surrounded by other industrial and agriculture land uses.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Land Use and Planning

The Project site lies adjacent to the City of Tracy and its SOI. Review of the planned growth demonstrates that the Project site is not located within the planned 10-year or 30-year SOI or City growth boundary (San Joaquin County 2023). As such, the Project would not physically divide the City of Tracy. The proposed Project would also be consistent with adjacent and nearby existing and planned industrial uses. Moreover, the Project would involve the construction of improvements to the existing West Schulte Road that bisects the Project site. Construction of improvements to West Schulte Road would not result in the division of an established community as improvements would not result in significant changes to the existing roadway or access to nearby roadways. Improvements planned for West Schulte Road include the construction of landscape strips, a new median, a Class I bikeway, and a new sidewalk. Additionally, the Project would involve the construction of two new roadways identified as Pavilion Parkway and Promontory Parkway along the western and northern boundaries of the Project site, respectively, and would connect the Project site to IPC Phase 1. Development of Pavilion Parkway and Promontory Parkway would result in an improved circulation system to the surrounding parcels and would not limit or inhibit access to nearby developments. Therefore, development of the Project would not physically divide an established community and impacts would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Conflicts with Plans, Policies or Regulations

Impact LU-2 The Project would not conflict with applicable land use plans, policies or regulations adopted to avoid or mitigate an environmental effect.

Impact Analysis

General Plan Consistency Analysis

The General Plan includes goals and policies that are adopted to ensure that future developments occur in a way that makes the most of existing infrastructure and public facilities, minimizes impacts to natural resources, expands opportunities for job growth, restores and revitalizes unincorporated communities, and provides greater opportunities to all County residents (San Joaquin County 2016). The analysis in Table 3.11-2 demonstrates that the Project and IPCP2 Specific Plan would not create inconsistencies with the applicable goals and policies of the County General Plan.

Table 3.11-2. General Plan Consistency Analysis with the Project and IPCP2 Specific Plan

Policy	Consistency Analysis
Goal LU-1: Direct most urban development towards cities and urban and rural communities within the unincorporated county to promote economic	Consistent. The Project would construct 5.36 million square feet of warehousing space in the unincorporated portion of the County, near existing urban areas



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Land Use and Planning

Policy	Consistency Analysis
development, while preserving agricultural lands and protecting open space resources.	including the City of Tracy, Lammersville, and Mountain House. The Project site is also located near existing or planned industrial development, including IPC Phase 1, Westside Specific Plan, Owen Brockway Glass Container Manufacturing Facility, and LBA III Industrial Project. The Project would provide approximately 4,377 new jobs within the County and place industrial uses near existing freeways (I-210 and I-580). Thus, the Project would be consistent with surrounding land uses and would promote economic development. Development of the site would convert 284 acres of agricultural lands to industrial uses. Impacts from the conversion of agriculture are evaluated within Section 3.1. As discussed within Section 3.1, the Project Applicant would implement Mitigation Measure AG-1 and comply with the requirements of the County's Agricultural Mitigation Ordinance.
Goal LU-2: Promote efficient development and land use practices in new development that provide for the protection of vital resources and enhancement of communities.	Consistent. The Project would construct new industrial space within the unincorporated portion of the County and adjacent to other existing or planned industrial uses. The Project would construct new bike lanes and streets to improve community connectivity. The Project would comply with all applicable CALGreen building standards as well as a series of sustainability measures, see Section 2.8 Sustainability of the Project Description, that would promote efficient development.
Policy LU-2.1: Compatible and Complimentary Development. The County shall ensure that new development is compatible with adjacent uses and complements the surrounding natural or agricultural setting.	Consistent. The Project would construct new industrial space within the unincorporated portion of the County and adjacent to other existing or planned industrial uses. Development of the site would convert 284- acres of agricultural lands to industrial uses. Impacts from the conversion of agriculture are evaluated within Section 3.1.
Policy LU-2.8: Environmental Assessments and Mitigation. The County shall evaluate proposed new development projects for their potential environmental impacts and shall require all feasible mitigation of identified significant impacts. The County shall require, as appropriate, that projects for which an EIR is prepared include the consideration of infill locations for new development in the alternatives evaluation.	Consistent. The Project has been evaluated within this document for environmental impacts.
Policy LU-2.9: Preliminary Soils Report. The County shall require preliminary soils report for new development projects in areas with shallow or unstable soils or slopes in excess of 15 percent. If the preliminary soil report indicates soil conditions could be unstable, the County shall require a detailed geological report by a registered geologist and registered civil engineer or a registered engineering geologist that demonstrates the suitability of any proposed or additional development.	Consistent. The Project site does not include shallow or unstable soils or slopes greater than 15 percent. Nevertheless, ENGEO prepared a Preliminary Geotechnical Exploration Report in 2021 to characterize surface and subsurface conditions at the site, see Appendix H. The Geotechnical Exploration Report concluded that site conditions were appropriate for the Project (ENGEO 2021).
Policy LU-2.12: Soil Suitability and Nitrate Loading Studies. The County shall require soil suitability and nitrate loading studies when needed to demonstrate that site conditions can safely accept wastewater in conformance with the State Water Resources Control	Consistent. ENGEO prepared a Preliminary Geotechnical Exploration Report in 2021 and concluded that the site conditions were appropriate for the Project, see Appendix H (ENGEO 2021).



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Land Use and Planning

Policy	Consistency Analysis
Board Onsite Wastewater Treatment Systems Policy and local health and water quality standards.	Nitrogen loading studies are required by Environmental Health Department (EHD) for onsite wastewater treatment systems, however EHD only permits systems with flow rates less than 10,000 gallons a day. The flow rate from the onsite wastewater treatment plant exceeds 10,000 gallons a day thus the RWQCB will be the permitting agency for the wastewater facilities not EHD. The nitrogen loading study is not a study required by the RWQCB, but would be completed upon request of the RWQCB. Nitrate loading studies are typically required for projects that include a septic system. The proposed treatment process includes primary, secondary, and tertiary treatment and the disposal will be through a recycled water distribution system used for meeting landscaping requirements throughout the project. Water would not be discharged from the site nor would the site include a septic system. As such, a nitrate study would not be required.
Policy LU-2.14: General Plan Land Use Amendments. When reviewing proposed General Plan amendments to change or modify land use designations or the land use diagram or a zoning reclassification, the County shall consider the following: • consistency of the proposal with the Vision and Guiding Principles and the goals and policies of the General Plan • new physical, social, or economic factors that were not present when the time of General Plan was adopted; • reasonable alternative sites in the vicinity that are already planned for the use and can accommodate the proposal; • potential for an undesirable, growth-inducing precedent or premature conversion of agricultural land; • the availability of infrastructure and services; and • the effect on the fiscal health of the County.	Consistent. The Project includes a GPA to reclassify the Project site as I-G/SP-1 to allow for industrial uses that would promote economic development and provide jobs in the area. • The Project would be subject to the goals and policies of the General Plan. Applicable General Plan goals and policies to the Project are identified in Chapters 3.1 through 3.19. • New physical, social, or economic factors not present at the time the General Plan was adopted were considered within this analysis. For example, Section 3.3 includes a discussion of the CalEnviroScreen environmental and social scores of the surrounding areas and Section 3.14 includes more recent population data within the analysis. • An alternative project site was considered and ultimately rejected from consideration as discussed in Section 5.0. • Impacts from the conversion of agriculture are evaluated within Section 3.1. As discussed within Section 3.1, the Project Applicant would implement Mitigation Measure AG-1 and comply with the requirements of the County's Agricultural Mitigation Ordinance. Impacts from inducing growth are evaluated within Section 3.14. • The Project site would construct a new water and wastewater system on-site. Other public services and utility infrastructure are provided in Section 3.14 and 3.17, respectively.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Land Use and Planning

Policy	Consistency Analysis
	The Project would generate additional industrial business in the County which would provide jobs during Project construction and operation as well as tax income from the future tenants. The Project would have a positive effect on the fiscal health of the County.
Goal LU-3: Preserve and enhance the character and scale of San Joaquin County's communities and rural areas, including their architectural heritage and historic character.	Consistent. The Project site is currently used for agriculture and does not include any structures. Therefore, the Project would not interfere with this goal.
Goal LU-6: Promote the development of new industrial and employment uses in the unincorporated areas of the County that are compatible with surrounding land uses and meet the present and future needs of County residents.	Consistent. The Project would construct new industrial space within an unincorporated portion of the County that would be adjacent to other existing or planned industrial uses.
Policy LU-6.1: Employment Centers. The County shall encourage the development of carefully planned employment centers and industrial uses in areas with suitable topography and adequate public infrastructure, including water, sewer, and transportation access.	Consistent. The Project would construct new industrial space within an unincorporated portion of the County that would be adjacent to other existing or planned industrial uses. The Project would include the development of a new public water district system with on-site water and wastewater treatment areas as well as new roadways to provide transportation access.
Policy LU-6.3: Employment Center Access. Where appropriate, the County shall direct new employment centers and industrial developments to locate near existing or future freeway interchanges and major highway intersections and along existing or future transit, bicycle, and pedestrian and trail corridors.	Consistent. The Project is situated near I-580 and I-205. In addition, the Project would construct Pavilion Parkway and Promontory Parkway that would include pedestrian sidewalks and bicycle lanes consistent with San Joaquin Regional Transit District requirements.
Policy LU-6.5: Industrial Grouping. The County shall group employment centers, industrially designated areas, and truck terminals to reduce conflicts with surrounding land uses and to make efficient use of infrastructure and services.	Consistent. The Project would construct new industrial space within an unincorporated portion of the County that would be adjacent to other existing or planned industrial uses. The Project site would use existing freeway infrastructure during operation.
Policy LU-6.7: Industrial Development. The County shall require new industrial development provide adequate access, parking, landscaping, loading and storage areas, and buffers. The County shall ensure that industrial uses and employment center developments include appropriate transit, bicycle, and pedestrian facilities.	Consistent. The Project would construct new industrial space within an unincorporated portion of the County that would be adjacent to other existing or planned industrial uses. The Project includes employee, truck, and trailer parking at each of the proposed buildings. The Specific Plan includes a Master Landscape Plan to detail the landscaping required along roadways, building frontages, and within the parking areas. In addition, the Project would construct Pavilion Parkway and Promontory Parkway that would include pedestrian sidewalks and bicycle lanes as well as bus pads and shelters consistent with San Joaquin Regional Transit District requirements.
Policy LU-6.8: Sustainable Technologies. The County shall encourage all employment and industrial projects to incorporate sustainable technologies including energy and water efficient practices.	Consistent. The Project would be constructed consistent with the latest CALGreen standards and incorporate a series of sustainability measures, including: high efficiency lighting, cool roofs, and CTR program. All sustainability measures are listed in Section 3.8, Greenhouse Gases.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Land Use and Planning

As demonstrated above, the Project would be consistent with the land use goals of the General Plan. The impact would be less than significant.

San Joaquin County Development Title Consistency

As the Project site is located adjacent to the City of Tracy and out of its SOI, the County currently zones the parcels within the Project site as AG-40. The purpose of AG-40 zoning is to identify agricultural lands for the continuation of commercial agricultural enterprises. The Project would request a rezoning classification of the property from AG-40 to I-G/SP-1. The I-G/SP-1 zoning is intended to allow for flexibility in development of industrial uses, such as manufacturing, distribution, and storage uses. Permitted uses within general industrial zoning include wholesale and distribution/logistics uses, utility services, retail sales and services, and administrative services. As such, the Project would be consistent with County zoning and the impact would be less than significant. .

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

3.11.4 Notice of Preparation Comments Related to Land Use

As discussed in Section 1.0, Introduction, the County distributed a NOP of the Draft EIR for the Project beginning on March 31, 2023. The NOP was distributed for a 30-day comment period that ended on May 1, 2023. The Public Scoping Meeting on the Draft EIR for the Project was held on April 10, 2023. The comments received on the NOP and during the Public Scoping Meeting were considered in the preparation of this Draft EIR. Comments related to land use and where they are addressed in this section are provided in Table 3.11-3. Additionally, each comment includes a brief summary of how the concern was addressed, the impact, or why additional analysis is not required. Commenters may have made comments addressing multiple EIR sections, but only specific land use comments are provided in Table 3.11-3. See Table 1.2-1 in Section 1.0, Introduction for a summary of all comments made during the NOP scoping period.

Table 3.11-3. Comments Received on the NOP for Land Use

Affiliation	Signatory	Date	Comment Description	Location Addressed in Land Use Chapter	Response to Comment
Private Parties – Written Comments Received					
San Joaquin Farm Bureau Federation	Andrew Watkins	May 1, 2023	Concerns related to impacts to prime agricultural land and zone reclassification to industrial uses.	• Subsection 3.11.3, Environmental Impacts, Project Impacts and	Impact LU-2 discusses General Plan and zoning consistency. The impact to land use was found to be less than significant. Impacts from agriculture



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Land Use and Planning

Affiliation	Signatory	Date	Comment Description	Location Addressed in Land Use Chapter	Response to Comment
				Mitigation Measures	are discussed in Section 3.1.
Sierra Club	Margo Praus	May 1, 2023	List of conditions of approval including measures related to project setbacks, as well as the Attorney General's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document.	- Subsection 3.11.3, Environmental Impacts, Project Impacts and Mitigation Measures - Section 3.3, Table 3.3-37 - Section 3.3, Table 3.3-38	Impact LU-2 includes a discussion of Project consistency with applicable plans including the General Plan. Project consistency with the best practices and recommended mitigation, including those pertaining to land use, in the AG's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document is evaluated in Table 3.3-37. Consistency with the other recommended conditions of approval related to air quality from Sierra Club are provided in Table 3.3-38.
City of Tracy	Kris Balaji	September 14, 2023	The comment notes that the Project should be consistent with the County's General Plan, including General Plan guiding principles and policies.	Subsection 3.11.3, Environmental Impacts, Project Impacts and Mitigation Measures	Impact LU-2 includes a discussion of the applicable General Plan Land Use policies. The Project was determined to be consistent and the impact would be less than significant. In regard to the Project's consistency with the General Plan's guiding principles, the Project seeks to construct 5.36 million feet of industrial use in an area of the County that is transitioning from agricultural to industrial. The Project would generate additional jobs and tax revenue for the County, providing economic development. The Project's impact to agriculture is discussed in Section 3.2.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Land Use and Planning

Affiliation	Signatory	Date	Comment Description	Location Addressed in Land Use Chapter	Response to Comment
Private Parties – Comment Cards at Scoping Meeting					
Interested Individual	Dotty Nygard	April 10, 2023	Request to follow Attorney General's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document.	• Subsection 3.11.3, Environmental Impacts, Project Impacts and Mitigation Measures • Section 3.3, Table 3.3-37	Impact LU-2 includes a discussion of Project consistency with applicable plans including the General Plan. Project consistency with the best practices and recommended mitigation including those pertaining to land use, in the AG's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document is evaluated in Table 3.3-37.



3.12 NOISE

This section describes the environmental setting for noise, including the existing site conditions, regulatory setting, and potential impact that would result from the Project, and, if significant impacts are identified, the mitigation measures that would reduce these impacts.

3.12.1 Environmental Setting

Noise Fundamentals and Terminology

Noise is generally defined as unwanted sound that annoys or disturbs people and potentially causes an adverse psychological or physiological effect on human health. Because noise is an environmental pollutant that can interfere with human activities, evaluation of noise is necessary when considering the environmental impacts of a project.

Sound is mechanical energy transmitted by pressure waves over a medium such as air or water. Sound is characterized by various parameters that include the rate of oscillation of sound waves (frequency), the speed of propagation, and the pressure level or energy content (amplitude). In particular, the sound pressure level (SPL) is the most common descriptor used to characterize the loudness of an existing sound level.

Although the decibel (dB) scale, a logarithmic scale, is used to quantify sound intensity, it does not accurately describe how sound intensity is perceived by human hearing. The perceived loudness of sound is dependent upon many factors, including sound pressure level and frequency content. The human ear is not equally sensitive to all frequencies in the entire spectrum, so noise measurements are weighted more heavily for frequencies to which humans are sensitive in a process called A-weighting, written as dB(A) and referred to as A-weighted decibels. There is a strong correlation between A-weighted sound levels and community response to noise. For this reason, the A-weighted sound level has become the standard tool of environmental noise assessment. Table 3.12-1 summarizes typical A-weighted sound levels for different common noise sources.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

Table 3.12-1. Typical A-Weighted Sound Levels

Common Outdoor Activities	Noise Level (dB(A))	Common Indoor Activities
Jet flyover at 1,000 Feet	-110-	Rock band
Gas lawnmower at 3 Feet	-100-	
Diesel truck at 50 Feet at 50 MPH	-90-	
Noisy urban area, daytime	-80-	Food blender at 3 Feet Garbage Disposal at 3 Feet
Gas lawnmower, 100 Feet	-70-	
Commercial area	-60-	Vacuum Cleaner at 10 Feet Normal Speech at 3 Feet
Heavy traffic at 300 Feet	-50-	
Quiet urban daytime	-40-	Large business office Dishwasher in next room
Quiet urban nighttime	-30-	
Quiet suburban nighttime	-20-	Theater, large conference room (Background)
Quiet rural nighttime	-10-	Library Bedroom at night, concert hall (Background)
	-0-	Broadcast/recording studio

Source: Caltrans 2013.

Different types of measurements are used to characterize the time-varying nature of sound. These measurements include the equivalent sound level (Leq), the minimum and maximum sound levels (Lmin and Lmax), percentile-exceeded sound levels (such as L10, L20), the day-night sound level (Ldn), and the community noise equivalent level (CNEL). Ldn and CNEL values often differ by less than 1 dB. As a matter of practice, Ldn and CNEL values are considered to be equivalent and are treated as such. Table 3.12-2 further defines these sound levels and other sound measurements and terminology used in this analysis.

Table 3.12-2. Definition of Sound Measurements

Sound Measurements	Definition
Decibel (dB)	A unitless measure of sound on a logarithmic scale, which indicates the squared ratio of sound pressure amplitude to a reference sound pressure amplitude. The reference pressure is 20 micro-pascals.
A-Weighted Decibel (dB(A))	An overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.
Maximum Sound Level (Lmax)	The maximum sound level measured during the measurement period.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

Sound Measurements	Definition
Minimum Sound Level (L _{min})	The minimum sound level measured during the measurement period.
Equivalent Sound Level (L _{eq})	The equivalent steady state sound level that in a stated period of time would contain the same acoustical energy.
Percentile-Exceeded Sound Level (L _{xx})	The sound level exceeded xx % of a specific time period. L ₁₀ is the sound level exceeded 10% of the time. L ₉₀ is the sound level exceeded 90% of the time. L ₉₀ is often considered to be representative of the background noise level in a given area.
Day-Night Level (L _{dn})	The energy average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the A-weighted sound levels occurring during the period from 10:00 PM to 7:00 AM
Community Noise Equivalent Level (CNEL)	The energy average of the A-weighted sound levels occurring during a 24-hour period with 5 dB added to the A-weighted sound levels occurring during the period from 7:00 PM to 10:00 PM and 10 dB added to the A-weighted sound levels occurring during the period from 10:00 PM to 7:00 AM.
Peak Particle Velocity (Peak Velocity or PPV)	A measurement of ground vibration defined as the maximum speed (measured in inches per second) at which a particle in the ground is moving relative to its inactive state. PPV is usually expressed in inches/second.
Frequency: Hertz (Hz)	The number of complete pressure fluctuations per second above and below atmospheric pressure.

Source: Federal Highway Administration (FHWA) 2006.

With respect to how humans perceive and react to changes in noise levels, a 1 dB(A) increase is imperceptible, a 3 dB(A) increase is barely perceptible, a 5 dB(A) increase is clearly noticeable, and a 10 dB(A) increase is subjectively perceived as approximately twice as loud (Caltrans 2013). These subjective reactions to changes in noise levels were developed on the basis of test subjects' reactions to changes in the levels of steady-state pure tones or broadband noise and to changes in levels of a given noise source. These statistical indicators are thought to be most applicable to noise levels in the range of 50 to 70 dB(A), as this is the usual range of voice and interior noise levels (Caltrans 2013). Numbers of agencies and municipalities have developed or adopted noise level standards, consistent with these and other similar studies to help prevent annoyance and to protect against the degradation of the existing noise environment.

For a point source such as a stationary compressor or construction equipment, sound attenuates based on geometry at a rate of 6 dB per doubling of distance. For a line source such as free-flowing traffic on a freeway, sound attenuates at a rate of 3 dB per doubling of distance. Atmospheric conditions including wind, temperature gradients, and humidity can change how sound propagates over distance and can affect the level of sound received at a given location. The degree to which the ground surface absorbs acoustical energy also affects sound propagation. Sound that travels over an acoustically absorptive surface, such as grass, attenuates at a slightly greater rate than sound that travels over a hard surface, such as pavement. The increased attenuation is typically in the range of 1 to 2 dB per doubling of distance. Barriers, such as buildings and topography that block the line of sight between a source and receiver, also increase the attenuation of sound over distance (Caltrans 2013).



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

Decibel Addition

Because decibels are logarithmic units, sound pressure levels cannot be added or subtracted through ordinary arithmetic. On the dB scale, a doubling of sound energy corresponds to a 3 dB increase. In other words, when two identical sources are each producing sound of the same loudness, their combined sound level at a given distance would be 3 dB higher than one source under the same conditions (Caltrans 2013). For example, if one source produces a sound pressure level of 70 dB(A), two identical sources would combine to produce 73 dB(A). The cumulative sound level of any number of sources can be determined using decibel addition.

Vibration Standards

Vibration is like noise such that it involves a source, a transmission path, and a receiver. While related to noise, vibration differs in that noise is generally considered to be pressure waves transmitted through air, whereas vibration usually consists of the excitation of a structure or surface. As with noise, vibration consists of an amplitude and frequency. A person's perception to vibration depends on their individual sensitivity to vibration, as well as the amplitude and frequency of the source and the response of the system that is vibrating (Caltrans 2020).

Vibration can be measured in terms of acceleration, velocity, or displacement. A common practice is to monitor vibration in terms of peak particle velocity in inches per second (in/sec PPV). Standards pertaining to perception as well as damage to structures have been developed for vibration levels defined in terms of in/sec PPV.

Human and structural response to different vibration levels is influenced by a number of factors, including ground type, distance between source and receptor, duration, and the number of perceived vibration events. Table 3.12-3 notes the general threshold at which human annoyance could occur is 0.1 PPV for continuous/frequent sources. Table 3.12-4 indicates the threshold for damage to typical residential and commercial structures ranges from 0.3 to 0.5 PPV for continuous/frequent sources.

Table 3.12-3. Guideline Vibration Annoyance Potential Criteria

Human Response	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Sources
Barely perceptible	0.035	0.012
Distinctly perceptible	0.24	0.035
Strongly perceptible	0.90	0.10
Severe	2.0	0.40

Notes:

Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seal equipment, vibratory pile drivers, and vibratory compaction equipment.

Source: Caltrans 2020.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

Table 3.12-4. Guideline Vibration Damage Potential Criteria

Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.30	0.12
Historic and some old buildings	0.50	0.20
Older residential structure	0.70	0.30
New residential structures	1.2	0.50
Modern industrial/commercial buildings	2.0	0.50

Notes:

Transient sources again create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seal equipment, vibratory pile drivers, and vibratory compaction equipment.

Source: Caltrans 2020.

The operation of heavy construction equipment, particularly pile driving, and other impact devices, such as pavement breakers, create seismic waves that radiate along the surface of the ground and downward into the earth. These surface waves can be felt as ground vibration. Vibration from the operation of this equipment can result in effects ranging from annoyance of people to damage of structures. Varying geology and distance will result in different vibration levels containing different frequencies and displacements. In all cases, vibration amplitudes will decrease with increasing distance. Perceptible groundborne vibration is generally limited to areas within a few hundred feet of construction activities (Caltrans 2020).

Table 7-4, Vibration Source Levels for Construction Equipment, in the 2018 Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual lists vibration source levels for the construction equipment most likely to generate high levels of ground vibration (FTA 2018). High vibratory construction equipment that would be used during Project construction includes vibratory rollers, bulldozers, trucks, and drills. Table 3.12-5 summarizes the typical reference vibration levels generated by this equipment.

Table 3.12-5. Vibration Source Levels for Construction Equipment

Equipment	PPVref at 25 Feet
Vibratory roller	0.210
Large bulldozer	0.089
Loaded trucks	0.076
Small bulldozer	0.003



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

Equipment	PPVref at 25 Feet
Caisson drilling	0.089

Source: FTA 2018.

Vibration amplitude attenuates over distance and is a complex function of how energy is imparted into the ground and the soil conditions through which the vibration is traveling. The following equation can be used to estimate the vibration level at a given distance for typical soil conditions (FTA 2018). “PPVref” is the reference PPV from Table 5 and “Distance” is the distance between the source and the receptor:

$$PPV = PPV_{ref} \times (25/Distance)^{1.5}$$

Existing Project Setting

Sensitive Receptors

Some land uses are more tolerant of noise than others. For example, schools, hospitals, churches, and residences are considered to be more sensitive to noise intrusion than are commercial or industrial activities. Ambient noise levels can also affect the perceived desirability or livability of a development.

The Project site lies near the junction of two major freeways, I-205 and I-580. There are a variety of land uses and facilities within the vicinity of the Project area, including:

- To the north of the Project area is the Westside Specific Plan, a 535-acre development that would construct a variety of commercial, institutional, and residential land uses;
- To the northwest of the Project area is the 421-acre Lammersville community and Mountain House community, which at buildout would include residential, commercial, educational, industrial, and open spaces.
- To the west of the Project site lies IPC Phase 1, which covers approximately 1,780 acres and envisions commercial, office, business park industrial, and park uses. Immediately west of the Project site, south of West Schulte Road, is the Owens Brockway Glass Container Manufacturing Facility, the proposed LBA III Industrial Project, and the proposed 14800 West Schulte Road Logistics Center.
- To the south of the Project site is the Western Pacific Railroad tracks and an almond orchard.
- To the east are agricultural lands and residential and urban development uses.

The closest homes and businesses are off South Lammers Road on APN 209-240-04, including the closest noise sensitive receptors which is located approximately 200 feet east of the Project site boundary off South Lammers Road, see Figure 22.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

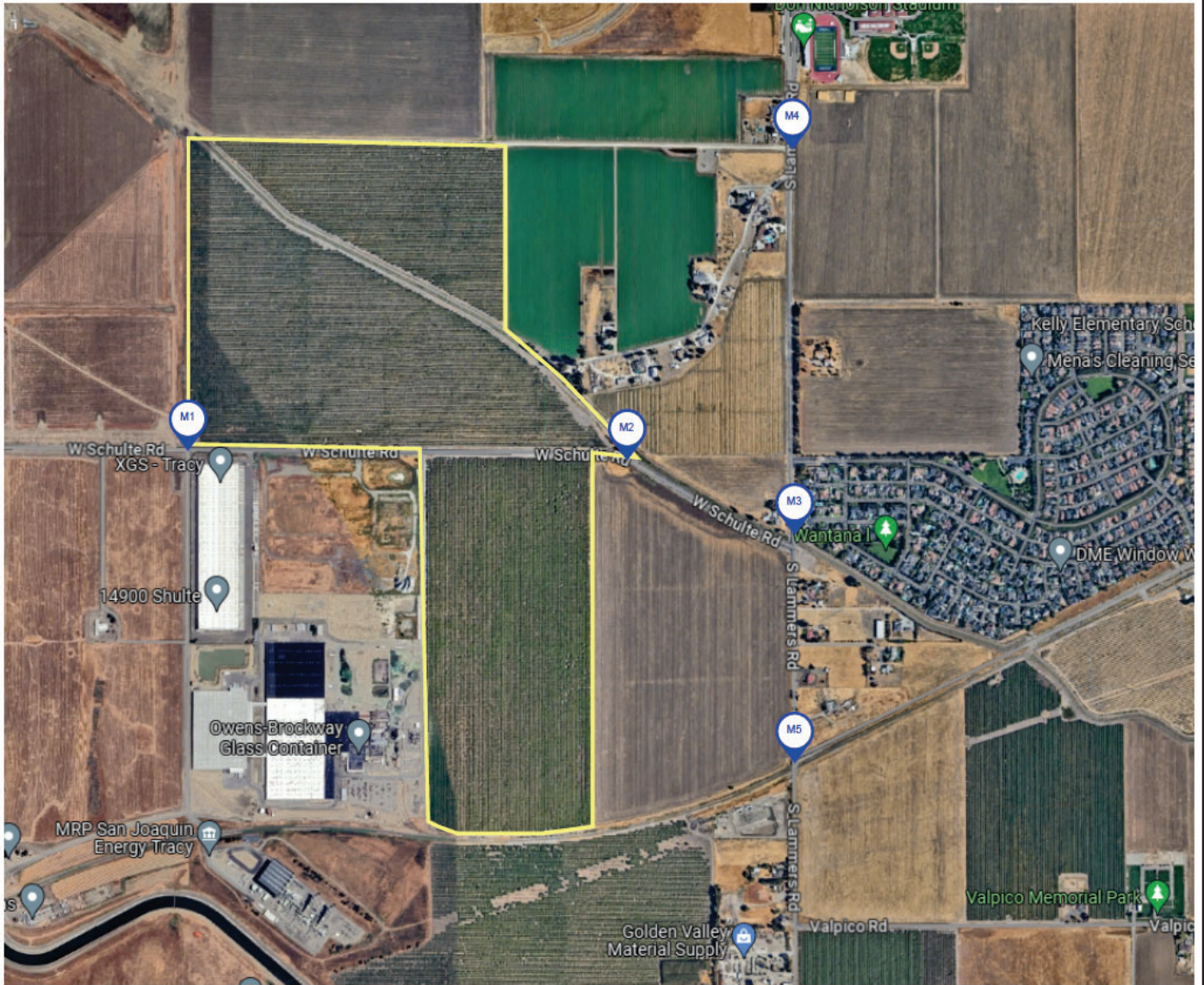
Existing Ambient Noise Levels

The existing or ambient, noise environment in a project area is characterized by the area's general level of development. Areas which are not urbanized are relatively quiet, while areas which are more urbanized are noisier as a result of roadway traffic, industrial activities, and other human activities.

San Joaquin County, and the Project site, is exposed to noise generated by several sources, including traffic noise from I-205 and I-580, traffic noise from local roadways, such as West Schulte Road and South Lammers Road, and noise generated from various industrial, commercial, and agricultural activities. The ambient noise levels at the Project area were determined using two methods. First, Tables 4.H-4 Predicted Existing Traffic Noise Exposure – County Roadways and Table 4.H-5 Predicted Existing Traffic Noise Exposure – Highways in the General Plan DEIR (San Joaquin County 2014) were referenced to determine the ambient noise levels around the Project area. Referencing Table 4.H-5, the distance between the Project site and the highways are greater than the distance listed for the 60 dB(A) contour line. Therefore, noise from the highways does not have a significant influence on the ambient noise levels at and around the Project site. Table 4.H-4 notes traffic noise generated by both West Schulte Road and South Lammers Road is a maximum of 63 dB(A) Ldn at 100 feet from the roadway centerline, with higher noise levels closer to the roads. Considering distance attenuation from a line source, noise levels within 10 feet of West Schulte Road and South Lammers Road would be 73 dB(A) Ldn or greater.

To supplement the information in Tables 4.H-4 and 4.H-5, short term (15-minute) noise measurements were conducted during daytime and nighttime hours at five (5) locations around the Project area. The locations of the measurements are shown in the blue pins in Figure 3.12-1. All measurements were taken with a fully calibrated Larson Davis LxT sound level meter. The sound level meter was manned for all measurements. The microphone for all measurements was located about 5' above local ground and within 10 feet of the roadways. A description of the measurement location, the short-term measurement results, and the estimated Ldn at each measurement location is shown below in Table 3.12-6. All Ldn levels were calculated using the equations in Appendix E: "Determining Existing Noise" in the Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual.





Project Location
San Joaquin County

Client/Project
International Park of Commerce Specific Plan
Phase 2

Figure No.
27

Title
**Project Area and Ambient Noise
Measurement Locations**

INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

Table 3.12-6. Measured Short-Term Noise Levels Around Project Area

Measurement Location	Leq, dB(A)		Estimated Ldn, dB(A)
	Daytime Hours (7AM to 10 PM)	Nighttime Hours (10 PM to 7 AM)	
M1: West Edge of Project Area Along W Schulte Rd	74.6 dB(A)	69.5 dB(A)	75.1 dB(A)
M2: East Edge of Project Area Along W Schulte Rd	74.5 dB(A)	68.9 dB(A)	74.7 dB(A)
M3: Corner of W Schulte Rd and S Lammers Rd	67.7 dB(A)	64.8 dB(A)	69.8 dB(A)
M4: S Lammers Rd near School	74.9 dB(A)	71.3 dB(A)	76.4 dB(A)
M5: S Lammers Rd Aligned with South Edge of Project Area	70.3 dB(A)	68.9 dB(A)	73.5 dB(A)

Based on the measured data, ambient noise levels close to the roadways are anticipated to be between 70 and 76 dB(A) Ldn. This is consistent with the noise contours in Tables 4.H-4 and 4.H-5 in the General Plan DEIR document.

The residential homes along S Lammers Road are set back between 80-100 feet from the edge of the roadway. Using the ambient noise measurement results and again considering distance attenuation from a line source, noise levels at 100 feet from the roadways (at the residential homes) is anticipated to be between 60 and 66 dB(A) Ldn.

3.12.2 Regulatory Setting

Federal

Federal, state, and local agencies regulate different aspects of environmental noise. Generally, the federal government sets standards for transportation-related noise sources closely linked to interstate commerce, including aircraft, locomotives, and trucks. No federal noise standards are directly applicable to this Project. The state government sets standards for transportation noise sources such as automobiles, light trucks, and motorcycles. Noise sources associated with industrial, commercial, and construction activities are generally subject to local control through noise ordinances and general plan policies. Local general plans identify general principles intended to guide and influence development plans.

State

California Green Building Standards

CALGreen establishes interior noise insulation standards for non-residential occupied buildings. CALGreen Section 5.507, Environmental Comfort, states the following:

5.507.4.1 Exterior noise transmission. Wall and roof-ceiling assemblies exposed to the noise source making up the building or addition envelope or altered envelope shall meet a composite



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

sound transmission class (STC) rating of at least 50 or a composite OITC rating of no less than 40, with exterior windows of a minimum STC of 40 or OITC of 30 in the following locations:

Within the 65 CNEL noise contour of an airport

Exceptions:

Ldn or CNEL for military airports shall be determined by the facility Air Installation Compatible Land Use Zone (AICUZ) plan.

Ldn or CNEL for other airports and heliports for which a land use plan that has not been developed shall be determined by the local general plan noise element.

Within the 65 CNEL or Ldn noise contour of a freeway or expressway, railroad, industrial source or fixed-guideway noise source as determined by the Noise Element of the General Plan.

5.507.4.1.1 Noise exposure where noise contours are not readily available. Buildings exposed to a noise level of 65 dB Leq-1-hr during any hour of operation shall have building, addition or alteration exterior wall and roof-ceiling assemblies exposed to the noise source meeting a composite STC rating of at least 45 (or OITC 35), with exterior windows of a minimum STC of 40 (or OITC 30).

5.507.4.2 Performance method. For buildings located as defined in Section 5.507.4.1 or 5.507.4.1.1, wall and roof-ceiling assemblies exposed to the noise source making up the building or addition envelope or altered envelope shall be constructed to provide an interior noise environment attributable to exterior sources that does not exceed an hourly equivalent noise level (Leq -1Hr) of 50 A-weighted sound level (dBA) in occupied areas during any hours of operations.

5.507.4.2.1 Site features. Exterior features such as sound walls or earth berms may be utilized as appropriate to the building, addition, or alteration project to mitigate sound migration to the interior.

5.507.4.2.2 Documentation of compliance. An acoustical analysis documenting complying interior sound levels shall be prepared by personnel approved by the architect or engineer of record.

5.507.4.3 Interior sound transmission. Wall and floor-ceiling assemblies separating tenant spaces and tenant spaces and public places shall have an STC of at least 40.

State of California General Plan Guidelines

The State of California regulates vehicular and freeway noise affecting classrooms, sets standards for sound transmission and occupational noise control, and identifies noise insulation standards and airport noise/land-use compatibility criteria. The State of California General Plan Guidelines, published by OPR, also provides guidance for the acceptability of projects within specific CNEL/L_{dn} contours (State of California 2017). The guidelines also present adjustments factors that may be used in order to arrive at



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution.

State Office of Planning and Research Noise Element Guidelines

The State OPR Noise Element Guidelines include recommended exterior and interior noise level standards for local jurisdictions to identify and prevent the creation of incompatible land uses due to noise. The Noise Element Guidelines contain a land use compatibility table that describes the compatibility of various land uses with a range of environmental noise levels in terms of the CNEL.

Local

San Joaquin County Development Title

Chapter 9-404 "Noise", Table 9-404.040 in the San Joaquin County Development Title establishes the following maximum allowable noise exposure levels for transportation and stationary noise sources (San Joaquin County 2025).

TABLE 9-404.040 - MAXIMUM ALLOWABLE NOISE EXPOSURE FOR NOISE SENSITIVE LAND USES		
Part I: Transportation Noise Sources		
Noise Sensitive Land Use (Use Types)	Outdoor Activity Areas ¹ (dB Ldn)	Interior Spaces (dB Ldn)
Residential: all Housing Types and Residential Use	65	45
College and Trade School	65	45
Commercial Use Types not separately listed	-	45
Community Assembly/Religious Assembly	65	45
Cultural Institutions	65	45
Hospitals and Clinics	65	45
Offices	-	45
Parks and Recreation Facilities	65	45
Schools	65	45
Part II: Stationary Noise Sources		
Sound Level	Outdoor Activity Areas of Noise Sensitive Land Uses ¹ Daytime ² (7 a.m. to 10 p.m.)	Outdoor Activity Areas for Noise Sensitive Land Uses ¹ Nighttime ² (10 p.m. to 7 a.m.)
Hourly Equivalent Sound Level (Leq), dB ³	55	45
Maximum Sound Level (Lmax), dB	75	65
1. Where the location of outdoor activity areas is unknown or is not applicable, the noise standard shall be applied at the property line of the receiving land use. When determining the effectiveness of noise mitigation measures, the standards shall be applied on the receiving side of noise barriers or other property line noise mitigation measures.		
2. Each of the noise level standards specified shall be reduced by 5 dB for impulsive noise, single tone noise, or noise consisting primarily of speech or music.		
3. If the noise source operates for less than 30 minutes per hour, then the maximum sound level standard shall apply.		

Source: San Joaquin County 2025.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

Table 9-404.050 “Noise Exposure – Land Use Requirements and Limitations” in the San Joaquin County Development Title Update document describes the requirements and limitations of various land uses within the Ldn ranges that must be address in required acoustical studies as follows:

TABLE 9-404.050: NOISE EXPOSURE – LAND USE REQUIREMENTS AND LIMITATIONS		
Land Use	Day/Night Average Sound Level (Ldn)	Requirements and Limitations
Residential: Single Unit Dwelling, Duplex, Bungalow Court, and Townhouse	Less than 65	Normally acceptable
	65 to 75	Conditionally acceptable; acoustic study and noise attenuation measures required
	Over 75	Unacceptable; acoustic study and noise attenuation measures required
Residential Multi-family, Group Residential, and Transient Lodging	Less than 65	Normally acceptable
	Over 65	Conditionally acceptable; acoustic study and noise attenuation measures required
Schools, Libraries, Community Assembly, Hospitals, Religious Assembly, Residential Care, Playgrounds, Parks, Commercial, and Office	Less than 65	Normally acceptable
	65 and Over	Conditionally acceptable; acoustic study and noise attenuation measures required
Agricultural, Industrial, and Utilities; golf courses, riding stables, water sports, and cemeteries	Less than 75	Normally acceptable
	75 and over	Conditionally acceptable; acoustic study and noise attenuation measures required; avoid uses involving concentrations of people
New residential development in noise impacted areas are subject to the following noise levels:		
1. For new single-unit residential development, maintain a standard of 60 Ldn for exterior noise in private use areas. 2. For new multi-unit residential development maintain a standard of 65 Ldn in community outdoor recreation areas. Noise standards are not applied to private decks and balconies. 3. Where new residential units would be exposed to intermittent noise levels generated during train operations, maximum railroad noise levels inside homes shall not exceed 45 dBA in bedrooms or 55 dBA in other occupied spaces. These single event limits are only applicable where there are normally four or more train operations per day.		

Source: San Joaquin County 2025.

Section 9-404.060 “Additional Regulations for Specific Activities” states the following for noise generated by construction (San Joaquin County 2025):

- a) Construction. General construction noise shall be limited to weekdays from 6:00 a.m. to 9:00 p.m. Pre-construction activities, including loading and unloading, deliveries, truck idling, backup beeps, and radios, also are limited to these construction noise hours.
 - 1) No noise-producing construction activities shall be permitted outside of these hours or on Sundays and federal holidays unless a temporary waiver is granted by the Building Official.
 - 2) More restrictive construction noise hours may be established as a Condition of Approval of an Administrative Use Permit or a Conditional Use Permit when appropriate given the surrounding neighborhood, the type of noise, or other unique factors.
 - 3) Any waiver granted shall take the potential noise impacts upon the surrounding neighborhood and the larger community into consideration.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

- 4) Except in emergencies, no construction shall be permitted outside of these hours, including maintenance work on public rights-of-way, that creates construction noise.

San Joaquin County General Plan

The County's General Plan presents a vision for the County's future, looking ahead to 2035. This long-range planning document includes a comprehensive framework for the County's physical, economic, and social development and environmental resources preservation, as well as policies to guide day-to-day decisions. The County's General Plan emphasizes that future development must occur in a way that makes the most of existing infrastructure and public facilities, minimizes impacts to natural resources, expands opportunities for job growth, restores and revitalizes unincorporated communities, and provides greater opportunities to all County residents.

The County's General Plan includes the following goals and policies related to noise that are applicable to the Project (San Joaquin County 2016):

Goal PHS-9: To protect county residents from the harmful and nuisance effects of exposure to excessive noise.

- **Policy PHS-9.1: Noise Standards for New Land Uses.** The County shall require new development to comply with the noise standards shown in Tables PHS-1 and PHS-2 through proper site and building design, such as building orientation, setbacks, barriers, and building construction practices. [Tables PHS-1 and PSH-2 from the San Joaquin County General Plan are shown below.]

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

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

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

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

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



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

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

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

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

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

- **Policy PHS-9.4: Acceptable Vibration Levels.** The County shall require construction projects anticipated to generate a significant amount of vibration to ensure acceptable interior vibration levels at nearby vibration-sensitive uses based (on) FTA criteria.

City of Tracy Code of Ordinances

Article 9 “Noise Control” of the City of Tracy Code of Ordinances addresses one-hour average sound level limits for stationary equipment and nuisance noise definitions (City of Tracy 2025). There are no specific noise level limits for noise generated from traffic. Section 4.12.820 prohibits noise generated by the following traffic sources:

- (a) Horns, signaling devices, etc. The intentional sounding of any horn or other signaling device on any automobile, motorcycle, or other vehicle, except as a danger warning; the creation by means of any such signaling device of any unreasonably loud or harsh sound; and the sounding of any such device for any unnecessary and unreasonable period of time.
- (f) Exhausts. The noise emanating into the open air of the noise from the exhaust of any stationary internal-combustion engine, motorboat, or motor vehicle except through a muffler or other device which will effectively prevent loud or explosive noises therefrom.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

City of Tracy General Plan

The City of Tracy's General Plan "is the principal policy and planning document for guiding future conservation, enhancement, and development in the City. It represents the basic policy direction of the Tracy City Council on basic community values, ideals, and aspirations to govern a shared environment through 2025. The General Plan addresses all aspects of development including land use, transportation, housing, economic development, public facilities and infrastructure and open spaces, among other topics."

The City's General Plan Noise Element includes the following actions and policies related to noise that are applicable to traffic and construction (City of Tracy 2011):

- **Truck Routes:** The City of Tracy has a specific city ordinance relating to truck routes (Section 3.08.310 of the Tracy Municipal Code). The ordinance defines weight restrictions, specifies the ability of trucks to enter areas not designated as truck routes, and defines the truck routes within the city.
- **Policy P4:** All construction in the vicinity of noise sensitive land uses, such as residences, hospitals, or convalescent homes, shall be limited to daylight hours or 7:00 a.m. to 7:00 p.m. In addition, the following construction noise control measures shall be included as requirements at construction sites to minimize construction noise impacts:
 - Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
 - Locate stationary noise-generating equipment as far as possible from sensitive receptors when sensitive receptors adjoin or are near a construction area.
 - Utilize "quiet" air compressors and other stationary noise sources where technology exists.
- **Action A1:** Enforce Section 27007 of the California Motor Vehicle Code that prohibits amplified sound that can be heard 50 or more feet from a vehicle.
- **Action A2:** Enforce Section 27150 of the California Motor Vehicle Code that addresses excessive exhaust noise.

3.12.3 Environmental Impacts

This section analyzes the Project's potential to result in significant impacts on noise. If an impact is determined to be significant, mitigation measures are identified that would reduce or avoid impacts.

Methodology

The noise contour tables listed in the San Joaquin County Development Title Update Document and short-term ambient noise level measurements were used to provide baseline noise conditions at nearby sensitive receptors and within the Project site vicinity. For the purpose of this analysis, potential sensitive



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

receptors were determined by reviewing aerial photography of the Project vicinity in 2023 and from site observations.

Impacts from Project-related traffic were estimated using Existing and Existing Plus Project traffic volumes from the TIA prepared by Fehr & Peers in February 2024 (Fehr & Peers 2024).

Noise from the Project's stationary mechanical systems, such as air handling units and exhaust fans, would operate regularly and are therefore required to comply with the requirements listed in Chapter 9-404 "Noise", Table 9-404.040 in the San Joaquin County Development Title Update document.

The FHWA Roadway Construction Noise Model (RCNM) was used to estimate the impact from short-term construction activities. The RCNM is used as the FHWA's national standard for predicting noise generated from construction activities. The RCNM analysis includes the calculation of noise levels at a defined distance for a variety of construction equipment. The spreadsheet inputs include acoustical use factor and distance to receptors and calculates the expected Lmax values and Leq values at a selected receptor. As a note, the acoustical use factor is the percentage of time during a construction noise operation that a piece of construction equipment is operating at full power. For example, if an acoustical use factor is 40%, this means the piece of equipment is operating at full power for approximately 24 minutes out of every hour during construction. The RCNM output files are provided in Appendix N.

Groundborne vibration levels associated with construction-related activities for the Project were evaluated utilizing typical groundborne vibration levels associated with construction equipment. Potential groundborne vibration impacts related to structural damage and human annoyance were evaluated, taking into account the distance from construction activities to nearby structures and typically applied criteria for structural damage and human annoyance.

Thresholds of Significance

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purposes of this EIR, implementation of the Project may result in a potentially significant impact on noise if it would do any of the following:

- 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 other applicable standard 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?

USEPA Guidelines

The USEPA has established guidelines for assessing the impact of an increase in noise levels. These guidelines have been used as industry standard for several years to determine the potential impact of noise increases on communities (USEPA 1973). Most people will tolerate a small increase in background noise (up to about 5 dB(A)) without complaint, especially if the increase is gradual over a period of years



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

(such as from gradually increasing traffic volumes). Increases greater than 5 dB(A) may cause complaints and interference with sleep. Increases above 10 dB(A) (heard as a doubling of judged loudness) are likely to cause complaints and would be considered a serious increase. Table 3.12-7 defines each of the traditional impact descriptions, their quantitative range, and the qualitative human response to changes in noise levels.

Table 3.12-7. USEPA Impact Guidelines

Increase over Existing or Baseline Sound Levels	Impact Per USEPA Region Guidelines	Qualitative Human Perception of Difference in Sound Levels
0 dB to 5 dB	Minimum Impact	Imperceivable or Slight Difference
6 dB to 10 dB	Significant Impact	Significant Noticeable Difference – Complaints Possible
Over 10 dB	Serious Impact	Loudness Changes by a Factor of Two or Greater. Clearly Audible Difference – Complaints Likely

Source: USEPA 1973.

The USEPA Impact guidelines are also echoed in Section 3.5 “Human Response to Changes in Noise Levels” in the Caltrans Annotated Noise Study Report (Caltrans 2024).

Project Impacts and Mitigation Measures

Noise Levels in Excess of Standards

Impact NOI-1	The Project would not result in the generation of substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in local general plan or noise ordinance, or other applicable standard of other agencies.

Impact Analysis

The discussion addresses whether the Project would expose sensitive noise-receptors, neighboring properties, or occupied non-residential spaces to excessive noise during Project operations or construction. The impacts from construction, exterior and interior traffic noise, and fixed sources are discussed below:

Exterior Traffic Noise Level Impacts

Traffic noise depends primarily on vehicle speed (tire noise increases with speed), proportion of medium and large truck traffic (trucks generate engine, exhaust, and wind noise in addition to tire noise), and number of speed control devices, such as traffic lights and stop signs (accelerating and decelerating vehicles and trucks can generate more noise).

Changes in traffic volumes can also have an impact on overall traffic noise levels. For example, it takes 25 percent more traffic volume to produce an increase of only 1 dB(A) in the ambient noise level. For roads already heavy with traffic volume, an increase in traffic numbers could even reduce noise because



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

the heavier volumes could slow down the average speed of the vehicles. A doubling of traffic volume results in a 3 dB(A) increase in noise levels.

To describe future noise levels due to traffic added from the Project, AM and PM peak hour existing traffic volumes (with and without the Project) listed in the traffic study were used to determine the percentage increase of traffic on the roads adjacent to the Project site and nearby sensitive receptors. Table 3.12-8 shows the peak hour volumes associated with traffic on the local roadway network under the existing and existing plus Project traffic conditions. The last columns in the table show the overall percentage change and the estimated difference in peak hour noise level in dB(A).

Table 3.12-8. Traffic Peak Hour Volumes and Estimated Noise Increase

Roadway Intersection	Existing Peak Hour Traffic Volumes	Existing Peak Hour Traffic Volumes with Project	Percentage Change	Estimated dB(A) Change
International Pkwy and I-205 WB Ramps	1,986 (1,413)	2,141 (1,524)	7.8% (7.9%)	0.3 (0.3)
International Pkwy and I-205 EB Ramps	1,355 (1,188)	1,560 (1,393)	15.1% (17.3%)	0.6 (0.7)
International Pkwy and Promontory Pkwy	1,419 (1,150)	1,625 (1,357)	14.5% (18.0%)	0.6 (0.7)
International Pkwy and West Schulte Rd	1,802 (1,396)	2,591 (2,203)	43.8% (57.8%)	1.8 (2.3)
International Pkwy and I-580 NB Ramps	1,768 (318)	2,449 (1,019)	38.5% (220.4%)	1.5 (8.8)
International Pkwy and I-580 SB Ramps	910 (1,011)	1,284 (1,407)	41.1% (39.2%)	1.6 (1.6)
Hansen Road and Promontory Pkwy	286 (258)	447 (425)	56.3% (64.7%)	2.3 (2.6)
Hansen Road and West Schulte Rd	781 (623)	1,726 (1,595)	121.0% (156.0%)	4.8 (6.2)
Nagle Rd / I-205 WB Ramp and Grant Line Rd	2,051 (3,846)	2,356 (4,094)	14.9% (6.5%)	0.6 (0.3)
South Lammers Rd and Byron Rd	794 (1,174)	1,099 (1,422)	38.4% (21.1%)	1.5 (0.8)
South Lammers Rd and Eleventh St	2,419 (2,885)	2,842 (3,336)	17.5% (15.6%)	0.7 (0.6)
South Lammers Rd and Capital Park Dr	1,689 (1,515)	2,112 (1,966)	25.0% (29.8%)	1.0 (1.2)
South Lammers Rd and West Schulte Rd	986 (936)	1,685 (1,679)	70.9% (79.4%)	2.8 (3.1)
South Lammers Rd and Valpico Rd	443 (581)	719 (873)	62.3% (50.3%)	2.5 (2.0)
Corral Hollow Rd and Eleventh St	2,782 (4,362)	2,900 (4,565)	4.2% (4.7%)	0.2 (0.2)
Byron Rd and Grant Line Rd	1,855 (2,066)	2,160 (2,314)	16.4% (12.0%)	0.7 (0.5)

Notes:

Numbers in parenthesis are PM peak hour traffic volumes; numbers not in parenthesis are AM peak hour traffic volumes.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

As stated in the Noise section above, an increase of 3 dB(A) is the threshold for a noise increase to be noticeable and increases above 5 dB(A) are considered significant according to the USEPA guidelines. Also, for CEQA purposes, the County considers an increase over ambient to be a potentially significant impact if it is 5 dB(A) or more.

According to Table 3.12-8 above, the Project is expected to increase traffic volumes by varying amounts along most roadways surrounding the Project site. There would essentially be no change in traffic noise over ambient noise levels (3 dB(A) or lower) expected along most streets except at the intersection of Hansen Road and W Schulte Road and at the intersection of International Parkway and the I-580 northbound ramps.

Noise levels at the intersection of Hansen Road and West Schulte Road are anticipated to increase by 6 dB(A) during the PM peak hour. This intersection lies approximately one mile west of the Project site and is surrounded by industrial and commercial uses and would not adversely impact residential homes, schools or any other sensitive receptor. The closest sensitive receptor to the intersection of Hansen Road and West Schulte Road is a residence located approximately 1.4 miles north in the Lammersville community. The noise level at the intersection of International Parkway and the I-580 northbound ramps is expected to increase by 9 dB(A) during the PM peak hour. This intersection is approximately 2 miles west of the Project site and is also surrounded by industrial and commercial uses. Noise increases at this intersection would not adversely impact any noise sensitive receptors. The closest noise-sensitive receptor to this intersection is a single-family residence approximately 1,770 feet northwest.

Noise levels at the intersection of South Lammers Road and West Schulte Road are estimated to increase by 3.1 dB(A) during the PM peak hour, meaning the nearby residential area may experience a barely noticeable increase in traffic noise during this time. The traffic noise increase will not be significant according to the USEPA guidelines or County CEQA thresholds. Also, according to the traffic study, there will be no truck traffic related to the Project on South Lammers Road. As such, trucks would not directly pass by the residential homes or high school which front South Lammers Road. Therefore, the impacts from traffic noise levels would be less than significant.

Lastly, it should be noted that the traffic impact analysis uses the existing peak hour traffic volumes rather than future traffic volumes to estimate a worst-case condition. Future traffic volumes will be higher so the Project's contribution will be a lower percentage and the percentage increase in noise over ambient levels at the time will be smaller. Therefore, the EIR's conclusions are conservative and there actually will be fewer impacts than identified by the EIR using current traffic volumes.

Interior Traffic Noise Level Impacts

CALGreen states if an occupied non-residential space is exposed to a noise level of 65 dB(A) Leq 1-hr during any hour of operation, the exterior façade design is required to incorporate features to reduce noise inside the spaces to a maximum of 50 dBA Leq 1-hr. Any buildings within 76 feet of West Schulte Road or within 79 feet of South Lammers Road are within the 65 dB(A) Ldn contour for these roadways and may be exposed to 1-hour noise level of 65 dB(A) Leq or greater is possible. Therefore, the project buildings may be required to comply with the CALGreen requirements.

The CALGreen code limits would include a detailed noise analysis by a qualified acoustical consultant who will evaluate the noise levels experienced by occupied non-residential spaces and provide



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

recommendations for glazing and the building envelope to meet the CALGreen noise standard. Therefore, the impacts from exterior traffic noise to the occupied non-residential spaces would be less than significant.

Short Term Construction Noise to Community

Two types of short-term noise impacts could occur during construction. The first type of noise is from hauling trips and construction crew vehicular commutes. Construction crew commutes would incrementally increase noise levels on access roads leading to the project site.

Travel routes for construction worker vehicles, construction equipment, and hauling trips to remove almond tree waste would be determined in consultation with the County's Transportation Engineering Division and included in the construction traffic management plan to be developed in accordance with the County's standard conditions of approval. Trucks and other construction worker vehicles would access the Project vicinity from both I-580 and I-205 at Mountain House/International Parkway. Mountain House Parkway, West Schulte Road, proposed Pavilion Parkway, and proposed Promontory Parkway would be designated as the main truck routes to access Project uses. According to Table 3.16-1 in the Transportation section below, there is already heavy truck traffic that exists on the designated truck routes including International Parkway (3,150 trucks), West Schulte Road (2,250 trucks), and Promontory Parkway (1,000 trucks). The designated truck routes are all surrounded by industrial and commercial uses therefore, noise increases along these routes would not adversely impact any noise sensitive receptors. No construction vehicles or haul trucks will travel on South Lammers Road near the school and residential homes.

The construction of the Project would involve a maximum of 679 construction worker vehicles and 265 vendor vehicles per day (944 total) traveling to and from the site. Assuming the worst case of all worker and vendor vehicles entering or existing the site at the same time, this would add 944 vehicles to the peak hour traffic volume on the local roadways noted above.

Therefore, to describe future noise levels due to construction traffic added from the Project, peak hour existing traffic volumes with and without the Project's construction traffic were used to determine the percentage increase of traffic on the roads adjacent to the Project site and nearby sensitive receptors. Table 3.12-9 shows the peak hour volumes associated with traffic on the local roadway network under the existing and existing plus Project construction traffic conditions. The last columns in the table show the overall percentage change and the estimated difference in peak hour noise level in dB(A).

Table 3.12-9. Traffic Peak Hour Volumes and Estimated Noise Increase from Construction Traffic

Roadway Intersection	Existing Peak Hour Traffic Volumes	Existing Peak Hour Traffic Volumes with Project Construction Traffic	Percentage Change	Estimated dB(A) Change
International Pkwy and I-205 WB Ramps	1,986 (1,413)	2,930 (2,357)	47.5% (66.8%)	1.9 (2.6)
International Pkwy and I-205 EB Ramps	1,355 (1,188)	2,299 (2,132)	69.7% (79.5%)	2.8 (3.2)



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

Roadway Intersection	Existing Peak Hour Traffic Volumes	Existing Peak Hour Traffic Volumes with Project Construction Traffic	Percentage Change	Estimated dB(A) Change
International Pkwy and Promontory Pkwy	1,419 (1,150)	2,363 (2,094)	66.5% (82.1%)	2.7 (3.3)
International Pkwy and West Schulte Rd	1,802 (1,396)	2,746 (2,340)	52.4% (67.6%)	2.1 (2.7)
International Pkwy and I-580 NB Ramps	1,768 (318)	2,712 (1,262)	53.4% (297%)	2.1 (11.9)
International Pkwy and I-580 SB Ramps	910 (1,011)	1,854 (1,955)	103.8% (93.4%)	4.1 (3.7)
Hansen Road and Promontory Pkwy	286 (258)	1,230 (1,202)	330.1% (365.9%)	13.2 (14.6)
Hansen Road and West Schulte Rd	781 (623)	1,725 (1,567)	120.9% (151.5%)	4.8 (6.1)
Nagle Rd / I-205 WB Ramp and Grant Line Rd	2,051 (3,846)	2,995 (4,790)	46.0% (24.5%)	1.8 (1.0)
Corral Hollow Rd and Eleventh St	2,782 (4,362)	3,726 (5,306)	33.9% (21.6%)	1.4 (0.9)
Byron Rd and Grant Line Rd	1,855 (2,066)	2,799 (3,010)	50.9% (45.7%)	2.0 (1.8)

Notes:

Numbers in parenthesis are PM peak hour traffic volumes; numbers not in parenthesis are AM peak hour traffic volumes.

According to Table 3.12-9 above, the Project is expected to increase traffic volumes by varying amounts along select roadways surrounding the Project site. Intersections potentially experiencing the highest noise increases are Hansen Road and Promontory Parkway and International Parkway and the I-580 NB ramps. As noted above, these road intersections are all surrounded by industrial and commercial uses and would not adversely impact any noise sensitive receptors. Also, according to the traffic study, there will again be no traffic related to the construction of the Project on South Lammers Road. As such, construction trucks and vehicles would not directly pass by the residential homes or high school which front South Lammers Road. Therefore, the impacts from construction traffic noise levels would be less than significant.

The second type of noise generated during construction is from the construction activity itself. Construction activities would include site preparation, grading, building construction, paving, and architectural coating. Each construction stage has its own mix of equipment, and consequently, its own noise characteristics. The various construction operations would change the character of the noise generated at the project site and therefore, the noise level as construction progresses. The loudest stages of construction typically involve earthmoving and grading equipment.

The Project would be constructed in three phases over a ten-year period. Phases 1 and 2 were anticipated to take place concurrently over a period of 5 years. Phase 3 would take place immediately following completion of Phases 1 and 2 and would be constructed over an additional 5 years. Each phase would include 5 stages of construction. Each stage will use different construction equipment. The main types of noise-producing equipment for each construction stage are shown in Table 3.12-10.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

Table 3.12-10. Construction Stage Equipment

Construction Phase 1 and 2	Construction Equipment	
Site Preparation	• Rubber-Tired Dozers (15) • Tractors (7)	• Front-End Loaders (7) • Backhoes (6)
Grading/Undergrounding Canal	• Graders (5) • Tractors (4) • Backhoes (3) • Rubber-Tired Dozers (5)	• Excavators (10) • Front-End Loaders (3) • Scrapers (10) • Haul Trucks (9)
Building Construction/Utilities	• Gradall Forklifts (15) • Cranes (5) • Tractors (5) • Backhoes (5)	• Generators (5) • Welders (5) • Front-End Loaders (5)
Paving	• Pavers (10) • Paving Equipment (10)	• Rollers (10)
Architectural Coating	• Air Compressors (5)	
Construction Phase 3	Construction Equipment	
Site Preparation	• Rubber-Tired Dozers (9) • Tractors (4)	• Front-End Loaders (4) • Backhoes (4)
Grading	• Graders (3) • Tractors (2) • Backhoes (2) • Rubber-Tired Dozers (3)	• Excavators (6) • Front-End Loaders (2) • Scrapers (6) • Haul Trucks (6)
Building Construction/Utilities	• Gradall Forklifts (9) • Cranes (3) • Tractors (3) • Backhoes (3)	• Generators (3) • Welders (3) • Front-End Loaders (3)
Paving	• Pavers (6) • Paving Equipment (10)	• Rollers (6)
Architectural Coating	• Air Compressors (3)	

Table 3.12-11 lists the types of construction equipment and the maximum and average operational noise level as measured at 200 feet and 700 feet from the operating equipment. The 200-foot distance represents the approximate distance between the Project site boundary and the closest noise-sensitive receptor for Construction Phases 1 and 2 and the 700-foot distance is the approximate distance between the Project site boundary and the closest noise-sensitive receptor for Construction Phase 3, see Figure 22.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

**Table 3.12-11. Federal Highway Administration Roadway Construction Noise Model
Source Noise Levels**

Construction Equipment Source at the Project Site	Distance to Closest Noise Sensitive Receptor, feet	Sound Level at Receptor		
		Lmax, dB(A)	Acoustical Use Factor (%)	Leq, dB(A)
Backhoe	200 700	65.5 54.6	40	61.5 50.7
Crane	200 700	68.5 57.6	16	60.6 49.7
Compressor (air)	200 700	65.6 54.7	40	61.6 50.8
Dozer	200 700	69.6 58.7	40	65.6 54.8
Excavator	200 700	68.7 57.8	40	64.7 53.8
Forklift (Gradall)	200 700	71.4 60.5	40	67.4 56.5
Front End Loader	200 700	67.1 56.2	40	63.1 52.2
Generator	200 700	68.6 57.7	50	65.6 54.7
Grader	200 700	73.0 62.1	40	69.0 58.1
Haul (Dump) Truck	200 700	64.4 53.5	40	60.4 49.5
Paver / Paving Equipment	200 700	65.2 54.3	50	62.2 51.3
Roller	200 700	68.0 57.1	20	61.0 50.1
Scraper	200 700	71.5 60.7	40	67.6 56.7
Tractor	200 700	72.0 61.1	40	68.0 57.1
Welder	200 700	62.0 51.1	40	58.0 47.1

Source: Stantec 2026.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

A worst-case condition for construction activity would assume all noise-generating equipment was operating at the same time and at the same distance from the closest noise-sensitive receptor. Using this assumption, the RCNM program calculated the following combined Leq and Lmax noise levels from each stage of construction as shown in Table 3.12-12.

Table 3.12-12. Calculated Noise Level from Each Construction Stage

Construction Phases 1 and 2	Distance to Closest Noise Sensitive Receptor, ft¹	Calculated Lmax, dB(A)	Calculated Leq, dB(A)
Site Preparation	200	84.4	80.4
Grading	200	86.8	82.8
Building Construction	200	86.1	81.9
Paving	200	81.1	76.6
Architectural Coating	200	72.6	68.5
Construction Phase 3	Distance to Closest Noise Sensitive Receptor, ft¹	Calculated Lmax, dB(A)	Calculated Leq, dB(A)
Site Preparation	700	71.7	67.7
Grading	700	73.8	69.8
Building Construction	700	73.0	68.9
Paving	700	68.7	64.4
Architectural Coating	700	59.5	55.5

¹ The distance used for this analysis is the distance from the Project site boundary to the nearest sensitive receptor. During construction, equipment would likely operate further from the receptor, reducing the noise level at the nearest sensitive receptor. Source: Stantec 2026.

Measured daytime ambient noise levels ten feet from the roadways in the Project vicinity ranged between 68 and 75 dB(A). The residential homes along S Lammers Road are set back between 80-100 feet from the edge of the roadway. Using the ambient noise measurement results and again considering distance attenuation from a line source, daytime ambient noise levels at the residential homes are anticipated to be between 59 and 66 dB(A).

The calculated worst-case construction Leq noise levels listed in Table 3.12-12 are anticipated to potentially be up to 24 dB(A) above the ambient noise levels at the closest residential homes during the loudest phases of construction, again depending on the equipment used and the proximity of the equipment to the closest noise sensitive receptors. This is above the 5 dB(A) impact threshold considered by the County.

Also, the Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual offers guidelines in Section 7 "Noise and Vibration During Construction". Section 7 in the manual states "



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

While it is not the purpose of this manual to specify standardized criteria for construction noise impact, the following guidelines can be considered reasonable criteria for assessment. If these criteria are exceeded, there may be adverse community reaction.”

Table 7-2 in the Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual lists a general assessment noise criterion of 90 dB(A) Leq for construction noise received at residential properties during daytime hours.

Table 7-2 General Assessment Construction Noise Criteria

Land Use	<i>Leq,equp(1hr), dBA</i>	
	Day	Night
Residential	90	80
Commercial	100	100
Industrial	100	100

All calculated worst-case construction noise levels are below the 90 dB(A) daytime criterion.

Construction activities would also be limited to the restrictions set by Section 9-404.060 in the San Joaquin County Development Title Update Document. Section 9-404.060 states the following:

- a) *Construction. General construction noise shall be limited to weekdays from 6:00 a.m. to 9:00 p.m. Pre-construction activities, including loading and unloading, deliveries, truck idling, backup beeps, and radios, also are limited to these construction noise hours.*
 - 1) *No noise-producing construction activities shall be permitted outside of these hours or on Sundays and federal holidays unless a temporary waiver is granted by the Building Official.*
 - 2) *More restrictive construction noise hours may be established as a Condition of Approval of an Administrative Use Permit or a Conditional Use Permit when appropriate given the surrounding neighborhood, the type of noise, or other unique factors.*
 - 3) *Any waiver granted shall take the potential noise impacts upon the surrounding neighborhood and the larger community into consideration.*
 - 4) *Except in emergencies, no construction shall be permitted outside of these hours, including maintenance work on public rights-of-way, that creates construction noise.*

Although noise from construction at the closest noise sensitive receptors is anticipated to be below the Federal Transit Administration general assessment noise criterion and all construction activities would follow the San Joaquin County Development Title Update Document which has restricted hours for construction, it is still anticipated to be more than 5 dB(A) above the ambient noise levels in the area. The Federal Transit Administration offers the following construction mitigation measures listed in Section 12.1.3 “Mitigation of Construction Noise” in the Transit Noise and Vibration Impact Assessment document. Some of the applicable FTA construction noise reduction measures are listed below and are included in Mitigation Measure NOI-1 to reduce noise from construction.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

- Design Considerations and Project Layout
 - Construct noise barriers, such as temporary walls or piles of excavated material, between noisy activities and noise-sensitive receptors. [Barriers can theoretically provide up to 10 dB(A) of noise reduction.]
 - Re-route truck traffic away from residential streets. Select streets with the fewest homes if no alternatives are available.
 - Site equipment on the construction lot as far away from noise-sensitive sites as possible. [Greater distances from noise sensitive receptors equate to a reduction in noise. Noise from construction equipment acts as a point source and decreases by 6 dB(A) with every doubling of distance.]
 - Construct walled enclosures around especially noisy activities or clusters of noisy equipment. [Full equipment enclosures can theoretically provide up to 20 dB(A) of noise reduction. Partial equipment enclosures generally provide up to 10 dB(A) of noise reduction.]
- Sequence of Operations
 - Combine noisy operations to occur in the same time period. The total noise level produced will not be substantially greater than the level produced if the operations were performed separately.
 - Again, avoid nighttime activities (as stated in the San Joaquin County Development Title Update Document). Sensitivity to noise increases during the nighttime hours in residential neighborhoods.
- Alternative Construction Methods
 - Use specially quieted equipment, such as quieted and enclosed air compressors and properly working mufflers on all engines. [Equipment wraps and mufflers generally provide approximately 5 dB(A) of noise reduction.]
- Mitigation Plan
 - Describe and commit to a mitigation plan that will be developed later when the information is available to make final decisions (not often available during the project development phase) on all specific mitigation measures. The objective of the plan should be to minimize construction noise using all reasonable (e.g., cost vs. benefit) and feasible (e.g., possible to construct) means available, including the measures listed above. The mitigation plan will be submitted as part of the building permit process.
 - Designate a “disturbance coordinator” who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem be implemented. Visibly post



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.

•

Short Term Construction Noise to Project Buildings

As stated above, the construction of Phase 3 would take place immediately following completion of Phases 1 and 2 and would be constructed over an additional 5 years. Therefore, noise generated by the construction of Phase 3 would potentially impact the Phases 1 and 2 buildings.

Table 3.12-13 again lists the types of construction equipment and the maximum and average operational noise level as measured at 330 feet from the operating equipment. The 330-foot distance represents the approximate distance between the Phase 3 boundary and the closest Phase 1 and 2 building, see Figure 7.

**Table 3.12-13. Federal Highway Administration Roadway Construction Noise Model
Source Noise Levels**

Construction Equipment Source at the Project Site	Distance to Closest Phase 1 and 2 Building, feet	Sound Level at Receptor		
		Lmax, dB(A)	Acoustical Use Factor (%)	Leq, dB(A)
Backhoe	330	61.2	40	57.2
Crane	330	64.2	16	56.2
Compressor (air)	330	61.3	40	57.3
Dozer	330	65.3	40	61.3
Excavator	330	64.3	40	60.3
Forklift (Gradall)	330	67.0	40	63.0
Front End Loader	330	62.7	40	58.7
Generator	330	64.2	50	61.2
Grader	330	68.6	40	64.6
Haul Truck	330	60.1	40	56.1
Paver / Paving Equipment	330	60.8	50	57.8
Roller	330	63.6	20	56.6
Scraper	330	67.2	40	63.2
Tractor	330	67.6	40	63.6
Welder	330	57.6	40	53.6



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

Construction Equipment Source at the Project Site	Distance to Closest Phase 1 and 2 Building, feet	Sound Level at Receptor		
		Lmax, dB(A)	Acoustical Use Factor (%)	Leq, dB(A)

Source: Stantec 2026.

Again, a worst-case condition for construction activity would assume all noise-generating equipment were operating at the same time and at the same distance from the closest noise-sensitive receptor. Using this assumption, the RCNM program calculated the following combined Leq and Lmax noise levels from each stage of construction as shown in Table 3.12-14.

Table 3.12-14. Calculated Noise Level from Each Construction Stage

Construction Phase 3	Distance to Closest Phase 1 and 2 Building, ft ¹	Calculated Lmax, dB(A)	Calculated Leq, dB(A)
Site Preparation	330	78.3	74.3
Grading	330	80.3	76.4
Building Construction	330	79.5	75.4
Paving	330	75.2	71.0
Architectural Coating	330	66.1	62.1

¹ The distance used for this analysis is the distance from the Phase 3 boundary to the closest Phase 1 and 2 building. During construction, equipment would likely operate further from the receptor, reducing the noise level at the project building.
Source: Stantec 2026.

Again, measured daytime ambient noise levels in the Project vicinity ranged between 68 and 75 dB(A). The calculated worst-case construction Leq noise levels listed in Table 3.12-14 are anticipated to be up to 7 dB(A) above the ambient noise levels at the Phase 1 and 2 Buildings during the loudest phases of construction. This is slightly above the 5 dB(A) impact threshold considered by the County. However, again, construction activities would be limited to the restrictions set by Section 9-404.060 in the San Joaquin County Development Title Update Document.

As noted above, the Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual offers guidelines for construction noise limits in Section 7 "Noise and Vibration During Construction". Table 7-2 in the Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual (also shown above) lists a general assessment noise criterion of 100 dB(A) Leq for construction noise received at commercial properties during daytime hours. All calculated worst-case construction noise levels are below the 100 dB(A) daytime criterion. Also, the FTA construction noise reduction measures listed above would be implemented as required, see Mitigation Measure NOI-1.

In conclusion, all calculated construction noise levels are below the general assessment construction noise criterion recommended by the FTA and construction activities would comply with the County's



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

construction hours and noise standards. However, noise from construction is anticipated to be more than 5 dB(A) above ambient noise levels in the area depending on the construction equipment and activities. Therefore, the impacts from short-term construction would be significant and unavoidable even with mitigation.

Fixed Source Noise

Typical building and utility facilities will often involve new mechanical equipment, such as air handling units, chillers, exhaust fans, and pumps. This equipment will generate noise that will radiate to the neighboring properties. The noise from this equipment will be required to comply with Table 9-404.050 in the San Joaquin County Development Title Update document. Thus, the on-site equipment would be designed incorporating measures such as shielding and/or appropriate attenuators to reduce noise levels that may affect nearby properties. In addition, nighttime noise limits would be applicable to any equipment required to operate between the hours of 10:00 PM and 7:00 AM.

When the actual on-site equipment for the buildings and utility facilities is selected, the equipment would be designed to incorporate measures as needed, such as shielding, barriers, and/or attenuators, to reduce noise levels that may affect nearby properties. Therefore, the impacts from fixed-source noises to the neighboring properties would be less than significant.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

MM NOI-1: Construction Activity. All construction activity shall follow the hours restrictions listed in the San Joaquin County Development Title Update Document. The following construction noise reduction measures listed in Section 12.1.3 "Mitigation of Construction Noise" in the Transit Noise and Vibration Impact Assessment document shall also be incorporated to reduce the noise impact to the community:

Design Considerations and Project Layout

- Construct noise barriers, such as temporary walls or piles of excavated material, between noisy activities and noise-sensitive receptors. [Barriers can theoretically provide up to 10 dB(A) of noise reduction.]
- Re-route truck traffic away from residential streets. Select streets with the fewest homes if no alternatives are available.
- Site equipment on the construction lot as far away from noise-sensitive sites as possible. [Greater distances from noise sensitive receptors equate to a reduction in noise. Noise from construction equipment acts as a point source and decreases by 6 dB(A) with every doubling of distance.]
- Construct walled enclosures around especially noisy activities or clusters of noisy equipment. [Full equipment enclosures can theoretically provide up to



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

20 dB(A) of noise reduction. Partial equipment enclosures generally provide up to 10 dB(A) of noise reduction.]

Sequence of Operations

- Combine noisy operations to occur in the same time period. The total noise level produced will not be substantially greater than the level produced if the operations were performed separately.
- Again, avoid nighttime activities (as stated in the San Joaquin County Development Title Update Document). Sensitivity to noise increases during the nighttime hours in residential neighborhoods.

Alternative Construction Methods

- Use specially quieted equipment, such as quieted and enclosed air compressors and properly working mufflers on all engines. [Equipment wraps and mufflers generally provide approximately 5 dB(A) of noise reduction.]

Mitigation Plan

- Describe and commit to a mitigation plan that will be developed later when the information is available to make final decisions (not often available during the project development phase) on all specific mitigation measures. The objective of the plan should be to minimize construction noise using all reasonable (e.g., cost vs. benefit) and feasible (e.g., possible to construct) means available, including the measures listed above. The mitigation plan will be submitted as part of the building permit process.
- Designate a “disturbance coordinator” who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem be implemented. Visibly post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.
-

Level of Significance After Mitigation

Significant and Unavoidable.

Groundborne Vibration

Impact NOI-2	The Project would not result in the generation of excess groundborne vibration or groundborne noise levels.

Impact Analysis



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

The discussion addresses whether the Project would expose sensitive receptors and existing buildings to excessive vibration during Project operations or construction.

Short Term Construction Vibration

During construction of the Project, equipment such as trucks, bulldozers, and rollers may be used as close as 200 feet from the nearest sensitive receptor. Equipment used during project construction could generate vibration levels between 0.0001 PPV (in/sec) and 0.0093 PPV (in/sec) at 200 feet, as shown below in Table 3.12-15. All the groundborne vibration levels are below the FTA vibration threshold at which human annoyance could occur of 0.10 PPV (in/sec). Additionally, construction activities would be temporary in nature and would likely occur during normal daytime working hours. Therefore, construction vibrations are not predicted to cause damage to existing buildings or cause annoyance to sensitive receptors. Therefore, the impacts from construction vibration would be less than significant.

Table 3.12-15. Vibration Source Levels for Construction Equipment

Type of Equipment	Peak Particle Velocity at 200 Feet, PPV (in/sec)	Threshold at which Human Annoyance Could Occur, PPV (in/sec)	Potential for Proposed Project to Exceed Threshold
Large Bulldozer	0.0039	0.10	None
Loaded Trucks	0.0034	0.10	None
Small Bulldozer	0.0001	0.10	None
Vibratory Roller	0.0093	0.10	None

Source: FTA 2018.

Operational Vibration

The Project's operation would increase vehicle and truck traffic on most of the roadways surrounding the Project area, see Table 3.12-8. As noted in the traffic study, there would be no truck traffic related to the Project on South Lammers Road. Therefore, trucks would not directly pass by the residential homes or John C. Kimball High School which fronts South Lammers Road.

The Caltrans Transportation Noise and Vibration Manual states traffic, auto, and heavy trucks traveling on roadways rarely generate vibration amplitudes high enough to cause structural or cosmetic damage (Caltrans 2020). However, a qualitative analysis is provided to evaluate the likelihood of vibration impacts from the Project based on the empirical vibration curve developed by Caltrans.

The Caltrans Noise and Vibration Manual collected measured vibration data for truck pass-bys. This data demonstrates that truck pass-bys can be characterized by a peak in vibration that is considerably higher than those generated by automobiles for a few seconds. Vibration from these trucks drops off dramatically with distance. As truck volumes increase, more peaks would occur but not necessarily higher peaks. Vibration wavefronts emanating from several trucks closely together may either cancel or partially cancel (destructive interference) or reinforce or partially reinforce (constructive interference) each other, depending on their phases and frequencies. Since traffic vibrations can be considered random, total destructive or constructive interference probabilities are minimal. Coupled with the fact that two trucks cannot occupy the same space and the rapid drop-off rates for ground vibration, it is understandable that two or more trucks normally do not contribute significantly to each other's peaks.



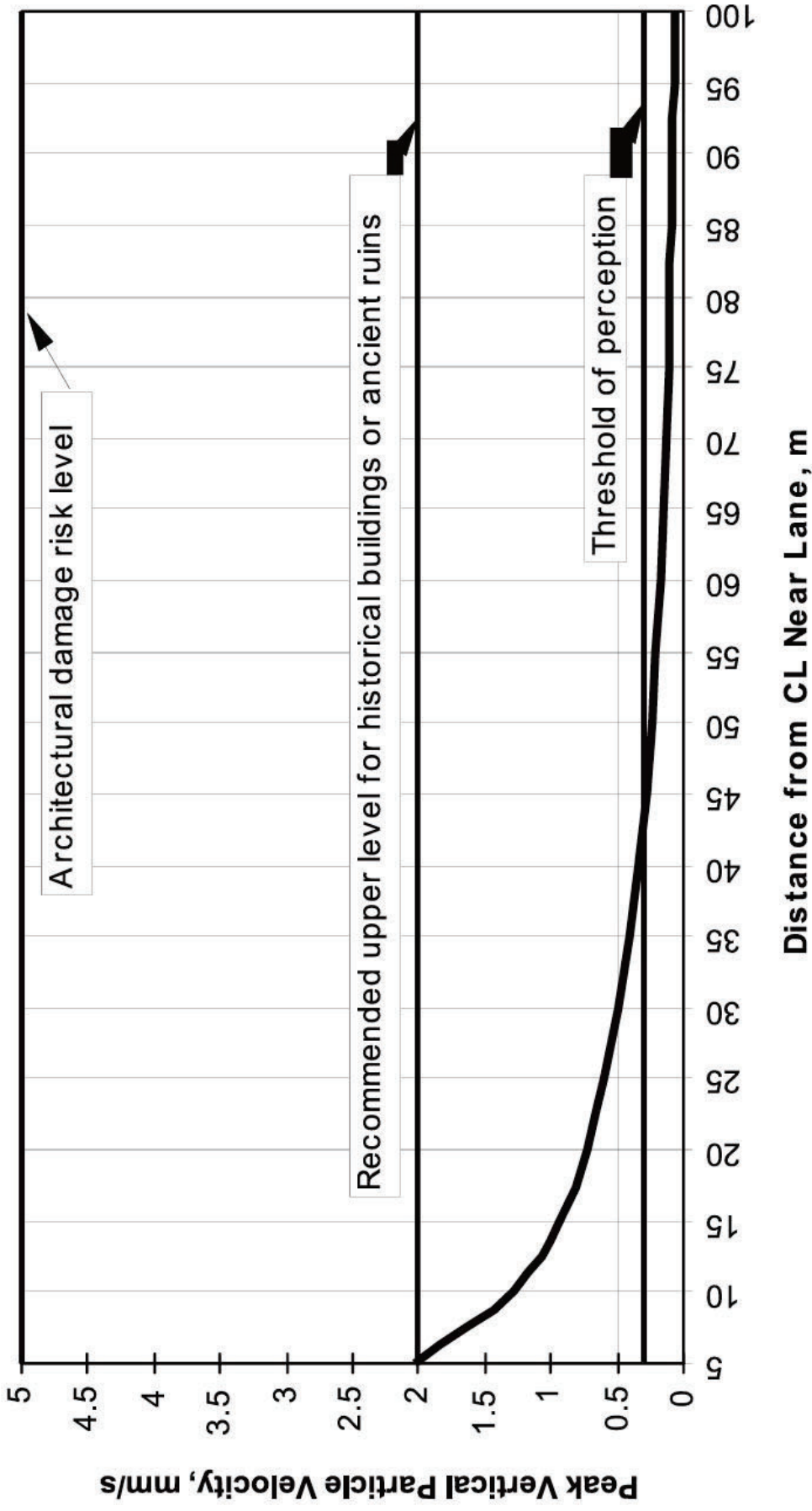
INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

In order to predict the maximum truck traffic vibrations from the Project, the Caltrans empirical curve, as shown in Figure 28, was obtained from the Caltrans Noise and Vibration Manual (Caltrans 2020). This curve was used to predict operational vibration impacts. Figure 28 shows a graph of measured vibration data collected from truck traffic traveling on freeways and local roadways plotted by truck traffic vibrations versus distance from the nearest travel lane's centerline. The graph indicates that the highest traffic-generated vibrations measured on freeway shoulders (5 m from the centerline of the nearest lane) have never exceeded 2.0 mm/s or (0.08 PPV [in/sec]) with the worst combinations of heavy trucks. This amplitude coincides with the maximum recommended "safe amplitude" for historical buildings listed in Table 3.13-4.





Source: Caltrans 2020

Project Location
San Joaquin County

Project
International Park of Commerce Specific Plan
Phase 2

Figure No.
28

Title

National Wetlands, South Project
Site

INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

Figure 28 also illustrates the rapid attenuation of vibration amplitudes, which dips below the perception threshold for most people at about 45 m (150 ft). Caltrans states that sensitive receptors adjacent to local roadways, within 15 m (50 feet) of the nearest travel lane's centerline would have maximum worst-case vibration levels near 0.08 mm/s (0.0032 PPV [in/sec]). Caltrans and FTA provide a range of perceptible annoyance levels, see Table 3.13-3, and the predicted level of 0.0032 PPV (in/sec) falls well below the distinctly perceptible level of 0.08 PPV (in/sec) and below the FTA damage criteria of 0.3 PPV (in/sec). Further, this worst-case vibration level from truck traffic would not exceed the Caltrans threshold of 0.2 PPV (in/sec). It is expected that actual vibration levels within the Project area from truck traffic will be lower than this worst-case level when soil type and pavement conditions are considered. Therefore, the impacts from operational vibration would be less than significant.

Level of Significance Before Mitigation

Less than Significant Impact.

Mitigation Measures

No Mitigation is Necessary.

Level of Significance After Mitigation

Less than Significant Impact.

Airport Noise

Impact NOI-3	The Project would not expose people residing or working in the project area to excessive noise levels, as the Project is not 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.

Impact Analysis

The closest airport to the Project site is the Tracy Municipal Airport, located approximately 3.14 miles southeast of the site. According to the San Joaquin County Airport Land Use Compatibility Plan (ALUCP), the Project site is not located within the Airport Influence Area (AIA), safety zones, or noise contour zones for the Tracy Municipal Airport or any other airport located in the area (San Joaquin County 2018). Therefore, the Project would not result in a safety hazard or excessive noise for people working in the Project area, and there would be no impact.

Level of Significance Before Mitigation

Less than Significant Impact.

Mitigation Measures

No Mitigation is Necessary.

Level of Significance After Mitigation

Less than Significant Impact.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

3.12.4 Notice of Preparation Comments Related to Noise and Vibration

As discussed in Section 1.0, Introduction, the County distributed a NOP of the Draft EIR for the Project beginning on March 31, 2023. The NOP was distributed for a 30-day comment period that ended on May 1, 2023. The Public Scoping Meeting on the Draft EIR for the Project was held on April 10, 2023. The comments received on the NOP and during the Public Scoping Meeting were considered in the preparation of this Draft EIR. Comments related to noise and vibration and where they are addressed in this section are provided in Table 3.12-16. Additionally, each comment includes a brief summary of how the concern was addressed, the impact, or why additional analysis is not required. Commenters may have made comments addressing multiple EIR sections, but only specific noise and vibration comments are provided in Table 3.12-16. See Table 1.2-1 in Section 1.0, Introduction for a summary of all comments made during the NOP scoping period.

Table 3.12-16. Comments Received on the NOP for Noise

Affiliation	Signatory	Date	Comment Description	Location Addressed in Noise Chapter	Response to Comment
Private Parties – Written Comments Received					
Interested Individual	Dale and Patricia Brandes	April 24, 2023	Concerns related to Cordes Ranch and ground vibration from trucks	Subsection 3.3.3, Environmental Impacts, Project Impacts and Mitigation Measures	Impacts from vibration are discussed in Impact NOI-2. As discussed in the impact, trucks can create more vibration than other autos. However, the vibration from trucks was considered to be a “safe amplitude.” Cumulative impacts are evaluated in Section 4.0.
Interested Individual	Vannie Dart	April 30, 2023	Concerns related to Cordes Ranch and ground vibration from trucks.	• Subsection 3.3.3, Environmental Impacts, Project Impacts and Mitigation Measures	Impacts from vibration are discussed in Impact NOI-2. As discussed in the impact, trucks can create more vibration than other autos. However, the vibration from trucks was considered to be a “safe amplitude.” Cumulative impacts are evaluated in Section 4.0.
Interested Individual	Wendy Tocchini	April 30, 2023	Concerns related to cumulative impacts and noise impacts.	• Subsection 3.12.3, Environmental Impacts, Project Impacts and Mitigation Measures	Impacts on noise levels from construction, traffic, and fixed sources are evaluated in Impact NOI-1.
Private Parties – Comment Cards at Scoping Meeting					



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Noise

Affiliation	Signatory	Date	Comment Description	Location Addressed in Noise Chapter	Response to Comment
Interested Individual	Dale and Patricia Brandes	April 10, 2023	The commenter states that noise impacts should be considered.	Subsection 3.12.3, Environmental Impacts, Project Impacts and Mitigation Measures	Impacts on noise levels from construction, traffic, and fixed sources are evaluated in Impact NOI-1.



3.13 POPULATION AND HOUSING

This section describes the environmental setting for population and housing, including the existing site conditions, regulatory setting, and potential impact that would result from the Project, and, if significant impacts are identified, the mitigation measures that would reduce these impacts.

3.13.1 Environmental Setting

Population Trends

Historic Growth

The County's population grew rapidly from 1990 to 2020, by approximately 61 percent. During this time, the County grew from a population of 480,628 in 1990 to 773,505 in 2020, resulting in an increase of 292,877 people over 30 years.

The County's incorporated cities experienced the majority of this growth with the City of Stockton experiencing the largest percentage share of growth between 1990 to 2010. The percentage share of the County population in the unincorporated areas decreased annually between 1970 and 2010 as the unincorporated area made up 36.0 percent of the entire County population in 1970 and decreased to 21 percent in 2010. The County's historic population growth between 1990 and 2025 is summarized in Table 3.13-1.

Table 3.13-1. San Joaquin County Historic Population Growth

Year	Population	Change from Previous (Percent)
1990	480,628	--
1995	517,926	7.8
2000	563,598	8.8
2005	645,059	14.5
2010	685,306	6.2
2015	722,580	5.4
2020	773,505	7.0
2023	786,145	1.6
2024	802,328	2.1
2025	805,856	0.4

Source: DOF 2007, 2012, 2021, 2023, 2025

Current and Projected Population

As of January 1, 2025, the California Department of Finance (DOF) estimates the population of the County to be approximately 805,856 (DOF 2025). The General Plan EIR includes projections related to the County's population from 2010 to 2035. The projected population estimates are based on the DOF's projections. As identified in the General Plan EIR, the DOF anticipates continued growth in the County, with the County's population increasing to 1,110,972 by 2035 (San Joaquin County 2014). This would represent a 38 percent increase from the County's 2025 population of 805,856.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Population and Housing

Housing Trends

Housing Units and Average Household Size

According to the DOF, the reported number of housing units in the County in 1990 was 166,274 units. The County's housing growth increased at a rate of approximately 13.8 percent between 1990 and 2000. The years between 2010 and 2015 had the slowest rate of growth with only a 1.8 percent increase in housing units in the County. The County's housing growth between 1990 and 2025 is summarized in Table 3.13-2.

Table 3.13-2. San Joaquin County Historic Housing Units Growth

Year	Housing Units	Change from Previous (Percent)
1990	166,274	--
1995	177,335	6.7
2000	189,160	6.7
2005	215,531	13.9
2010	233,755	8.6
2015	237,905	1.8
2020	249,058	4.7
2023	262,955	5.6
2024	265,558	1.0
2025	269,626	1.5

Source: DOF 2007, 2012, 2021, 2023, 2025

According to the DOF's Population and Housing data, approximately 158,156 units were occupied in 1990, with an average of 2.9 persons per household and a 4.9 percent housing vacancy rate (DOF 2007). By 2000, there were approximately 181,629 occupied housing units, with an average of 3.0 persons per household and a 4.0 percent housing vacancy rate (DOF 2007).

As of January 1, 2025, the DOF estimates there are 269,626 units within the County with an average household size of 3.1 persons per household (DOF 2025). Of these existing 269,626 units, approximately 252,172 units were occupied in 2025, resulting in a 4.1 percent vacancy rate (DOF 2025).

Regional Housing Needs Allocation

The SJCOG prepared the Regional Housing Needs Allocation (RHNA) Plan to allocate regional housing growth among different jurisdictions. The RHNA is the state-mandated process to identify the total number of housing units (by affordability level) that each jurisdiction must accommodate in its General Plan Housing Element for an eight-year period. SJCOG adopted the Final 2023-2031 RHNA Plan for San Joaquin County in September 2022. This RHNA Plan requires the County to plan for and revise local zoning if needed; to accommodate 8,808 additional housing units in the unincorporated County area during the 2023-2031 period. Table 3.13-3 summarizes the County's housing need allocated for each income level and jurisdiction within the County.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Population and Housing

Table 3.13-3. SJCOG 2023-2031 Regional Housing Need Allocation

Jurisdiction	Very Low Income (<50% of Area Median Income)	Low Income (50-80% of Area Median Income)	Moderate Income (80-120% of Area Median Income)	Above Moderate Income (> 120% of Area Median Income)	Total
Escalon	90	56	66	155	367
Lathrop	2,386	1,498	1,342	3,176	8,402
Lodi	941	591	706	1,671	3,909
Manteca	2,246	1,409	1,381	3,270	4,651
Ripon	347	218	255	604	1,424
Stockton	2,465	1,548	2,572	6,088	12,673
Tracy	2,994	1,879	1,175	2,782	8,830
Unincorporated San Joaquin County	1,824	1,145	1,734	4,105	8,808
Total San Joaquin County	13,293	8,344	9,231	21,851	52,719

Source: SJCOG 2022a

Based on the 2023-2031 RHNA Plan, approximately 59 percent of the County's housing needs will be allocated to moderate to above moderate income households, and 41 percent will be allocated to very low to low income households (SJCOG 2022a).

Employment Trends

According to the General Plan and the California Employment Development Department (EDD), San Joaquin County makes up approximately 43 percent of employment within the northern San Joaquin Valley; however, the number of jobs in the County grew slower than any other San Joaquin Valley county at 1.7 percent annually during the period from 1990 to 2007 (San Joaquin County 2016). The County's General Plan identified that the location of future jobs should closely follow population growth and the projected growth is expected to be absorbed largely by the cities located within the County as well as those new communities that are able to attract employment with housing.

The economy of San Joaquin Valley has traditionally been agriculturally based, particularly in crop production, food manufacturing, and other supportive industries for agricultural industries. The County has a similar agricultural composition; however, the County has a much more diversified economic base that provides for the potential for successful collaboration between related industry sectors. The County's General Plan identified that over the past 15 years, the County has moved from a predominately agricultural economy to a more diversified economy that includes a significant trade, transportation, retail, and business services economic base (San Joaquin County 2016). According to the General Plan EIR, in census year 2010, the largest industry employer in the County was the government (state and local) (38,200 jobs), followed by Health Care and Social Assistance (23,800 jobs) and Retail Trade (23,700 jobs). It was anticipated that these three sectors would remain the largest employers in the County in 2020 with Health Care and Social Assistance expected to grow at the fastest rate (San Joaquin County 2014). Then by 2035, total employment across the County would increase to over 271,000 jobs.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Population and Housing

Table 3.13-4 below summarizes the employment estimates from the General Plan.

Table 3.13-4. General Plan Employment Estimates

Year	Annual Employment
2010	203,200
2020	242,700
2035	271,685

In 2024, San Joaquin County released the updated Housing Element which included updated employment numbers for the County. The updated Housing Element determined that the annual employment within the County would be approximately 77,000 more jobs in 2020 than estimated in the General Plan from 2014 (San Joaquin County 2024). According to the EDD, the labor force in San Joaquin County in August 2025 was 376,800 people with the total number of employed at 351,400 people resulting in an unemployment rate of 6.8 percent (EDD 2025). As such, actual employment within the County exceeds General Plan projections.

3.13.2 Regulatory Setting

This section briefly describes regional and local regulations and policies pertaining to population and housing as they apply to the proposed Project.

Federal

Title VI of the Civil Rights Act of 1964

Title VI prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance.

Title VIII of the Civil Rights Act of 1968

Title VIII of the Civil Rights Act, the Fair Housing Act, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents of legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap (disability).

Section 504 of the Rehabilitation Act of 1973

Section 504 prohibits discrimination based on disability in any program receiving federal financial assistance.

Section 109 of Title I of the Housing and Community Development Act of 1974

Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from Housing and Urban Development's (HUD) Community Development and Block Grant Program.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Population and Housing

Title II of the Americans with Disabilities Act of 1990

Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

Architectural Barriers Act of 1968

The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 must be accessible to and useable by handicapped persons.

Age Discrimination Act of 1975

The Age Discrimination Act prohibits discrimination on the basis of age in programs receiving federal financial assistance.

Executive Order 11063

Executive Order 11063 prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

State

California Housing Element Law

Pursuant to Section 65580 of the Government Code, a Housing Element of a General Plan must contain local commitments to:

- Provide sites with appropriate zoning and development standards and with services and facilities to accommodate the jurisdiction's RHNA for each income level. The RHNA is the only population and/or housing requirement that applies to the General Plan.
- Assist in the development of adequate housing to meet the needs of lower and moderate income households.
- Address, and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities.
- Conserve and improve the condition of the existing affordable housing stock.
- Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.
- Preserve assisted housing developments for lower income households.

State Housing Element law mandates specific topics and issues that must be addressed in the Housing Element. These include:



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Population and Housing

- An analysis of population and employment trends, documentation of projections, and quantification of existing and projected housing needs for all income levels.
- An analysis and documentation of household characteristics, such as the age of housing stock, tenancy type, overcrowded conditions, and the level of payment compared to ability to pay.
- An analysis and documentation of special needs, such as female-headed households, homeless individuals, persons with disabilities, large households, farmworkers, and the elderly.
- A regional share of the total regional housing need for all income categories.
- An inventory of land suitable for residential development, including vacant land and infill/redevelopment opportunities. This analysis also looks at potential residential sites and their accessibility to adequate infrastructure and services.
- Identification of actual and potential governmental and non-governmental constraints that could potentially impede the maintenance, improvement, and development of housing for all income groups.
- Identification and analysis of opportunities for energy conservation in residential developments.
- An inventory of at-risk affordable units that have the possibility of converting to market rate.
- A statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the improvement, maintenance, and development of housing.

State law requires that adequate opportunity for participation be solicited from all economic segments of the community towards preparation of the Housing Element. Specifically, the jurisdiction must reach out to lower and moderate income persons and persons with special needs. Preparation of the Housing Element must also be coordinated with other local jurisdictions within the regional housing market area.

Article 34

Article 34 of the California Constitution requires a majority vote of the electorate to approve the development, construction, or acquisition by a public body of any “low rent project” within that jurisdiction. In other words, for any project to be built and/or operated by a public agency where at least 50 percent of the occupants are low income and rents are restricted to affordable levels, the jurisdiction must seek voter approval (Article 34 authority).

California Building Standards Code

In 2001, the State of California consolidated the Uniform Building, Plumbing, Electrical, and Mechanical codes into the California Building Standards Code, which is contained in Title 24 of the California Code of Regulations. The California Building Standards Code contains eleven parts: Electrical Code, Plumbing Code, Administrative Code, Mechanical Code, Energy Code, Elevator Safety Code, Historical Building Code, Fire Code, and Code for Building Conservation Reference Standards Code. These codes promote public health and safety and ensure that safe and decent housing is constructed in the County unincorporated areas. The codes serve to protect residents from hazards and risks and are not considered to be undue constraints to housing production.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Population and Housing

Local

Assisted Housing Programs

The San Joaquin County Housing Authority implements several programs that assist the low to moderate income community with housing costs. In 1999, the Housing Choice Voucher Program (HCVP) was introduced, superseding the 1974 Housing Assistance Payment Program (Section 8), and the 1967 Housing Act Leased Housing Section 23 program. HCVP eliminated the certificate process, providing tenants which greater flexibility in renting affordable units. HCVP also provides greater flexibility for property owners to set initial rent rates and allows for market-based rent adjustments. The County Housing Authority owns four Public Housing developments, which provide assistance for low to moderate income families, and one complex that provides assistance for the elderly.

Regional Housing Needs Allocation

The California Housing Element Law requires local jurisdictions to allow the construction of a share of the region's projected housing needs. This share is called the RHNA. The specific RHNA number for a jurisdiction is important because state law mandates that each jurisdiction provide sufficient land to accommodate a variety of housing opportunities for all economic segments of the community to meet or exceed this number of housing units. The SJCOG, as the regional planning agency, calculates the RHNA for individual jurisdictions within San Joaquin County.

San Joaquin Council of Governments

The SJCOG is a joint-powers authority comprised of the County of San Joaquin and the cities of Stockton, Lodi, Manteca, Tracy, Ripon, Escalon, and Lathrop and is the County's metropolitan planning organization. The role of the SJCOG is to foster intergovernmental coordination within the County and with neighboring jurisdictions, other agencies in the San Joaquin Valley, the State of California, and various federal agencies.

In 1980, the State of California gave all Councils of Government the job of assigning each city and county its "fair share" of affordable housing needs. SJCOG is responsible for determining the fair share distribution of those affordable housing units among the different jurisdictions within the SJCOG and the SJCOG prepares a regional housing needs plan every eight years. The plan lists how many housing units by income category are needed by each jurisdiction, according to state formulas. The purpose of these plans is to help jurisdictions prepare for future residential growth in a way that allows residents of all income levels access to housing. Localities use these housing unit figures in preparing the Housing Element for their General Plans. SJCOG adopted its most recent RHNA Plan in September 2022 which outlines the RHNA allocation for 2023-2031.

Sustainable Communities Strategy

Pursuant to SB 375, the Sustainable Communities and Climate Protection Act of 2008, metropolitan planning organizations across the state are required to prepare sustainable communities strategies to forecast growth in the planning area, develop regional transportation improvement programs, and identify ideal areas for RHNA units. In August 2022, the SJCOG Board of Directors approved the 2022 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which serves as the region's long-range transportation and growth plan through the year 2046 (SJCOG 2022b). Some primary goals in the



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Population and Housing

2022 RTP/SCS include streamlining residential growth within high-quality transit areas, and encouraging infill development.

San Joaquin County General Plan Housing Element

The latest San Joaquin County General Plan Housing Element was adopted March 2024 (and revised August 2024). The first part of the Housing Element consists of a background report, which provides information on household characteristics, housing needs, housing supply, land inventory for new development, housing programs, constraints, and incentives for new housing development within the county. The second part of the Housing Element consists of the policy document, which includes the community's goals, policies, quantified objectives, and implementation programs for the maintenance, improvement, and development of housing.

3.13.3 Environmental Impacts

This section analyzes the Project's potential to result in significant impacts related to population and housing. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid impacts.

Methodology

The following analysis is based on a review of documents pertaining to the Project, including the General Plan, General Plan EIR, EDD, and growth projections.

Thresholds of Significance

The significance criteria used to identify population and housing impacts is from Appendix G of the CEQA Guidelines. For the purposes of this EIR, implementation of the Project would cause a significant impact on population and housing if it would do the following:

- 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); or
- b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Project Impacts and Mitigation Measures

Inducement of Unplanned Population Growth

Impact POP-1	The Project would not 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).

Impact Analysis

The Project does not include a residential component, and therefore, would not directly generate population growth through the provision of housing. The Project would result in a net increase in square footage of nonresidential floor area, which would generate increased employment opportunities, which in



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Population and Housing

turn could generate indirect population growth. However, Project employees are anticipated to come from the local population, and the Project is not expected to introduce new residents to the area. Regardless, this impact analysis evaluates the employment growth that will be caused by the Project to determine whether it is within the County's growth projections. If the employment growth anticipated from implementation of the Project does not exceed the employment forecast included in the County General Plan, then the Project would not have the potential to indirectly (through employment growth) cause substantial unplanned population growth.

The Project would include roadway construction and improvements; however, it would not result in the extension of roads into areas not already served by existing roadways and would not result in increased potential for indirect population growth. The Project also includes the development of onsite water and wastewater treatment facilities. However, the water and wastewater treatment facilities would only serve the Project buildings and would not provide services to offsite developments. Therefore, construction of the onsite water and wastewater treatment facilities would not result in increased potential for indirect population growth.

The General Plan EIR identified that under the 2035 General Plan, 51,000 new jobs would be created from 2010 to 2035 for a total of 271,685 jobs in the County by 2035 (San Joaquin County 2014). However, according to the EDD in 2025, the labor force in San Joaquin County in August 2025 was 376,800 people with the total number of employed at 351,400 people (EDD 2025). As such, in 2025 the County's total employment has already exceeded the General Plan's 2035 anticipated employment growth. s.

Operation of the Project is estimated to employ approximately 4,733 employees at buildout (Kier and Wright 2023). The number of employees anticipated was calculated using a ratio of one employee per every 1,500 square feet of building space for warehouse uses and one employee per every 200 square feet of building space for office areas. The Project would result in a total building square footage of approximately 5.36 million square feet with 95 percent of the total building area designated for warehouse uses and five percent of total building area designated for office uses. Therefore, the Project would result in approximately 5.09 million square feet of warehouse space and approximately 268,000 square feet of office space. As such, the Project anticipates 4,733 employees at buildout. The Project's jobs exceed the General Plan's 2035 anticipated employment growth however the Project would comply with the land use goals and policies within the General Plan, see Table 3.11-2. Specifically, buildout of the Project would comply with General Plan Policy LU-1.6, which states:

The County shall direct new employment-generating uses to locate within Urban and Rural Communities and City Fringe Areas, at freeway interchanges, and in other areas designated for commercial or industrial development. The County may allow employment-generating uses in other unincorporated areas when development proposals demonstrate that the project will not conflict with adjacent uses and will provide: jobs to County residents; adequate infrastructure and services (i.e., water, sewer, drainage, and transportation); and positive tax benefits to the County.

The Project would construct 5.36 million square feet of warehousing space in the unincorporated portion of the County, near existing urban areas including the City of Tracy, Lammersville, and Mountain House as well as near existing freeways (I-210 and I-580). The Project site is also located near existing or planned industrial development, including IPC Phase 1, Westside Specific Plan, Owen Brockway Glass



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Population and Housing

Container Manufacturing Facility, and LBA III Industrial Project. Thus, the Project would place a new employment-generating land use in an urban area that is transitioning to industrial development. Additionally, the Project workforce is anticipated to come from the local population and would serve as a positive tax benefit to the County. Finally, the Project ensures adequate infrastructure by providing new, on-site water and wastewater treatment plants, new roadways, and bio-treatment and detention ponds for drainage.

While the Project's jobs were not accounted for within General Plan 2035 projections, the Project would comply with General Plan land use policies regarding the location of new employment generating uses and would employ from the local workforce. Therefore, the Project is not anticipated to result in substantial unplanned growth in the area either directly or indirectly and impacts would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Displacement of Existing People or Housing

Impact POP-2	The Project would not displace substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere.

Impact Analysis

The Project site is currently used for agriculture. There are no existing buildings or structures onsite, including housing. Therefore, development of the Project would not result in the displacement of substantial number of existing people or housing and would not require the construction of replacement housing elsewhere. Therefore, there would be no impact.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.

3.13.4 Notice of Preparation Comments Related to Population and Housing

As discussed in Section 1.0, Introduction, the County distributed a NOP of the Draft EIR for the Project beginning on March 31, 2023. The NOP was distributed for a 30-day comment period that ended on May 1, 2023. The Public Scoping Meeting on the Draft EIR for the Project was held on April 10, 2023. The comments received on the NOP and during the Public Scoping Meeting were considered in the



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Population and Housing

preparation of this Draft EIR. Comments related to population and housing and where they are addressed in this section are provided in Table 3.13-5. Additionally, each comment includes a brief summary of how the concern was addressed, the impact, or why additional analysis is not required. Commenters may have made comments addressing multiple EIR sections, but only specific population and housing comments are provided in Table 3.13-5. See Table 1.2-1 in Section 1.0, Introduction for a summary of all comments made during the NOP scoping period.

Table 3.13-5. Comments Received on the NOP for Population and Housing

Affiliation	Signatory	Date	Comment Description	Location Addressed in Population and Housing Chapter	Response to Comment
Private Parties – Written Comments Received					
City of Tracy	Kris Balaji	September 14, 2023	The comment notes that the Project may lead to regional growth through the creation of new jobs that could induce population, housing, commercial, and other associated growth. The commenter asks how project-generated growth will be planned for.	Subsection 3.13.3, Environmental Impacts, Project Impacts and Mitigation Measures	As discussed in Impact POP-1, the Project does not include a residential component, and therefore, would not directly generate population growth through the provision of housing. The Project would result in a net increase in square footage of nonresidential floor area, which would generate increased employment opportunities, which in turn could generate indirect population growth. However, Project employees are anticipated to come from the local population and the increase in new jobs is consistent with policies of the General Plan. As a result, the Project would not induce substantial unplanned growth.



3.14 PUBLIC SERVICES

This section describes the environmental setting for public services including the existing site conditions, regulatory setting, and potential impact that would result from the Project, and, if significant impacts are identified, the mitigation measures that would reduce these impacts.

3.14.1 Environmental Setting

Fire and Emergency Services

Fire protection services for the unincorporated areas of the County are provided by independent special district fire departments, the California Department of Forestry and Fire Protection (CAL FIRE), and in some cases through contracted service with city fire departments. Collectively, there are 22 fire protection districts protecting the San Joaquin County region, which are staffed with paid firefighters, reserve firefighters, volunteer firefighters, and administrative staff that provide support services. All public fire protection agencies in the County operate under a master mutual aid agreement (San Joaquin County 2014).

The Project site is located within the Tracy Rural Fire District (Tracy Fire District). According to the San Joaquin LAFCO, the Tracy Fire District provides fire protection, suppression and prevention, inspection, hazardous material, water rescue, and basic and emergency medical services, paramedic, and other services (San Joaquin LAFCO 2025). Tracy Fire District provides fire protection services to the unincorporated areas surrounding the City of Tracy. The City of Tracy operates a separate fire department. The City of Tracy and the Tracy Fire District are both member agencies of the South San Joaquin County Fire Authority, which provides fire protection services to the southern portion of San Joaquin County. The service area for the Tracy fire district is defined as the approximately 200-square mile region bounded by the Grant Line Canal to the north, the San Joaquin River to the east, I-580 to the south, and the Alameda County line to the west. The closest fire station to the site is Tracy Fire Station 94, located approximately one mile west of the Project site. Tracy Fire Station 94 houses a 2020 Pierce Velocity Type 1 Pumper (E94) and 2020 International/BME Model 34 Type 3 Engine (OES 4307) and staffed with three personnel (Tracy Rural Fire District 2025). According to the City of Tracy Public Safety Master Plan, Fire Station 94 is planned to be relocated to a parcel within the Cordes Ranch Specific Plan Area (City of Tracy 2023).

Police Services

The County Sheriff's Office has the primary responsibility for providing police protection for the unincorporated areas of the County. The Sheriff's Office consists of seven divisions: Civil and Custody Division, Coroner's Office, Internal Affairs Division, Public Information and Records Division, Administrative Division, Investigations Division, and Operations and Services Division. Additionally, the Sheriff's Office staffs a County Communications Center that operates on a 24-hour, seven-days-per-week basis. The Communications Center has the primary responsibility for answering all emergency 911 calls originating in the unincorporated areas and the City of Lathrop (San Joaquin County 2014).

The unincorporated areas of the County are divided into eight districts, or "beat areas," that are staffed around the clock by Deputy Sheriffs who provide emergency response capability to citizens in their beat area. The Project site is located within beat area 8. The Sheriff's Office operates out of their station



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Public Services

located at 7000 Michael Canlis Boulevard located in French Camp, located approximately 15 miles northeast of the Project site. The Sheriff's Office also contracts with the City of Lathrop and the Mountain House Community Services District to provide full police and law enforcement services. In addition to their regular highway-related duties, the California Highway Patrol maintains routine patrols and investigates traffic incidents on public roads in unincorporated communities of the County (San Joaquin County 2014).

Schools

Elementary and secondary school students in the County are served by 14 school districts. A majority of the students (approximately 93 percent) are served by the following eight unified school districts that offer grades K-12: Escalon, Lincoln, Linden, Lodi, Manteca, Ripon, Tracy, and Stockton. The remaining students are served by elementary school districts offering grades K-8, including Banta, Jefferson, Lammersville, New Hope, New Jerusalem, and Oak View Union. The Project site is located within the Lammersville Unified School District (LUSD). According to the General Plan EIR, as of 2014, there were over 218 K-12 public schools in the County, of which 12 percent were charter schools. Private school enrollment accounts for approximately 4.6 percent of the total K-12 enrollment in the County (San Joaquin County 2014).

According to the General Plan EIR, the condition of school facilities at the time varied between excellent and adequate with respect to quality since many schools have undergone renovations based on modernization funding. However, many school classroom and administrative facilities are experiencing some form of overcrowding (San Joaquin County 2014). Within the LUSD, the student to teacher ratio is 24 to 1, which exceeds the statewide average of 22 to 1 (U.S. News 2023).

Parks

According to General Plan EIR Table 4.M-4, the County has 500 acres of regional parks and recreation areas; 1,494 acres of state parks and recreation areas; 2,632 acres of local parks and recreation areas; and 1,386 acres of state wildlife areas. San Joaquin County has eleven regional park facilities that offer a variety of recreational opportunities. The County owns and operates nearly half of the regional park facilities, with the remaining parks owned and operated by incorporated cities. The County's regional parks offer various degrees of active and passive recreation, including hiking and fishing, sport fields, boat launching, zoos, gardens, museums, and amusement parks. The San Joaquin County Parks and Recreation department manages the operation and expansion of all County-owned regional, community, and neighborhood park facilities (San Joaquin County 2014).

Local parks in the County include neighborhood parks, community parks, and mini parks and are mostly owned and operated by cities, with the exception of two facilities that are located in unincorporated areas of the County. These parks are the Morada Park, operated exclusively as a Little League facility in the community of Morada, and the Mountain House Park, operated by the Mountain House Community Services District. Other recreational opportunities in the County include playgrounds and bikeways, golf courses, waterway recreation areas, and the Delta which provides a wide variety of both land-based and water-based recreational opportunities (San Joaquin County 2014). The closest parks to the Project site are the Henry Barboza Park and Ceciliani Park, located approximately two miles east and northeast of the Project site, respectively, within the City of Tracy. The Valpico Memorial Park is also located near the Project site, roughly one mile to the east. However, the Valpico Memorial Park is a public cemetery that would not include any traditional park functions. The Project would not impact public use of the Valpico



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Public Services

Memorial Park. The Cordes Ranch Specific Plan also includes a green belt and two park areas which, upon buildout, would provide parkland near the Project site.

Other Public Facilities

The Stockton-San Joaquin County Public Library system offers public library services throughout the County. Funding for the library system is provided through the City of Stockton, San Joaquin County, and the State of California through Public Library Foundation Program funding. There are six service areas within the City of Stockton, and nine additional areas throughout the County. Branch libraries are located in the cities of Escalon, Lathrop, Manteca, Ripon, and Tracy, as well as in the unincorporated communities of Linden, Mountain House, and Thornton. Additionally, in order to reach city and County neighborhoods that do not have a branch library nearby, the Mobile Library circulates throughout 24 separate stops in the County and the City of Stockton (San Joaquin County 2014).

3.14.2 Regulatory Setting

Federal

National Fire Plan

The National Fire Plan was developed under Executive Order 11246 in August 2000, with the intention of actively responding to severe wildland fires and their impacts on communities while ensuring sufficient firefighting capacity for the future. The plan is implemented by the United States Department of Agriculture (USDA) Forest Service and the Department of the Interior and provides assistance to communities that have been or may be threatened by wildland fire. Agencies provide support for educating citizens and a variety of grant programs including Rural, State, and Volunteer Fire Assistance and Economic Action Programs, for projects designed to reduce the fire risks to communities. A fundamental step in achieving this goal was the identification of communities that are at higher risk of damage from wildfire due to their location within the wildland-urban interface, which is defined as the area where homes and wild lands intermix. The Project site is not located within an area identified as a Community at Risk.

State

California Fire Plan

The California Fire Plan is the State of California's road map for reducing the risk of wildfire. The Fire Plan, finalized in 1996, is a cooperative effort between the State Board of Forestry and Fire Protection and the California Department of Forestry and Fire Protection, directing each CAL FIRE unit to prepare locally specific Fire Management Plans. A key product of the California Fire Plan is the development of wildfire safety zones to reduce citizen and firefighter risks from future large wildfires. In compliance with the California Fire Plan, individual CAL FIRE units are required to develop Fire Management Plans for their areas of responsibility. Parts of San Joaquin County are located in multiple Fire Plan areas based on the location with respect to CAL FIRE administrative area boundaries. The Project site is located within the Santa Clara Unit Fire Plan.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Public Services

State Responsibility Areas

State Responsibility Areas (SRAs) are classified by the State Board of Forestry and Fire Protection as being the primary financial responsibility of the State for preventing and suppressing fires. These lands include lands covered wholly or in part by timber, brush, undergrowth or grass, whether of commercial value or not; lands that protect the soil from erosion, retard run-off of water, or accelerate percolation; lands used principally for range or forage purposes; lands not owned by the federal government; and lands not incorporated. Lands are removed from SRAs when housing densities average more than three units per acre over an area of 250 acres. The Project site is not located within an SRA.

Emergency Services Act

The Emergency Services Act is the State of California's basic law establishing the foundation for emergency response. The Act is contained in the California Government Code beginning with Section 8550. The Act gives the Governor and chief executives of all political subdivisions emergency powers, establishes the Governor's Office of Emergency Services (Cal OES), assigns emergency functions to state agencies, provides for mutual aid, and authorizes such organizations as are necessary to carry out the provisions of the law. This regulatory area applies to Cal OES only. Division 2.5 of the Health and Safety Code provides the statutory authority and describes the duties of the State Emergency Medical Services (EMS) Authority and local (County) EMS agencies for the administration and planning of EMS systems. This statute requires the local county EMS agencies to "plan, implement, and evaluate an emergency medical services system consisting of an organized pattern of readiness and response services based on public and private agreements and operational procedures." As pertains to EMS planning activities, the State EMS Authority has developed planning and implementation guidelines which are used by county EMS agencies as a planning tool by which to measure and improve all aspects of their EMS system. As set forth in the Emergency Services Act, these EMS System Standards and Guidelines are comprised of the following topic areas: 1) manpower and training, 2) communications, 3) transportation, 4) assessment of hospitals and critical care centers, 5) system organization and management, 6) data collection and evaluation, 7) public information and education, and 8) disaster response.

Local

San Joaquin County Local Hazard Mitigation Plan

As part of the Multi-Hazard Functional Plan (MHFP), the San Joaquin County Local Hazard Mitigation Plan is used as guidance during restoration, repairs, or new development of property or structures related to actual or potential disaster events. The plan contains goals and mitigation actions to reduce repetitive damages caused by hazards such as storms or flood events by taking appropriate mitigation actions in advance of such events.

San Joaquin County Office of Emergency Services Multi-Hazard Functional Plan

The San Joaquin County Office of Emergency Services (OES) is the single coordinating center for major emergency activities. In cooperation with others, OES maintains and oversees the MHFP. The MHFP is a comprehensive disaster preparedness program. For example, during a major emergency, OES is granted emergency powers to control and direct emergency operations, obtain vital supplies and equipment,



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Public Services

recruit necessary personnel, and make and issue rules and regulations on matters related to the protection of life and property affected by the emergency. The OES program becomes the Emergency Operations Center from which all department heads direct and control emergency operations. Emergency situations requiring emergency services by OES include dam evacuation procedures and hazardous materials incidents.

San Joaquin County Code of Ordinances

Chapter 9-1225, Fire Protection Facilities Financing. The ordinance establishes a Fire Protection Facilities Improvement Fee for all development in unincorporated San Joaquin County in order to generate revenues to facilitate future construction of fire protection facilities as needed.

Chapter 9-1230, Local Park and Recreation Facilities Financing. This ordinance requires that either dedication of parkland and/or payment of in-lieu fees shall occur upon subdivision of land in order to maintain the County's standard of three acres of parkland per 1,000 residents.

Chapter 9-1245, County Facilities Fee Program. The program establishes the fee program that finances region-serving capital facilities throughout the County. Payment of the County Facilities Fee shall be submitted prior to issuance of any building permit.

San Joaquin County General Plan

The General Plan presents a vision for the County's future, looking ahead to 2035. This long-range planning document includes a comprehensive framework for the County's physical, economic, and social development and environmental resources preservation, as well as policies to guide day-to-day decisions. The General Plan emphasizes that future development must occur in a way that makes the most of existing infrastructure and public facilities, minimizes impacts to natural resources, expands opportunities for job growth, restores and revitalizes unincorporated communities, and provides greater opportunities to all County residents.

The County's General Plan includes the following goals and policies related to public services that are applicable to the Project (San Joaquin County 2016):

Goal LU-8: Protect open space for its recreational, agricultural, safety, and environmental value and provide adequate parks and open space areas throughout the County.

- **Policy LU-8.1: Open Space Preservation.** The County shall limit, to the extent feasible, the conversion of open space and agricultural lands to urban uses and place a high priority on preserving open space lands for recreation, habitat protection and enhancement, flood hazard management, public safety, water resource protection, and overall community benefit.
- **Policy LU-8.3: Waterway Conservation and Restoration.** The County shall encourage the conservation and restoration of rivers, creeks, and sloughs as multi-functional open space corridors that complement adjoining development and connect city and County recreation facilities (e.g., parks).
- **Policy LU-8.4: New Parks and Open Spaces.** The County shall ensure that sufficient parks, open space, waterways, and trails are planned throughout the County, to ensure adequate



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Public Services

facilities are available to existing and future residents, including underserved areas and low-income neighborhoods.

Goal IS-1: To provide residents and businesses quality, cost-effective, and sustainable public facilities and services.

- **Policy IS-1.1: Essential Facilities and Services.** The County shall strive to ensure that adequate public facilities and services essential for public health and safety are provided to all County residents and businesses and maintained at acceptable service levels. Where public facilities and services are provided by other agencies, the County shall encourage similar service level goals.
- **Policy IS-1.4: Infrastructure Maintenance.** The County shall work with agencies to maintain, improve, and replace public facilities as necessary to maintain adequate levels of service for existing and future development and reduce the need for new facilities. Where public facilities and services are provided by other agencies, the County shall encourage similar service level goals.
- **Policy IS-1.5: Infrastructure and Service Expansions.** The County shall base the expansion of public facilities and services on current needs and planned or projected development patterns.
- **Policy IS-1.8: Infrastructure Financing, Design, and Construction.** The County shall require new development to fund the initial financing, design, and construction of required infrastructure facilities. All financing (including operation and maintenance) and improvement plans shall be subject to County review and approval.
- **Policy IS-1.13: Infrastructure Financing.** The County shall approve new development only when financial mechanisms are in place to ensure that adopted County service standards are met and that long-term infrastructure and facility maintenance can be provided.
- **Policy IS-1.14: Equitable Infrastructure Financing.** The County shall ensure that infrastructure and facility financing mechanisms for urban services are imposed equitably, and shall require the reimbursement from subsequent developments which benefit from the improved system.

Goal PHS-1.1: To maintain a level of disaster preparedness necessary for the protection of public and private property, and the health, safety, and welfare of people living and working in San Joaquin County.

- **Policy PHS-1.1: Effective Emergency Response.** The County shall maintain adequate facilities equipment and staffing to respond effectively to emergencies.
- **Policy PHS-1.10: Emergency Vehicles Access.** The County shall require all new developments to provide, and existing developments to maintain, adequate primary and alternative access for emergency vehicles.

Goal PHS-4: To minimize the risk of wildland and urban fire hazards.

- **Policy PHS-4.3: Fire Prevention Measures.** The County shall implement State recommendations for fire prevention in Fire Hazard Severity Zones and require new and/or existing development to provide clearance around structures, use fire-resistant ground cover,



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Public Services

build with fire-resistant roofing materials, participate in fuel load reduction, and take other appropriate measures.

Goal NCR-8: To develop and maintain a comprehensive system of parklands and protected public recreational areas that achieve County park ratio standards and meet the active and passive recreation needs of San Joaquin County residents and visitors.

- **Policy NCR-8.1: Comprehensive Park System.** The County shall continue to acquire, develop, maintain, and operate, based on available funding, a comprehensive system of parkland and recreational facilities that include active and passive recreation for a wide range of users.
- **Policy NCR-8.2: Park Ratio Standard.** The County shall encourage and support the development of recreational facilities to serve unincorporated communities at a ratio of 10 acres of regional parks and three acres of local parks per 1,000 residents, except for Mountain House, which has an approved park ratio of not less than five acres of parks per 1,000 population. The County shall consider increasing its park ratio standards to address unmet park needs.
- **Policy NCR-8.22: Park Dedication and In-lieu Fees.** The County shall require dedication of parkland or in-lieu fees for local parks until other methods of sufficient financing are established. In-lieu fees shall:
 - be collected for new developments proposed in the county;
 - include land acquisition and site development costs, such as grading, access, drainage, and fencing; and
 - be given to the agency providing local recreation facilities.

3.14.3 Environmental Impacts

This section analyzes the Project's potential to result in significant impacts related to public services. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid impacts.

Methodology

Consistent with the requirements of CEQA, the significance of potential impacts is evaluated through the application of the significance criteria described below. The following analysis is based on a review of the General Plan, General Plan EIR, and the San Joaquin County Code of Ordinances.

Thresholds of Significance

The significance criteria used to identify public service impacts is from Appendix G of the CEQA Guidelines. For the purposes of this EIR, implementation of the Project would cause a significant impact on public services if it would do the following:

- a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Public Services

acceptable service ratios, response times, or other performance objectives for any of the public services:

- i. Fire Protection;
- ii. Police Protection;
- iii. Schools;
- iv. Parks; or
- v. Other Public Facilities.

Project Impacts and Mitigation Measures

Fire and Emergency Services

Impact PUB-1	The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives related to fire and emergency services.

Impact Analysis

The Project site is located in an area already served by fire protection services. The Project site is located within the Tracy fire district, which is a member of the South San Joaquin County Fire Authority. The closest fire station to the site is the Tracy Fire Station 94, which is currently located approximately one mile west of the Project site. When the fire station is relocated to the Cordes Ranch Specific Plan Area it would be located approximately 1.31 miles northwest of the Project site. The Tracy fire district has a response time of four minutes and 23 seconds to six minutes and 47 seconds depending on whether the call is from an urban or rural location (San Joaquin County 2014). South San Joaquin County Fire Authority also provides emergency medical care responding to approximately 5,300 emergency medical services calls per year. In order to decrease response times, in 2024 the South San Joaquin Fire Authority subcontracted with the American Medical Responders, an ambulance company, to provide backup surge emergency ambulances to serve the greater Tracy area during times of unanticipated high call volumes (San Joaquin County Emergency Medical Services 2024). Based on the Project site's proximity to existing Station 94 and its planned relocation within the Cordes Ranch Specific Plan Area, together with the South San Joaquin County Fire Authority's service model, existing and planned facilities and services are expected to provide adequate response times to the Project site during construction and operation.

Construction of the Project would incrementally increase the demand for fire and emergency services at the site over time as the Project is built out. However, construction activities itself would not require increased fire and emergency services at the site as construction activities would be completed in accordance with standard construction safety requirements, including implementation of Health and Safety Plans, which would reduce the potential for fire or emergencies at the site. Therefore, construction



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Public Services

activities would not result in the need for new or physically altered fire and emergency facilities and impacts would be less than significant.

During operation, the Project would result in an increase in demand for fire protection services at the site over existing conditions as it would place new structures and uses on an existing agricultural site. The Project would be required to comply with General Plan Policy IS-5.6, Consistent Fire Protection Standards for New Development, which requires new developments to be consistent with standards for fire flows and fire protection. A fire water system would be developed on-site and would include one fire well adjacent to within the potable water treatment site area as well as an associated fire storage tank and pump station. The onsite fire water system would be independent from the potable water system and would be designed to meet the requirements of the local fire district. A looped pipe system and fire hydrant system would be provided across the site. Additionally, each building would be equipped with an interior fire sprinkler system and booster pumps to ensure adequate water pressure. Figure 8 depicts the proposed fire main, looped fire service, and fire water wells.

The Project would be designed and constructed in accordance with the County's fire protection requirements and the California Building Standards Code, which includes the California Fire Code. Existing fire protection requirements include provisions associated with development standards and restrictions regarding structure design, fuel modification zone design, adequacy of emergency access, and water for firefighting. Implementation of the County's fire protection requirements and the California Building Standards Code would reduce the potential for fires at the site by providing fire hydrants throughout the site and ensuring the new development is equipped with fire protection measures such as alarms and sprinklers. Additionally, the Project would involve the construction of improvements to the existing West Schulte Road which bisects the Project site, as well as the construction of two new roadways identified as Pavilion Parkway and Promontory Parkway. Improvements to West Schulte Road would not result in changes that would impede emergency access to the Project site and surrounding areas. Pavilion Parkway would be a four-lane roadway and Promontory Parkway would be a six-lane roadway, and the two new roadways would be designed and constructed in accordance with all applicable roadway standards. In addition, in compliance with California Fire Code requirements, all access points would be accessible to large emergency vehicles such as fire engines. Improvements to existing roadways and construction of new roadways would ensure that fire protection vehicles would have adequate access to the Project site and would increase emergency response efficiency for the area. The Project is not anticipated to have any uses that would require special firefighting needs and all new building applications would require fire review and approval.

During operation, the Project would employ approximately 4,733 people which may result in an increase in emergency calls for fire or emergency medical technicians. The Project would be required to pay a development impact fee as required by San Joaquin County Code Chapter 9-1225, Fire Protection Facilities Financing. Chapter 9-1225 of the County Code establishes a Fire Protection Facilities Improvement Fee for developments in the unincorporated area of the County to pay for the improvement of fire and emergency protection facilities. The revenues raised by the payment of the fee would be used to pay for the fire district's future construction of facilities to meet increased demand for fire protection and emergency services from new developments. The payment of required fees would offset the cost of fire protection and emergency services demands associated with the Project, and the incorporation of fire protection measures into the design of the Project, as required per the California Fire Code, would minimize the need for fire protection services at the site.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Public Services

Therefore, though the Project would increase the need for fire protection and emergency services in the area, existing and planned facilities and services are expected to adequately serve the Project and its workforce while maintaining regional service levels without necessitating the construction of new facilities or expansion of existing facilities. Additionally, the Project would pay its fair share of the cost of capital facilities construction needed to meet Project demand and such facilities would be constructed by the County pursuant to its adopted fee program, the Project would not have a significant impact with respect to the construction of new facilities or expansion of existing facilities. The impact would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Police Services

Impact PUB-2	The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives related to police services.

Impact Analysis

The County Sheriff's Office has the primary responsibility for providing police protection for the unincorporated areas of the County. As noted previously, the unincorporated areas of the County are divided into eight beat areas that are staffed around the clock by Deputy Sheriffs. The Project site is located within beat area 8. In addition, the California Highway Patrol maintains routine patrols and investigates traffic incidents on public roads in unincorporated communities of the County (San Joaquin County 2014). The County's Sheriff's Office recommends a ratio of 1.5 line deputies per 1,000 residents countywide. The General Plan EIR did not identify beat area 8 as a beat area that would see the greatest net increase in population and housing units and identified that beat area 8 would not experience substantial percentage growth when compared to existing conditions. Additionally, the Sheriff's Office has long-term staffing plans that would increase staffing across multiple divisions and expand patrol services into various urban and rural areas to be used as substations (San Joaquin County 2014). The average response time for an officer to respond to calls within the County is 15 minutes for emergency calls and 24 minutes for non-emergency calls (San Joaquin County 2014).

Construction of the Project would incrementally increase the demand for police services at the site over time as the Project is built out. However, construction activities itself would not require increased police services at the site as construction activities would be completed in accordance with standard



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Public Services

construction safety requirements. Therefore, construction activities would not result in the need for new or physically altered police facilities and impacts would be less than significant.

The Project would result in the conversion of the Project site from agricultural uses to industrial uses which would result in an increase in demand for police protection services at the site during long-term operation of the Project. The Project would include safety features to reduce the need for police protection services at the site, including the construction of security gates and fencing. Outdoor and nighttime lighting would be provided throughout the site for parking lot security and safety. Additionally, the Project site is located in an area already served by the County Sheriff, as adjacent and nearby lands are developed with similar industrial uses that require the same level of police protections services as the Project. Furthermore, the County Sheriff's Department will have an opportunity to review and comment on security measures during the plan check review process.

The General Plan includes Program IS-S which requires the County to develop and adopt impact fees to offset the costs of providing law enforcement services. Impact fees specific to law enforcement services have not been established at the time of preparation of this EIR; however, if the fee program is established prior to construction of the Project, the Project would be required to pay all fees to offset increased demand to public services from development of the Project. Although there are no law enforcement specific impact fees established at this time, the San Joaquin County Code Chapter 9-1245, County Facilities Fee Program, establishes a fee that finances region-serving capital facilities located throughout the County to ensure that new developments pay its fair share of improvements to capital facilities. Capital facilities are provided for public purposes and could include, but are not limited to, fire and rescue, government offices, police, libraries, utility facilities, streets, and transit. Determination of whether payment of the Capital Facilities Fee is required as a condition of approval of development projects is determined by the County, and fees are collected by the County before the issuance of building permits. The Project would pay all fees as determined to be required by the County. Therefore, although the Project would increase the need for police protection services in the area, it would not require the construction of new facilities or expansion of existing facilities. As discussed above, the Project site is currently served by the County Sheriff's Office and California Highway Patrol. Additionally, the Project would be constructed with safety features and pay all required fees required by the County to reduce and offset the increased demand. Thus, the potential impact would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report
Public Services

Schools

Impact PUB-3	The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives related to schools.

Impact Analysis

Construction activities associated with the Project would not result in increased demand to nearby schools as construction workers are anticipated to come from the local population and would not result in the relocation of new construction workers to the area and would not introduce new school-age children to the area. Therefore, construction activities associated with the Project would not generate new residents and there would be no impacts to schools.

During operation, the Project would not include the development of residential uses onsite that would directly result in new residents or create an increase demand for school services. The Project would create approximately 4,733 new jobs; however, employees are expected to come from the local population and would not be expected to introduce new residents to the area (Keir and Wright 2023). Therefore, the Project would not indirectly generate new residents that would require expanded school facilities.

Regardless, all residential and non-residential development projects in California are subject to SB 50, which requires the payment of mandatory impact fees to offset any impact to school services or facilities. Pursuant to Government Code Section 65996, payment of fees by property owners and developers is considered to mitigate in full for the purposes of CEQA any impacts to school facilities associated with a project. Therefore, with the payment of required fees, impacts associated with school facilities are considered mitigated and the Project would not require the construction of new facilities or expansion of existing school facilities. Impacts would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report
Public Services

Parks

Impact PUB-4	The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives related to parks.

Impact Analysis

Construction activities associated with the Project would not result in increased demand to nearby parks as construction workers are anticipated to come from the local population and would not result in population growth in the area. Therefore, construction activities associated with the Project would not generate new residents and there would be no impacts to parks.

During operation, the Project would not include the development of residential uses onsite that would directly result in new residents or create an increased demand for parkland. The Project would create approximately 4,733 new jobs; however, employees are expected to come from the local population and would not be expected to introduce new residents to the area (Keir and Wright 2023). Therefore, the Project would not indirectly generate new residents that would increase the demand for park facilities.

General Plan Policy NCR-8.22, Park Dedication and In-lieu Fees requires the dedication of parkland or payment of in-lieu fees for new developments proposed in the County. San Joaquin County Code Chapter 9-1230, Local Park and Recreation Facilities Financing, implements the requirements of the General Plan and requires new residential subdivisions to dedicate land and/or pay in-lieu fees for local park and recreation facilities in accordance with the General Plan. As an industrial development, the Project is exempt from the Local Park and Recreation Facilities Financing ordinance. Park demands are addressed and mitigated through fees on residential development. New residents to the County will either live in existing buildings, which have previously paid park fees through the development process, or new homes that will do so. As noted above, employees of the Project are anticipated to come from within the general Project vicinity. Therefore, the housing units for each employee would have been previously subject to the requirements of Chapter 9-1230. Therefore, the Project would not require the construction of new facilities or expansion of existing facilities and impacts to parks would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Public Services

Other Public Services

Impact PUB-5	The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives related to other public services.

Impact Analysis

Other public facilities include the library facilities including the Stockton-San Joaquin County Public Library which operates 13 branches and a Mobile Library through the partnership of the City of Stockton and San Joaquin County. The closest library branch to the Project is the Tracy Branch Library, located approximately 3.7 miles northeast of the Project site.

Construction activities associated with the Project would not result in increased demand to other public services as construction workers are anticipated to come from the local population and would not result in population growth in the area. Therefore, construction activities associated with the Project would not generate new residents and there would be no impacts to other public services.

During operation, the Project would not include the development of residential uses onsite that would directly result in new residents or create an increased demand for other public services. The Project would create approximately 4,733 new jobs; however, employees are expected to come from the local population and would not be expected to introduce new residents to the area (Keir and Wright). Therefore, the Project would not indirectly generate new residents that would require new or expanded public facilities. The San Joaquin County Code Chapter 9-1245, County Facilities Fee Program, establishes a fee that finances region-serving Capital Facilities located throughout the County to ensure that new developments pay their fair share of improvements to capital facilities. Capital facilities include region-serving public improvements and community amenities normally provided by the County of San Joaquin and could include, but are not limited to, fire and rescue, government offices, police, libraries, utility facilities, streets, and transit. As the library facilities are provided by the County, they would qualify as capital facilities under this ordinance. The County ultimately determines whether a development project is required to pay into the Capital Facilities Fee, and levies such fees as a condition of project approval. Fees are then collected by the County before the issuance of building permits. The Project would pay all fees as determined to be required by the County. Because the Project would pay its fair share of the cost of capital facilities construction needed to meet demand resulting from the Project, and such facilities would be constructed by the County pursuant to its adopted fee program, the Project would not have a significant impact with respect to other public services. Therefore, the impact would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Public Services

Level of Significance After Mitigation

Less Than Significant Impact.

3.14.4 Notice of Preparation Comments Related to Public Services

As discussed in Section 1.0, Introduction, the County distributed a NOP of the Draft EIR for the Project beginning on March 31, 2023. The NOP was distributed for a 30-day comment period that ended on May 1, 2023. The Public Scoping Meeting on the Draft EIR for the Project was held on April 10, 2023. The comments received on the NOP and during the Public Scoping Meeting were considered in the preparation of this Draft EIR. Comments related to public services and where they are addressed in this section are provided in Table 3.14-1. Additionally, each comment includes a brief summary of how the concern was addressed, the impact, or why additional analysis is not required. Commenters may have made comments addressing multiple EIR sections, but only specific public service comments are provided in Table 3.14-1. See Table 1.2-1 in Section 1.0, Introduction for a summary of all comments made during the NOP scoping period.

Table 3.14-1. Comments Received on the NOP for Public Services

Affiliation	Signatory	Date	Comment Description	Location Addressed in Air Quality Chapter	Response to Comment
Private Parties – Written Comments Received					
Interested Individual	Dale and Patricia Brandes	April 24, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related crime.	Subsection 3.14.3, Environmental Impacts, Project Impacts and Mitigation Measures	As discussed under Impact PU-2, Project construction and operation would increase the need for police services. The Project will comply with San Joaquin County Code Chapter 9-1245, County Facilities Fee Program if the County determines that it is applicable. The Project would include safety features to reduce the need for police protection services at the site, including the construction of security gates, fencing, and outdoor and nighttime lighting. Cumulative impacts are evaluated in Section 4.0.
City of Tracy	Kris Balaji	September 14, 2023	The comment notes that the Project may affect the Citywide Public Safety Master Plan and the Citywide Public Facilities Master Plan. The commenter goes	Subsection 3.14.3, Environmental Impacts, Project Impacts and Mitigation Measures	In terms of public safety resources, the Project area is served by the South San Joaquin County Fire Authority and the County Sheriff. The impacts to those resources are discussed in Impact PUB-1 and Impact PUB-2. The



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Public Services

Affiliation	Signatory	Date	Comment Description	Location Addressed in Air Quality Chapter	Response to Comment
			onto notes that the Project is surrounded by city limits and, as a result, the County's public safety resources would be inefficient.		Project would comply with all fire building codes and general plan programs to reduce the impacts to fire and police services. As the Project would be served by County safety services and would not induce population growth within the City (see Impact POP-1), the Project would not impact the Citywide Public Safety Master Plan or the Citywide Public Facilities Master Plan.
Private Parties – Comment Cards at Scoping Meeting					
Interested Individual	Dale and Patricia Brandes	April 10, 2023	Concerns related to Cortes Ranch Project, as well as overall concerns related to crime.	Subsection 3.14.3, Environmental Impacts, Project Impacts and Mitigation Measures	As discussed under Impact PU-2, Project construction and operation would increase the need for police services. The Project will comply with San Joaquin County Code Chapter 9-1245, County Facilities Fee Program if the County determines that it is applicable. Determination of whether payment of the Capital Facilities Fee is required as a condition of approval of development projects is determined by the County, and fees are collected by the County before the issuance of building permits. The Project would include safety features to reduce the need for police protection services at the site, including the construction of security gates, fencing, and outdoor and nighttime lighting. Cumulative impacts are evaluated in Section 4.0.
Interested Individual	Keith Vanderveen	April 10, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related to John C. Kimball school.	Subsection 3.14.3, Environmental Impacts, Project Impacts and Mitigation Measures	The Project would not increase the number of students attending local schools, but would pay developer impact fees pursuant to Government Code Section 65996.



3.15 RECREATION

This section describes the environmental setting for recreation including the existing site conditions, regulatory setting, and potential impact that would result from the Project, and, if significant impacts are identified, the mitigation measures that would reduce these impacts.

3.15.1 Environmental Setting

According to the General Plan EIR Table 4.M-4, the County has 500 acres of regional parks and recreation areas; 1,494 acres of state parks and recreation areas; 2,632 acres of local parks and recreation areas; and 1,386 acres of state wildlife areas. The County has established a countywide park ratio standard of 10 acres of regional parks and 3 acres of local parks per 1,000 residents.

There are four federal and state wildlife facilities located within the County that provide protection for special-status species and opportunities for wildlife viewing. Additionally, the CDFW owns and manages three additional wildlife facilities in the County. San Joaquin County has eleven regional park facilities that offer a variety of recreational opportunities. The County owns and operates nearly half of the regional park facilities, with the remaining parks owned and operated by cities within the County. The County's regional parks offer various degrees of active and passive recreation, including hiking and fishing, sport fields, boat launching, zoos, gardens, museums, and amusement parks. The San Joaquin County Parks and Recreation department manages the operation and expansion of all County-owned regional, community, and neighborhood park facilities (San Joaquin County 2014).

Local parks in the County include neighborhood parks, community parks, and mini parks and are mostly owned and operated by cities, with the exception of two facilities that are located in unincorporated areas of the County, which are the Morada Park operated exclusively as a Little League facility in the community of Morada and the Mountain House Park operated by the Mountain House Community Services District. Other recreational opportunities in the County include playgrounds and bikeways, golf courses, waterway recreation areas, and the Delta which provides a wide variety of both land-based and water-based recreational and tourism activities. Land-based activities include hunting, camping, picnicking, hiking, biking, wildlife viewing and photographing, sightseeing, attending special events, visiting historic and cultural sites, and visiting wineries. Water-based activities include fishing, sailing, water skiing, operating personal watercraft, cruising, canoeing and kayaking, swimming, boat camping, house boating, windsurfing, and hunting (San Joaquin County 2014).

Project Site

The closest parks to the Project site are the Henry Barboza Park and Ceciliani Park, located approximately two miles east and northeast respectively of the Project site within the City of Tracy. The Valpico Memorial Park is also located near the Project site, approximately one mile to the east. However, the Valpico Memorial Park is a public cemetery and would not include any recreational activities.

3.15.2 Regulatory Setting

Federal

There are no federal regulations related to recreation.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Recreation

State

Quimby Act

The Quimby Act was established by the California Legislature in 1965 to provide parks for the growing communities in California. The act authorizes cities and counties to adopt ordinances addressing parkland and/or fees for residential subdivisions for the purpose of providing and preserving open space and recreational facilities and improvements and requires the provision of three acres of park area per 1,000 persons residing in a subdivision unless the existing neighborhood and community park area exceeds that limit, in which case the city or county may adopt a higher standard not to exceed five acres per 1,000 residents. The Quimby Act also specifies acceptable uses and expenditures of such funds.

Mitigation Fee Act

The California Mitigation Fee Act (Government Code Sections 66000 *et seq.*) allows local governments to establish fees that will be imposed upon development projects for the purpose of mitigating the impact that development projects have on city's ability to provide public facilities. In order to comply with the Mitigation Fee Act, the city or county must follow four primary requirements: 1) Make certain determinations regarding the purpose and use of a fee and establish a nexus or connection between a development project or class of project and the public improvement being financed with the fee; 2) Segregate fee revenue from the General Fund in order to avoid commingling of capital facilities fees and general funds; 3) Make findings each fiscal year describing the continuing need for fees that have been in the possession of the city/county for five years or more and that have not been spent or committed to a project; and 4) Refund any fees with interest for developer deposits for which the findings noted above cannot be made.

California Public Park Preservation Act

The primary instrument for protecting and preserving parkland is California's Public Park Preservation Act of 1971. Under the Public Park Preservation Act, cities and counties may not acquire any real property that is in use as a public park for any nonpark use unless compensation, land, or both are provided to replace the parkland acquired. This provides for no net loss of parkland and facilities.

Local

San Joaquin County General Plan

The General Plan presents a vision for the County's future, looking ahead to 2035. This long-range planning document includes a comprehensive framework for the County's physical, economic, and social development and environmental resources preservation, as well as policies to guide day-to-day decisions. The General Plan emphasizes that future development must occur in a way that makes the most of existing infrastructure and public facilities, minimizes impacts to natural resources, expands opportunities for job growth, restores and revitalizes unincorporated communities, and provides greater opportunities to all County residents.

The General Plan includes the following goals and policies related to recreation that are applicable to the Project (San Joaquin County 2016):



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Recreation

Goal LU-8: Protect open space for its recreational, agricultural, safety, and environmental value and provide adequate parks and open space areas throughout the County.

- **Policy LU-8.1: Open Space Preservation.** The County shall limit, to the extent feasible, the conversion of open space and agricultural lands to urban uses, and place a high priority on preserving open space lands for recreation, habitat protection and enhancement, flood hazard management, public safety, water resource protection, and overall community benefit.
- **Policy LU-8.3: Waterway Conservation and Restoration.** The County shall encourage the conservation and restoration of rivers, creeks, and sloughs as multi-functional open space corridors that complement adjoining development and connect city and County recreation facilities (e.g., parks).
- **Policy LU-8.4: New Parks and Open Spaces.** The County shall ensure that sufficient parks, open space, waterways, and trails are planned throughout the County, to ensure adequate facilities are available to existing and future residents, including underserved areas and low-income neighborhoods.

Goal NCR-8: To develop and maintain a comprehensive system of parklands and protected public recreational areas that achieve County park ratio standards and meet the active and passive recreation needs of San Joaquin County residents and visitors.

- **Policy NCR-8.1: Comprehensive Park System.** The County shall continue to acquire, develop, maintain, and operate, based on available funding, a comprehensive system of parkland and recreational facilities that include active and passive recreation for a wide range of users.
- **Policy NCR-8.2: Park Ratio Standard.** The County shall encourage and support the development of recreational facilities to serve unincorporated communities at a ratio of 10 acres of regional parks and three acres of local parks per 1,000 residents, except for Mountain House, which has an approved park ratio of not less than five acres of parks per 1,000 population. The County shall consider increasing its park ratio standards to address unmet park needs.
- **Policy NCR-8.22: Park Dedication and In-lieu Fees.** The County shall require dedication of parkland or in-lieu fees for local parks until other methods of sufficient financing are established. In-lieu fees shall:
 - be collected for new developments proposed in the county;
 - include land acquisition and site development costs, such as grading, access, drainage, and fencing; and
 - be given to the agency providing local recreation facilities.

3.15.3 Environmental Impacts

This section analyzes the Project's potential to result in significant impacts related to recreation. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid impacts.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Recreation

Methodology

Consistent with the requirements of CEQA the significance of potential impacts is evaluated through the application of the significance criteria described above. The following analysis is based on a review of the General Plan, General Plan EIR, and the San Joaquin County Code of Ordinances.

Thresholds of Significance

The significance criteria used to identify recreational impacts is from Appendix G of the CEQA Guidelines. For the purposes of this EIR, implementation of the Project would cause a significant impact related to recreation if it would do the following:

- a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Project Impacts and Mitigation Measures

Increased Use of Neighborhood or Regional Parks

Impact REC-1	The Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Impact Analysis

Construction activities associated with the Project would not result in increased demand to nearby parks or other recreational facilities as construction workers are anticipated to come from the local population and would not result in population growth in the area. Therefore, construction activities associated with the Project would not generate new residents and no impacts to parks or recreational facilities would occur during construction.

During operation, the Project would not include the development of residential uses onsite that would directly result in new residents or create an increased demand for parkland. The Project would create approximately 4,733 new jobs; however, employees are expected to come from the local population and would not be expected to introduce new residents to the area (Keir and Wright 2023). Therefore, the Project would not indirectly generate new residents that would increase the demand for park facilities.

The County's General Plan Policy NCR-8.22, Park Dedication and In-lieu Fees, requires the dedication of parkland or payment of in-lieu fees for new developments proposed in the County. San Joaquin County Code Chapter 9-1230, Local Park and Recreation Facilities Financing, requires residential developers to dedicate land, pay an in-lieu fee thereof, or a combination, for park and recreational purposes in accordance with the County's General Plan. As an industrial project, the Project is exempt from the Local Park and Recreation Facilities Financing ordinance. As noted above, employees of the Project are anticipated to come from within the general Project vicinity. Therefore, the housing units for each employee would have been previously subject to the requirements of Chapter 9-1230. Overall, the Project



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Recreation

would not result in an increase in the use of existing parks and recreational facilities such that substantial physical deterioration would occur or be accelerated, and impacts would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Inclusion of Recreational Facilities

Impact REC-2	The Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Impact Analysis

Construction activities associated with the Project would not result in increased demand to nearby parks or other recreational facilities as construction workers are anticipated to come from the local population and would not result in population growth in the area. Therefore, construction activities associated with the Project would not generate new residents and no impacts to parks or recreational facilities would occur during construction.

As identified above, the Project does not include a residential component that would directly induce population growth thereby increasing the demand for existing parks and recreational facilities. The Project would create approximately 4,733 new jobs; however, employees are expected to come from the local population and would not be expected to introduce new residents to the area (Keir and Wright 2023). Therefore, the Project would not indirectly generate new residents that would increase the demand for park facilities. Therefore, the Project would not include recreational facilities or require the construction or expansion of recreational facility which may have an adverse physical effect on the environment, and impacts would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

3.15.4 Notice of Preparation Comments Related to Population and Housing

As discussed in Section 1.0, Introduction, the County distributed a NOP of the Draft EIR for the Project beginning on March 31, 2023. The NOP was distributed for a 30-day comment period that ended on May 1, 2023. The Public Scoping Meeting on the Draft EIR for the Project was held on April 10, 2023. The



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Recreation

comments received on the NOP and during the Public Scoping Meeting were considered in the preparation of this Draft EIR. No comments related to recreation were submitted. See Table 1.2-1 in Section 1.0, Introduction for a summary of all comments made during the NOP scoping period.



3.16 TRANSPORTATION

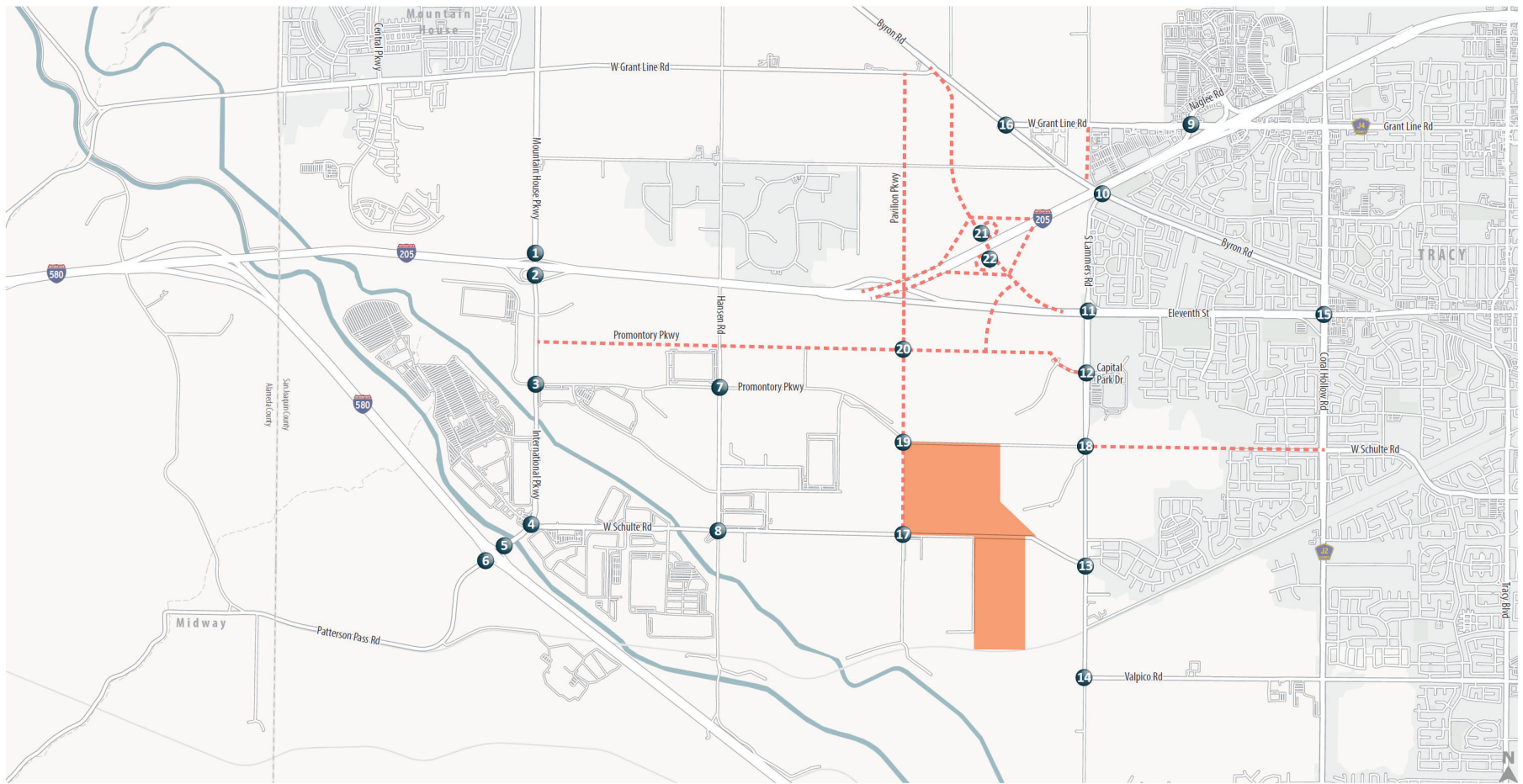
This section describes the existing setting for intersections and roadways, including the existing Project site conditions, regulatory setting, and potential impacts that could result from the Project, and, if significant impacts are identified, the mitigation measures that would reduce these impacts. Descriptions and analysis in this section are based primarily on the Traffic Impact Assessment (TIA) prepared by Fehr & Peers on February 22, 2024, included in Appendix O to this EIR.

3.16.1 Environmental Setting

Roadway System

The following describes the local roadway network that serves the Project site and surrounding area. The roadway system in the Project vicinity consists of a series of freeways and surface streets. I-580 and I-205 are freeways that provide regional access to the Project site. South Lammers Road, International Parkway, Grant Line Road, West Schulte Road, Promontory Parkway, Hansen Road, and Byron Road are arterial streets that provide local access to the Project site, see Figure 29.





Project Site
 Study Intersection

Planned Roadways

Source: Fehr & Peers 2024

Project Location
 San Joaquin County

Project
 International Park of Commerce Specific Plan
 Phase 2

Figure No.
29

Title

**Existing and Planned Roadway
 Network**

INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Transportation

Freeways

I-580. I-580 is a four-lane freeway that terminates at US 101 in San Rafael and I-5 south of Tracy. It connects to East Bay cities including Pleasanton, Castro Valley, Oakland, and Richmond. I-580 is located approximately 1.5 miles southwest of the Project site. The posted speed limit is 70 miles per hour (mph) near the City of Tracy and the Project site.

I-205. I-205 is a six-lane freeway that goes through the northern part of the City of Tracy and connects to I-580 in the west and I-5 in the east. I-205 is located approximately 0.75 miles north of the Project site. The posted speed limit ranges from 65 mph to 70 mph.

Arterial Streets

South Lammers Road. South Lammers Road is a major arterial that changes from two to six lanes and terminates at Byron Road in the north and Tracy Hills Drive in the south. South Lammers Road lies approximately 0.3 miles east of the Project site. The posted speed limit ranges from 40 mph to 50 mph.

International Parkway. International Parkway is a four-lane major arterial that connects to I-205 in the north and I-580 in the south. International Parkway lies approximately 2 miles west of the Project site. The posted speed limit is 45 mph.

Grant Line Road. Grant Line Road is a major arterial that changes from two to six lanes and connects to Byron Road in the west and Eleventh Street in the east. It runs through the northern part of the City of Tracy and shares an interchange with I-205. Grant Line Road lies approximately 2 miles north of the Project site. The posted speed limit is 40 mph west of North MacArthur Drive and 45 mph east of North MacArthur Drive.

West Schulte Road. West Schulte Road is a minor arterial that changes from two to six lanes and terminates at International Parkway in the west and South Lammers Road in the east. West Schulte Road bisects the Project site. The Project includes improvements to West Schulte Road. Specifically, the Project would reconstruct both the east and west bound lanes of West Schulte Road from Quality Road to the eastern Project boundary. However, the Project would only construct the western bound lanes (northern side) of West Schulte Road from Pavilion Parkway to Quality Road, see Figure 4. The posted speed limit is 45 mph west of Hansen Road and 50 mph east of Hansen Road.

Promontory Parkway. Promontory Parkway is a four-lane minor arterial that currently terminates past International Parkway in the west and past Hansen Road in the east. As part of the Project, the western end of Promontory Parkway would be extended to Coral Hollow Road, north of the Project site. The posted speed limit is 35 mph between International Parkway and Hansen Road.

Hansen Road. Hansen Road is a two-lane minor arterial that connects to Byron Road in the north and terminates south of West Schulte Road. It has a posted speed limit of 45 mph. In 2025, the City of Tracy permanently closed the Hansen Road overpass of I-205.

Byron Road. Byron Road is a two-lane minor arterial that terminates at Coral Hollow Road in the east and turns into Byron Highway in the west. It connects the City of Tracy to an outlying residential neighborhood. The posted speed limit ranges from 45 mph to 55 mph.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Transportation

Existing Truck Traffic

Table 3.16-1 presents the existing truck volumes on all study roadways, summed for both directions. The volumes are significantly greater on designated truck routes, with portions of International Parkway and West Schulte Road carrying over 3,000 and 2,000 trucks per day, respectively.

Table 3.16-1. Existing Truck Traffic in Project Vicinity

Roadway Segment	Number of Trucks Per Day
International Parkway south of West Schulte Road	3,150
West Schulte Road east of International Parkway	2,250
Promontory Parkway east of International Parkway	1,000
Hansen Road south of Promontory Parkway	450
Eleventh Street east of South Lammers Road	400
South Lammers Road south of Eleventh Street	250

Notes: Volumes are for both directions and are rounded to the nearest 50 trucks based on counts.

Source: Fehr & Peers 2024.

Bicycle and Pedestrian System

The Project site is located in a generally rural area featuring primarily agricultural uses. As a result, bicycle and pedestrian infrastructure is limited in the Project vicinity.

There is an existing Class III bicycle route on West Schulte Road from International Parkway to South Lammers Road. Other bike paths, lanes, and routes are currently provided on streets closer to the central part of Tracy, such as Eleventh Street and Coral Hollow Road. An extensive network of bicycle and pedestrian facilities are planned within the Project area, particularly to the west of the Project site, that will be implemented by the adjacent IPC Phase 1 project.

Many arterial streets in the Project area have sidewalks and crosswalks for pedestrians. Hansen Road has continuous sidewalks on both sides of the street from north of Promontory Parkway to West Schulte Road. International Parkway has sidewalks on one or both sides of the street from the I-205 eastbound ramps to West Schulte Road. West Schulte Road and Hopkins Road have discontinuous sidewalks on one or both sides of the street.

Transit System

Transit service in the Project vicinity is provided by San Joaquin Regional Transit District (RTD) and TRACER Bus Service, which is the City of Tracy's transit service. However, bus stops or transit lines do not currently operate along any street serving as a Project site boundary. TRACER Routes A, B, C, and the Commuter Route connect the rest of the City of Tracy to stops on streets within the Project area, such as Eleventh Street, Coral Hollow Road, and Grant Line Road. The closest stops to the Project site include Commuter Route H stop 27, South Lammers Road west of John C. Kimball High, located 1 mile northeast of the Project site, and Route D stop 26, 11th Street & South Lammers Road, north of John C. Kimball High, located 1.25 miles northeast of the Project site (City of Tracy 2023a). San Joaquin RTD Route 90 provides regional access from the Project area to Stockton and has stops on Grant Line Road.



3.16.2 Regulatory Setting

This section identifies the laws, regulations, policies, and programs related to the physical environment that pertains to the Project's effects on transportation and circulation on the highways and local roadways within San Joaquin County.

Federal

Federal regulations, including those established by the Federal Highway Administration (FHWA), are implemented in California by the California Department of Transportation (Caltrans).

State

California Department of Transportation

Caltrans is responsible for planning, designing, constructing, and maintaining all State-owned and -operated roadways in San Joaquin County. Any improvements or modifications to the State highway system within San Joaquin County must be approved by Caltrans. San Joaquin County and other local agencies do not have the ability to unilaterally make improvements to the State highway system.

Senate Bill 743

On September 27, 2013, SB 743 was signed into law. The legislature found that with the adoption of the Sustainable Communities and Climate Protection Act of 2008 (SB 375), the State had signaled its commitment to encourage land use and transportation planning decisions and investments that reduce vehicle miles traveled (VMT) and thereby contribute to the reduction of GHG emissions, as required by the California Global Warming Solutions Act of 2006 (AB 32). Generally, SB 743 moves away from using delay-based level of service (LOS) as the metric for identifying a significant impact and instead uses VMT. The new criteria, "shall promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses" (PRC Section 21099(b)(1)). On January 20, 2016, the Governor's Office and Planning and Research (OPR) released revisions to its proposed Draft CEQA guidelines for the implementation of SB 743.

In December 2018, the California Natural Resources Agency certified and adopted the CEQA Guidelines update package, including the Guidelines section implementing SB 743 (Section 15064.3). Section 15064.3 of the CEQA Guidelines states that VMT is the "most appropriate measure of transportation impacts" and mandates analysis of VMT impacts effective July 1, 2020. A project's effect on automobile delay is no longer a consideration when identifying a significant impact; therefore, the impact of the Project on delay-based traffic operations is not addressed in this EIR. However, an analysis of LOS on study roadways and intersections is a planning consideration and is included in the Project's TIA for consideration by the decision-makers (Appendix O).

OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA

OPR developed a Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory), which contains OPR's technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Transportation

Regarding trucks, the Technical Advisory points out that CEQA Section 15064 refers to automobiles when referencing VMT. The document then offers a definition that automobiles consist of on-road passenger vehicles, including cars and light duty trucks. It further states that “Heavy-duty truck VMT could be included for modeling convenience and ease of calculation.”

1. California Complete Streets Act of 2008

This law requires cities and counties to include complete streets policies as part of their general plans so that roadways are designed to safely accommodate all users, including bicyclists, pedestrians, transit riders, children, the elderly, and persons with disabilities, as well as motorists. This Act will complement an existing policy, which directs Caltrans to “fully consider the needs of non-motorized travelers (including pedestrians, bicyclists, and persons with disabilities) in all programming, planning, maintenance, construction, operations, and project development activities and products.” As of January 2011, any substantive revision of the circulation element in the general plan of a California local government must include complete streets provisions.

The SJCOG, in coordination with the County of San Joaquin, has designated multi-modal corridors on several county roadways as part of its RCMP. The RCMP is a key partner document to the General Plan as it helps guide the prioritization of improvements.

2. California Transportation Development Act

The California Transportation Development Act (TDA) provides a dedicated State funding source for use by local jurisdictions at the county level to improve existing public transportation and encourage regional public transportation coordination. Transit agency audits are performed on a triennial basis to ensure that transit agencies are meeting minimum service performance standards (e.g., passengers per revenue mile and hour, annual passengers served, etc.). Use of TDA monies is also tied to identifying and allocating funds to unmet transit needs on an annual basis.

Regional

Regional Transportation Plan and Sustainable Communities Strategy (2022)

The SJCOG is comprised of San Joaquin County and the cities of Stockton, Lodi, Manteca, Tracy, Ripon, Escalon, and Lathrop, and serves as the regional transportation planning agency. In August 2022, the SJCOG Board adopted the 2022 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). This document serves as the region’s long-range transportation plan and provides guidance for decisions about transportation spending priorities. The RTP/SCS includes a list of planned transportation improvements as well as policies to guide future development.

Regional Congestion Management Program

The federal congestion management process requires metropolitan planning organizations, such as SJCOG, to develop and implement a Regional Congestion Management Program (RCMP) to fulfill its requirements as a metropolitan area with a population exceeding 200,000. The focus of the RCMP is on reducing single occupant vehicle travel while minimizing the need for increasing roadway capacity. It also provides additional resources for the development and deployment of new congestion management



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Transportation

technologies. Monitoring the performance of the RCMP focuses on multimodal performance metrics for bicycling, walking, and transit as well as VMT, travel reliability, and safety.

Regional Bicycle, Pedestrian, and Safe Routes to School Master Plan (2012)

The SJCOG Bicycle, Pedestrian, and Safe Routes to School Master Plan was developed to identify bikeways and pedestrian projects of regional significance to prioritize funding and facilitate project implementation. The plan's vision is to meet the needs for people of all ages and abilities in San Joaquin County by improving and enhancing the existing bicycle and pedestrian network. Its goals are to increase bicycle and pedestrian travel throughout the county, improve bicycle, pedestrian, and school access safety, and increase education and awareness of bicycling and walking in San Joaquin County.

Regional Transportation Impact Fee

The Regional Transportation Impact Fee (RTIF) program was established in 2005, and is intended to impose a fee to provide funding for transportation and transit improvements that help mitigate the impact of new growth. New development throughout the county will be subject to the fee, which will be proportional to the impact on the regional transportation network caused by such new development. The funding derived from the RTIF program must be used in combination with other funding available to complete the needed transportation and transit improvements.

San Joaquin Regional Transportation District Short-Range Transit Plan 2018-2028

The San Joaquin Regional Transit District is governed by a five-member board of directors, consisting of two members appointed by the Stockton City Council, two members appointed by the San Joaquin County Board of Supervisors, and one member appointed jointly by five members of the San Joaquin County Board of Supervisors and five members of the Stockton City Council.

The San Joaquin Regional Transit District Short-Range Transit Plan (SRTP) for fiscal years 2018-2019 to 2027-2028 serves as a guide for the development of the goals, objectives, and policies for future transit services in the Stockton Metropolitan Area and unincorporated San Joaquin County over the next 10 years. The SRTP proposes strategies intended to guide transit development while containing costs within available revenues.

San Joaquin Valley Air Pollution Control District

Under State and federal requirements, the San Joaquin Valley is mandated to implement transportation control measures (TCMs) and other mobile source control measures to significantly decrease emissions. Bicycle programs are one of the TCMs recommended in the San Joaquin County Transportation Control Measures Programs.

In addition, SJVAPCD Rule 9410 requires major employers (with 100 or more employees) in the region to develop and implement transportation demand management (TDM) strategies. Adopted in 2009, the Employer Trip Reduction Implementation Plan (eTRIP) encourages employees to reduce single-occupancy vehicle trips, thus reducing pollutant emissions associated with work commutes. These strategies can include, but are not limited to, employee shuttles, staggered work hours, telecommuting options, transit subsidies, and carpool/vanpool programs.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Transportation

Local

3. San Joaquin County Bicycle Master Plan Update (2020)

The Bicycle Master Plan is intended to provide a blueprint for creating a safe, comfortable, and efficient bicycle network and bicycling experience for the County's residents and visitors. The plan presents policies, bicycle infrastructure projects, programs, and action plans to support the improvement and expansion of the County's bicycling network. The Bicycle Master Plan is developed in context of the Public Facilities and Services Element of the County General Plan, which includes goals and policies to develop a balanced transportation system for automobiles, transit, bicycles, and pedestrians.

The 2020 Bicycle Master Plan Update includes recommended modifications to the General Plan Public Facilities and Services Element to reflect recommended changes to policies, programs, and development standards. The 2020 Bicycle Master Plan Update proposes the following bikeways in the Project area:

- Class I bicycle path on Corral Hollow Road from Canal at Ponderosa Drive to Ellis Town Drive, Parkside Drive to Midway Drive, and Linne Road to Delta Mendota Canal
- Class I bicycle path on Mountain House Parkway from Byron Road to the West Side Irrigation Canal
- Class II bicycle lane on Valpico Road from South Lammers Road to Corral Hollow Road
- Class II bicycle lane on South Lammers Road from West Schulte Road to the Tracy city limits
- Class III bicycle route on Corral Hollow Road from South Lammers Road to the Tracy city limits
- Class III bicycle route on Hansen Road from Grant Line Road to West Schulte Road

San Joaquin County VMT Thresholds Study (2020)

The San Joaquin County VMT Thresholds Study describes how San Joaquin County will implement SB 743. The report describes how, in large part, the County is endorsing the majority of the recommendations from the OPR's Technical Advisory. However, it provides a County-specific VMT analysis for screening and threshold setting for average VMT per capita and employee metrics. The following conclusions are applicable to the Project analysis:

- Employment Projects (Work-based VMT): Establish baseline VMT and threshold on a per employee basis. When assessing an office or manufacturing project, the project's VMT is divided by the number of employees expected to occupy the project to determine the VMT per employee of the project. "Work" uses include, but are not limited to, offices, office parks, business parks, industrial, warehousing, processing, and manufacturing, where the predominant VMT is employee-based.
- Truck VMT: Although heavy-duty truck VMT is generally excluded from the Technical Advisory, the County may elect to include an assessment of truck VMT if it is reasonable to assume that the project would result in a significant change in the pattern, frequency, or length of truck trips. Truck VMT would be assessed in terms of net change in total truck VMT. This does not preclude the need to assess VMT per employee. This would primarily apply to projects such as industrial, warehousing, processing, and manufacturing uses.
- Specific Plans: Their analysis may employ the same thresholds described above for individual land use types.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Transportation

With regard to significance thresholds, the report states the following:

- The County has decided to utilize a 15 percent reduction in baseline VMT per employee as the threshold of significance for work projects.
- A general plan, area plan, or community plan may have a significant impact on transportation if proposed new residential, office, or retail land uses would in aggregate exceed the respective thresholds recommended above.

These VMT thresholds are recommended based on the most recent guidance on VMT thresholds from OPR and consistent with the State's climate goals. This information is used as part of the VMT analysis methodologies and thresholds applied in this study.

San Joaquin County General Plan

The General Plan presents a vision for the County's future, looking ahead to 2035. This long-range planning document includes a comprehensive framework for the County's physical, economic, and social development and environmental resources preservation, as well as policies to guide day-to-day decisions. The General Plan emphasizes that future development must occur in a way that makes the most of existing infrastructure and public facilities, minimizes impacts to natural resources, expands opportunities for job growth, restores and revitalizes unincorporated communities, and provides greater opportunities to all County residents.

The General Plan includes the following goals and policies related to transportation that are applicable to the Project (San Joaquin County 2016):

Goal LU-3. Preserve and enhance the character and scale of San Joaquin County's communities and rural areas, including their architectural heritage and historic character.

- **Policy LU-3.4. Walkable and Bikeable Streets.** The County shall encourage new streets within Urban and Rural Communities and City Fringe Areas to be designed and constructed to not only accommodate auto and truck traffic, but also serve as comfortable pedestrian and cyclist environments and reflect public health goals by encouraging physical activity. These should include, but not be limited to:
 - Street tree planting adjacent to curbs and between the street and sidewalk to provide a buffer between pedestrians and automobiles, where appropriate,
 - Minimize curb cuts along streets, sidewalks on both sides of streets, and
 - Bike lanes and walking paths, where feasible on collectors and arterials, and traffic calming devices such as roundabouts, bulb-outs at intersections, and traffic tables.

Goal LU-5. Promote the development of regional and locally serving commercial uses in communities and other areas of the unincorporated County.

- **Policy LU-5.5. Bicycle Access and Parking.** The County shall require new commercial development within Urban Communities and City Fringe areas to include bicycle access and secure parking racks.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Transportation

Goal TM-1. To maintain a comprehensive and coordinated multimodal transportation system that enhances the mobility of people, improves the environment, and is safe, efficient, and cost effective.

- **Policy TM-1.1. Transportation System Safety.** The County shall manage the transportation system to ensure safe operating conditions.
- **Policy TM-1.3. Multimodal System.** The County shall encourage, where appropriate, development of an integrated, multi-modal transportation system that offers attractive choices among modes including pedestrian ways, public transportation, roadways, bikeways, rail, waterways, and aviation, and reduces air pollution and greenhouse gas emissions.
- **Policy TM-1.4. Regional Transportation Facilities.** The County shall work with Caltrans, SJCOG, and the cities in the County where appropriate to plan, develop, and maintain regional transportation facilities, and to identify existing and future transportation corridors that should be linked across jurisdictional boundaries so that sufficient right-of-way may be preserved.
- **Policy TM-1.6. Automobile Dependency Alternatives.** The County shall support public and private efforts where appropriate to provide alternative choices to single occupant driving.
- **Policy TM-1.7. Energy Conservation.** The County shall develop the transportation system to reduce vehicle miles traveled, conserve energy resources, minimize air pollution, and reduce greenhouse gas emissions.
- **Policy TM-1.8. Multimodal Congestion Management.** The County shall support, as appropriate, SJCOG efforts to monitor multimodal corridors within the County as part of the Regional Congestion Management Program. The County shall also encourage the consideration of additional multimodal corridors, where appropriate, as part of future updates to the Regional Congestion Management Program.
- **Policy TM-1.10. Eliminate Gaps.** The County shall strive to eliminate “gaps” in roadways, bikeways, and pedestrian networks by planning and seeking funding to construct grade-separated crossings of rail lines, canals, creeks, and other barriers to improve connectivity and encourage construction of new bikeways and pedestrian-ways in and between existing communities where appropriate.
- **Policy TM-1.11. Transportation System Improvements.** The County shall require new development to provide transportation system improvements necessary to serve the development.
- **Policy TM-1.12. Transportation and Land Use.** The County shall ensure that transportation system investments and improvements support existing and future sustainable land use patterns.

Goal TM-2. To improve County roadways to include pedestrian, bicycle, and transit facilities to better serve people who use these active transportation modes.

- **Policy TM-2.1. Urban Complete Streets.** The County shall require new streets within Urban Communities to be designed and constructed to serve all users, including pedestrians, bicyclists, and transit passengers, of all ages and abilities. This includes:



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Transportation

- creating multi-modal street connections in order to establish a comprehensive, integrated, and connected transportation network for all modes of travel;
 - minimizing curb cuts along non-local streets to improve safety and capacity;
 - planting street trees adjacent to curbs and between the street and sidewalk to provide a buffer between pedestrians and vehicular traffic, where appropriate;
 - constructing sidewalks and bike lanes on both sides of streets, where feasible;
 - including parking options to provide a buffer between pedestrians and vehicular traffic, where appropriate;
 - coordinating with local jurisdictions and SJCOG to ensure multimodal connections are established and maintained between jurisdictions; and
 - incorporating traffic-calming devices such as roundabouts, bulb-outs at intersections, and traffic tables into the transportation system where appropriate to improve safety and encourage travel by active transportation modes.
- **Policy TM-2.4. Rural Complete Streets.** The County shall strive to serve all users on rural roadways in the County and shall design and construct rural roadways to serve safely bicyclists, transit passengers, and agricultural machinery operators. This includes:
 - Constructing wide shoulders to provide a safe space for bicyclists, and agricultural machinery vehicles;
 - Removing visual barriers along rural roads, particularly near intersections, to improve the visibility of bicyclists; and
 - Coordinating with local jurisdictions and SJCOG to ensure multimodal connections are established and maintained between jurisdictions.
- **Policy TM-2.7. New Development.** The County shall require all new developments to provide their fair share of roadway facilities for alternative transportation modes to reduce automobile demand.
- **Policy TM-2.8. Private Complete Streets.** The County shall encourage large private developments (e.g., office parks, apartment complexes, retail centers) to provide internal complete streets that connect to the existing roadway system.

Goal TM-3. Maintain a safe, efficient, and cost-effective roadway system for the movement of people and goods.

- **Policy TM-3.3. Onsite Circulation Systems.** The County shall require new development to design on-site circulation systems and parking facilities to minimize backup on County roadways.
- **Policy TM-3.4. Roadway Plan Coordination.** The County shall coordinate roadway improvements with regional plans, such as the countywide Regional Transportation Plan and



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Transportation

Regional Transportation Improvement Plan Program, the Congestion Management Program, and the Measure K Strategic Plan funding program.

- **Policy TM-3.10. Rural Road Traffic.** The County should monitor the use of rural roads by commuters as bypass routes from gridlocked arterials to gather data for use in any future traffic studies or plans designed to reduce the traffic impact on the operation of agricultural machinery.
- **Policy TM-3.11. Rural Traffic Management Areas.** The County shall mitigate excessive commuter diversion traffic through the development and adoption of rural traffic management plans. Where applicable, the County shall prepare a rural traffic management plan when public concerns are raised about excessive traffic or the County identifies issue areas, County Public Works Director confirms that a defined rural area is experiencing excessive commuter traffic due to diversion, and a survey of an area's property owners, with at least 33 percent responding, shows at least 50 percent are in support of a plan.
- **Policy TM-3.12. Development Rights-of-Way.** The County shall require dedication and improvement of necessary on and off-site rights-of-way at the time of new development, in accordance with the County's Functional Classification, Standard Drawings, and Level of Service Standards.
- **Policy TM-3.14. Reduced Parking Requirements.** The County may reduce automobile parking area requirements for new developments in exchange for owner-supplied amenities or facilities (e.g., transit facilities, secure bicycle storage facilities) or in-lieu fee payments for public transit.

Goal TM-4. To maintain and expand a safe, continuous, and convenient bicycle system and pedestrian network.

- **Policy TM-4.1. Pedestrian and Bicycle Network Continuity.** The County shall strive to eliminate gaps in the rural bicycle network by constructing or designating new bike facilities, where appropriate, and in accordance with the San Joaquin County Bicycle Master Plan.

3.16.3 Environmental Impacts

This section analyzes the Project's potential to result in significant impacts related to transportation. If an impact is determined to be significant, mitigation measures are identified that would reduce or avoid impacts.

Methodology

The assessment of potential impact presented below is based on a comparison of existing site setting with defined or anticipated conditions that would occur as a result of the Project. Where available, information from the TIA prepared for the Project by Fehr & Peers was used to analyze the Project. In the absence of such documentation, available information from the relevant regulatory agency (e.g., SJCOC and Department of Transportation) was used to assess the potential difference between existing, or baseline, conditions and Project-related conditions. A summary of the trip generation and VMT methodology are provided below and detailed in Appendix O.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Transportation

Trip Generation Methodology

The Project's trip generation was estimated using published trip rates from the most recent version of the Institute of Transportation Engineers' (ITE) Trip Generation Manual, 11th Edition. Published trip rates from the Trip Generation Manual were reviewed and compared to locally collected data for warehouse/logistics facilities in San Joaquin County. That analysis found the ITE rates to be conservative (meaning higher) with respect to current operational characteristics of similar local facilities. The ITE trip generation rates are approximately 40 percent higher than those measured in the field in the County.

As the exact nature of the land uses that would ultimately develop on the site are currently unknown, estimates of the sizes and types of uses were forecasted based on the total industrial buildout of 5.36 million square feet, see Table 2.5-1 and the Note explaining that the amount of space assumed for each type of use is intended to provide a conservative estimate of trips for EIR review purposes. Table 3.16-2 below estimates trips for each land use.

Table 3.16-2. Project Vehicle Trip Generation Summary

ITE Land Use	ITE Code ¹	Percent of Project	KSF	Daily Trips	AM Peak			PM Peak		
					In	Out	Total	In	Out	Total
High Cube Transload and Short-Term Storage Warehouse	154	10%	536	751	33	10	43	15	39	54
High-Cube Fulfillment Center Warehouse – Sort	155	5%	268	1,726	189	45	234	125	197	322
General Light Industrial	110	10%	536	2,611	349	48	397	48	301	349
High-Cube Parcel Hub Warehouse	156	10%	536	2,482	304	72	376	278	66	344
High-Cube Cold Storage Warehouse	157	10%	536	1,137	47	12	59	25	40	65
Warehousing	150	25%	1,340	2,292	175	53	228	67	175	242
High-Cube Fulfillment Center Warehouse – Non-Sort	155	25%	1,340	2,426	162	39	201	83	132	215
Manufacturing	140	5%	268	1,273	139	44	183	61	138	199
Total New Vehicle Trips				14,698	1,398	323	1,721	702	1,088	1,790

Source: Fehr & Peers 2024; Trip Generation Manual, 11th Edition (Institute of Transportation Engineers, 4909-0858-0738 v1

¹ Notes/Trip Generation Rates

ITE 154 (High Cube Transload and Short-Term Storage Warehouse) Trip Generation Calculations:

Daily: $T = 1.40(X)$

AM Peak Hour: $T = 0.08(X)$ (77% in, 23% out)

PM Peak Hour: $T = 0.10(X)$ (28% in, 72% out)

ITE 155 (High-Cube Fulfillment Center Warehouse – Sort) Trip Generation Calculations:

Daily: $T = 6.44(X)$

AM Peak Hour: $T = 0.74(X)$ (81% in, 19% out)

PM Peak Hour: $T = 1.20(X)$ (39% in, 61% out)

ITE 110 (General Light Industrial) Trip Generation Calculations:

Daily: $T = 4.87(X)$

AM Peak Hour: $T = 0.74(X)$ (88% in, 12% out)

PM Peak Hour: $T = 0.65(X)$ (14% in, 86% out)

ITE 156 (High-Cube Parcel Hub Warehouse) Trip Generation Calculations:

Daily: $T = 4.63(X)$

AM Peak Hour: $T = 0.70(X)$ (81% in, 19% out)

PM Peak Hour: $T = 0.64(X)$ (81% in, 19% out)



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Transportation

ITE 157 (High-Cube Cold Storage Warehouse) Trip Generation Calculations:

Daily: T = 2.12(X)

AM Peak Hour: T = 0.11(X) (81% in, 19% out)

PM Peak Hour: T = 0.12(X) (39% in, 61% out)

ITE 150 (Warehousing) Trip Generation Calculations:

Daily: T = 1.71(X)

AM Peak Hour: T = 0.17(X) (77% in, 23% out)

PM Peak Hour: T = 0.18(X) (28% in, 72% out)

ITE 155 (High-Cube Fulfillment Center Warehouse – Non-Sort) Trip Generation Calculations:

Daily: T = 1.81(X)

AM Peak Hour: T = 0.15(X) (81% in, 19% out)

PM Peak Hour: T = 0.16(X) (39% in, 61% out)

ITE 140 (Manufacturing) Trip Generation Calculations:

Daily: T = 4.75(X)

AM Peak Hour: T = 0.68(X) (76% in, 24% out)

PM Peak Hour: T = 0.74(X) (31% in, 69% out)

As presented above, the Project is estimated to generate approximately 14,698 daily weekday trips, with 1,721 trips occurring during the AM peak hour, and 1,790 trips during the PM peak hour. The results in the table represent total trips, including both truck and passenger cars. To estimate the effects of truck trips on the transportation network within the transportation assessment, truck trips were converted to a passenger car equivalent (PCE) using a factor of 2.0 (Transportation Research Board *Highway Capacity Manual Sixth Edition, Chapter 12*). Converting truck trips to PCEs better accounts for the additional strain that truck trips place on the operations of the circulation system. (See the TIA in Appendix O for the assumptions and formulas used.)

VMT Methodology

VMT was assessed based on the methodology and criteria established in the San Joaquin County VMT Thresholds Study. The SJCOG model was used to estimate the weekday Project VMT per employee, and the Project VMT per employee was then compared to the relevant environmental significance threshold of 85 percent of the unincorporated countywide average VMT per employee. The applicable VMT threshold for the Project is 32.8 VMT per employee (i.e., 85 percent of the unincorporated countywide average of 38.6 VMT per employee) forecast by the SJCOG model. The relevant employment VMT is the total daily home-based work VMT per employee (this two-way measurement includes only the employee's trip from home to work and return).

Thresholds of Significance

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purposes of this EIR, implementation of the Project may result in a potentially significant impact on transportation if it would do any of the following:

- 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 due to geometric design feature (e.g., sharp curves or dangerous intersection(s) or incompatible uses (e.g., farm equipment));
- d. Result in inadequate emergency access.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report
Transportation

Project Impacts and Mitigation Measures

Conflicts with Plans, Ordinance or Policies related to Circulation Systems

Impact TRANS-1 The Project would not conflict with a program plan, ordinance, or policy addressing the circulation systems, including transit, roadway, bicycle, and pedestrian facilities.

Impact Analysis

The main access to the Project site would be from Pavilion Parkway, Promontory Parkway, and West Schulte Road. Access roads would also be constructed on the southern portion of the Project site. Trucks and other vehicles would access the Project vicinity from both I-580 and I-205 at Mountain House/International Parkway. Mountain House Parkway, West Schulte Road, proposed Pavilion Parkway, and proposed Promontory Parkway would be designated as the main truck routes to access Project uses. Project related truck traffic, both during construction and operations are expected to access the site to and from the west due to truck traffic restrictions on roadways to the east and north, including Hansen Road, Van Sosteen Road, and Lammers Road. Regional truck traffic is expected to use the I-580/International Parkway and I-205/International Parkway/Mountain House interchanges. Truck route intersections would be designed to meet STAA standards to accommodate the large truck and trailer turning movements.

The Project would include implementation of improvements to the existing bicycle and pedestrian network in the area, such as the installation of Class I shared use paths on all major circulation streets within the Project area, including West Schulte Road, Pavilion Parkway, and Promontory Parkway. Five-foot wide sidewalks would also be provided along Project frontages and would connect to the surrounding public pedestrian network. In addition, improvements to pedestrian crossings at signalized intersections would be made as part of the Project. Large canopy trees proposed as part of the Project's landscaping would provide shade along the sidewalks. The Project's roadway system would facilitate the use of public transportation facilities by providing bus pull outs and passenger shelters. While no bus lines currently run through in the site's immediate vicinity, these facilities would accommodate future transit service in the event of rerouting public bus lines.

The Project has been designed to comply with and help implement the SJCOG RTP/SCS. For example, the Project would extend planned roadways Promontory Parkway and Pavilion Parkway along the Project frontage as well as provide roadway improvements along West Schulte Road and construct new on-site access roadways. Consistent with RTP/SCS Strategy No. 7, the Project would include the incorporation of complete street elements (i.e., pedestrian and bicycle facilities along vehicle roadways), and consistent with RTP/SCS Strategy No. 12, the Project would make efficient use of the existing road network (i.e., I-580 and I-205). Thus, the Project would not conflict with the relevant plan regarding the roadway circulation system.

Figure 5-4, Proposed Bikeway Network (Southwest), of the Bicycle Master Plan identifies a planned Class I shared use path along West Schulte Road (San Joaquin County 2020). The Project would implement this planned bicycle path and would directly support Goal 1 of the Bicycle Master Plan, which is to invest in a high quality and efficient bicycle network in the County. The SJCOG Bicycle, Pedestrian, and Safe Routes to School Master Plan did not specifically identify any planned improvements on the Project site, but the Project would not conflict with or preclude development of any planned improvements (SJCOG



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Transportation

2012). Finally, the Project would not eliminate or adversely affect an existing or planned bikeway or pedestrian facility. Given the pedestrian and bicycle improvements proposed as part of the Project, the Project would not conflict with the relevant plans regarding pedestrian and bicycle facilities.

Transit routes do not currently operate within the immediate Project vicinity. The closest stops to the Project site include TRACER Commuter Route H stop 27, South Lammers Road west of John C. Kimball High School, located 1 mile northeast of the Project site, and TRACER Route D stop 26, 11th Street & South Lammers Road, north of Kimball High, located 1.25 miles northeast of the Project site (City of Tracy 2023a). San Joaquin County RTD Route 90 provides regional service between the Tracy Transit Station (approximately 3 miles east of the site) and Stockton, with Route 150 providing a connection from Stockton to the City of Dublin Bay Area Rapid Transit station (San Joaquin RTD 2025). The Project roadway system would accommodate potential future public transportation service by providing bus pull outs and shelters for passengers. However, the lack of any existing fixed-route bus service to the Project site is expected to result in an unmet demand for transit service. The SRTP includes a goal to expand fixed-route service between Mountain House and other unincorporated areas of the County, which would include the Project site. Implementation of Mitigation Measure TRANS-1 would ensure that the Project supports this goal, and the Project would not conflict with the applicable plan regarding transit facilities.

Based on the discussion above, with implementation of mitigation, the Project would not conflict with a program plan, ordinance, or policy addressing the circulation systems, including transit, roadway, bicycle, and pedestrian facilities. However, as noted, implementation of the Project without the extension of transit service would result in unmet transit demand. As discussed SRTP includes a goal to expand transit service in the area, no transit service to the Project site is currently planned or scheduled. While transit agencies normally expand service to areas of new demand, the Project cannot guarantee that transit agencies will provide this service. Therefore, this impact is considered significant and unavoidable.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

MM TRANS-1: Bus Service. The Project Applicant will ensure that the Project's internal transportation facilities are designed to accommodate future bus service in accordance with San Joaquin RTD's standards. Appropriate internal provisions, including bus pullouts and shelters in accordance with San Joaquin RTD's standards will be provided. The Project Applicant shall coordinate with San Joaquin RTD and TRACER to ensure that the Project is designed to serve the extension of fixed-route bus service to the Project site in accordance with the SRTP.

Level of Significance After Mitigation

Significant and Unavoidable.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Transportation

Vehicle Miles Traveled

Impact TRANS-2 The Project would conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

Impact Analysis

Pursuant to the San Joaquin County VMT Thresholds Study and consistent with the OPR's guidance, an industrial project is considered to have a less-than-significant impact related to VMT if the project's VMT per employee would achieve a 15 percent reduction compared to the baseline VMT per employee. The average VMT per employee in unincorporated areas of San Joaquin County is 38.6. Therefore, the applicable threshold of significance for the Project is 32.8 VMT per employee.

As shown in Table 3.16-3, the Project's daily VMT per employee would be 41.5 and would exceed the applicable threshold of significance. The employment VMT is the total daily home-based work VMT per employee (this two-way measurement includes only the employee's trip from home to work and return). VMT associated with trucks or non-home-based employee trips are not included in the data reported in Table 3.16-3. Total Project VMT is discussed later and documented in Table 3.16-5.

Table 3.16-3. Daily VMT Per Employee (Unmitigated)

Scenario	Work-Based VMT per Employee ¹
Project VMT	41.5 VMT per employee
Threshold of Significance (85 percent of unincorporated Countywide average)	32.8 VMT per employee
Exceed Threshold?	Yes

Notes:

¹ Calculated using the 2016 SJCOG travel demand model. VMT shown is only associated with employee travel between the Project and home.

Source: Fehr & Peers 2024.

As shown in the table above, the Project would exceed the applicable San Joaquin County employee VMT threshold and, as a result, would be required to implement Mitigation Measure TRANS-2, which requires a TDM Plan to reduce VMT to the maximum extent feasible. TDM strategies are most effective when they are applied at a citywide or regional scale and when the travel characteristics of the users or tenants of a site are known. Studies show that the maximum VMT reduction associated with the implementation of all available TDM strategies at the site, such as providing shuttles to the ACE Station, employer vanpools, carpools and car sharing programs, a subsidized transit program, secure bicycle parking, enhanced bicycle and pedestrian infrastructure, pre-tax commuter benefits, a guaranteed ride home service, alternative work schedules, and others, would be expected to reduce VMT per employee by 5 to 10 percent (CAPCOA 2021). Assuming a 5 to 10 percent VMT reduction from implementation of the TDM Plan, Project VMT per employee would be reduced to between 37.4 and 39.4, see Table 3.16-4.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Transportation

Table 3.16-4. Daily VMT Per Employee (Mitigated)

Scenario	Work-Based VMT per Employee ¹
Project VMT	37.4 – 39.4 VMT per employee
Threshold of Significance (85 percent of unincorporated Countywide average)	32.8 VMT per employee
Exceed Threshold?	Yes

Notes:

¹ Calculated using the 2016 SJCOG travel demand model. VMT shown is only associated with employee travel between the Project and home.

Source: Fehr & Peers 2024.

Since the Project VMT of 37.4 to 39.4 VMT per employee, with the implementation of mitigation, is greater than the significance threshold of 32.8 VMT per employee, additional VMT reducing mitigation measures were considered; however, no feasible mitigation measures exist that would be sufficient to fully mitigate the Project's VMT impact to a less than significant level. The available VMT reduction strategies would not reduce the Project's daily VMT per employee to below the 32.8 threshold of significance. However, MM AQ-16 which requires owners, operators, and tenants to provide employees with transit information and coordinating ridesharing amongst employees, might result in some VMT reduction. Other measures to reduce VMT were considered, however they were determined to be infeasible due to the economic, environmental, social, and technological challenges. For example, promoting active transportation generally occurs on a regional level. While the Project would construct new pedestrian and bicycle pathways on nearby roads that would further the active transportation options within the County, an effective active transportation network should be developed at a regional level. SJCOG is currently developing an Active Transportation Plan that anticipates final adoption in Winter 2026. Implementation of the Active Transportation Plan would likely encourage site employees to use pedestrian or bicycle networks to commute to work. Other measures considered include increasing transit service throughout unincorporated San Joaquin County and transit type availability. However, similar to an active transportation plan, these measures would be applicable on the regional level. The Project would construct a bus stop for transit expansion and would not interfere with the implementation of regional transportation improvements.

Table 3.16-5 shows total project generated VMT. VMT for both automobiles and trucks are presented separately. Daily automobile and truck trip generation is based on the trip generation calculations presented earlier in Table 3.16-2. Average trip length for automobile trips was obtained from the SJCOG travel demand model for the baseline while the average trip length for truck trips was obtained from the *San Joaquin Countywide Warehousing Data Collection and Travel Behavior Study* (Fehr & Peers 2024).

Table 3.16-5. Total Project VMT

Scenario	Measure	Daily Trips ¹	Average Trip Length ²	VMT Generated
Baseline plus Project	Automobile VMT	10,787	25.29	272,803
	Truck VMT	3,911	41.8	163,480

Calculated based on trip generation estimates presented in Table 3.16-2.

Automobile trip lengths from the SJCOG model, truck trip lengths from the *San Joaquin Countywide Warehousing Data Collection and Travel Behavior Study*.

Source: Fehr & Peers 2024.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Transportation

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

MM TRANS-2: Transportation Demand Management Strategies. The Project Applicant shall develop a TDM Plan for the Project, including any anticipated phasing, and shall submit the TDM Plan to the County for review and approval. The TDM Plan shall identify trip reduction strategies as well as mechanisms for funding and overseeing the delivery of trip reduction programs and strategies. The TDM Plan shall be designed to achieve the maximum feasible trip reduction from employee trips as there are no feasible measures to reduce the truck VMT. The TDM Plan shall describe which measures apply to the entire site and which, if any, apply on a parcel-by-parcel basis.

The TDM plan shall indicate the estimated vehicle trip reduction (VTR) for each strategy proposed based on published research or guidelines. For TDM measures containing ongoing operational VTR strategies, the Plan shall include an ongoing monitoring and enforcement program to ensure the Plan is implemented on an ongoing basis during project operation. For VTR strategies involving physical improvements, the project shall obtain the necessary permits/approvals from the County and install the improvements prior to the completion of the applicable Phase of the project. Applicant will resubmit the TDM Plan if there is a material change in the expected travel characteristics (i.e. number of employees, commute distance) resulting from a deviation from the permitted uses (i.e., unit count, use type, phasing).

Level of Significance After Mitigation

Significant and Unavoidable Impact.

Design Hazards

Impact TRANS-3 The Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersection(s) or incompatible uses (e.g., farm equipment)).

Impact Analysis

The Project would not substantially increase hazards due to geometric design features (e.g., sharp curves or dangerous intersections) or incompatible uses. The Project would not include hazardous features; all internal roadways, bicycle and pedestrian facilities, and transit amenities would be constructed in accordance with County design standards. No uses are proposed that would be incompatible with the surrounding transportation network. The impact would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

None Required.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report
Transportation

Level of Significance After Mitigation

Less than Significant Impact.

Emergency Access

Impact TRANS-4 The Project would not result in inadequate emergency access.

Impact Analysis

The City of Tracy and the Tracy fire district are both member agencies of the SSJCFA, which provides fire protection services to the southern portion of San Joaquin County. Fire protection services at the Project site would be provided by the TRFD and SSJCFA. TRFD Station 94 and SSJCFA Fire Station 94/CAL FIRE Station 26 are located at the southwest corner of Hansen Road and West Schulte Road, located approximately one mile west of the Project site. According to the City of Tracy Public Safety Master Plan, TRFD Fire Station 94 is planned to be relocated to a parcel within the Cordes Ranch Specific Plan Area (City of Tracy 2023b). The relocated station would be approximately one mile northwest of the Project site.

Emergency vehicle access to the Project site would be accommodated through multiple roadways, including West Schulte Road, Promontory Parkway, and Pavilion Parkway. The access driveways would be 40 feet wide and allow for both vehicle and truck access. The Project would provide safe on-site circulation of trucks and vehicles by designing driveways to meet STAA standards. Additionally, the Project would involve the construction of improvements to the existing West Schulte Road which bisects the Project site, as well as the construction of two new roadways (Pavilion Parkway and Promontory Parkway). Improvements to West Schulte Road would not result in changes that would impede emergency access to the Project site and surrounding areas. Pavilion Parkway would be a four-lane roadway and Promontory Parkway would be a six-lane roadway, and the two new roadways would be designed and constructed in accordance with all applicable roadway standards. In addition, in compliance with California Fire Code requirements, all access points into the Project site would be accessible to large emergency vehicles such as fire engines.

The Project would be required to comply with the current California Fire and Building Codes, as well as any applicable County requirements. Existing fire protection requirements include provisions associated with development standards and restrictions regarding structure design, fuel modification zone design, adequacy of emergency access, and water for firefighting. Implementation of the County's fire protection requirements and the California Building Standards Code would reduce the potential for fires at the site by providing fire hydrants throughout the site and ensuring the new development is equipped with fire protection measures such as alarms and sprinklers.

Given compliance with applicable standards, emergency vehicles would be able to access the Project site at several locations. As required by Mitigation Measure TRANS-3, the SSJCFA would also review the Project design to ensure that all SSJCFA design standards are met. The SSJCFA design standards include regulations for signage and delineation of emergency accessways and other features to ensure that emergency vehicles can adequately access the site and on-site structures and can circulate the internal roadways within the site. Project design review and approval of the SSJCFA would confirm adequate emergency vehicle access onto the site and to each building proposed as part of the Project.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Transportation

As a result, with implementation of mitigation, the Project would not result in inadequate emergency access. The impact would be less than significant with mitigation incorporated.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

MM TRANS-3: Fire Requirements. In accordance with South San Joaquin County Fire Authority requirements and design standards, provide even surface pavement, appropriate signage, delineation, and other features at all emergency access points and internal roadways to accommodate emergency vehicles. As part of the Project's final design and permitting process seek and obtain approval of the South San Joaquin County Fire Authority.

Level of Significance After Mitigation

Less Than Significant with Mitigation.

3.16.4 Notice of Preparation Comments Related to Transportation

As discussed in Section 1.0, Introduction, the County distributed a NOP of the Draft EIR for the Project beginning on March 31, 2023. The NOP was distributed for a 30-day comment period that ended on May 1, 2023. The Public Scoping Meeting on the Draft EIR for the Project was held on April 10, 2023. The comments received on the NOP and during the Public Scoping Meeting were considered in the preparation of this Draft EIR. Comments related to transportation and where they are addressed in this section are provided in Table 3.16-6. Additionally, each comment includes a brief summary of how the concern was addressed, the impact, or why additional analysis is not required. Commenters may have made comments addressing multiple EIR sections, but only specific transportation comments are provided in Table 3.16-6. See Table 1.2-1 in Section 1.0, Introduction for a summary of all comments made during the NOP scoping period.

Table 3.16-6. Comments Received on the NOP for Transportation

Affiliation	Signatory	Date	Comment Description	Location Addressed in Transportation Chapter	Response to Comment
Private Parties – Written Comments Received					
California Department of Transportation	Tom Dumas	May 1, 2023	Recommends complete street approach and accommodation for alternate modes of transportation.	Subsection 3.16.3, Environmental Impacts, Project Impacts and Mitigation Measures	The Project would include the development of bike lanes, sidewalks, and bus turnouts on International Parkway, Promontory Parkway, and West Schulte Road. Additionally, the Project would implement Mitigation Measure TRANS-1



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Transportation

Affiliation	Signatory	Date	Comment Description	Location Addressed in Transportation Chapter	Response to Comment
					that requires the Project applicant to ensure internal transportation facilities are designed to accommodate future bus service in coordination with San Joaquin RTD and TRACER.
Interested Individual	Dale and Patricia Brandes	April 24, 2023	Concerns related to Cordes Ranch Project, as well as traffic. Specifically, an increase in truck traffic along Hansen Road.	Subsection 3.16.3, Environmental Impacts, Project Impacts and Mitigation Measures	The EIR addressed all CEQA Appendix G questions related to traffic and would implement Mitigation Measures TRANS-1 to TRANS-3. Hansen Road north of I-205 is not a trucking route for the Project. According to the TIA, the Project is not projected to increase truck traffic on the portion of Hansen road north of I-205. There would be slight increases in passenger car trips, but all drivers would be required to follow local traffic laws and the speed limit. Additionally, in Fall 2023, Hansen Road was closed to through traffic at I-205 overpass. This road closure lasted 18 months while the County and City of Tracy conducted a traffic study to determine recommendations for permanent solutions and roadway improvements (City of Tracy 2023c). The traffic study was released in February 2025 (San Joaquin County Department of Public Works 2025) and the temporary



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Transportation

Affiliation	Signatory	Date	Comment Description	Location Addressed in Transportation Chapter	Response to Comment
					road closure was made permanent in April 2025 (Governor's Office of Land Use & Climate Innovation [LUCI] 2025). Cumulative impacts are evaluated in Section 4.0.
California Department of Justice	Christie Vosburg	April 11, 2023	Recommendation to use Attorney General's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document, to reduce impacts.	Section 3.3, Table 3.3-37	Project consistency with the best practices and recommended mitigation in the AG's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document is evaluated in Table 3.3-37.
Hazen Brown, on behalf of Byron-Bethany Irrigation District	Adam Brown	May 1, 2023	Concerns related to traffic circulation around the WSID canal.	Subsection 3.16.3, Environmental Impacts, Project Impacts and Mitigation Measures	The WSID canal will be undergrounded as part of Project construction. Project traffic is not anticipated to impact the WSID canal. Impacts to transportation design hazards are addressed above.
Mitchell Tsai, on behalf of Nor Cal Carpenters	Mitchell Tsai	May 1, 2023	Commenter seeks to require the use of a local workforce to address transportation impacts.	Subsection 3.16.3, Environmental Impacts, Project Impacts and Mitigation Measures	The EIR addressed all CEQA Appendix G questions related to traffic and would implement Mitigation Measures TRANS-1 to TRANS-3.
Interested Individual	Patricia Moore	April 27, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related transportation. Specifically, concerns regarding traffic on Hansen Road and Von Sosten Road.	Subsection 3.16.3, Environmental Impacts, Project Impacts and Mitigation Measures	The EIR addressed all CEQA Appendix G questions related to traffic and would implement Mitigation Measures TRANS-1 to TRANS-3. Hansen Road north of I-205 is not a trucking route for the Project. According to the TIA, the Project is not



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Transportation

Affiliation	Signatory	Date	Comment Description	Location Addressed in Transportation Chapter	Response to Comment
					projected to increase truck traffic on the portion of Hansen road north of I-205. There would be slight increases in passenger car trips, but all drivers would be required to follow local traffic laws and the speed limit. Additionally, in Fall 2023, Hansen Road was closed to through traffic at I-205 overpass. This road closure lasted 18 months while the County and City of Tracy conducted a traffic study to determine recommendations for permanent solutions and roadway improvements (City of Tracy 2023c). The traffic study was released in February 2025 (San Joaquin County Department of Public Works 2025) and the temporary road closure was made permanent in April 2025 (LUCI 2025). Cumulative impacts are evaluated in Section 4.0.
Sierra Club	Margo Praus	May 1, 2023	List of conditions of approval including measures related to traffic, as well as the Attorney General's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental	- Section 3.3, Table 3.3-37 - Section 3.3, Table 3.3-38	Project consistency with the best practices and recommended mitigation in the AG's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document is evaluated in Table 3.3-37.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Transportation

Affiliation	Signatory	Date	Comment Description	Location Addressed in Transportation Chapter	Response to Comment
			Quality Act” document.		Consistency with the other recommended conditions of approval related to air quality from Sierra Club are provided in Table 3.3-38.
San Joaquin Valley Air Pollution Control District	Brian Clements	May 1, 2023	Restatement of Air District’s standard requirements and rules that must be complied with, as well as recommendation for reduction measures, some of which apply to trucks and transportation.	Comments pertain to trucking emissions and, as such, are addressed in Section 3.3.	The SJVAPCD recommends avoiding truck routing past sensitive receptors, reduce truck idling, and implement Rule 9410. The risk posed by truck routing were evaluated within Section 3.3, Air Quality. Truck idling will be minimized with implementation of Mitigation Measure AQ-13 to limit truck idling. Additionally, according to the Specific Plan the Project will incorporate District Rule 9410.
Interested Individual	Vannie Dart	April 30, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related to traffic using Lammersville Elementary School areas and speeding.	Subsection 3.16.1, Environmental Setting.	The Project would include designated trucking routes and drivers would be required to follow all traffic laws including speed limits. Hansen Road north of I-205 is not a trucking route for the Project. According to the TIA, the Project is not projected to increase truck traffic on the portion of Hansen road north of I-205. There would be slight increases in passenger car trips, but all drivers would be required to follow local traffic laws and the speed limit. Additionally, in Fall 2023, Hansen Road was closed to through traffic at I-205



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Transportation

Affiliation	Signatory	Date	Comment Description	Location Addressed in Transportation Chapter	Response to Comment
					overpass. This road closure lasted 18 months while the County and City of Tracy conducted a traffic study to determine recommendations for permanent solutions and roadway improvements (City of Tracy 2023c). The traffic study was released in February 2025 (San Joaquin County Department of Public Works 2025) and the temporary road closure was made permanent in April 2025 (LUCI 2025). Cumulative impacts are evaluated in Section 4.0.
Interested Individual	Wendy Tocchini	April 30, 2023	Concerns related to Cortes Ranch Project, as well as overall concerns related to traffic in residential areas and speeding on Hansen Road and Von Sosten.	Subsection 3.16.1, Environmental Setting.	Hansen Road north of I-205 is not a trucking route for the Project. According to the TIA, the Project is not projected to increase truck traffic on the portion of Hansen road north of I-205. There would be slight increases in passenger car trips, but all drivers would be required to follow local traffic laws and the speed limit. Additionally, in Fall 2023, Hansen Road was closed to through traffic at I-205 overpass. This road closure lasted 18 months while the County and City of Tracy conducted a traffic study to determine recommendations for permanent solutions and roadway



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Transportation

Affiliation	Signatory	Date	Comment Description	Location Addressed in Transportation Chapter	Response to Comment
					improvements (City of Tracy 2023c). The traffic study was released in February 2025 (San Joaquin County Department of Public Works 2025) and the temporary road closure was made permanent in April 2025 (LUCI 2025). This would also reduce Project traffic on Von Sostan, which lies north of Lammersville as it forces Project traffic to use other routes that are suitable for trucks. Cumulative impacts are evaluated in Section 4.0.
City of Tracy	Kris Balaji	September 14, 2023	The comment requests additional information on how Project generated traffic will impact freeways and interchanges. The letter also asks that the developer do the following: (1) construct West Schulte Road to its ultimate width determined by the City from Pavilion Parkway to the eastern boundary of the Project site; (2) construct Pavilion Parkway to its ultimate width as determined by the City from Schulte Road to Promontory Parkway; (3) construct Promontory Parkway to its ultimate width as determined by the City from Pavilion Parkway to the	- Subsection 3.16.3, Environmental Impacts, Project Impacts and Mitigation Measures - Appendix O	Appendix O includes the TIA prepared by Keir & Wright for the Project. The TIA evaluates the daily trips and trip patterns during baseline and cumulative conditions. Section 2.0, Project Description details all roadways construction and roadway improvements proposed for Pavilion Parkway, Promontory Parkways, and West Schulte Road. The Specific Plan details the landscaping setbacks and roadway medians that the development would include on all roadways. The new roadways would be designed and constructed to match adjacent development.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Transportation

Affiliation	Signatory	Date	Comment Description	Location Addressed in Transportation Chapter	Response to Comment
			development's easterly boundary; (4) construct raised landscaped and irrigated medians on all Promontory Parkway, Pavilion Parkway, and Schulte Road to restrict truck movements to move towards International Parkway; and (5) prepare a traffic study. The comment also requests an analysis for opening day operations and cumulative conditions, intersection studies, discourage trucks using Lammers Road, and utilize the City's roadway design standards.		
Private Parties – Comment Cards at Scoping Meeting					
Interested Individual	Dale and Patricia Brandes	April 10, 2023	Concerns related to Cordes Ranch Project, as well as traffic on Hansen Road and Von Sosten Road.	Subsection 3.16.3, Environmental Impacts, Project Impacts and Mitigation Measures	The EIR addressed all CEQA Appendix G questions related to traffic and would implement Mitigation Measures TRANS-1 to TRANS-3. Hansen Road north of I-205 is not a trucking route for the Project. According to the TIA, the Project is not projected to increase truck traffic on the portion of Hansen road north of I-205. There would be slight increases in passenger car trips, but all drivers would be required to follow local traffic laws and the speed limit.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Transportation

Affiliation	Signatory	Date	Comment Description	Location Addressed in Transportation Chapter	Response to Comment
					Additionally, in Fall 2023, Hansen Road was closed to through traffic at I-205 overpass. This road closure lasted 18 months while the County and City of Tracy conducted a traffic study to determine recommendations for permanent solutions and roadway improvements (City of Tracy 2023c). The traffic study was released in February 2025 (San Joaquin County Department of Public Works 2025) and the temporary road closure was made permanent in April 2025 (LUCI 2025). Cumulative impacts are evaluated in Section 4.0.
Interested Individual	Dotty Nygard	April 10, 2023	Request to follow Attorney General's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document.	Section 3.3, Table 3.3-37	Project consistency with the best practices and recommended mitigation in the AG's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document is evaluated in Table 3.3-37.
Interested Individual	Keith Vanderveen	April 10, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related to traffic on Hansen Road and on Von Sosten Road.	Subsection 3.16.3, Environmental Impacts, Project Impacts and Mitigation Measures	The EIR addressed all CEQA Appendix G questions related to traffic and would implement Mitigation Measures TRANS-1 to TRANS-3. Hansen Road north of I-205 is not a trucking route for the Project. According to the TIA, the Project is not



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Transportation

Affiliation	Signatory	Date	Comment Description	Location Addressed in Transportation Chapter	Response to Comment
					projected to increase truck traffic on the portion of Hansen road north of I-205. There would be slight increases in passenger car trips, but all drivers would be required to follow local traffic laws and the speed limit. Additionally, in Fall 2023, Hansen Road was closed to through traffic at I-205 overpass. This road closure lasted 18 months while the County and City of Tracy conducted a traffic study to determine recommendations for permanent solutions and roadway improvements (City of Tracy 2023c). The traffic study was released in February 2025 (San Joaquin County Department of Public Works 2025) and the temporary road closure was made permanent in April 2025 (LUCI 2025). This would also reduce Project traffic on Von Sostem, which lies north of Lammersville as it forces Project traffic to use other routes that are suitable for trucks. Changes to the level of service from the Project were evaluated within the TIA. Cumulative impacts are evaluated in Section 4.0.
Interested Individual	Shawn Strickland	April 10, 2023	Concerns related to Cordes Ranch	Subsection 3.16.3,	The EIR addressed all CEQA Appendix G



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Transportation

Affiliation	Signatory	Date	Comment Description	Location Addressed in Transportation Chapter	Response to Comment
			Project, as well as overall concerns related to traffic on Schulte Road to Patterson Pass.	Environmental Impacts, Project Impacts and Mitigation Measures	questions related to traffic and would implement Mitigation Measures TRANS-1 to TRANS-3. Changes to the level of service from the Project were evaluated within the TIA including impacts to West Schulte Road. Patterson Pass may be used from West Schulte Road to I-580 on ramps and therefore would not see a large increase of traffic west of I-580. Cumulative impacts are evaluated in Section 4.0.
Interested Individual	Wendy Tocchini	April 10, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related to traffic on Hansen Road.	Subsection 3.16.3, Environmental Impacts, Project Impacts and Mitigation Measures	The EIR addressed all CEQA Appendix G questions related to traffic and would implement Mitigation Measures TRANS-1 to TRANS-3. Hansen Road north of I-205 is not a trucking route for the Project. According to the TIA, the Project is not projected to increase truck traffic on the portion of Hansen road north of I-205. There would be slight increases in passenger car trips, but all drivers would be required to follow local traffic laws and the speed limit. Additionally, in Fall 2023, Hansen Road was closed to through traffic at I-205 overpass. This road closure lasted 18 months while the County and City of Tracy conducted a traffic study to



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Transportation

Affiliation	Signatory	Date	Comment Description	Location Addressed in Transportation Chapter	Response to Comment
					determine recommendations for permanent solutions and roadway improvements (City of Tracy 2023c). The traffic study was released in February 2025 (San Joaquin County Department of Public Works 2025) and the temporary road closure was made permanent in April 2025 (LUCI 2025). Cumulative impacts are evaluated in Section 4.0.



3.17 TRIBAL CULTURAL RESOURCES

This section describes the environmental setting for tribal cultural resources (TCRs), including the existing Project site conditions, regulatory setting, and potential impacts that could result from the Project, and, if significant impacts are identified, the mitigation measures that would reduce these impacts. This discussion is based in part on the results of County outreach to tribal entities as required under CEQA (PRC Section 21080.3.1 *et seq.* [AB 52]) and the Government Code (§65352.3 [SB 18]). AB 52, as well as background information and survey results from the Cultural Resources Inventory and Evaluation Report prepared by Solano Archeological Services, LLC, September 2025 (Solano 2025), included in Appendix F to this EIR. Outreach correspondence documentation is provided as Appendix P.

3.17.1 Environmental Setting

The County Community Development Department sent letters to the NAHC and individual tribal entities under both AB 52 and SB 18 on August 9, 2022, and October 10, 2022, respectively, inviting them to consult for both.

The following tribal entities and individuals were sent invitations to consult on the Project:

- NAHC
- United Auburn Indian Community
- North Valley Yokuts Tribe
- California Valley Miwok Tribe
- California Tribal TANF Partnership
- Buena Vista Rancheria of Me-Wuk Indians

As of the date of publication of this EIR, no correspondence or requests for consultation from tribal entities or individuals were received by the County under either AB 52 or SB 18. Furthermore, no TCRs were identified within the Project footprint, following the review of the Sacred Lands Files at the NAHC or following the invitations to consult sent to tribes identified by the NAHC as having ancestral ties to the entire County.

3.17.2 Regulatory Setting

Federal

No federal regulations related to tribal cultural resources are relevant to the Project.

State

The following state regulations pertaining to TCRs apply to the Project. Please refer to Section 3.5, Cultural Resources, for a detailed list of applicable state regulations that relate to cultural resources.

Public Resources Code Section 5097.98

PRC Section 5097.98 provides protocol for the discovery of human remains. It states that “when the commission receives notification of a discovery of Native American human remains from a County Coroner pursuant to subdivision (c) of Section 7050.5 of the Health and Safety Code, it shall immediately



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Tribal Cultural Resources

notify persons believed to be most likely descended from the deceased Native American.” It also sets forth provisions for descendants’ preferences for treatment of the human remains and what should be done if the commission is unable to identify a descendant.

Native American Heritage Commission

Section 5097.91 of the PRC established the NAHC, whose duties include the inventory of places of religious or social significance to Native Americans and the identification of known graves and cemeteries of Native Americans on private lands. Under Section 5097.91 of the PRC, a State policy of noninterference with the free expression or exercise of Native American religion was articulated along with a prohibition of severe or irreparable damage to Native American sanctified cemeteries, places of worship, religious or ceremonial sites or sacred shrines located on public property. Section 5097.98 of the PRC specifies a protocol to be followed when the NAHC receives notification of a discovery of Native American human remains from a County Coroner. Section 5097.5 defines the unauthorized disturbance or removal of archaeological, historic, or paleontological resources located on public lands as a misdemeanor. Additionally, among the functions of the NAHC is maintenance of lists of Native American Contacts and Most Likely Descendants (MLDs).

- **Native American Contacts.** Project proponents or their designees are required by law to contact NAHC and advise the Commission of the purpose and location of proposed projects, and request NAHC to provide a list of Native American individuals and organizations that may have concerns regarding the project or its potential effects. Upon receipt of the list, the project proponent is responsible to contact the individuals and organizations listed, furnishing each with a statement of the project’s purpose and a map of its location. If the Native American contacts do not respond within two weeks, the proponent should undertake contact by telephone and maintain a log documenting all efforts to communicate with the Native American contacts. The Native American contacts are not to be confused with MLDs, discussed below.
- **MLDs.** The NAHC maintains a list of most likely descendants (MLDs), those persons regarded as most likely descended from a deceased Native American. In the event that human remains are found in a location other than a dedicated cemetery and the remains are identified as Native American, the county coroner is required to contact NAHC. Designated MLDs have the authority to specify the treatment and disposition of Native American human remains. MLDs constitute a separate group from Native American contacts.

California Government Code Section 65352.3 (SB 18)—Senate Bill 18—Protection of Tribal Cultural Places

SB 18 (California Government Code Section 65352.3) incorporates the protection of California traditional tribal cultural places into land use planning for cities, counties, and agencies by establishing responsibilities for local governments to contact, refer plans to, and consult with California Native American tribes as part of the adoption or amendment of any general or specific plan proposed on or after March 1, 2005. SB 18 requires public notice to be sent to tribes listed on the NAHC SB 18 Tribal Consultation list within the geographical areas affected by the proposed changes. Tribes must respond to a local government notice within 90 days (unless a shorter time frame has been agreed upon by the tribe), indicating whether or not they want to consult with the local government. Consultations are for the purpose of preserving or mitigating impacts to places, features, and objects described in Sections 5097.9



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Tribal Cultural Resources

and 5097.993 of the PRC that may be affected by the proposed adoption or amendment to a general or specific plan.

Public Resources Code Sections 21080.3.1 et seq. & 21074 (AB 52)—Effects on Tribal Cultural Resources

AB 52 amended the CEQA statute to identify an additional category of resource to be considered under CEQA, called “tribal cultural resources.” It added PRC Section 21074, which defines “tribal cultural resources” as follows:

(a) “Tribal cultural resources” are either of the following:

- 1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - A. Included or determined to be eligible for inclusion in the [California Register of Historic Resources] CRHR.
 - B. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- 2) 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

Assembly Bill 52—Effects on Tribal Cultural Resources

AB 52 was signed into law on September 25, 2014, and provides that any public or private “project with an effect that may cause a substantial adverse change in the significance of a Tribal Cultural Resource (TCR) is a project that may have a significant effect on the environment.” Under prior law, TCRs were typically addressed under the umbrella of “cultural resources”. However, AB 52 formally added the category of “tribal cultural resources” to CEQA and extends the consultation and confidentiality requirements to all projects, rather than just projects subject to SB 18, as discussed above.

AB 52 requires consultation with California Native American tribes. By including the consideration of TCRs early in the CEQA process, the legislature intended to ensure that local and tribal governments, public agencies, and applicants would have information available early in each project’s planning process, to identify and address potential adverse impacts to TCRs. By taking this proactive approach, the Legislature also intended to reduce the potential for delay and conflicts in the environmental review process. To help determine whether a project may have such an effect, the PRC requires a Lead Agency to notify and consult with any California Native American tribe that requests consultation. The County maintains an AB 52 list with tribes that are traditionally and culturally affiliated with the geographic area of the Project.

The purpose of the consultation is to determine if TCRs are present or may be impacted by a proposed project. The parties must consult in good faith, and consultation is deemed concluded when either: (1) the



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Tribal Cultural Resources

parties agree to measures to mitigate or avoid a significant effect on a TCR (if such a significant effect exists); or (2) when a party concludes that mutual agreement cannot be reached. Mitigation measures agreed upon during consultation must be recommended for inclusion in the environmental document. AB 52 also identifies mitigation measures that may be considered to avoid significant impacts if there is no agreement on appropriate mitigation. Recommended measures include:

- Preservation in place.
- Protecting the cultural character and integrity of the resource.
- Protecting the traditional use of the resource.
- Protecting the confidentiality of the resource.
- Permanent conservation easements with culturally appropriate management criteria.

Local

San Joaquin County General Plan

The General Plan presents a vision for the County's future, looking ahead to 2035. This long-range planning document includes a comprehensive framework for the County's physical, economic, and social development and environmental resources preservation, as well as policies to guide day-to-day decisions. The General Plan emphasizes that future development must occur in a way that makes the most of existing infrastructure and public facilities, minimizes impacts to natural resources, expands opportunities for job growth, restores and revitalizes unincorporated communities, and provides greater opportunities to all County residents.

The General Plan includes the following goal and policy related to TCRs that are applicable to the Project (San Joaquin County 2016):

Goal NCR-6: To protect San Joaquin County's valuable architectural, historical, archeological, and cultural resources.

- **NCR-6.6: Tribal Consultation.** The County shall consult with Native American tribes regarding proposed development projects and land use policy changes consistent with the State's Local and Tribal Intergovernmental Consultation requirements.

3.17.3 Environmental Impacts

This section analyzes the Project's potential to result in significant impacts related to TCRs. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid impacts.

Methodology

Under CEQA, the evaluation of impacts to TCRs consists of two parts: (1) identification of TCRs within a project site or immediate vicinity through AB 52 consultation; and (2) a determination of whether the project may result in a "substantial adverse change" in the significance of the identified resources. The



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Tribal Cultural Resources

impact analysis in this section is based on the results of archival research, the cultural resources survey of the Project site conducted by Solano in 2021, and the results of AB 52 and SB 18 consultation undertaken between the County and tribes. Compiled correspondence related to tribal outreach is included as Appendix P.

Thresholds of Significance

The significance criteria used to identify TRC impacts is from Appendix G of the CEQA Guidelines. For the purposes of this EIR, implementation of the Project would cause a significant impact on TCRs if it would do the following:

- a. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
 - ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Project Impact Analysis and Mitigation Measures

Effects to the Significance of a TCR

Impact TCR-1	The Project would not cause a substantial adverse change in the significance of a TCR, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe.

Impact Analysis

As discussed further in Section 3.5, Cultural Resources, there were no listed resources identified or determined eligible for listing in the CRHR on the Project site. In addition, on-site TCRs were not identified through NAHC correspondence or through AB 52 consultation efforts. No TCRs were identified in the Project site (Solano 2025). No tribes requested consultation as of the date of this publication. Therefore, construction and operation of the proposed Project would have no impact to TCRs as defined in PRC Section 5020.1(k) and PRC Section 5024.1.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Tribal Cultural Resources

Level of Significance After Mitigation

No Impact.

3.17.4 Notice of Preparation Comments Related to Tribal Cultural Resources

As discussed in Section 1.0, Introduction, the County distributed a NOP of the Draft EIR for the Project beginning on March 31, 2023. The NOP was distributed for a 30-day comment period that ended on May 1, 2023. The Public Scoping Meeting on the Draft EIR for the Project was held on April 10, 2023. The comments received on the NOP and during the Public Scoping Meeting were considered in the preparation of this Draft EIR. Comments related to tribal cultural resources and where they are addressed in this section are provided in Table 3.17-1. Additionally, each comment includes a brief summary of how the concern was addressed, the impact, or why additional analysis is not required. Commenters may have made comments addressing multiple EIR sections, but only specific tribal cultural resource comments are provided in Table 3.17-1. See Table 1.2-1 in Section 1.0, Introduction for a summary of all comments made during the NOP scoping period.

Table 3.17-1. Comments Received on the NOP for Tribal Cultural Resources

Affiliation	Signatory	Date	Comment Description	Location Addressed in Tribal Cultural Resources Chapter	Response to Comment
Private Parties – Written Comments Received					
Native American Heritage Commission	Priscilla Torres-Fuentes	April 3, 2023	Referral response and restatement of AB 52 and SB 18 requirements.	- Subsection 3.17.3, Environmental Impacts, Project Impacts and Mitigation Measures - Appendix P	A cultural resources survey of the Project site conducted by Solano in 2021, and the results of AB 52 and SB 18 consultation undertaken between the County and tribes. Compiled correspondence related to tribal outreach responses are included in Appendix P.



3.18 UTILITIES AND SERVICE SYSTEMS

This section describes the environmental setting for utilities and service systems including the existing site conditions, regulatory setting, and potential impacts that would result from the Project, and, if significant impacts are identified, the mitigation measures that would reduce these impacts. Additional detail and background on utility and service systems are based, in part, on the Water Management Plan prepared by Kier and Wright on August 24, 2023, included in Appendix J to this EIR; and the Water Supply Assessment (WSA) prepared by Kier and Wright on May 11, 2023, included in Appendix L to this EIR; and the Title 22 Engineering Report prepared by Kier and Wright on January 31, 2023 included in Appendix M to this EIR.

3.18.1 Environmental Setting

Water

According to the General Plan EIR, potable water for irrigation and domestic use in the County is provided through multiple agencies and water projects, including federal, regional, and local water districts, special districts, and private systems (San Joaquin County 2014). Most water supply districts in the County have been moving away from using groundwater sources and have transitioned to using surface water to reduce overdraft of groundwater. The Central Valley Project (CVP) delivers approximately seven million acre-feet per year (AFY) of surface water for agricultural, urban, and wildlife uses throughout the Central Valley, including San Joaquin County. Approximately five million AFY are dedicated to farmland irrigation, and 600,000 AFY are dedicated to municipal and industrial uses in the Central Valley. The remainder is distributed to CVP contractors on the San Joaquin River and Mendota Pool, conveyed through the Luis Canal, reserved for water right holders in the Stanislaus River watershed, or stored in the New Melones Reservoir.

Irrigation districts within the County provide a reliable and economical source of irrigation water to the agricultural areas of the County. Some irrigation districts provide water to cities and water districts that process the water for domestic use. Irrigation districts in the County also treat and distribute domestic water and provide other services such as electricity. There are 14 irrigation districts throughout the County that provide irrigation water to agricultural areas. According to the WSA prepared by Kier and Wright on May 11, 2023 (Appendix L) for the Project, the water supply for the existing orchard present at the Project site is surface water from the WSID, which has recently been consolidated with the BBID (Kier and Wright 2023a). The WSID is located within the Tracy Planning Area and provides water for irrigation to approximately 30 farms spanning 6,589 acres of land. The BBID provides water for approximately 14,174 acres of land located in the southwestern portion of the County, in the Tracy and Mountain Housing Planning Areas, and extending from the Old River north of Mountain House south of Highway 132. Approximately 20,600 AFY of water are purchased through the CVP by BBID for delivery to agricultural and domestic users (San Joaquin County 2014).

The Project would supply all water demand (domestic, irrigation, and fire) via three on-site wells that would extract groundwater from the Tracy Subbasin. The Project would be served by a non-transient non-community water system, defined as a water system that regularly supplies water to at least 25 of the same people for at least six months of the year (USEPA 2025). The water system would be operated by the permittee or a qualified entity, pursuant to the California Health & Safety Code, under a permit issued



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Utilities and Service Systems

by the San Joaquin County Environmental Health Department (EHD). The State Water Resources Control Board, Division of Drinking Water (DDW) has directed that if the Project site were ever annexed into the City of Tracy, the Project would need to coordinate with the City of Tracy in order to connect to the City of Tracy's water system. The scope of this analysis only includes the construction and operation of the Project as described within the Project Description, see Section 2.0. The Project is not proposing to be annexed within the City of Tracy or connect to City water and, as such, are not included in this analysis.

Wastewater

Sanitary sewer service within the County is provided by several special districts, including community service districts, public utility districts, sanitary districts, and sewer maintenance districts. Some special districts are connected to cities but operated independently, while other districts were created to serve planned developments that were never built. Some agencies provide sewer collection services only, and contract with major sewer districts who have sewer treatment facilities for wastewater treatment and disposal (San Joaquin County 2014). The Project site is not located within an existing sewer district.

The Project applicant submitted an application to the CVRWQCB on February 1, 2023 for the development of an on-site wastewater treatment system and sludge drying ponds. The wastewater treatment site would be centrally located on the northern portion of the Project site and would be constructed in the lowest elevation to allow for the majority of the Project's wastewater to gravity feed to the proposed wastewater treatment facility. Wastewater would be collected and conveyed to an equalization basin prior to entering a packaged wastewater treatment plant. The wastewater treatment system would be connected to the first building on the site and expanded to subsequent buildings as they are constructed. The wastewater treatment plant site would also house the proposed recycled water facilities. Recycled water would be considered disinfected, tertiary treated recycled water (pursuant to the State Water Resources Control Board [SWRCB]) and would be used for landscape irrigation of the site (Kier and Wright 2023b).

Storm Drainage

San Joaquin County is the primary provider for storm drainage infrastructure to unincorporated areas of the County. Many communities do not have a storm drainage system in place and other communities rely entirely on surface drainage to convey stormwater. Surface drainage systems typically receive little maintenance and may experience increased instances of flooding (San Joaquin County 2014).

The existing Project site slopes approximately one percent to the northeast and does not include any existing storm drain infrastructure. Under existing conditions, off-site stormwater ponds to the south of West Schulte Road and during a 100-year, 24-hour storm event, the stormwater overtops the roadway and ponds onto an 128.5 acre portion of the Project site on the southwestern portion, north of West Schulte Road. This portion of the Project site is bermed by the WSID canal causing off-site stormwater flows to pond onsite until it overtops the canal bank and drains into the WSID canal (Kier and Wright 2023b).

Detention and treatment basins are proposed to serve new development on the Project site. The primary need for detention basins is to provide significant stormwater quality enhancement at the site. The stormwater generated at the site by the Project would pass through a series of water quality basins and then flow into detention basins. The stormwater detention basin adjacent to the water and wastewater



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Utilities and Service Systems

facilities for the Project would be the source water for supplemental stormwater deliveries to the recycled water storage tank. These deliveries are anticipated to only occur in the winter and would be used to help reduce Total Dissolved Solids (TDS) concentrations in the recycled water prior to use (Kier and Wright 2023a). When supplemental stormwater is not needed, water stored within the detention basins would be discharged to the WSID canal. Each detention basin would have an outflow to the WSID channel with two of the detention basins to be constructed with gravity outfalls and the other two detention basins equipped with a pump to discharge water detained in the basin. The proposed detention basins would also attenuate peak flows to meter downstream releases of stormwater to reduced rates. All proposed detention basins would be sized to accommodate the 100-year 24-hour storm under build-out conditions as well as the off-site stormwater that flows on-site during a 100-year, 24-hour storm. Treatment basins are designed to treat water from small storm events (less than 1 inch of rainfall) prior to discharge into the detention basins. Four detention basins would be constructed on the northern side of the Project site and an additional four treatment basins would be constructed on the southern side of the Project site, see Figure 7.

The storm drainage system for the Project would consist of inlets, piping, and bio-treatment and detention ponds that would provide for stormwater conveyance and treatment as well as transport to the recycled water tank, as necessary. The four bio-treatment basins would be constructed on the southern portion of the Project site and would provide the treatment of stormwater, discharged via a system of inlets and piping. Another system of pipes would extend to the north and discharge the treated stormwater to the detention basins located on the northern portion of the Project site. The four detention basins within the northern portion of the Project site would also provide the treatment of stormwater falling on the northern parcels or flowing into the northern parcels via a system of inlets and piping before ultimately discharging into the canal. As identified in the Preliminary Technical Report for the Expansion of the International Park of Commerce prepared by Kier and Wright in January 2023, the Project is negotiating an agreement with the BBID that would allow for the metered discharge of the stormwater from the detention basins to the existing WSID Upper Main Canal bisecting the site during large storm events or when there is no remaining capacity to store treated stormwater on-site (Kier and Wright 2023c). In the event stormwater cannot be discharged off-site, the Project Applicant has prepared a stormwater optionality design that would size up the detention basins to fully capture and contain two consecutive 10-year, 48-hour storms for infiltration and treatment. BMPs in the 2020 SWQCCP would be implemented in the design of the Project, as appropriate, to reduce the directly connected impervious areas and to promote a higher level of stormwater quality.

Solid Waste

The unincorporated County is divided into six solid waste collection franchise areas, which are serviced by five solid waste collection service providers. Tracy Delta Solid Waste Management currently provides services to the southeastern portion of the County for the collection, transportation and disposal of refuse and garbage, including the collection of recyclable material, and would serve the Project. There are three active solid waste disposal/landfill facilities in the County including the Foothill Landfill, North County Landfill, and Forward Landfill. The Foothill Landfill and North County Landfill are Class III Landfills that are owned and operated by the County Public Works Department. The Forward Landfill is a Class II Landfill and is owned and operated by Forward Inc./Allied Waste North America. The County also operates the Lovelace Materials Recovery Facility and Recycle Center which is a Household Hazardous Waste Facility. Solid waste collected by Tracy Delta Solid Waste Management would be taken to the



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Utilities and Service Systems

Tracy Material Recovery Facility and Transfer Station before being transported to the Foothill Sanitary Landfill, in the eastern County area. The County has implemented several special waste collection and recycling programs and composting, enhanced recycling, and waste oil programs are provided at recycling centers, materials recovery facilities, and transfer facilities throughout the County (San Joaquin County 2014).

The proposed land uses on the Project site would generate additional solid waste. Tracy Delta Solid Waste Management would continue to provide disposal and recycling services for the Project upon build-out.

Electric Power, Natural Gas, and Telecommunication

The electrical service providers in the County, which include PG&E, Modesto Irrigation District, Lodi Electric Utility, and the Port of Stockton, purchase wholesale energy and distributes it across the County through a series of substations, transformers, and transmission lines to reach the end customer. Two major 500 MW transmission lines traverse the County and connect San Joaquin to the national power grid. PG&E owns most of the transmission and distribution lines across the County, including those on and in proximity to the Project site (San Joaquin County 2014).

PG&E also distributes natural gas to San Joaquin County. Natural gas is stored in underground fields and transported through high pressure distribution lines to regulators to reduce the pressure to local distribution mains. From the local distribution main, small diameter lines serve individual customers. The primary natural gas transmission lines in the County run along I-5, I-580, and State Route 12 and are owned by PG&E (San Joaquin County 2014).

For the Project, a joint trench system is proposed that would include telephone, cable TV, possible ancillary fiber system conduits (dark fiber), conduits and conductors for street lighting and traffic signals, and such other equipment and facilities as determined by the County.

3.18.2 Regulatory Setting

Federal

Clean Water Act (CWA)

The CWA is the cornerstone of surface water quality protection in the United States. The statute employs a variety of regulatory and non-regulatory tools to sharply reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff.

Section 303 of the CWA requires states to adopt water quality standards for all surface waters of the United States. Where multiple uses exist, water quality standards must protect the most sensitive use. Water quality standards are typically numeric although narrative criteria based on bio-monitoring methods may be employed where numerical standards cannot be established or where they are needed to supplement numerical standards. The SWRCB and the RWQCB are responsible for ensuring implementation and compliance with the provisions of the Federal CWA.

In 1972, the CWA was amended to provide that the discharge of pollutants to waters of the United States from any point source is unlawful unless the discharge is in compliance with a NPDES permit. The 1987



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Utilities and Service Systems

amendments to the CWA added Section 402(p), which establishes a framework for regulating municipal and industrial stormwater discharges, including discharges associated with construction activities, under the NPDES program.

State

Senate Bills 610

The purpose and legislative intent of SB 610 is to preclude projects from being approved without specific evaluations being performed and documented by the local water provider proving that water is available to serve the project.

SB 610 (codified at Section 10910 – 10915 of the California Water Code) requires the preparation of a WSA for large-scale development projects, typically defined as any project involving a water demand increase equivalent to that associated with 500 or more dwelling units or other types of developments (e.g., hotels and motels, commercial buildings, industrial parks, etc.) using a comparable amount of water. The WSA must evaluate the water supply available for new development based on the anticipated demand. For the broad range of projects that are subject to this law, the statutory WSA must be requested by the Lead Agency from the local water provider at the time the Lead Agency determines that an EIR is required for the project under CEQA, or the Lead Agency may prepare the WSA.

The WSA required by SB 610 is to be prepared sufficiently early in the development review process that it can be incorporated in the CEQA evaluation and documentation of a project. The Project is subject to CEQA, and it is considered a “project” as defined by California Water Code Section 10912. Therefore, the County, as Lead Agency, is required to prepare an SB 610 WSA. A WSA for the Project was prepared by Kier and Wright in May 2023 that analyzes the sufficiency of the proposed water supplies to meet the Project’s projected future water demands under all hydrologic conditions (normal years, single dry years, and multiple dry years), in addition to the existing and future water uses of the area within a 20-year planning horizon, see Appendix L.

Sustainable Groundwater Management Act (SGMA)

The Sustainable Groundwater Management Act (SGMA) established a new structure for managing California’s groundwater resources at the local level by local agencies. The SGMA required Groundwater Sustainability Agencies (GSAs) to form in the state’s high- and medium-priority basins and subbasins by June 30, 2017. The California Water Code states that a GSA shall have five years from the date of reprioritization to be managed under a Groundwater Sustainability Plan (GSP). The planning deadline for California’s first round of GSPs was January 31, 2020, for basins subject to critical conditions of overdraft, and January 31, 2022, for all other high- and medium-priority basins. The Tracy Subbasin, which underlies the Project site, is designated as a medium-priority subbasin. A GSP for the Tracy Subbasin was adopted in 2022 and approved by the California Department of Water Resources in January 2024.

Statewide Water Conservation Act of 2009 (Senate Bill X7-7)

In November 2009, the California legislature passed SB X7-7 requiring a 20 percent reduction in per capita urban water use by 2020, with an interim target of 10 percent in 2015. The legislation requires urban water users to develop consistent water use targets and to use those targets in their UWMPs.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Utilities and Service Systems

Assembly Bill 1668 and Senate Bill 606

AB 1668 and SB 606 establish guidelines for efficient water use and a framework for the implementation and oversight of the new standards, which must be in place by 2022. The two bills strengthen the state's water resiliency in the face of future droughts.

California Department of Resources Recycling and Recovery (CalRecycle; formerly the California Integrated Waste Management Board)

CalRecycle oversees, manages, and monitors solid waste generated in California. It provides limited grants and loans to help California cities, counties, businesses, and organizations meet the state's waste reduction, reuse, and recycling goals. CalRecycle develops, manages, and enforces waste disposal and recycling regulations, including AB 939 and SB 1016.

Assembly Bill 939

AB 939 (PRC 41780) requires cities and counties to prepare Integrated Waste Management Plans (IWMPs) and to divert 50 percent of solid waste from landfills beginning in calendar year 2000 and each year thereafter. AB 939 also requires cities and counties to prepare Source Reduction and Recycling Elements as part of their IWMPs. The Source Reduction and Recycling Elements are designed to develop recycling services to achieve diversion goals, stimulate local recycling in manufacturing, and stimulate the purchase of recycled products.

Senate Bill 1016

SB 1016 requires that the 50-percent solid waste diversion requirement established by AB 939 be expressed in pounds per person per day. SB 1016 also changed the CalRecycle review process for each municipality's IWMP. The CalRecycle Board reviews a jurisdiction's compliance with diversion rate targets in accordance with a specified schedule.

Local

San Joaquin County General Plan

The General Plan presents a vision for the County's future, looking ahead to 2035. This long-range planning document includes a comprehensive framework for the County's physical, economic, and social development and environmental resources preservation, as well as policies to guide day-to-day decisions. The General Plan emphasizes that future development must occur in a way that makes the most of existing infrastructure and public facilities, minimizes impacts to natural resources, expands opportunities for job growth, restores and revitalizes unincorporated communities, and provides greater opportunities to all County residents.

The General Plan includes the following goals and policies related to utilities that are applicable to the Project (San Joaquin County 2016):

Goal IS-1: To provide residents and businesses quality, cost-effective, and sustainable public facilities and services.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Utilities and Service Systems

- **Policy IS-1.1: Essential Facilities and Services.** The County shall strive to ensure that adequate public facilities and services essential for public health and safety are provided to all County residents and businesses and maintained at acceptable service levels. Where public facilities and services are provided by other agencies, the County shall encourage similar service level goals.
- **Policy IS-1.2: Infrastructure Standards.** The County shall require new developments that include improvements to existing infrastructure or new infrastructure to meet the requirements and standards of the County or other agencies providing services.
- **Policy IS-1.8: Infrastructure Financing, Design, and Construction.** The County shall require new development to fund the initial financing, design, and construction of required infrastructure facilities. All financing (including operation and maintenance) and improvement plans shall be subject to County review and approval.
- **Policy IS-1.9: Maximize Use of Existing Facilities.** The County shall require new development to be designed and sited to use existing facilities and services to the extent practical and to the extent that such a design and site choice would be consistent with good design principles.
- **Policy IS-1.12: Easement and Rights-of-Way Protection.** The County shall, in coordination with other agencies, ensure that new development does not encroach on existing public facility easements or on areas planned or needed for future rights-of-way (e.g., roadways, interchanges) and infrastructure. The County shall require, as necessary, offers of dedication for future easements.
- **Policy IS-1.13: Infrastructure Financing.** The County shall approve new development only when financial mechanisms are in place to ensure that adopted County service standards are met and that long-term infrastructure and facility maintenance can be provided.
- **Policy IS-1.16: Master Planned Facilities.** The County shall require new development including single-parcel development, to provide necessary on-site and off-site infrastructure improvements. Proposed new developments that cannot be served by an existing service provider shall be required to fund preparation of a master plan or specific plan for the parcel and adjacent areas that includes:
 - a large enough area and mix of uses to support self-sustaining infrastructure service systems;
 - detailed infrastructure and service plan, financing, and maintenance plan; and
 - approval by the Director of Public Works.

Goal IS-2: To ensure appropriate public utility agencies are in place for the long-term maintenance of infrastructure and provision of services.

- **Policy IS-2.6: New Development Requirements.** The County shall require new development to provide water, sewer, stormwater, and/or street lighting service(s), using one of the following methods, subject to County review and approval:



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Utilities and Service Systems

- Obtain a will-serve letter from an existing Special District, Community Service District, Mello-Roos Community Facilities District or other non-city public utility agency and obtain LAFCo approval for annexation or out-of-agency service;
 - Obtain a will-serve letter from a city and obtain LAFCo approval for out-of-agency service;
 - Fund the formation of a new Community Service District, Mello-Roos Community Facilities District or other non-County public utility agency that would perform ongoing maintenance; or
 - When approved by the Director of Public Works, fund the formation of a new County Service Area (CSA) that would provide ongoing maintenance services.
- **Policy IS-2.7: Service Agency Notification.** The County shall notify the appropriate agencies (e.g., cities, special districts, school districts, emergency agencies) of new development applications within their service areas early in the review process to allow sufficient time to assess impacts on facilities and services.

Goal IS-4: To ensure reliable supplies of water for unincorporated areas to meet the needs of existing and future residents and businesses, while promoting water conservation and the use of sustainable water supply sources.

- **Policy IS-4.8: Water Conservation Measures.** The County shall require existing and new development to incorporate all feasible water conservation measures to reduce the need for water system improvements.
- **Policy IS-4.13: Water Quality Standards.** The County shall require that water supplies serving new development meet State water quality standards. If necessary, the County shall require that water be treated to meet State standards and that a water quality monitoring program be in place prior to issuance of building permits.
- **Policy IS-4.15: Test Wells.** Prior to issuing building permits for new development that will rely on groundwater, the County shall require confirmation for existing wells or test wells for new wells to ensure that water quality and quantity are adequate to meet the needs of existing, proposed, and planned future development.

Goal IS-5: To maintain an adequate level of service in the water systems serving unincorporated areas to meet the needs of existing and future residents and businesses, while improving water system efficiency.

- **Policy IS-5.1: Adequate Water Treatment and Distribution Facilities.** The County shall ensure, through the development review process, that adequate water, treatment and distribution facilities are sufficient to serve new development, and are scalable to meet capacity demands when needed. Such needs shall include capacities necessary to comply with water quality and public safety requirements.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Utilities and Service Systems

- **Policy IS-5.2: Water System Standards.** The County shall require the minimum standards for water system improvements provided in Table IS-1 for the approval of tentative maps and zone reclassifications.
- **Policy IS-5.3: Water Infrastructure Fees.** As a condition of approval for new developments, the County shall require verification of payment of fees imposed for water infrastructure capacity per the fee payment schedule from the appropriate local agency prior to the approval of any final subdivision map.
- **Policy IS-5.6: Consistent Fire Protection Standards for New Development.** The County, in coordination with local water agencies and fire protection agencies, shall ensure consistent and adequate standards for fire flows and fire protection for new development.

Goal IS-6: To ensure wastewater treatment facilities and septic systems are available and adequate to collect, treat, store, and safely dispose of wastewater.

- **Policy IS-6.3: Adequate Wastewater Facilities.** The County shall ensure through the development review process that wastewater collection, treatment, and disposal facilities are sufficient to serve existing and new development, and are scalable to meet capacity demands when needed.
- **Policy IS-6.4: Wastewater System Standards.** The County shall require the minimum standards for wastewater system improvements provided in Table IS-2 for the approval of tentative maps and zone reclassifications.
- **Policy IS-6.5: Wastewater System Requirements.** For land uses required to be served by public wastewater treatment systems, new development shall be served by an existing public wastewater treatment agency or by a new public utility service agency if no public agency is empowered to provide wastewater treatment services. For land uses not requiring public wastewater treatment systems, the County may allow private wastewater systems or septic systems if the County Environmental Health Director determines that the systems meet the State Water Resources Control Board On-site Wastewater Treatment Systems Policy and the approved Local Agency Management Plan.
- **Policy IS-6.6: Wastewater Treatment System Standards.** The County shall require that the development, operation and maintenance of wastewater treatment systems meet the requirements and standards of the wastewater treatment agency and the County, including the requirements and standards of the County Environmental Health Department.
- **Policy IS-6.9: Wastewater Facility Infrastructure Fees.** As a condition of approval for new developments, the County shall have verification of payment of fees imposed for wastewater infrastructure capacity per the fee payment schedule from the local wastewater agency.

Goal IS-7: To manage stormwater from existing and future development using methods that reduce potential flooding, maintain natural water quality, enhance percolation for groundwater recharge, and provide opportunities for reuse.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Utilities and Service Systems

- **Policy IS-7.1: Adequate Stormwater Facilities.** The County shall require that stormwater drainage facilities are properly designed, sited, constructed, and maintained to efficiently capture and dispose of runoff and minimize impacts to water quality.
- **Policy IS-7.2: Stormwater Drainage System Standards.** The County shall require the minimum standards for stormwater drainage system improvements provided in Table IS-3 for the approval of tentative maps and zone reclassifications.

Goal LU-2: Promote efficient development and land use practices in new development that provide for the protection of vital resources and enhancement of communities.

- **Policy LU-2.11: Suitability for Development with On-site Sewage Disposal System.** The County shall ensure that new development that uses on-site sewage disposal meets the requirements of the State Water Resources Control Board (SWRCB) Water Quality Control Policy for Siting, Design, Operation, and Maintenance of On-site Wastewater Treatment Systems (OWTS Policy) and local health and water quality standards.
- **Policy LU-2.12: Soil Suitability and Nitrate Loading Studies.** The County shall require soil suitability and nitrate loading studies when needed to demonstrate that site conditions can safely accept wastewater in conformance with the State Water Resources Control Board On-site Wastewater Treatment Systems Policy and local health and water quality standards.

3.18.3 Environmental Impacts

This section analyzes the Project's potential to result in significant impacts on utilities and service systems. If an impact is determined to be significant, mitigation measures are identified that would reduce or avoid impacts.

Methodology

The assessment of potential impacts presented below is based on a comparison of the existing site setting with defined or anticipated conditions that would occur as a result of the Project. Where available, Project-specific studies are used to identify Project-related conditions (Kier and Wright 2023a, 2023b, 2023c). In the absence of such documentation, available information from the relevant regulatory agency is used to assess the potential difference between existing, or baseline, conditions and Project-related conditions.

Thresholds of Significance

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purposes of this EIR, implementation of the Project may result in a potentially significant impact on utilities if it would do any of the following:

- a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which would cause significant environmental effects;



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Utilities and Service Systems

- b. Not have sufficient water supply available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years;
- c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have 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. Not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Project Impacts and Mitigation Measures

Relocation of Facilities

Impact UTIL-1	The Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which would cause significant environmental effects.

Impact Analysis

The Project would involve construction of new water, wastewater treatment, and stormwater drainage facilities. Additionally, the Project would expand electric power, natural gas, and telecommunications systems. These facilities would be located entirely within the Project site and would not require installation of off-site facilities, except where connections to existing power, natural gas, or telecommunication lines within the surrounding area may be required.

These facilities would be constructed with standard construction techniques and in accordance with all regulatory requirements that address potential impacts associated with trenching activities and the use of heavy machinery. All the impacts of the construction and operation of these facilities is disclosed, analyzed and where applicable, mitigated, throughout this EIR as part of the Project.

Water

The Project site is not currently served by an existing water district and is outside the service area of existing districts. As a result, the Project proposes to supply all on-site water demands from three on-site wells that extract groundwater from the Tracy Subbasin. The Project would be served by a non-transient non-community water system. The water system would be operated by the permittee or a qualified entity pursuant to the California Health & Safety Code.

The Project would include the construction of three new on-site wells (two potable water wells and one fire water well). The fire facilities would include the well, a fire storage tank, a pump station, and the fire distribution system. The raw water facilities would include the construction of two potable water wells and pipelines to transport the raw well water to the potable water treatment plant. The treated water facilities include the potable water treatment system, water storage tanks, and potable water distribution system. In addition, the Project would include the construction of a recycled water system that would be used to



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Utilities and Service Systems

dispose of treated wastewater and would provide irrigation to all landscaping within the Project site. The discharge from the wastewater treatment system would be stored in a recycled water tank that has been tentatively sized to store 50 days of wastewater production, approximately 2.3 million gallons. The tank would fill during the non-irrigation season (winter) and drain when irrigation demands go up in the summer months. A recycled water pump station would pull water from the storage tank to the recycled water distribution system and maintain a minimum pressure of 60 psi.

The potable water treatment system is expected to be an ion exchange system. The ion exchange system selectively removes nuisance salts as waste (brine). The brine is removed and processed in a separate treatment system for dewatering and drying. Brine would be dried within lined drying beds located in the water treatment system area of the Project site. The brine drying beds will be lined but left uncovered to allow water to evaporate. Once dried, the brine would be scraped out of the drying beds and hauled off-site. Approximately 100 cubic yards of brine waste, regulated by County Environmental Health, are expected to be produced and removed from the Project site every year. The brine drying and scraping process may generate minor fugitive dust emissions, however within the drying ponds, the brine would contain moisture preventing fugitive dust from forming. All scraping and earthmoving activities would be subject to SJVAPCD Rule 403 that prevents fugitive dust generation.

The average daily demand for the potable water system would be 50 gallons per minute (gpm) at buildout and could be as high as 150 gpm during maximum daily demands. The water system would discharge water into a 100,000-gallon welded steel tank. The water from the tank would be pumped into the potable water distribution system using a combination of service pumps to meet the range of system demands. The new water system constructed on-site would be constructed to adequately handle the Project's water demand and would be constructed in accordance with all applicable regulations and standards related to the construction and operation of on-site wells and water treatment facilities, including regulations and standards set by EHD, CVRWQCB, and California Health & Safety Code. Moreover, the environmental impacts associated with the construction of the new water treatment facilities were addressed throughout this EIR. Additional water facilities are not anticipated as the Tracy Subbasin has plenty of capacity to support the Project and the amount of pumping required by the Project would not result in a significant impact to the Tracy Subbasin, see WSA (Kier and Wright 2023a). The Project construction, including the construction of the new water treatment facilities, would comply with all County and state building codes, air quality rules and regulations, local ordinances, and implement Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, CUL-1, GEO-1, GEO-2, HAZ-1, HAZ-2, HAZ-3, AQ-1, and AQ-2 to reduce the environmental impacts associated with construction. Therefore, the impact would be less than significant with mitigation.

Wastewater

The proposed wastewater treatment facility would be centrally located on the northern portion of the Project site and would be constructed in the lowest elevation to allow for the majority of the Project's wastewater to gravity feed to the facility. The wastewater treatment system would be connected to the first building on the site and expanded to subsequent buildings as they are constructed. The wastewater treatment plant site would also house the proposed recycled water facilities, to provide water for landscape irrigation of the site via a proposed on-site "purple pipe" system.

The wastewater treatment process would incorporate an equalization tank, a screening zone, a pre-anoxic (PAX) zone, two pre-aeration (PA) zones, a post-anoxic (AXP) zone, two membrane bioreactor

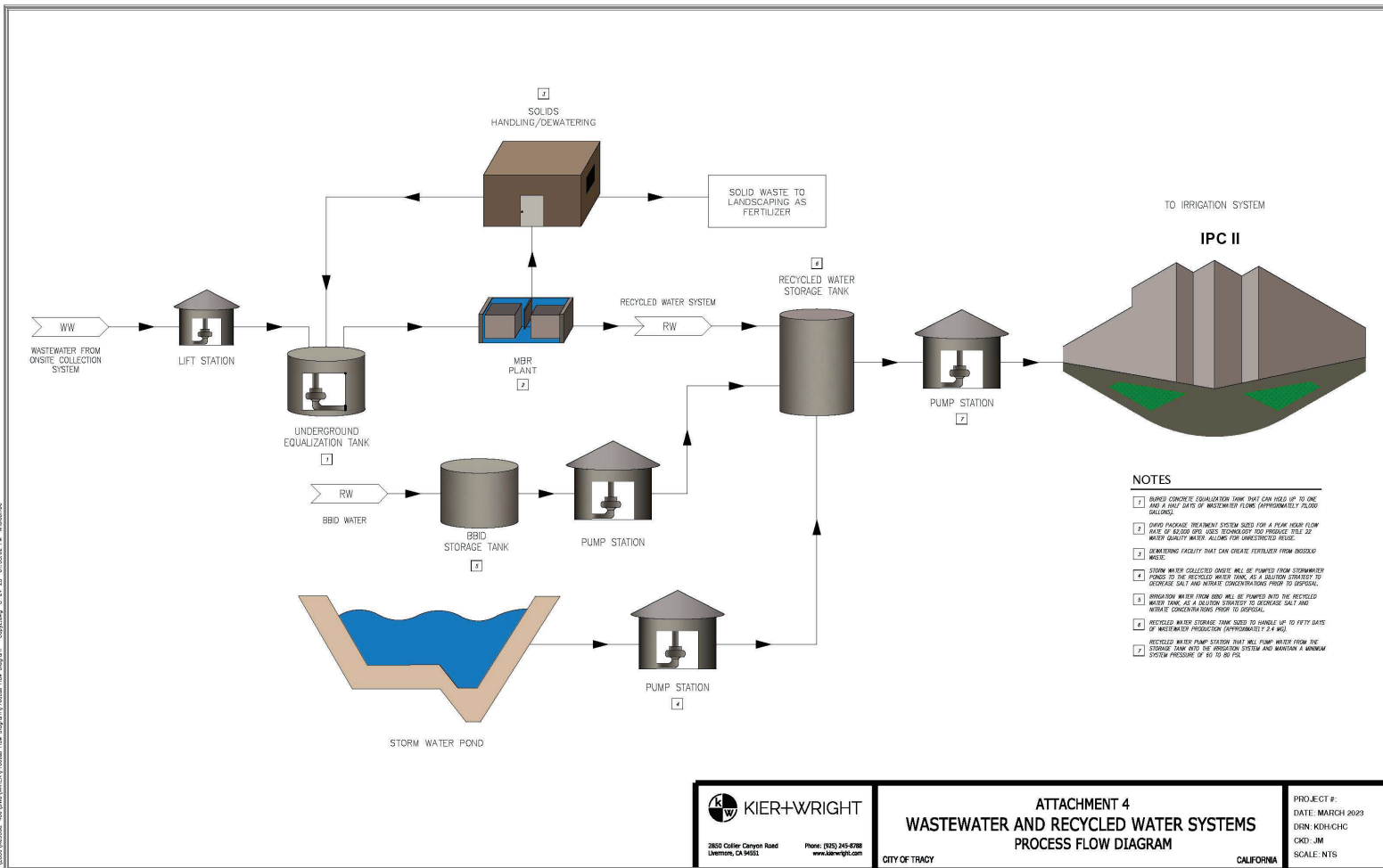


INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Utilities and Service Systems

(MBR) zones, and an ultraviolet (UV) disinfection system. Raw wastewater would be pumped from all over the Project site to a buried, concrete equalization tank with a capacity of 75,000 gallons, equal to approximately one and a half days' worth of wastewater. The equalization tank regulates the flow of wastewater from all on-site sources before it is pumped from the tank to the wastewater treatment system, which has a design flow rate of 62,000 gallons per day. The raw wastewater would travel through the screening zone with coarse and fine screens designed to remove solids. The solids would be sent to the solids handling facility constructed downstream of the wastewater treatment system. The solids produced are anticipated to be approximately 12 cubic yards per year at buildout of the Project and would be of a quality that can be disposed of on-site as fertilizer for the landscaping. The water removed in the solids handling facility would be piped into the headworks of the wastewater treatment system. The screened wastewater would flow through the PAX, PA, and AXP zones for treatment then continue to the MBR zones to be filtered using silicon carbide ceramic plate membrane units. Finally, the wastewater would flow through an UV disinfection system and be stored in a 2.4 million gallon storage tank (Kier and Wright 2023b). A depiction of the wastewater treatment process is provided in Figure 30.





Source: Kier and Wright, Draft Water Management Plan 2023

Project Location
San Joaquin County

Project
International Park of Commerce Specific Plan
Phase 2

Figure No.
30

Title

**Wastewater and Recycled Water
Systems**

INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Utilities and Service Systems

General Plan Policy IS-6.6: Wastewater Treatment System Standards, requires that the development, operation, and maintenance of wastewater treatment systems meet the requirements and standards of the wastewater treatment agency and the County, including the requirements and standards of the County EHD. The new wastewater system constructed on-site would be constructed and operated in accordance with all applicable regulations and standards related to the construction and operation of wastewater treatment facilities, including regulations and standards set by EHD, RWQCB, and California Health & Safety Code. Moreover, the environmental impacts associated with the construction of the new wastewater treatment facilities were addressed throughout this EIR. Project construction would comply with all County and state building codes, air quality rules and regulations, local ordinances, and implement Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, CUL-1, GEO-1, GEO-2, HAZ-1, HAZ-2, HAZ-3, AQ-1, and AQ-2 -to reduce the environmental impacts associated with construction. Therefore, the impact would be less than significant with mitigation.

Stormwater

The Project would include the construction of a new stormwater drainage system on-site that would provide for treatment and detention of stormwater runoff on-site. Detention basins are proposed to serve new development on the Project site. The proposed detention basins would attenuate peak flows to meter downstream releases of stormwater to reduced rates. All proposed detention basins would be sized to accommodate the 100-year 24-hour storm under build-out conditions. Treatment basins are designed to treat water from small storm events (less than 1 inch of rainfall) before discharging to the detention basins. Storm drainage for the Project would consist of a system of inlets, piping, and bio-treatment and detention ponds that would provide for stormwater conveyance and treatment as well as transport to the recycled water tank as necessary. Four detention basins would be constructed on the northern side of the Project site and an additional four treatment basins would be constructed on the southern side of the Project site, see Figure 7. BMPs in the 2020 SWQCCP would be implemented in the design of the Project, as appropriate, to reduce the directly connected impervious areas and to promote a higher level of stormwater quality. The new stormwater drainage system on-site would be constructed and operated in accordance with all applicable regulations and standards related to the construction and operation of storm drainage systems, including the 2020 SWQCCP. All on-site, stormwater runoff from the site would be treated and stored on-site. If storage capacity is limited, remaining treated stormwater from the site would be discharged into the 42-inch storm drainage pipelines that would replace the existing WSID canal. Moreover, the environmental impacts associated with the construction of the new wastewater treatment facilities were addressed throughout this EIR. Project construction would comply with all County and state building codes, air quality rules and regulations, local ordinances, and implement Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, CUL-1, GEO-1, GEO-2, HAZ-1, HAZ-2, HAZ-3, AQ-1, and AQ-2 to reduce the environmental impacts associated with construction. Therefore, the impact would be less than significant with mitigation.

Other Utilities

Electrical and gas services to the Project site would be provided by PG&E. All public electric transmission, gas, and distribution utilities on and in proximity of the Project site are owned and maintained by PG&E. A proposed joint trench system would include telephone, cable TV, possible ancillary fiber system conduits (dark fiber), conduits and conductors for street lighting and traffic signals, and such other equipment and facilities as determined by the County. Construction of all other utilities, including electrical, gas, and



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Utilities and Service Systems

telecommunication facilities, would be designed and constructed in accordance with all applicable regulations and standards. Moreover, the environmental impacts associated with the construction of the new substation were modeled and evaluated within the EIR, see Section 3.3. Project construction would comply with all County and state building codes, air quality rules and regulations, local ordinances, and implement Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, CUL-1, GEO-1, GEO-2, HAZ-1, HAZ-2, HAZ-3, AQ-1, and AQ-2 to reduce the environmental impacts associated with construction.

As discussed in Section 3.6, the Project's total mitigated electricity demand would be approximately 63,600 MWh/year and 58,322 million BTU per year. For comparison, in 2023, California utilities sold approximately 239,480,452 MWh of electricity and 2,085 billion cubic feet of natural gas were used across the State. The total mitigated operational electricity demand of the Project would represent less than 0.027 percent of the State's annual electricity sales and the Project's annual operational demand for natural gas would represent less than 0.003 percent of the State's annual natural gas demand. Therefore, the Project would not strain the existing electrical or natural gas infrastructure.

Therefore, the impact would be less than significant with mitigation.

Level of Significance Before Mitigation

Less than Significant Impact with Mitigation.

Mitigation Measures

Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, CUL-1, GEO-1, GEO-2, HAZ-1, HAZ-2, HAZ-3, AQ-1, and AQ-2 would be required.

Level of Significance After Mitigation

Less than Significant Impact.

Water Supply

Impact UTIL-2	The Project would have sufficient water supply available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

Impact Analysis

The Project site is located in unincorporated San Joaquin County, outside the City of Tracy SOI. The Project site is not served by any water utility suppliers, including the City of Tracy's water supplier. A WSA was prepared for the Project which determined that connection to the City's water system is not considered feasible due to the City's limited surface water supplies (Kier and Wright 2023a). Also, water service by Tracy is infeasible because the Project site is outside the City's SOI. Therefore, the Project proposes to supply all on-site water demands (domestic, irrigation, and fire) via three on-site groundwater wells. Two wells would satisfy the potable water demands for the Project while the third well would serve the fire system. The source of groundwater is the Tracy Subbasin. Disinfected tertiary treated recycled water would serve as a secondary source of supply to satisfy a large portion of the annual irrigation demands.

As shown in Table 3.18-1 below, the WSA determined that the Project would extract approximately 58 AFY from the Tracy Subbasin for potable water and non-potable water for the fire system. The Tracy



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Utilities and Service Systems

Subbasin has plenty of capacity to support the Project and the amount of pumping required by the Project would not result in a significant impact to the Tracy Subbasin, see WSA (Kier and Wright 2023a). Additionally, the Project's annual landscape irrigation demand was calculated using a conservative demand factor and was determined to be approximately 73 AFY. The Project landscaping includes native trees and plants and does not include any turf, consistent with AB 1572. The conservative value of 73 AFY is assumed to occur during the summer months and would therefore require supplemental water. During the summer months where peak irrigation would occur, 53 AFY of the irrigation demands would be met through treated wastewater from the Project's recycled water system, and the remaining demand would be supplemented by BBID (primarily during the summer months). BBID would supplement approximately 20 AFY to meet the Project's irrigation demands which is significantly less than the 1,500 AFY that BBID provides to the Project site under existing conditions, see Table 3.18-1.

Table 3.18-1. Project Water Demands (AFY)

	Proposed Project Demand	Recycled Water Supplement	Net New Potable Demand
Industrial Warehousing	58	0	58
Irrigation	73	53 ¹	20
Total Water Demand			78

¹ Recycled water produced from treated wastewater to supplement Project irrigation demands.

Source: Kier and Wright 2023a

Irrigation of the Project site currently requires approximately 1,500 AFY of surface water, which is served by the BBID. Development of the Project would reduce the existing 1,500 AFY demand down to 78 AFY, resulting in a net surplus of 1,422 AFY. The WSA prepared for the Project determined that the Project's domestic and irrigation water demands would be sufficiently served for the normal, single dry, and multi-year drought scenarios (Kier and Wright 2023a). Irrigation water for the site would be recycled water from the on-site treated wastewater, waters captured in the on-site stormwater basins, and if needed, would be supplemented with water from the BBID as necessary. Additionally, the WSA determined that the Project's water demand of 58 AFY would not be anticipated to increase in the future and, based on the water budget results included in the WSA, the Tracy Subbasin is capable of meeting the Project's current and future water demands (demand is well within sustainable yield). Additionally, as discussed in Impact HYD-2, the Project's water demands would not interfere with other groundwater users in the Project vicinity. Therefore, the Project would have sufficient water supply available to serve the Project and impacts would be less than significant.

Level of Significance Before Mitigation

Less than Significant Impact.

Mitigation Measures

None required.

Level of Significance After Mitigation

Less than Significant Impact



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Utilities and Service Systems

Wastewater Treatment Capacity

Impact UTIL-3	The Project would not result in a determination by the wastewater treatment provider which serves or may serve the Project that it does not have adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments.

Impact Analysis

As identified above under Impact UTIL-1, the Project would include the construction of a new on-site wastewater treatment facility that would treat all wastewater generated at the site. The new on-site wastewater treatment facility would serve only the Project's wastewater demands and would not include treatment of wastewater generated off-site. The new wastewater treatment facility would be designed and constructed to adequately handle the anticipated wastewater generation on-site. Because the Project would provide and operate its own wastewater treatment facility, and the new wastewater treatment facility would be sized to handle the Project's wastewater generation, it would not result in a determination by a wastewater treatment provider that it does not have adequate capacity to serve the Project. There would be no impact.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

None required.

Level of Significance After Mitigation

No Impact.

Solid Waste

Impact UTIL-4	The Project would not 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.

Impact Analysis

Tracy Delta Solid Waste Management currently provides services to the southeastern portion of the County for the collection, transportation and disposal of refuse and garbage, including the collection of recyclable material and would provide disposal and recycling services for the Project. Solid waste would be collected at the Tracy Material Recovery Facility and Transfer Station before being transported to the Foothill Sanitary Landfill, in the eastern County area (San Joaquin County 2014).

CalRecycle publishes solid waste generation rates based on land use types. According to CalRecycle, manufacturing/warehouse uses generate 1.42 pounds of solid waste per 100 square feet per day (CalRecycle 2026a). Based on this waste generation rate, operation of the proposed 5.36 million square feet of industrial uses is expected to generate solid waste at a rate of approximately 76,112 pounds of solid waste (approximately 38 tons) per day. The Tracy Material Recovery Facility and Transfer Station has a daily intake throughput of 1,800 tons of solid waste and on average takes in approximately 354 tons per day (CalRecycle 2026c, City of Tracy 2011). Solid waste from the Project would represent



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Utilities and Service Systems

approximately 2.6 percent of the remaining daily allotted throughput at the Tracy Material Recovery Facility and Transfer Station. Therefore, the Tracy Material Recovery Facility has capacity to intake the Project's daily solid waste. Solid waste would then be transferred to the Foothill Sanitary Landfill, which has a maximum permitted daily throughput of 1,500 tons per day. Solid waste from the Project would represent approximately three percent of the daily capacity at the Foothill Sanitary Landfill. Furthermore, the Foothill Sanitary Landfill has a permitted capacity of 138 million cubic yards and has a remaining capacity to accommodate 125 million cubic yards of solid waste. Currently, it indicates a closure year of 2082 (CalRecycle 2026b). Therefore, the Foothill Sanitary Landfill has substantial remaining capacity to continue to accept solid waste. Overall, the Project would represent a small percentage of the allotted daily throughput and permitting capacities at both the Tracy Material Recovery Facility and Transfer Station and the Foothill Sanitary Landfill.

Additionally, the on-site wastewater treatment facility would result in generation of solid waste that would be hauled off-site to a disposal site. Approximately 100 cubic yards of brine waste are expected to be produced every year as part of the water treatment process. The brine waste would be regulated by County Environmental Health and would be hauled off-site to a Class I or a Class II landfill. The exact location of landfill where the brine waste would be disposed of is unknown at this time; however, given the substantial remaining capacity available at area landfills, it is anticipated that Class I and Class II landfills in the area would be able to adequately handle the brine waste generated during operation of the Project. Therefore, the Project would not generate solid waste in excess of state or local standards or in excess of the capacity of local infrastructure and impacts would be less than significant.

Level of Significance Before Mitigation

Less than Significant Impact.

Mitigation Measures

None required.

Level of Significance After Mitigation

Less than Significant Impact.

Compliance with Solid Waste Statutes and Regulations

Impact UTIL-5	The Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Impact Analysis

All collection, transportation, and disposal of solid waste generated by the Project would comply with all applicable federal, state, and local statutes and regulations. As identified by the General Plan EIR, under AB 939, the Integrated Waste Management Act of 1989, local jurisdictions are required to develop source reduction, reuse, recycling, and composting programs to reduce the amount of solid waste entering landfills (San Joaquin County 2014). Local jurisdictions are mandated to divert at least 50 percent of their solid waste generation into recycling. The Project would be required to submit plans to the County's Public Works Department for review and approval to ensure the Project would comply with applicable statutes and regulations related to solid waste. Therefore, impacts associated with solid waste disposal regulations would be less than significant.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Utilities and Service Systems

Level of Significance Before Mitigation

Less than Significant Impact.

Mitigation Measures

None required.

Level of Significance After Mitigation

Less than Significant Impact.

3.18.4 Notice of Preparation Comments Related to Utilities and Service Systems

As discussed in Section 1.0, Introduction, the County distributed a NOP of the Draft EIR for the Project beginning on March 31, 2023. The NOP was distributed for a 30-day comment period that ended on May 1, 2023. The Public Scoping Meeting on the Draft EIR for the Project was held on April 10, 2023. The comments received on the NOP and during the Public Scoping Meeting were considered in the preparation of this Draft EIR. Comments related to utilities and service systems and where they are addressed in this section are provided in Table 3.18-1. Additionally, each comment includes a brief summary of how the concern was addressed, the impact, or why additional analysis is not required. Commenters may have made comments addressing multiple EIR sections, but only specific utilities comments are provided in Table 3.18-1. See Table 1.2-1 in Section 1.0, Introduction for a summary of all comments made during the NOP scoping period.

Table 3.18-1. Comments Received on the NOP for Utilities

Affiliation	Signatory	Date	Comment Description	Location Addressed in Agriculture Chapter	Response to Comment
Private Parties – Written Comments Received					
Hazen Brown, on behalf of Byron-Bethany Irrigation District	Adam Brown	May 1, 2023	Concerns related to undergrounding of utilities and site utilizes in relation to the WSID Canal.	- Subsection 3.2.3, Environmental Impacts, Project Impacts and Mitigation Measures - Appendix J - Appendix K - Appendix L	The Project proposes to replace the canal with two 42-inch pipes through the site. The Project site plan evaluated in this document is an example of how the Project site may be laid out and the maximum build. Detailed engineering designs would require approval prior to construction that includes the placement of utilities in relation to the WSID Canal.
City of Tracy	Kris Balaji	September 14, 2023	The comment notes that the most appropriate method to ensure adequate infrastructure for the development would	Subsection 3.14.3, Environmental Impacts, Project Impacts and Mitigation Measures	The water infrastructure on the Project site, including the water and wastewater treatment facilities, storm basins, and the fire wells are



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Utilities and Service Systems

Affiliation	Signatory	Date	Comment Description	Location Addressed in Agriculture Chapter	Response to Comment
			be to enter into a pre-annexation agreement with the City to address the provision of utilities including the supply of potable and non-potable water and groundwater recharge. The commenter also wants additional details on the wastewater treatment facilities and stormwater infrastructure.		described in detail in Appendices J, K, and L. As discussed within Impact UTILITY-2 and UTILITY-3, the new water and wastewater systems would be sufficient to service the Project site. Moreover, the Tracy Subbasin was determined to be able to fill the Project's water demand in normal, dry, and multiple dry year conditions. Finally, water and wastewater services would be managed on the Project site. However, consistent with the State Water Resources Control Board, in the event that the Project site is rezoned to be within the City's limit or SOI, the Project would be required to secure a drinking water connection to the City of Tracy Water District within 18 months.
Private Parties – Comment Cards at Scoping Meeting					
Interested Individual	Keith Vanderveen	April 10, 2023	Concerns related to groundwater and stormwater drainage.	Subsection 3.2.3, Environmental Impacts, Project Impacts and Mitigation Measures	The Project would be subject to the NPDES Permit and the preparation of a SWPPP (as required under Mitigation Measure HYD-1), NPDES Industrial General Permit (as required under Mitigation Measure HYD-2), San Joaquin County Flood Control and Water Conservation District's SWQCCP, County's SWMP, County EHD, and RWQCB. In terms of groundwater, the Project would



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Utilities and Service Systems

Affiliation	Signatory	Date	Comment Description	Location Addressed in Agriculture Chapter	Response to Comment
					require 58 AFY. The Project was determined to not substantially reduce groundwater within the Tracy Subbasin.
Interested Individual	Wendy Tocchini	April 10, 2023	Concerns related to Cordes Ranch Project, as well as overall concerns related to drainage and runoff.	Subsection 3.2.3, Environmental Impacts, Project Impacts and Mitigation Measures	The proposed detention basins would be sized to accommodate the 100-year 24-hour storm under build-out conditions. If the detention basins, ponds, and recycled water tank does not have remaining capacity to store treated runoff and there is an excess of treated runoff, through an agreement with BBID, the excess runoff would be discharged to the new 42-inch pipelines that would replace the existing WSID canal that bisects the northern portion of the Project site. In the event stormwater cannot be discharged off-site into the WSID canal, the Project Applicant has prepared a stormwater optionality design that would size up the detention basins to fully capture and contain two consecutive 10-year, 48-hour storms for infiltration and treatment. The proposed detention basins on the northern side of the Project site under this stormwater optionality would remain in the same locations, see Figure 7, but would be sized up to account for the two 10-year, 48-hour storm events. The increase in size of detention basins 1 through 3 would not impact the site. The increase in size of



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Utilities and Service Systems

Affiliation	Signatory	Date	Comment Description	Location Addressed in Agriculture Chapter	Response to Comment
					detention basin 4 would result in the removal of a portion of the surface parking on the eastern side of the site adjacent to Building 3. The stormwater optionality would not change any of the proposed building sizes. Additionally, the water treatment basins under this option would be constructed deeper than the clay soils found within the upper five feet of the Project site, allowing for on-site percolation. The Project would be subject to the NPDES Permit and the preparation of a SWPPP (as required under Mitigation Measure HYD-1), NPDES Industrial General Permit (as required under Mitigation Measure HYD-2), San Joaquin County Flood Control and Water Conservation District's SWQCCP, County's SWMP, County EHD, and RWQCB.



3.19 WILDFIRE

This section describes the effects on wildfires and associated hazards that may result from Project implementation. The following discussion addresses existing environmental conditions in the Project area, identifies and analyzes environmental impacts, and recommends measures to reduce or avoid impacts anticipated from Project construction and operation.

3.19.1 Environmental Setting

Types of Wildfires

The term “wildfire” refers to fires that usually result from the ignition of dry grass, brush, or timber. Historically, wildfires commonly occurred in steep or heavily vegetated areas, which makes suppression of the fire difficult. More recently, wildfires have been encroaching into more urban area, threatening homes, businesses, and essential infrastructure. Though wildfires play an important role in the ecology of many natural habitats, risks to human safety and property increase as urban development moves into areas susceptible to wildfire hazards.

Wildfires burn in many types of vegetation, including forest, woodland, scrub, chaparral, and grasslands. Many species of native California plants are adapted to fire, and habitats such as chaparral shrubs and conifer forests can recover from fire. For example, some species of chaparral plants, such as ceanothus, require intense heat for germination and therefore have flammable resins on leaves and roots that can quickly sprout up in burned areas (National Park Service 2023). In 2024, there were 5,889 wildfires in California, burning about 472,314 acres, and wildfires have been observed to be more frequent and growing in intensity over the past several years (CAL FIRE 2025a).

Wildfire Causes

Although the term “wildfire” suggests natural origins, a 2017 study that evaluated 1.5 million wildfires in the United States between 1992 and 2012, found that humans were responsible for igniting 84 percent of wildfires, accounting for 44 percent of acreage burned (Balch et al. 2017). The three most common types of human-caused wildfires are debris burning (logging slash, farm fields, trash, etc.), arson, and equipment use (Pacific Biodiversity Institute 2007). Power lines can also ignite wildfires through downed lines, vegetation contact, conductors that collide, and equipment failures. Lightning is the most common cause of nature-induced wildfire (Balch et al. 2017).

An analysis of US Forest Service wildfire data from 1986 to 1996 determined that 95 percent of human caused wildfires and 90 percent of all wildfires were within 0.5 mile of a road, and that about 61 percent of all wildfires and 55 percent of human-caused wildfires were within approximately 650 feet (200 meters) of a road. The study concluded that the increase in human-caused ignition greatly outweighs the benefits of increased access for firefighters (Pacific Biodiversity Institute 2007).

There are three primary methods of wildfire spread:

- **Embers:** Embers are glowing or burning pieces of vegetation or construction debris that are lofted during a wildfire and can move up to a mile ahead of a wildfire, especially during high winds. Embers are the most prolific cause of home ignition, at a rate of two out of every three homes



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Wildfire

destroyed. These small embers or sparks may fall on the vegetation near a home (on dry leaves, needles, or twigs on the roof) and subsequently ignite the home. Embers can travel several miles during high wind events, such as the Santa Ana Winds, posing a potential risk to all structures without fire-resistant landscaping and construction within a mile of the fire (CAL FIRE 2023).

- **Direct Flame Contact:** Direct flame contact refers to the transfer of heat by direct flame exposure. Direct contact will heat the building materials of the home, and if the time and intensity of exposure is severe enough, windows will break and cause ignition.
- **Radiant Heat:** A house can catch fire from the heat that is transferred to it from nearby burning objects, even in the absence of direct flames or embers. By creating defensible space around homes, the risk from radiant heat is significantly reduced.

Secondary Effects of Wildfires

After a high intensity wildfire is suppressed, the burn scar is typically bare of its vegetative cover, which had supported the hillsides and steeper slopes. As a result, rainstorms increase the possibility of severe landslides and debris flows in these areas. The intense heat from the fire can also cause a chemical reaction in the soil that makes it less porous, causing water to run off during precipitation events, which can lead to flooding downstream.

In addition to damaging natural environments, wildfires can injure and cause fatalities of residents and firefighters as well as damage or destroy structures and personal property. Wildfires also deplete water reserves, down power lines, disrupt communication services, and block evacuation routes, which can isolate communities. Wildfires can also indirectly cause flooding if flood control facilities become inadequate to handle increases in stormwater runoff, sediment, and debris that are likely to be generated from burn scars. Regionally, smoke from wildfires creates poor air quality that can last for days or weeks, depending on the scale of the wildfire and wind patterns.

Project Site, Vicinity and Region

The Project site itself is currently in agricultural use, with almond orchards planted across the site. The 284-acre area is bisected by West Schulte Road, east of the proposed extension of Pavilion Parkway to the west, and south of the proposed extension of Promontory Parkway. The site is undeveloped and the WSID Upper Main Canal cuts through the northern portion of the development area. The Project site is located within the Tracy Rural Fire District which is a member of the South San Joaquin County Fire Authority, which provides fire protection services to the southern portion of San Joaquin County. The closest fire station to the site is Tracy Fire Station 94 which is adjacent to CAL FIRE Station 26, located approximately one mile west of the Project site at the corner of West Schulte and Hansen Road. As discussed in Section 3.14, Public Services, Tracy Fire Station 94 would be relocated to a site within the Cordes Ranch Specific Plan area. The relocated Tracy Fire Station 94 would be located approximately 1.31 miles northwest of the Project site (Tracy Rural Fire District 2017). Land uses in this portion of the County are primarily agricultural, industrial, and residential. Lands generally west of the site have been converted to industrial use within the last several years, and lands generally east of the site are residential. With the exception of the Owens Brockway Glass Container Manufacturing Facility that lies immediately west of the Project site, parcels surrounding the site are primarily agricultural.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

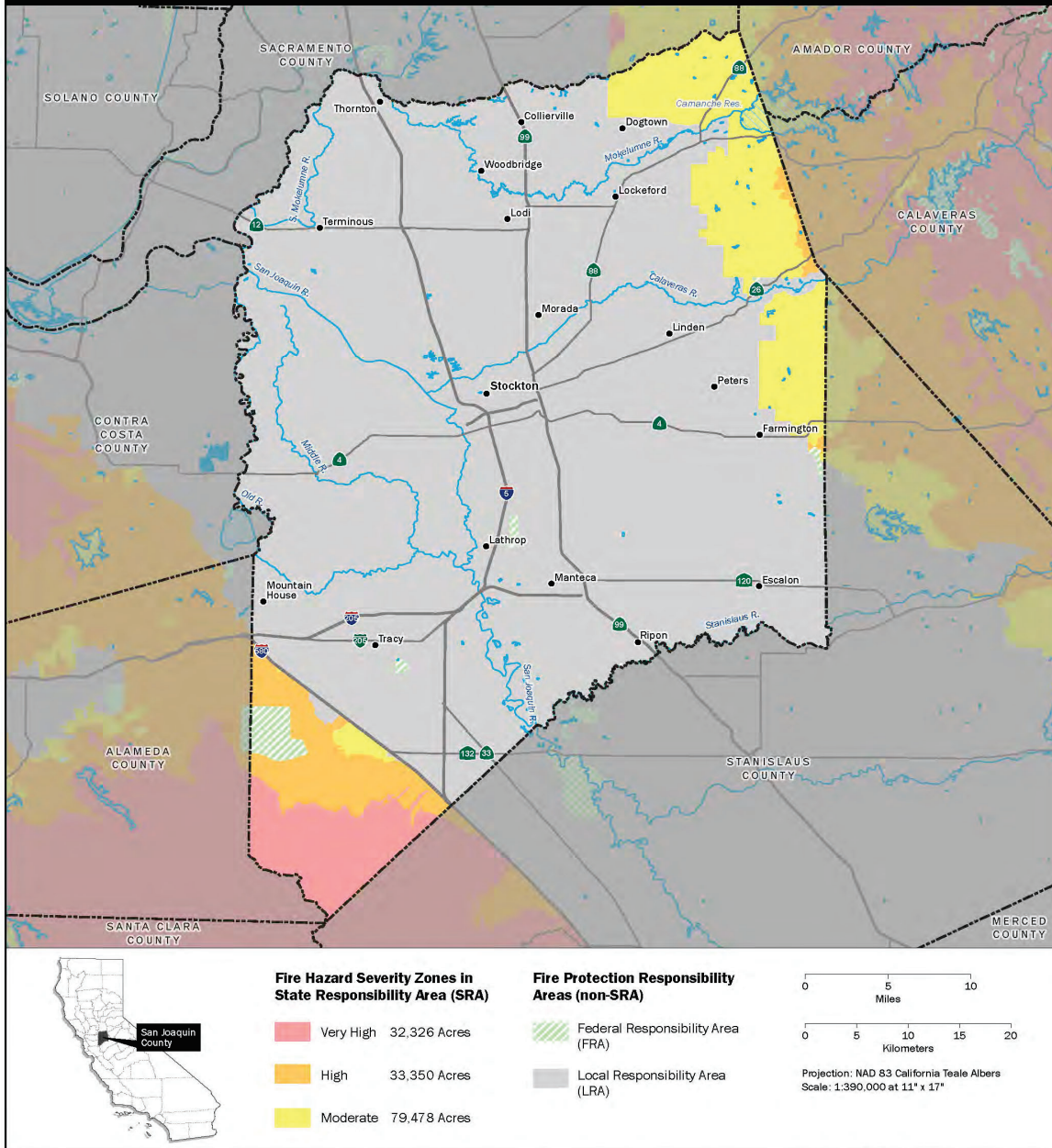
Wildfire

The Project site is near open space areas that are susceptible to wildfire. Additionally, portions of the County contain open space areas that are also vulnerable to wildfire, which could threaten developed areas within the County. The communities of Bellota, Clements, Linden and Lockeford are identified by the County as communities at risk to wildland fire, due to their location near areas susceptible to wildfires (San Joaquin County 2016); however, the Project site and surrounding vicinity are not identified as communities at risk and do not contain land designated as a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2025b). The Project site is located within the Tracy Rural Fire District which is under the jurisdiction of the South San Joaquin County Fire Authority and subject to review and inspection by the Tracy Rural Fire District Community Risk Reduction Division to ensure proposed construction projects meet applicable fire and life-safety requirements per California Fire Code and County Ordinances (Tracy Rural Fire District 2023). The Project site is identified by CALFIRE as being located within a Locally Responsible Area and is not located in a Very High Fire Hazard Severity Zone (CAL FIRE 2025c, 2025b). Additionally, the USFS Wildfire Hazard Potential Map identified the Project site's wildfire hazard potential as Very Low to Low as well as Non-burnable (USFS 2023). Therefore, the Project site is not identified as having a high risk of wildland fires, see Figure 31.



State Responsibility Area Fire Hazard Severity Zones

November 21, 2022



Source: CAL FIRE 2023

Project Location
San Joaquin County

Client/Project
International Park of Commerce Specific Plan
Phase 2

Figure No.
31

Title
**Fire Hazard Severity in San Joaquin
County**

3.19.2 Regulatory Setting

Federal

National Cohesive Wildlife Management Strategy

In the Federal Land Assistance, Management and Enhancement Act of 2009 (FLAME Act), Congress mandated the development of a National Cohesive Wildland Fire Management Strategy for all lands in the United States. Wildfire Management is guided by the National Cohesive Wildland Fire Management Strategy, which has three primary goals (USFS 2023):

- Resilient landscapes
- Fire adapted communities
- Safe and effective wildfire response

These three goals enable land managers to manage vegetation and fuels; protect homes, communities, and other values at risk; manage human-caused ignitions; and effectively and efficiently respond to wildfires. California is part of the Western Regional Strategy Committee, chartered to support and facilitate the implementation of the National Cohesive Wildland Fire Strategy.

National Fire Protection Association Standards

National Fire Protection Association (NFPA) codes, standards, recommended practices, and guides are developed through a consensus standards development process approved by the American National Standard Institute. NFPA standards are recommended (advisory) guidelines for fire protection that are referenced in the California Fire Code. Specific standards applicable to wildland fire hazards include, but are not limited to:

- NFPA 1141, Fire Protection Infrastructure for Land Development in Wildlands
- NFPA 1142, Water Supplies for Suburban and Rural Fire Fighting
- NFPA 1143, Wildland Fire Management
- NFPA 1144, Reducing Structure Ignition Hazards from Wildland Fire

State

California Department of Forestry and Fire Protection

CAL FIRE is dedicated to the fire protection and stewardship of over 31 million acres of California's wildlands. CAL FIRE provides fire assessment and firefighting services for land in State Responsibility Areas, conducts educational and training programs, provides fire planning guidance and mapping, and reviews general plan safety elements to ensure compliance with state fire safety requirements.

The Board of Forestry and Fire Protection is a government-appointed approval body within CAL FIRE. It is responsible for developing the general forest policy of the state, determining the guidance policies of CAL FIRE, and representing the state's interest in federal forestland in California. The Board of Forestry



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Wildfire

and Fire Protection also promulgates regulations and approves general plan safety elements that are adopted by local governments for compliance with State statutes.

The California Office of the State Fire Marshal supports the mission of CAL FIRE by focusing on fire prevention. These responsibilities include regulating buildings in which people live, congregate, or are confined; controlling substances and products which may, in and of themselves, or by their misuse, cause injuries, death and destruction by fire; providing statewide direction for fire prevention within wildland areas; regulating hazardous liquid pipelines; developing and renewing regulations and building standards; and providing training and education in fire protection methods and responsibilities. These are accomplished through major programs including engineering, education, enforcement, and support from the Board of Forestry and Fire Protection. For jurisdictions in a SRA or VHFHSZ, the Land Use Planning Program division of the Office of State Fire Marshal reviews safety elements during the update process to ensure consistency with California Government Code, Section 65302(g)(3).

Together, the Board of Forestry and Fire Protection, Office of State Fire Marshal, and CAL FIRE protect and enhance the forest resources of all wildland areas of California that are not under federal jurisdiction.

California Office of Emergency Services

The California Emergency Management Agency was incorporated into the Governor's Office on January 1, 2009 by AB 38, and merged the duties, powers, purposes, and responsibilities of the Governor's Office of Emergency Services (Cal OES) with those of the Governor's Office of Homeland Security. Cal OES is responsible for the coordination of overall state agency response to major disasters in support of local government. The agency is responsible for ensuring the state's readiness to respond to and recover all hazards – natural, man-made, emergencies, and disaster – and for assisting local governments in their emergency preparedness, response, recovery, and hazard mitigation efforts. The Cal OES Fire and Rescue Division coordinates statewide response of fire and rescue mutual aid resources to all types of emergencies, including hazardous materials. The Operations Section under the Fire and Rescue Division coordinates the California Fire and Rescue Mutual Aid System, and coordinated response through the Mutual Aid System, includes responses to major fires, earthquakes, tsunamis, hazardous materials and other disasters.

Fire Hazard Severity Zones and Responsibility Areas

CAL FIRE designates fire hazard severity zones as authorized under California Government Code Sections 51175 *et seq.* CAL FIRE considers many factors when designating fire severity zones, including fire history, existing and potential vegetation fuel, flame length, blowing embers, terrain, and weather patterns for the area. CAL FIRE designates fire hazard severity zones (FHSZ) in three types of areas depending on which level of government is financially responsible for fire protection:

- LRA: Local Responsibility Area. Incorporated communities are financially responsible for wildfire protection. There is one severity zone in the LRA, the very high FHSZ.
- SRA: State Responsibility Area. CAL FIRE and contracted counties are financially responsible for wildfire protection. There are three FHSZs—moderate, high, and very high.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Wildfire

- FRA: Federal Responsibility Area. Federal agencies such as the United States Forest Service, National Park Service, Bureau of Land Management, United States Department of Defense, United States Fish and Wildlife Service, and Department of the Interior are responsible for wildfire protection.

2018 Strategic Fire Plan for California

CAL FIRE produced the 2018 Strategic Fire Plan for California, with goals, objectives, and policies to prepare for and mitigate the effects of fire on California's natural and built environments (California Board of Forestry and Fire Protection [BFFP] 2018). The 2018 Strategic Plan focuses on fire prevention and suppression activities to protect lives, property, and ecosystems in addition to providing natural resource management to maintain state forests as a resilient carbon sink to meet California's climate change goals. A key component of the 2018 Strategic Plan is the collaboration between communities to ensure fire suppression and natural resource management is successful (BFFP 2018).

2021 California's Wildfire and Forest Resilience Action Plan

The Governor's Forest Management Task Force developed California's Wildfire and Forest Resilience Action Plan, which is a framework for establishing healthy and resilient forests that can withstand and adapt to wildfire, drought, and climate change. This plan accelerates efforts to restore the health and resilience of California's forests, grasslands, and natural places; improves the fire safety of communities; and sustains the economic vitality of rural forested areas. CAL FIRE, in partnership with the US Forest Service, intends to scale up forest thinning and prescribed fire; integrate climate adaptation into the statewide network of regional forest and community fire resilience plans; improve the electricity grid resilience, and promote sustainable land use.

State Responsibility Area and Very High Fire Severity Zone Fire Safe Regulations

California Code of Regulations Title 14, Division 1.5, Chapter 7, Subchapter 2, SRA/VHFHSZ Fire Safe Regulations, establishes minimum wildfire protection standards for construction and development in the SRA and very high FHSZ and requires CAL FIRE to review development proposals and enact recommendations that serve as conditions of approval in these zones. These standards include basic emergency access and perimeter wildfire protection measures; signing and building numbering; private water supply resources for emergency fire use; and vegetation modification. These regulations apply to all residential, commercial, and industrial buildings in the SRA, the siting of new mobile homes, all tentative and parcel maps, and applications for building permits approved before 1991 where these standards were not proposed. Fire Safe Regulations also include a minimum setback of 30 feet for all buildings from property lines and/or the center of a road. Section 1273.08, Dead-End Roads, of these standards provide regulations for the maximum lengths of single access roadways requiring the following:

- Parcels zoned for less than one acre: 800 feet
- Parcels zoned for 1 acre to 4.99 acres: 1,320 feet
- Parcels zoned for 5 acres to 19.99 acres: 2,640 feet
- Parcels zoned for 20 acres or larger: 5,280 feet



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Wildfire

Fire Safe Regulations, Section 1299.03, Fire Hazard Reduction Around Buildings and Structure Requirements, provides defensible space requirements for areas within 30 feet of a structure (Zone 1) and between 30 and 100 feet from a structure (Zone 2). In Zone 1, all dead and dying plants must be removed, as must any flammable vegetation that could catch fire. In Zone 2, horizontal and vertical spacing among shrubs and trees must be created and maintained.

Public Resources Code Section 4291

Public Resources Code Section 4291, Mountainous, Forest-, Brush- and Grass-Covered Lands, is intended for any person who owns, lease, controls, operates, or maintains a building or structure in a mountainous area, forest-covered lands, shrub-covered lands, grass-covered lands, or land that is covered with flammable material, regardless of whether the property is in an SRA or very high FHSZ. This section requires defensible space to be maintained within 100 feet from each side of a structure. An ember-resistant zone is also required within 5 feet of a structure and more intense fuel reduction between 5 and 30 feet of a structure.

California Building Standards Code

The California Buildings Standards Code (California Code of Regulations Title 24) provides 12 different codes for construction and buildings in California. This code is updated every three years, with the most recent version effective January 1, 2023.

Building Design Standards

The California Building Code (CBC), Part 2 of 24 California Code of Regulations, identifies building design standards, including those for fire safety. It is effective statewide, but a local jurisdiction may adopt more restrictive standards based on local conditions under specific amendment rules prescribed by the State Building Standards Commission. Residential buildings are plan checked by local city building officials for compliance with the CBC and any applicable local edits. Typical fire safety requirements of the CBC include the installation of sprinklers in buildings and other facilities; the establishment of fire-resistance standards for fire doors, building materials, and particular types of construction in high fire hazard severity zones; requirements for smoke-detection systems; exiting requirements; and the clearance of debris.

Materials and Methods for Exterior Wildfire Exposure

Chapter 7A of the CBC, Materials and Methods for Exterior Wildfire Exposure, prescribes building materials and construction methods for new buildings in a Fire Hazard Severity Zone or Wildland Interface Fire Area. Chapter 7A contains requirements for roofing; attic ventilation; exterior walls; exterior windows and glazing; exterior doors; decking; protection of underfloor, appendages, and floor projections; and ancillary structures. Other requirements include vegetation management compliance, as prescribed in California Fire Code Section 4906 and Public Resources Code 4291.

California Fire Code

The California Fire Code incorporates, by adoption, the International Fire Code of the International Code Council, with California amendments. This is the official fire code for the State and all political subdivisions. It is found in California Code of Regulations Title 24, Part 9 and, like the CBC, the California



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Wildfire

Fire Code is effective statewide, but a local jurisdiction may adopt more restrictive standards based on local conditions. The California Fire Code is a model code that regulates minimum fire safety regulations for new and existing buildings; facilities; storage; processes, including emergency planning and preparedness; fire service features; fire protection systems; hazardous materials; fire flow requirements; and fire hydrant locations and distribution. Typical fire safety requirements include installation of sprinklers in all buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

Wildland-Urban Interface Areas

Chapter 49 of the California Fire Code, Requirements for Wildland Urban Interface Fire Areas, applies to any geographical area identified as a FHSZ by CAL FIRE. It defines FHSZs, connects to the SRA Fire Safe Regulation requirements for defensible space, and parallels requirements for wildfire protection buildings construction and hazardous vegetation fuel management in other sections of the California Code of Regulations and the Public Resources Code. Chapter 49 of the 2022 California Fire Code, which goes into effect January 1, 2023, includes a definition for the Wildland-Urban Interface (WUI) and provides requirements for fire protection plans, landslide plans, long-term vegetation management, and creation and maintenance of defensible space for all new development within the WUI.

California Public Utilities Commission

In 2007, wildfires in southern California were ignited by overhead utility power lines and aerial communication facilities near power lines. In response, the California Public Utilities Commission began considering and adopting regulations to protect the public from fire hazards posed by overhead power lines and nearby aerial communication facilities. The commission published a fire threat map—under Rulemaking 15-05-006, following procedures in Decision 17-01-009, revised by Decision 17-06-024—that adopted a work plan for the development of a utility high fire-threat district where enhanced fire safety regulations in Decision 17-12-024 apply (CPUC 2025). The fire regulations require electrical utilities to:

- Prioritize the correction of safety hazards.
- Correct nonimmediate fire risks in “Tier 2” (elevated fire threat) areas in the high fire-threat district within 12 months, and in “Tier 3” (extreme fire threat) areas within 6 months.
- Maintain increased clearances between vegetation and power lines in the high fire-threat district.
- Maintain stricter wire-to-wire clearances for new and reconstructed facilities in Tier 3 areas.
- Conduct annual inspections of overhead distribution facilities in rural areas of Tier 2 and Tier 3 areas.
- Prepare a fire prevention plan annually if overhead facilities exist in the high fire threat district (CPUC 2025).



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Wildfire

California Government Code

California Government Code Section 65302(g) and Section 65302.15 require that safety elements be reviewed and revised as needed with the revision of a housing element or local hazard mitigation plan, but no less than every eight years, to ensure the goals, policies, actions, mapping, and background content are consistent with State regulations and reflect the best available information for wildfire risks, climate adaptation and resiliency, and emergency evacuation routes for certain residential areas. Communities with local hazard mitigation plan updates after January 1, 2022, must also ensure their safety elements or local hazard mitigation plans include an assessment of evacuation routes and their capacity, safety, and viability as well as evacuation locations under a range of emergency scenarios. For wildfire and evacuation purposes, a safety element must:

- Identify wildfire hazards with the latest fire severity zone maps from the Board of Forestry and Fire Protection, US Geological Survey, and other sources.
- Consider guidance given by LUCI's (formerly referred to as the Office of Planning and Research) Fire Hazard Planning document.
- Demonstrate that the jurisdiction or contract agency and associated codes satisfactorily address adequate water supply, egress requirements, vegetation management, street signage, land use policies, and other criteria to protect from wildfires.
- Establish in the safety element (and other elements that must be consistent with it) a set of comprehensive goals, policies, and feasible implementation measures for protection of the community from unreasonable risks of wildfire.
- Identify evacuation constraints residential parcels in hazard prone areas.

Governor's Office of Land Use and Climate Innovation Fire Hazard Technical Advisory

The Governor's LUCI (formerly referred to as the Office of Planning and Research at the time of publication) published the Fire Hazard Technical Advisory in 2015 and revised it in 2022 as a planning guide for addressing fire hazards, reducing risk, and increasing resilience across California's diverse communities and landscapes. The guide provides a range of goals, policies, and programs for fire hazard prevention and mitigation, disaster preparedness, and emergency response and recovery. The 2022 update includes specific land use strategies to reduce fire risk to buildings, infrastructure, and communities.

Local

San Joaquin County General Plan

The General Plan presents a vision for the County's future, looking ahead to 2035. This long-range planning document includes a comprehensive framework for the County's physical, economic, and social development and environmental resources preservation, as well as policies to guide day-to-day decisions. The General Plan emphasizes that future development must occur in a way that makes the most of existing infrastructure and public facilities, minimizes impacts to natural resources, expands opportunities for job growth, restores and revitalizes unincorporated communities, and provides greater opportunities to all County residents.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Wildfire

The General Plan includes the following goals and policies related to wildfire hazards that are applicable to the Project (San Joaquin County 2016):

Goal PHS-1: To maintain a level of disaster preparedness necessary for the protection of public and private property, and the health, safety, and welfare of people living and working in San Joaquin County.

- **PHS-1.3: Emergency Operations Plans.** The County shall maintain and implement the following emergency and hazard mitigation plans to provide emergency planning, mitigation, response, and recovery activities to the community:
 - Emergency Operations Plan,
 - Mountain House Community Emergency Operations Plan,
 - Multi-Hazard Functional Plan,
 - Local Hazard Mitigation Plan, and
 - Flood Safety Plan and Contingency Mapping.
- **PHS-1.4: Emergency Preparedness Exercises.** The County shall coordinate with local and regional agencies to conduct emergency and disaster preparedness exercises to test operational and emergency plans.
- **PHS-1.7: Emergency Response Facilities Location.** The County shall ensure that emergency response facilities and other critical facilities (e.g., hospitals, health care facilities, emergency shelters, Sheriff substations, fire stations) are located to avoid hazardous areas (see Seismic and Geologic and Flood Hazards), and designed to remain functional following a major disaster.
- **PHS-1.9: Inter-jurisdictional Coordination.** The County shall continue to participate in the Multi-Agency Coordination System (MACS) to ensure enhanced inter-jurisdictional coordination during disasters.
- **PHS-1.10: Emergency Vehicles Access.** The County shall require all new developments to provide, and existing developments to maintain, adequate primary and alternative access for emergency vehicles.

Goal PHS-4: To minimize the risk of wildland and urban fire hazards.

- **PHS-4.1: Community Wildfire Protection Plan.** The County shall maintain and implement the Community Wildfire Protection Plan as a mechanism for community input and identification of areas with high fire hazard risk.
- **PHS-4.2: Residential Densities in High Hazard Areas.** The County shall restrict development to rural residential densities or lower and require on-site fire suppression measures in areas with high or extreme wildfire hazards.
- **PHS-4.3: Fire Prevention Measures.** The County shall implement State recommendations for fire prevention in Fire Hazard Severity Zones and require new and/or existing development to



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Wildfire

provide clearance around structures, use fire-resistant ground cover, build with fire-resistant roofing materials, participate in fuel load reduction, and take other appropriate measures.

- **PHS-4.4: Clear Zones.** The County shall require clear zones and regular weed abatement around residential structures in high fire hazard areas and assist property owners in identifying how clear zones should be maintained.
- **PHS-4.5: Vegetation and Fuel Management.** The County shall require new development in high fire-hazard areas to have fire-resistant vegetation, cleared fire breaks separating communities or clusters of structures from native vegetation, or a long-term comprehensive vegetation and fuel management program consistent with State codes 4290 and 4291 for wildland fire interface and vegetation management.
- **PHS-4.6: Fire Protection Coordination.** The County shall encourage well-organized and efficient coordination among fire agencies, CAL FIRE, and the County.

San Joaquin County Local Hazard Mitigation Plan

The 2023 San Joaquin County Local Hazard Mitigation Plan (LHMP), revised in 2022, provides strategies for the County and other local jurisdictions to identify and implement mitigation actions for reducing damages from various potential natural and technological disasters. The LHMP meets the State and Federal requirement of the Disaster Mitigation Act of 2000, to develop an on-going process for mitigating disaster damages both prior to and following a disaster. Revisions of General Plan(s) will include new suggestions and planning guidance for hazard mitigation goals, objectives, actions, and implementation strategies. The goals, actions, and strategies contained in this main document are only for the unincorporated areas of the County. Jurisdictions have the option of developing a local hazard mitigation plan for their own jurisdiction or participating in the County's plan. Jurisdictions participating with the County will provide their mitigation actions and strategies individually to be included in the County's plan and identified by jurisdiction.

3.19.3 Environmental Impacts

This section analyzes the Project's potential to result in significant impacts related to wildfire hazards. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid impacts.

Methodology

The following analysis is based on a review of documents pertaining to the Project site, including the General Plan, General Plan EIR, and review of CAL FIRE's Fire Hazard Severity Zone Maps and the USFS Wildfire Hazard Potential Map.

Thresholds of Significance

The significance criteria used to identify wildfire impacts is from Appendix G of the CEQA Guidelines. For the purposes of this EIR, implementation of the Project would cause a significant impact on the wildfire if it would do the following:



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Wildfire

- 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.

Project Impacts and Mitigation Measures

Emergency Response Plans

Impact WF-1	The Project would not substantially impair an adopted emergency response plan or emergency evacuation plan.

Impact Analysis

Adopted emergency response plans and General Plan policies include those discussed under Section 3.19.2, such as the LHMP. The Project could result in a significant impact if it would substantially impair the implementation of this plan or the General Plan policies. As discussed in Section 2, Project Description, of this Draft EIR, the Project would develop approximately 284-acres of land currently in agricultural use designated land into industrial and commercial use. Project implementation would not occur within a SRA or VHFHSZ.

Full buildout under the Project would result in substantial changes to the circulation patterns and emergency access routes in this portion of the County. As shown in Figure 16 in the TIA prepared by Fehr and Peers, the Project's trucks are anticipated to take Hansen Road, Patterson Pass, I-580, I-205, Mountain House Parkway, and Pavilion Parkway to travel to and from the Project site. The majority of trucks would not traverse residential neighborhoods and would travel through industrial sections of Tracy and unincorporated San Joaquin County to enter or exit the Project area. Approximately six percent of truck trips (approximately 229 trips per day) would travel north on Pavilion Parkway and one percent of truck trips (approximately 38 trips per day) would travel north on Mountain House Parkway (Fehr and Peers 2024). As shown on Figure 29, Pavillion Parkway is a planned roadway and therefore in the event of an emergency Lammers residents would use other roadways such as Hansen Road, Von Sosten Road, and Mountain House Parkway. The construction of Pavilion Parkway would provide an additional exit route for the Lammers residents. In the event of an emergency, Mountain House residents would use Mountain House Parkway, Central Parkway, Grant Line Road, or Byron Road as the main emergency exit roadways. The addition of approximately 38 trucks per day on Mountain House would be minimal and the Project would not add traffic to any other route that may be used by nearby residents. Therefore, Project traffic is not anticipated to substantially impair an emergency evacuation. the Project would be required to integrate the LHMP and comply with the General Plan goals and policies to facilitate adequate emergency access and evacuation routes in the event of a wildfire. Additionally, the Project would be required to comply with the California Building Code, California Fire Code, and San Joaquin County



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Wildfire

Municipal Code, which have requirements for lengths of single-access roads, minimum widths of roadways, and vegetation fuel management around roadways. All future Project developments would be required to be reviewed by the South San Joaquin County Fire Authority's Community Risk Reduction Division prior to approval to ensure the Project meets California Fire Code and County codes.

Temporary impacts to emergency operations and evacuation have the potential to occur during construction activities, however construction personnel and the developer will ensure adequate alternative access routes are available in the event of a wildfire or emergency as is required under the California Fire Code Section 501.4. Furthermore, as shown in Figure 30, the Project is not located in an SRA or VHFHSZ (CAL FIRE 2023, 2025c). While Project construction activities have the potential to temporarily impact emergency operations and evacuation, integration of the LHMP and compliance with General Plan goals and policies, the California Building Code, California Fire Code, and San Joaquin County Municipal Code would result in a less than significant impact.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact

Exacerbate Wildfire Risks

Impact WF-2	The Project would not exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, due to slope, prevailing winds, and other factors.

Impact Analysis

While the Project does not include housing or associated population growth for this area, the Project would result in the presence of workers and other occupants during operation. As such, future development resulting from Project implementation would be required to adhere to a wide range of state and local codes pertaining to fire protection and would be required to comply with South San Joaquin County Fire Authority requirements. Adherence to County requirements and Project review by the Community Risk Reduction Division would minimize impacts resulting from Project implementation to the extent possible and would ensure that new development would not exacerbate fire hazards. Furthermore, the Project is not located in an SRA or VHFHSZ (CAL FIRE 2023, 2025c). Therefore, Project implementation would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and there would be no impact.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Wildfire

Level of Significance After Mitigation

No Impact.

Infrastructure Impacts

Impact WF-3	The Project would not 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.

Impact Analysis

As indicated above, the Project would be required to comply with all applicable fire and building codes and would be required to be reviewed by the South San Joaquin County Fire Authority's Community Risk Reduction Division prior to approval. Associated infrastructure would be constructed in accordance with County requirements and regulations and would be required to adhere to measures related to new infrastructure to minimize potential impacts. Additionally, the Project would be required to comply with General Plan policies, applicable State and local fire and building codes, and the County's Emergency Operations Plan and LHMP. Furthermore, the Project is not located in an SRA of VHFHSZ. Therefore, Project implementation would not exacerbate fire risk or result in temporary ongoing impacts to the environment, and there would be no impact.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.

Downslope Flooding or Landslides

Impact WF-3	The Project would not 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.

Impact Analysis

Project implementation would result in the conversion of agricultural land for the development of warehouse and distribution facilities, which would result in construction and installation of associated infrastructure to accommodate new development. Adherence to County requirements and Project review by the Community Risk Reduction Division would minimize impacts resulting from Project implementation to the extent possible and would ensure that new development would not exacerbate fire hazards. The Project area is flat and is located in an area with minimal landslide and flood hazards (ENGEO 2021, FEMA 2025). Therefore, people and structures would not be exposed to significant risks associated with post-fire landslides, mudflows, and flooding. Furthermore, the Project site and surrounding area are not located in an SRA or VHFHSZ (CAL FIRE 2023, 2025c). Therefore, Project implementation would not



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Wildfire

expose people or structure to significant risks as a result of post-fire slope instability or drainage changes, and there would be no impact.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.

3.19.4 Notice of Preparation Comments Related to Wildfire

As discussed in Section 1.0, Introduction, the County distributed a NOP of the Draft EIR for the Project beginning on March 31, 2023. The NOP was distributed for a 30-day comment period that ended on May 1, 2023. The Public Scoping Meeting on the Draft EIR for the Project was held on April 10, 2023. The comments received on the NOP and during the Public Scoping Meeting were considered in the preparation of this Draft EIR. No comments related to wildfire were submitted. See Table 1.2-1 in Section 1.0, Introduction for a summary of all comments made during the NOP scoping period.



4.0 CUMULATIVE EFFECTS

4.1 INTRODUCTION

Section 15130(a) of the State CEQA Guidelines requires a discussion of the cumulative impacts of a project when the project's incremental effect is cumulatively considerable. Cumulatively considerable, as defined in CEQA Guidelines Section 15065(a)(3), means that the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." The State CEQA Guidelines Section 15355 defines a cumulative impact as two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. Cumulative impacts can result from individually minor but collectively significant projects taking place over time.

According to the CEQA Guidelines:

Cumulative impacts refer to two or more individual effects that, when considered together, are considerable and that compound or increase other environmental impacts.

- a) *The individual effects may be changes resulting from a single project or multiple separate projects.*
- b) *"The cumulative impact from several projects is the change in the environment, which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." (CCR, Title 14, Division 6, Chapter 3, Section 15355)*

In addition, as stated in the CEQA Guidelines:

The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable (CCR, Title 14, Division 6, Chapter 3, Section 15064[T][5]).

4.2 CUMULATIVE IMPACT SETTING

Cumulative impact discussions for each environmental issue area are provided for each environmental resource topic analyzed in the Draft EIR. As established in the CEQA Guidelines, related projects consist of "closely related past, present, and reasonably foreseeable probable future projects that would likely result in similar impacts and are located in the same geographic area" (CCR, Title 14, Division 6, Chapter 3, Section 15355).

The State CEQA Guidelines define a cumulative impact as two or more individual impacts that, when considered together, are significant or that compound or increase other significant environmental impacts. Cumulative impacts can result from individually minor but collectively significant projects taking place over time (State CEQA Guidelines Section 15355). The incremental impact of a project, although less than significant on its own, may be considerable when viewed in the cumulative context of other closely related



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

past, present, and reasonably foreseeable projects. A considerable contribution is considered significant from the point of view of cumulative impact analysis.

CEQA Guidelines Section 15130 identifies two basic methods for establishing the cumulative environment in which a project is considered: the use of a list of past, present, and probable future projects or the use of adopted projections from a general plan, other regional planning document, or a certified EIR for such a planning document. This cumulative analysis uses a combination of the “list” approach and the “projections” approach to identify the cumulative setting. The plan and projections approach relies on an adopted plan or reliable projection that describes the significant cumulative impact. This Draft EIR combines both the project list and projection approaches to generate the most reliable future projections possible.

4.3 GEOGRAPHIC SCOPE

The extent of the geographic area analyzed for cumulative impacts varies depending on the specific resource under assessment. The boundaries used to compile the list of past, present, and reasonably foreseeable projects, considered in the cumulative impact analysis, are determined by the geographic area associated with the environmental impacts of the Project.

In the Draft EIR, each resource section focuses on the specific geographic area directly relevant to the topic being discussed. For example, regional-level analysis is conducted for air quality impacts due to their regional nature, whereas aesthetic impact analysis only considers projects in the vicinity of the Project site due to the localized nature of the impact.

The geographic area that could potentially be affected by the Project, in conjunction with other projects, varies depending on the type of environmental resource being evaluated. Table 4.3-1 provides information on the geographic area and the evaluation method used for the cumulative analysis of each resource area. The geographic scope of each resource topic is determined based on the area that could potentially be affected within the cumulative context. It is important to note that some resource area may only have localized impacts and may not contribute to the cumulative context, depending on the potential impacts caused by related projects in the County, region, service area, immediate Project vicinity, or not at all.

Table 4.3-1. Geographic Scope of Cumulative Impact and Method of Evaluation

Resource Topic	Geographic Area	Method of Evaluation
Aesthetics	Immediate Project vicinity	Projects
Agricultural and Forestry Resources	County	Projects and Projections
Air Quality	Local (toxic air contaminants); Air Basin (construction-related and mobile sources)	Projects and Projections
Biological Resources	Immediate Project vicinity	Projects
Cultural and Historical Resources	Project site only (does not contribute to cumulative impacts)	Projects
Energy	Utility provider service area	Projects and Projections



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

Resource Topic	Geographic Area	Method of Evaluation
Geology and Soils	Project site only (does not contribute to cumulative impacts)	Projects
Greenhouse Gas Emissions and Climate Change	State	Projections
Hazards and Hazardous Materials	Project site only (does not contribute to cumulative impacts)	Projects
Hydrology and Water Quality	Immediate Project vicinity and region	Projects and Projections
Land Use and Planning	County	Projects and Projections
Noise	Immediate Project vicinity (effects are highly localized)	Projects
Population and Housing	County	Projects and Projections
Public Services	Immediate Project vicinity and County	Projects and Projections
Recreation	Does not contribute to cumulative impacts	Projects and Projections
Transportation	Immediate Project vicinity and region	Projects and Projections
Tribal Cultural Resources	Project site only (does not contribute to cumulative impacts)	Projects
Utilities and Service Systems	Immediate Project vicinity and County	Projects and Projections
Wildfire	Immediate Project vicinity and region	Projects and Projections

Notes:

Projects = the use of a list of past, present, and reasonably foreseeable projects

Projections = the use of projections contained in relevant planning documents

For those environmental resources that were evaluated based on the projections approach, the projections take into consideration future projects that are not included in the below list of related plans and projects (see Table 4.4-1).

4.4 LIST OF RELATED PLANS AND PROJECTS

The cumulative analysis used for this Draft EIR focuses on a restricted list of past, present, and probable future projects within the vicinity of the Project site. These projects, which may have a cumulative effect on the resources in the Project area, are referred to as “related projects” for the purpose of this discussion.

These related projects are described in Table 4.4-1. The listed projects encompass those located in the City of Tracy, the City’s SOI, and unincorporated San Joaquin County. This table provides a comprehensive list of all projects submitted by the County, including their names, locations, brief descriptions, application statuses, and whether they have been screened out as related projects for the cumulative impact analysis. Each project underwent research to determine its review process status,



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

approval status, or pending status. For projects that had associated CEQA documents, the results of the respective environmental assessments were used to evaluate their potential cumulative contribution.

CEQA defines “probable future projects” as those with an active application at the time the NOP was released for a project (in this case, March 31, 2023). The list of active projects was reviewed again prior to release of the EIR in January 2026 to include additional active applications. The list of projects in Table 4.4-1 was used in the development and analysis of the cumulative settings and impacts for each resource topic. Past and current projects in the Project vicinity were also considered as part of the cumulative setting as they contribute to the existing conditions upon which the project and each probable future project’s environmental effects are compared. Projects were screened out from cumulative impact analysis based on the provided descriptions for various reasons. These include being small projects with short-term impacts not expected to contribute to cumulative impacts, being located within the SOI without applications submitted to the City and considered too speculative, having a Negative Declaration or Notice of Exemption (NOE) prepared in which the project would have been determined to have no significant environmental impacts and insignificant cumulative impacts as compared to the Project, or being otherwise exempt from CEQA and unable to contribute cumulatively. Some projects lacked available CEQA documents or other information. For these projects, determinations were made based on the project description, aerial imagery, online research, and other available information to assess their characteristics for further consideration and inclusion in the related projects list. The list of screened out projects and the reasons they were not included within the analysis are included in Appendix Q.

Unless otherwise specified, significance criteria are the same for cumulative impacts as they are for project impacts for each environmental topic area. When considered in relation to other reasonably foreseeable projects, cumulative impacts to some resources would be significant and more severe than those caused by the Project alone.

Table 4.4-1. List of Related Projects

Number	Lead Agency	Project Name	Project Address	Description	Status
1	City of Tracy	2 Industrial Buildings (Costco Annexation)	16000 West Schulte Road	1,812,279-sf industrial use	Under City Review
2	City of Tracy	4-Story Hotel (Tru by Hilton)	2605 West Grant Line Road	39,275-sf hotel use	Under City Review
3	City of Tracy	GH Logistics Truck Repair	1428 Mariani Court	1.4-acre industrial use	Under Construction
4	City of Tracy	Golden Springs and Corbett Lane	South side of I-205, at Golden Springs Drive	10.54-acre residential use	Under City Review
5	City of Tracy	Golden State Fire - Fire Apparatus	3501, 3601, 3701 Mars Way	55,226-sf industrial use	Under City Review
6	City of Tracy	Johnny's Diner-Outdoor Eatery	22 East 9 th Street	3,043-sf commercial use and restaurant	Under City Review
7	City of Tracy	La Quinta Hotel	565 Clover Road	48,845-sf hotel and commercial use	Under Construction
8	City of Tracy	Larkspur Basin Lots	DeBord Drive and Cairo Court	1.89-acre mixed residential use	Approved



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

Number	Lead Agency	Project Name	Project Address	Description	Status
9	City of Tracy	Martin's Paving Inc. New Building	3880 Holly Drive	58,268-sf mixed commercial and industrial use	Under City Review
10	City of Tracy	Monopine-250 W Mt. Diablo Ave	250 West Mount Diablo	No description provided	Under City Review
11	City of Tracy	Retail Center and Apartments (The Station)	NEC South Tracy Boulevard and Gandy Dancer Drive	28.71-acre industrial/mixed use/residential	Under City Review
12	City of Tracy	Rocking Horse (Version 2)	Lammers Road, north of West Schulte Road	226-unit single family residential development	Under City Review (v.1 approved – 2015 MND)
13	City of Tracy	Schulte Warehouse/Annexation	16286 West Schulte Road	217,466-sf mixed commercial and industrial use	Under City Review
14	City of Tracy	Tracy Alliance - 4 Industrial Buildings (Annexation)	6599 West Grant Line Road	122.39-acre mixed commercial and industrial use (3,352,320 sf of development)	Under City Review
15	City of Tracy	Tracy Pavilion	Lammers Road, north of Grant Line Road	129.7-acre residential and commercial development area	Under City Review
16	City of Tracy	Tracy Village	SEC Valpico Road and Corral Hollow Road	135-acre residential and shared use development	Under Construction
17	City of Tracy	Westside Ranch	SEC 11 th Street and Lammers Road	415-unit single family residential development	Under City Review
18	City of Tracy	Westside Specific Plan	SWC Lammers Road and 11 th Street	535-acre mixed residential development	Under City Review
19	City of Tracy SOI	Gateway/Westside Specific Plan	Lammers Road and 11 th Street	353-acre mixed residential and commercial development, part of West Hills Specific Plan	Not Yet Under City Review
20	San Joaquin County	PA-0500776	24500 South Macarthur Drive, Tracy, 95376	Public refrigeration warehouse facility expansion	Under Construction
21	San Joaquin County	PA-0600630	11770 West Clover Road, Tracy, 95304	A religious assembly (having a total maximum seating capacity of 249 people); conversion of an existing 1,770 sf single family residence to a prayer hall (seating capacity 90), addition of four restrooms, and 30 parking spaces. phase two to be completed within two years and to consist of a proposed 19,600 sf two-story assembly hall, and 46 additional parking spaces.	Under Construction



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

Number	Lead Agency	Project Name	Project Address	Description	Status
22	San Joaquin County	PA-0800005	30703 South MacArthur Drive, Tracy, 95377	Expansion of an existing solid waste processing and recycling facility from 39.2 acres to 51.7 acres; the addition of 19,200 sf to the existing 57,200 sf material recovery facility and transfer station building; addition of 10,500 sf to the existing maintenance and administration building; construction of a one mega-watt wood waste bio-mass gasification unit for on-site energy use only.	Under Construction
23	San Joaquin County	PA-1400084	26955 South Hansen Road, Tracy, 95377	27,240-sf industrial and commercial use trucking facility	Under Construction
24	San Joaquin County	PA-1800244	3501 West Lehman Road, Tracy, 95304	66,400-sf agricultural (nut) processing/preparation facility	Under Construction
25	San Joaquin County	PA-1800305	26106 South Patterson Pass Road, Tracy, 95377	60,870-sf nursery sales and services – landscaping services	Under Construction
26	San Joaquin County	PA-1800316	7300 West Delta Avenue, Tracy, 95304	10,000-sf agricultural processing facility (poultry and small animal manufacturing)	Under Construction
27	San Joaquin County	PA-1900127	16151 West Grant Line Road, Tracy, 95304	60,233-sf regional religious assembly space	Under Construction
28	San Joaquin County	PA-1900208	14800 West Schulte Road, Tracy, 95377	679,370-sf vehicle warehouse and distribution facility	Under Construction
29	San Joaquin County	PA-2000065	17400 West Bethany Road, Tracy, 95391	12,000-sf construction services (heavy operation) facility	Under Construction
30	San Joaquin County	PA-2000185	13347 West Middle Road, Tracy, 95304	18,000-sf regional religious assembly space	Pending/In Review
31	San Joaquin County	PA-2100126	24707 South Bird Road, Tracy, 95304	29,952-sf cannabis cultivation facility	Pending/In Review
32	San Joaquin County	PA-2100207	26901 South Hansen Road, Tracy, 95377	439-space trailer parking and storage facility	Under Construction
33	San Joaquin County	PA-2100209	28524 South Kasson Road, Tracy, 95304	70,925-sf agricultural waste facility	Under Construction
34	San Joaquin County	PA-2100238	12925 West Bethany Road, Tracy, 95304	27,000-sf regional religious assembly space	Pending/In Review



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

Number	Lead Agency	Project Name	Project Address	Description	Status
35	San Joaquin County	PA-2100275	7500 West 11 th Street, Tracy, 95304	17,000-sf gasoline sales and vehicle services; automotive sales and services	Pending/In Review
36	San Joaquin County	PA-2200137	20042 West Patterson Pass Road, Tracy, 95377	40-acre utility services (battery energy storage system)	Pending/In Review
37	San Joaquin County	PA-2200143	31013 South Tracy Boulevard, Tracy, 95377	Grading and filling a 5.54-million cubic yard, closed rock quarry	Pending/In Review
38	San Joaquin County	PA-2200149	23751 South Bird Road, Tracy, 95304	21.83-acre heavy equipment rental and storage yard	Pending/In Review
39	San Joaquin County	Pacific Gateway (PA-2100188)	east of I-580; north of SR 132; bounded by Durham Ferry Road to the north and Tracy Boulevard to the west	1,612.90-acre mixed use logistics plan area including 24,675,000 square feet of industrial development	Pending/In Review
40	City of Tracy	PA-2300194	30022 S State Route 33	9.98 acre truck stop with a convenience store, restaurant, fueling station, service building, and truck parking	Active
41	City of Tracy	PA-1900085	21356 S Naglee Road	A religious assembly to construct 34,439 square foot building for an assembly hall and a 13,818 square foot building for a classroom and prayer hall.	Approved with Conditions
Cordes Ranch Specific Plan Projects					
42	City of Tracy	Cordes Ranch - Marriott Courtyard, West Parkway Village	International Parkway/I-205	62,000-sf mixed commercial space, part of the larger Cordes Ranch development	Approved
43	City of Tracy	Cordes Ranch - Promontory Station	815 International Parkway	30,330-sf mixed commercial space, part of the larger Cordes Ranch development	Approved
44	City of Tracy	Cordes Ranch Building 13	6050 Promontory Parkway	150,159-sf mixed commercial and industrial space, part of the larger Cordes Ranch development	Under City Review
45	City of Tracy	Cordes Ranch Building 18	5070 Promontory Parkway	1,319,092-sf mixed commercial and industrial space, part of the larger Cordes Ranch development	Under City Review
46	City of Tracy	Cordes Ranch Building 2	6551 West Schulte Road	375,696-sf of mixed commercial and industrial space, part of the larger Cordes Ranch development	Under Construction



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

Number	Lead Agency	Project Name	Project Address	Description	Status
47	City of Tracy	Cordes Ranch Building 28	5390 Promontory Parkway	524,081-sf mixed commercial and industrial space, part of the larger Cordes Ranch development	Under City Review
48	City of Tracy	Cordes Ranch Central Green	Cordes Ranch	31-acre park and open space area, part of the larger Cordes Ranch development	Under Construction
49	City of Tracy	Cordes Ranch West Parkway Village Multi-Tenant Building	Cordes Ranch	1.96-acre mixed use development	Approved
50	City of Tracy	Cordes Ranch – Gas Station, Convenience Store, and Car Wash – Chevron (West Parkway Village)	International Parkway/I-205	1.16-acre mixed use commercial, part of larger Cordes Ranch development	Under Construction
Ellis Specific Plan					
51	City of Tracy	Ellis Phase 2	Ellis Town Drive	106-acre neighborhood development, part of larger Ellis Specific Plan	Under Construction
52	City of Tracy	Ellis Phase 3	4260 Lammers Road	74-acre neighborhood development, part of larger Ellis Specific Plan	Under Construction
53	City of Tracy	Ellis RE Lots/Limited Use Area	SE area of Ellis Specific Plan	41.87-acre mixed use development, part of larger Ellis Specific Plan	Approved
54	City of Tracy	Avenues	12650 West Valpico Road	95.83-acre residential development with 480 residential units	Approved
City of Tracy Specific Plan					
55	City of Tracy	Tracy Hills Commerce Center	29592 South Corral Hollow Road	97.53-acre mixed commercial and industrial use (1,729,453 sf development)	Under City Review
56	City of Tracy	Tracy Hills KT Project (Hillview)	Tracy Hills Drive, east of Corral Hollow	36-acre mixed residential development	Under Construction
57	City of Tracy	Tracy Hills Phase 1A (includes revision to 7C)	Tracy Hills Drive, west of Corral Hollow	367-acre mixed residential development	Under Construction
58	City of Tracy	Tracy Hills Phase 1B	Tracy Hills Drive, west of Phase 1A	434 mixed residential units, part of Tracy Hill Specific Plan	Under Construction
59	City of Tracy	Tracy Hills Phase 1C	Lammers Road, southeast of California Aqueduct	293 mixed residential units, part of Tracy Hill Specific Plan	Under City Review
60	City of Tracy	Tracy Hills Phase 2	Tracy Hills, south of I-580	1,517 mixed residential units, part of Tracy Hill Specific Plan	Approved
61	City of Tracy	Tracy Hills Phase 5	Lammers Road, between the Delta Mendota Canal and	1,390 mixed residential units, part of Tracy Hill Specific Plan	Under City Review



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

Number	Lead Agency	Project Name	Project Address	Description	Status
			California Aqueduct		
I-205 Corridor Specific Plan					
62	City of Tracy	Commercial Building Shell	Auto Plaza Drive, west of Naglee Road	27,336-sf commercial use	Approved
63	City of Tracy	Marriot Hotel	3550 North MacArthur Drive	58,800-sf hotel development	Under Construction
64	City of Tracy SOI	I-205 Expansion	Naglee and Larch Roads	This intersection is 0.75 mile north of I-205 in partial ag land	Not Yet Under City Review
Northeast Specific Plan					
65	City of Tracy	Hollingsworth Trailer Lot and Guardhouse	2259 East Grant Line Road	11.3-acre industrial and commercial use	Under City Review
66	City of Tracy	NEI Building 4	1269 East Grant Line Road	No description provided	Under Construction
67	City of Tracy	Paradise Pointe Business Park	3601 Pescadero Avenue	57.2-acre mixed use development (718,165 sf of industrial development)	Under City Review
68	City of Tracy	Seefried - 3 New Industrial Buildings	7191 West Grant Line Road	1,035,500-sf industrial development	Under Construction
69	City of Tracy	Seefried LI Building (NEI)	1651 East Grant Line Road	335,157-sf industrial development	Under City Review

4.5 CUMULATIVE IMPACT ANALYSIS

For purposes of this Draft EIR, the Project would result in a significant cumulative effect if:

- The cumulative effects of related projects (past, current, and probable future projects) are not significant, and the incremental impact of implementing the Project is substantial enough when added to the cumulative effects of related projects to result in a new cumulatively significant impact; or
- The cumulative effects of related projects (past, current, and probable future projects) are already significant, and implementation of the Project makes a considerable contribution to the effect. The standards used herein to determine a considerable contribution are that either the impact must be substantial or must exceed an established threshold of significance.

This cumulative analysis assumes that all mitigation measures identified in Sections 3.1 through 3.19 to mitigate Project impacts are adopted. The analysis herein analyzes whether, after adoption of Project-specific mitigation, the residual impacts of the Project would cause a cumulatively significant impact or would contribute considerably to existing and anticipated (without the Project) cumulatively significant effects. Where the Project would so contribute, additional mitigation is recommended where feasible.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

4.5.1 Aesthetics

The geographic scope of the cumulative aesthetics analysis is the area surrounding the Project site. This is the area within view of the Project; therefore, the area most likely to experience changes in visual character or experience light and glare impacts. Several projects listed in Table 4.4-1 lie directly adjacent to the site (e.g., Costco Annexation, PA-1900208, Cordes Ranch Specific Plan).

The Project site lies adjacent to the City of Tracy and is surrounded by industrial or planned industrial land uses to the north, west, and south. The Project site is undeveloped but is currently used for agriculture with an almond orchard covering the site. The Project is divided by West Schulte Road, splitting the northern and southern portions of the site with single-story residences located immediately east of the site.

The Project includes a zone change from agriculture to I-G/SP-1, which would fundamentally change the visual character of the site. However, this change would be compatible with the surrounding industrial uses and planned industrial uses including Cordes Ranch Specific Plan to the west, Westside Specific Plan to the north, and LBA III Industrial and Tracy Biomass plant to the south. The Project design and landscaping would be consistent with the Cordes Ranch Specific Plan, located west of the Project site. To create visual cohesion between the sites. The Project would comply with the Landscape Master Plan, detailed within the Specific Plan, that requires landscaping, trees, and groundcover on the roadways, parking areas, and building frontages. Design permits would be required from the County to approve the specific buildings and site design on each lot, including building height. Other County projects would similarly be required to comply with the Landscape Master Plan and have County approval for design permits, therefore there would be aesthetic cohesion between the Project and other industrial projects within the County. As the Project site and Project area transition from agriculture to industrial development, all projects would follow applicable design guides for building heights, aesthetics, roadway design, and landscaping. Therefore, the view of the Project site and Project area would continue to be cohesive from roadway views. Furthermore, due to its location, implementation of the Project would not degrade any views of a scenic vista. Other past, present, and reasonably foreseeable projects would not result in cumulatively significant aesthetic impacts.

Cumulative effects of lighting are visible over a wide area, due to the potential for lighting from a number of projects to create skyglow. The Project site emits minimal nighttime lighting under existing conditions and does not contribute to skyglow in the area. As described in Impact AES-4, the Project would introduce new lighting sources at the Project site, including exterior building lighting, security lighting, and light and glare associated with vehicles; however, these fixtures would comply with County lighting design requirements intended to avoid creating an adverse skyglow condition. Additionally, the Project would implement Mitigation Measure AES-1 that would require the Project applicant to submit a photometric plan to the County for review and approval to demonstrate that all exterior light fixtures would be directed downward or employ full cut-off fixtures to minimize light spillage. The Project would also be required to comply with General Plan Policy NCR-7.7 that encourages the reduction of glare during daytime hours and the reduction of nighttime light pollution and with San Joaquin County Municipal Code Section 9-1025.6, Light and Glare. Therefore, the Project would not have a considerable contribution to sky glow such that a new significant cumulative sky glow impact would occur. Other past, present, and reasonably foreseeable future developments in the Project vicinity that involve the installation of new exterior lighting fixtures have been and would be required to implement similar standard measures to prevent light



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

spillage. In conclusion, the Project, in conjunction with other past, present, and reasonably foreseeable projects in the applicable geographic area, would not have a cumulatively significant impact related to light and glare.

4.5.2 Agricultural and Forestry Resources

The geographic scope of the cumulative agriculture and forestry resources is the County. The Project site is located in an area transitioning from agriculture to industrial development.

The Project would remove an existing 284-acre almond orchard in order to construct 5.36 million sf of industrial space and include a zone change from agriculture to I-G/SP-1. This change would remove approximately 284 acres of prime farmland from the County resulting in a significant and unavoidable impact to agricultural conversion. Several projects listed in Table 4.4-1 would also remove agricultural uses (e.g., Westside Specific Plan, Tracy Hills Specific Plan, Ellis Specific Plan, Cordes Specific Plan, Costo Annexation). The projects within the County would be subject to the Agricultural Mitigation Ordinance or in-lieu fees to mitigate the loss of agricultural land. However, as discussed in Section 3.2, Agricultural and Forestry Resources, the payment of compensatory fees would not be sufficient to reduce the level of impact to the loss of agricultural land, and other feasible mitigation measures do not exist. Therefore, the Project, in conjunction with other past, present, and reasonably foreseeable projects in the applicable geographic areas would have a cumulatively significant impact related to agriculture and forestry resources. The cumulative impact would be significant and unavoidable.

4.5.3 Air Quality

The geographic scope of the cumulative air quality analysis is the SJVAB, which is under the jurisdiction of the SJVAPCD. Regional air quality is impacted by topography, dominant air flows, atmospheric inversions, location, and season; therefore, using the SJVAB represents the area most likely to be impacted by air emissions.

The SJVAB is currently designated as nonattainment for federal O₃ and PM_{2.5} as well as State O₃, PM₁₀, and PM_{2.5}. Construction and operational emissions of ozone precursors (ROG and NO_x) and particulate matter from related projects could violate or substantially contribute to an existing air quality violation. The SJVAPCD has prepared a series of air quality plans to reach attainment of these pollutants. According to the GAMAQI, a project would be determined to be inconsistent with the air quality plans if it exceeded the regional thresholds. If a project exceeds the identified significance thresholds, its emissions would also be cumulatively considerable, resulting in a significant adverse air quality impact to the region's existing air quality conditions.

As discussed in Section 3.3, Air Quality, construction of the Project would result in emissions that would exceed the SJVAPCD threshold of significance for NO_x. However, with implementation of Mitigation Measure AQ-1, which requires the use of Tier 4 construction equipment, the Project's construction emissions would be reduced to less than significant levels. In addition, with implementation of fugitive dust control measures, as required by SJVAPCD Regulation VIII, the Project would not result in any localized construction fugitive dust impacts. All related projects would also comply with County and SJVAPCD rules and guidelines, including the implementation of all feasible dust reduction measures under SJVAPCD Regulation VIII. Construction emissions from related projects would be subject to



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

SJVAPCD regional thresholds and would implement appropriate mitigation to reduce emissions to the extent possible. Larger, related projects may independently result in significant and unavoidable air quality impacts. However, the Project, with mitigation, would not exceed SJVAPCD construction thresholds, which are considered to represent the allowable incremental contribution of an individual development while still progressing toward overall attainment within the SJVAB. Therefore, since the Project would fall below SJVAPCD construction thresholds, it would not be cumulatively considerable.

During operations, the Project would result in criteria pollutant emissions that would exceed SJVAPCD thresholds of significance. Mitigation Measures AQ-7 through AQ-26 would reduce operational emissions, but not to below the SJVAPCD thresholds. Therefore, Mitigation Measure AQ-27 has also been imposed, which requires the Project Applicant to enter into a VERA with the SJVAPCD to compensate for all remaining emissions. The VERA would ensure that emissions are reduced through alternative reduction projects elsewhere in the SJVAB. Implementation of the on-site mitigation in conjunction with a VERA would reduce criteria pollutant emissions to less than significant levels. Therefore, since the Project reduces operational emissions of ROG, NO_x, and PM₁₀ to zero, the operational emissions would fall below SJVAPCD operational thresholds, which are considered to represent the allowable incremental contribution of an individual development while still progressing toward overall attainment within the SJVAB, it would not be cumulatively considerable.

With regard to health impacts, multiple health risk scenarios were quantified to evaluate the risks posed to off-site receptors from Project construction and operation. With the implementation of Mitigation Measures AQ-1 through AQ-26, the cancer and non-cancer health risks would fall below SJVAPCD thresholds. Projects in conjunction with past, present, and reasonably foreseeable future projects may emit DPM at levels that result in an excess cancer risk to nearby receptors. According to CARB, DPM dissipates quickly from the source of emissions, especially within the first 500 feet (CARB 2005). Other air districts, including BAAD, have recommended evaluating cumulative risks up to 1,000 feet from the nearest receptor (BAAD 2022). Review of Table 4.4-1 demonstrates that there are no other projects within 1,000 feet of the nearest residential receptor. Additionally, the nearest sensitive receptor is not within 1,000 feet of any major transportation routes that other project vehicles may travel. As such, the Project would not be cumulatively considerable.

Moreover, during construction the Project may pose a risk to on-site and off-site receptors through the emissions of fugitive dust that may generate health risks associated with the breathing of particulates, Valley Fever exposure, and pesticide exposure. Every project in the area would be required to comply with all regulatory requirements, including SJVAPCD Regulation VIII, which requires implementing fugitive dust reduction measures, and all federal, state, and local laws pertaining to hazardous waste (including pesticides), avoiding any cumulative impact. Additionally, compliance with OSHA regulations requires the implementation of Valley Fever avoidance measures during construction to educate workers on safety and symptoms.

The Project's ambient air emissions during construction and operation were also evaluated. Construction and operational NO_x, PM₁₀, and PM_{2.5} were found to fall below SJVAPCD screening thresholds. Construction and operational CO exceeded thresholds and, therefore, an ambient air analysis was performed through USEPA's AERMOD to determine the concentration of CO at the fenceline. The CO concentration when combined with background levels was not found to exceed NAAQS or CAAQS thresholds during construction or operation. Therefore, the ambient air quality risks were found to be less



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

than significant. SJVAPCD established these thresholds to determine if an individual project would result in a cumulatively significant impact. Therefore, since the Project falls below SJVAPCD thresholds for local emissions and health risks, it would not be cumulatively considerable.

Given the regulations governing the design of the on-site wastewater treatment facility and brine waste, the limited quantity of solids used as fertilizer, and implementation of Mitigation Measure AQ-28, which requires that any designated smoking areas are located at least 25 feet from the site boundary, the Project would not result in any impacts related to odors. The Project as well as the other past, present, and reasonably foreseeable projects within the SJVAB would also be subject to Rule 4102, Nuisance. Therefore, odors from the Project would not combine with other projects in the vicinity, and a cumulative impact related to odors would not occur.

As stated above, SJVAPCD thresholds are established to determine if a project would result in a cumulative impact. The past, present, and reasonably foreseeable development near the Project site have contributed to and would continue to contribute to air quality impacts in the Project vicinity. All of the projects listed in Table 4.4-1 are also located within the SJVAB and would be subject to review by the SJVAPCD. Accordingly, those projects would also be required to implement similar mitigation and emissions reduction strategies in order to meet the SJVAPCD thresholds.

With implementation of Mitigation Measures AQ-1 through AQ-28, the Project, in conjunction with other past, present, and reasonably foreseeable projects in the SJVAB, would not have a cumulatively significant impact related to air quality.

4.5.4 Biological Resources

The geographic scope of the cumulative biological resources analysis is the immediate Project vicinity. The Project site is located in an area transitioning from agriculture to industrial development. Accordingly, habitats in these areas tend to be disrupted and impacts would be localized.

Past and present actions by humans have substantially altered biological resources in the Central Valley region of California, including San Joaquin County; specifically, compared to historical conditions. Among the most important of these past actions have been conversion of natural vegetation and habitats to agricultural and developed land uses; fill and alteration of aquatic habitats; flood control and water supply projects; and the introduction of nonnative species, which in many cases have competed with, preyed upon, and degraded habitat for native species. More recently, the large-scale conversion of agricultural habitats to urban land uses has resulted in substantial loss of habitat for species that are covered in the San Joaquin County MSHCP.

Past, present, and foreseeable future urbanization within the County and City of Tracy has contributed substantially to the loss of grassland, wetland, and agricultural habitats that are important to many species in the region, including listed species like the burrowing owl. These past and present actions have resulted in significant adverse effects on the extent, species composition, and functioning of natural habitats that occur in the region; and on the distribution and abundance of plant and wildlife species associated with these habitats. Large areas of freshwater marsh, riparian, grassland, and vernal pool vegetation have been lost or degraded in the region over the past 100 years.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

The increase in the distribution and abundance of invasive plant species and nonnative plant communities, the large number of plant and wildlife species listed as threatened or endangered or considered sensitive by the CDFW, and the dramatic reductions in the extent of aquatic habitats and natural vegetation in the Central Valley region are evidence of these overall significant adverse effects.

These actions have altered habitats, biotic interactions, and physical processes that continue to affect species in the region today. However, the San Joaquin County MSHCP is intended to prevent further adverse changes to the biological and ecological systems within the County.

The Project site consists of almond orchards and sparse amounts of ruderal grassland vegetation. As described further in Section 3.4, Biological Resources, the site does not include any riparian habitats, native wildlife nurseries, or designated critical habitat for any federally listed species on or adjacent to the Project site. Additionally, the Project site does not contain any jurisdictional wetlands or waters of the US or the State. However, the Project has the potential to impact special-status birds species including the Swainson's hawk and burrowing owl. However, through the implementation of Mitigation Measures BIO-1 through BIO-4, the impacts to these species as a result of the development of the Project would be reduced to less than significant levels by requiring pre-construction surveys during nesting season, species avoidance, and compliance with the San Joaquin County MSHCP. The San Joaquin County MSHCP requires the payment of fees and compliance with standard Incidental Take Minimization Measures issued for projects to avoid impacts on nesting birds and other avian species. These mitigation measures are standard measures that other projects listed in Table 4.4-1 would be required to implement. As such, the Project would not result in a cumulative impact.

With implementation of Mitigation Measures BIO-1 through BIO-4, the Project, in conjunction with other past, present, and reasonably foreseeable projects in the SJVAB, would not have a cumulatively significant impact related to biological resources.

4.5.5 Cultural Resources

The geographic scope of the cumulative cultural resources analysis is the immediate Project vicinity. Cultural impacts tend to be localized because the integrity of any given resource depends on what occurs only in the immediately area around that resource, such as distribution of soils; therefore, in addition to the Project site the analysis includes the area directly surrounding the site that may be affected by Project activities. Continued urbanization of the region in accordance with applicable land use plans as well as past, present, and probably future development projects (see Table 4.4-1), could result in the disturbance of cultural resources, which includes archaeological and historic-period built environment resources. Regulations protecting cultural resources have substantially reduced the rate and intensity of these impacts. However, even with these regulations, cultural resources are still degraded or destroyed as cumulative development proceeds. As discussed in Section 3.5, Cultural Resources, no listed historic resources are within the Project area and no eligible historic resources exist on the Project site. Thus, no known historic resources would be adversely impacted by Project construction and, therefore, no cumulative impacts would occur. Additionally, a Sacred Lands File search was conducted for archeological resources, which came back negative. Regardless, the Project would implement Mitigation Measures CUL-1 and CUL-2, standard construction mitigation measures, to ensure that undiscovered cultural resources or human remains are not adversely impacted by construction. These mitigation



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

measures are standard measures that other projects listed in Table 4.4-1 would be required to implement. As such, the Project would not result in a cumulative impact.

With implementation of Mitigation Measures CUL-1 and CUL-2, the Project, in conjunction with other past, present, and reasonably foreseeable projects in the applicable geographic area, would not have a cumulatively significant impact related to cultural resources.

4.5.6 Energy

The geographic scope of the cumulative energy resources analysis is the PG&E service area, which consists of most of central and northern California. Increased demand for electrical and natural gas supplies and infrastructure is a byproduct of all future land uses and development throughout the San Joaquin region. Energy is consumed for heating, cooling, and electricity in homes and businesses; for public infrastructure and service operations; and for agriculture, industry, and commercial uses. Each service provider is responsible for ensuring adequate provision of these utilities within their jurisdictional boundaries and would be responsible for upgrading their existing electrical and natural gas distribution systems or constructing new distribution systems to meet the demands of individual projects.

As discussed in Section 3.6, Energy, the Project would result in less than significant impacts during both construction and operations with implementation of Mitigation Measures AQ-6, AQ-7, AQ-8, AQ-11, TRANS-1, and TRANS-2. The consumption of energy resources associated with Project construction would not be considered wasteful or inefficient. In addition, Project construction would comply with all applicable regulations governing fuel efficiency. During operations, the Project would include several sustainability features to ensure that energy would be consumed efficiently. Additionally, all vehicle trips associated with the Project would comply with State regulations governing fuel efficiency.

Other development projects in the cumulative setting would result in the consumption of energy that would combine with the Project. However, future projects would also be required to comply with State-mandated energy efficiency regulations, which have been approved to be progressively more stringent over time. Thus, as cumulative development occurs under the increasingly stringent regulations, the energy use associated with such cumulative development would be anticipated to be increasingly energy efficient over time as well. Based on the above, implementation of the Project in combination with other cumulative development would not result in the wasteful or inefficient use of energy. With implementation of Mitigation Measures AQ-6, AQ-7, AQ-8, AQ-11, TRANS-1, and TRANS-2, the Project, in conjunction with other past, present, and reasonably foreseeable project in the applicable geographic area, would not have a cumulatively significant impact related to energy resources.

4.5.7 Geology and Soils

The geographic scope of the cumulative geology and soils analysis is the Project site. Adverse effects associated with geologic, soil, and seismic hazards tend to be site specific, because each Project site has its own geologic and soils conditions and its own design characteristics.

As discussed in Section 3.7, Geology and Soils, the Great Valley Fault and Greenville Fault are located approximately one mile south and ten miles west, respectively, of the Project site. The Project site is relatively flat and is not located in a landslide area and the liquefaction potential is low. However, the Project site is identified as having the potential for moderately to highly expansive surficial soils with



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

moderate to high shrink/swell potential. The Project would be required to be designed and constructed in accordance with all CBC guidelines and requirements and implement Mitigation Measure GEO-1. Mitigation Measure GEO-1 requires the Project to implement all design specifications and recommendations contained within the Preliminary Geotechnical Exploration Report prior to the issuance of grading permits. Additionally, Mitigation Measure GEO-1 requires the Project to prepare a design-level report that would be submitted to the County and reviewed as part of the building permit review process in order to reduce the impacts of strong ground shaking during an earthquake. These mitigation measures are standard measures that other projects listed in Table 4.4-1 would be required to implement.

Paleontological resources or unique geologic features are also localized to a project site. There are no known unique paleontological resources or unique geologic features present at the Project site. Mitigation Measure GEO-2 requires the Project to adopt procedures for inadvertent discovery of paleontological resources. These mitigation measures are standard measures that other projects listed in Table 4.4-1 would be required to implement.

Cumulative impacts on geology and soils would be less than significant due to the implementation of existing regulations and policies intended to manage geological hazards; and due to the site-specific nature of geological, mineral, and paleontological resource impacts. Increases in population, jobs, buildings, and infrastructure cumulatively considered would create a corresponding increase in exposure to humans and structures to risks associated with seismic activity, expansive soils, and unstable ground. However, each individual project which would contribute to these increases in people and development must meet the requirements of the California Building Code, local ordinances, and land use plan policies, such as developing grading erosion control plans.

Therefore, the Project, in conjunction with other past, present, and reasonably foreseeable planned and approved projects in the vicinity, would not have a cumulatively significant impact related to geology, soils, seismicity, and paleontology.

4.5.8 Greenhouse Gas Emissions

The geographic scope of the cumulative GHG analysis is the State of California. However, GHG impacts are inherently cumulative, and all GHG emissions contribute to the significant environmental impacts of global climate change. Although an individual project cannot generate enough GHG emissions to change climactic conditions, the combination of GHG emissions from an individual project in combination with other future projects could contribute to global climate change.

As discussed in Section 3.8, SJVAPCD does not have an applicable, numerical threshold by which individual projects can compare emissions and determine significance. The Project is expected to generate approximately 80,036 MT CO_{2e} per year (unmitigated) which would exceed Placer County GHG thresholds. However, the Project would implement Mitigation Measures AQ-1 through AQ-27, TRANS-1, and TRANS-2 that would reduce GHG emissions. Mitigation Measure AQ-27 requires the Project applicant to implement a VERA with the SJVAPCD as part of the Project. A VERA is an air quality mitigation measure by which a developer can voluntarily enter into a contractual agreement with the SJVAPCD to mitigate a development project's impact on air quality. Under the agreement, the developer provides funds to the District to administer the implementation of the VERA. The District then identifies emissions reductions projects, funds those projects, and verifies that the specified emission reductions



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

have been successfully achieved. The District considers implementation of a VERA to be a feasible mitigation measure under CEQA, effectively achieving emissions reductions necessary to reduce impacts to a less than significant level (SJVAPCD 2023).

Greenhouse gas and criteria air pollutant emissions generally come from similar sources including transportation, area, industrial, and energy sectors. VERA projects have included replacement of older, higher-emitting agricultural tractors with new latest-tier tractors, replacement of older, higher-emitting agricultural irrigation water pump engines with electric motors, retrofit of residential open-hearth fireplaces with certified natural gas burning inserts, rebates to Valley residents and businesses for the purchase or lease of new clean-air vehicles, new zero-emission railcar moving equipment to replace an existing switcher locomotive for use within the Valley and a dairy feed mixer electrification project (SJVAPCD 2023). Under Mitigation Measure AQ-27, the Project applicant would enter into a VERA to reduce Project emissions. The Project applicant has engaged in conversations with the SJVAPCD and will continue to have future discussions with SJVAPCD staff in order to determine the specific terms of the VERA. While the VERA is designed to reduce criteria air pollutants, the projects it funds would in turn reduce GHG emissions. SJVAPCD does not quantify the GHG emission reductions achieved through the VERA, however it can be assumed that GHG emissions would be greatly reduced as compared to Table 3.8-3 with implementation of Mitigation Measure AQ-27.

Additionally, the Project would include sustainability design features including cool roofs, high efficiency lighting, native landscaping, and a purple pipe system, see Section 2.0, and would be required to adhere to CARB rules and regulations pertaining to fleet emissions, and would provide infrastructure to support EV fleets. Finally, siting new industrial uses within San Joaquin County compared to other areas of the State allows these uses to be placed near existing and upcoming demand due to increase in population, near future employee residences, and near an existing transportation network. These advantages result in less overall vehicle miles traveled for warehouses compared to other areas of the State. Therefore, the Project was determined to be consistent with CARB's 2022 Scoping Plan, SJCOG RTP/SCS, and the General Plan. Other projects in the County are expected to include similar measures and locational advantages to reduce GHG emissions. However, since the Project's GHG emissions would exceed Placer County APCD's GHG threshold and the GHG reductions that would be created by the VERA cannot be quantified at this time, the Project, in combination with other past, present, and reasonably foreseeable projects throughout the State, would result in a cumulatively significant impact related to GHGs.

4.5.9 Hazards and Hazardous Materials

The geographic scope for the cumulative hazards and hazardous materials analysis is the Project area. However, for the transport of hazardous materials, the geographic scope includes local and regional transportation facilities. The health and safety impacts associated with a project usually occur on a project-by-project basis, rather than cumulatively. Development associated with the Project and future development within the area could result in increased hazard related impacts. For example, Project construction would involve the storage, use, disposal, and transport of hazardous materials (such as asphalt, fuel, lubricants, and solvents). Facilities/tenants that may use hazardous materials on-site after the Project is constructed would be required to obtain permits and comply with appropriate regulatory agency standards designed to avoid hazardous waste releases. The storage, use, disposal, and transport of hazardous materials are extensively regulated by various federal, State, and local agencies, and



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

therefore construction companies and businesses (during the operational phase) that would handle any hazardous substances would be required by law to implement and comply with these existing hazardous materials regulations. The potential exists for future nearby project sites to contain hazardous materials (e.g., piles of debris, underground or aboveground storage tanks, septic systems, lead-based paints, asbestos-containing materials, or PCBs). However, if hazardous materials are encountered on-site during construction of the related projects, the associated impacts would be localized to those areas and would not be additive to other hazardous materials-related impacts in the Project site.

As discussed in Section 3.9, Hazards and Hazardous Materials, the Project would not result in any significant impacts associated with hazardous materials with implementation of Mitigation Measures HAZ-1 through HAZ-3, Mitigation Measure HYD-1, and other applicable regulatory measures including General Plan Policy PHS-7.8 and Policy PHS-7.9. Mitigation Measures HAZ-1 through HAZ-3 require the development of a soil management plan, dry well re-abandonment, and hazardous materials management plan. Mitigation Measure HYD-1 requires the preparation of a SWPPP consistent with the NPDES permit. General Plan Policy PHS-7.8 requires all new developments to be consistent with the County Hazardous Waste Management Plan and Policy PHS-7.9 requires public disclosure of hazardous materials and waste for proposed businesses. The other past, present, and reasonably foreseeable projects have been and would be subject to applicable federal, State, and local regulatory requirements and similar mitigation measures regarding the transport of hazardous materials, clean up of hazardous materials, and the use and storage of hazardous materials during construction and operation. Additionally, hazardous material impacts tend to be localized to individual project sites. Consequently, the Project, in conjunction with other past, present, and reasonably foreseeable planned and approved projects in the vicinity, would not have a cumulatively significant impact related to hazards.

4.5.10 Hydrology and Water Quality

The geographic scope of the cumulative hydrology and water quality analysis is the immediate Project area for water quality impacts and the region for hydrologic impacts.

The Project would involve short-term construction and long-term operational activities that would have the potential to degrade water quality in downstream water bodies. These activities would be subject to regulatory requirements to ensure that no adverse impacts would occur. Additionally, the Project would implement Mitigation Measure HYD-1 to prepare a SWPPP and applicable BMPs consistent with the NPDES Permit and Mitigation Measure HYD-2 that requires the Project to obtain coverage under the NPDES Industrial General Permit. Additionally, the Project would construct water and wastewater treatment facilities. These facilities would be operated in compliance with San Joaquin EHD and the RWQCB. Other past, present, and reasonably foreseeable projects that propose new development have been and would be required to implement similar mitigation measures in accordance with applicable laws and regulations. The combined implementation of construction and operation water quality control measures by other past, present, and reasonably foreseeable projects would avoid, or reduce to a less than significant level, any related cumulative impacts on downstream waterways.

In regard to groundwater supplies, the Project would construct a new water treatment system that would extract 58 AFY from the Tracy Subbasin. As discussed in Section 3.10, Hydrology and Water Quality, the additional groundwater pull from the Tracy Subbasin would not impact private well users or the City of Tracy Water District's supply. Moreover, it was determined that the Tracy Subbasin would have adequate



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

groundwater to support the Project. Other projects that rely on existing water suppliers would consult with the supplier to ensure adequate water is available to serve the project during normal, dry-year, and multiple dry year conditions. The Tracy Subbasin provides water to other nearby private wells and to the City of Tracy Water District. The Tracy Water District would be the water provider to all projects within the City's boundaries or SOI listed in Table 4.4-1 (e.g., La Quinta Hotel, Schulte Warehouse/Annexation, Westside Specific Plan). The City of Tracy Water District is planning to expand surface water use and decrease the annual groundwater use by approximately 1,000 AFY by 2030. The Project would also pump only 0.03% percent of the Tracy Subbasin's sustainable yield of 178,000 AFY. With the reduction of groundwater supplies by the City of Tracy Water District and the sustainable yield of the Tracy Subbasin, adequate water supplies would be available for other projects that may rely on groundwater. The combined implementation of construction and operation water quality control measures by other past, present, and reasonably foreseeable projects would avoid, or reduce to a less than significant level, any related cumulative impacts on downstream waterways.

Other Project-related hydrology impacts were found to be less than significant with Mitigation Measures HYD-1 and HYD-2 (e.g., drainage). Other past, present, and reasonably foreseeable projects that propose new development have been and would be required to implement similar mitigation measures in accordance with applicable laws and regulations. The combined implementation of construction and operation water quality control measures by other past, present, and reasonably foreseeable projects would avoid, or reduce to a less than significant level, any related cumulative impacts on drainage.

Therefore, the Project, in conjunction with other past, present, and reasonably foreseeable planned and approved projects in the vicinity, would not have a cumulatively significant impact related to hydrology and water quality.

4.5.11 Land Use and Planning

The geographic scope of the cumulative land use analysis is San Joaquin County, including the City of Tracy. The cumulative land use analysis includes all existing, approved, proposed and reasonably foreseeable development projects within the County and City of Tracy. Land use inconsistency is not considered a significant cumulative effect because it is not a physical environmental impact. Moreover, the combination of land use policy inconsistencies would not rise to the level of a physical effect.

Existing development in the immediate Project vicinity is predominantly industrial and agricultural uses with residential uses to the east of the Project site. Projects under construction within the immediate Project vicinity include PA-1900208, PA-2100207, and PA-1400084. These projects are constructing new vehicle warehousing, distribution facilities, storage facilities, and parking areas within unincorporated San Joaquin County. PA-1900208 lies adjacent to the Project site and PAS 2100207 and PA-1400084 lies approximately 1.5 miles southwest of the Project site. Foreseeable future development in the area includes the Costco Annexation, Schulte Warehouse/Annexation, and Cordes Ranch Building 18.

The Project would require a GPA to amend the General Plan land use designation of the site from A/G to I-G and a rezoning from AG-40 to I-G/SP-1. As discussed in Section 3.11, the Project would not divide a community and would be consistent with the San Joaquin County General Plan. The Project site is located in an area transitioning from agriculture to industrial development. Projects under consideration in the area and reasonably foreseeable future projects would be required to be consistent with the General



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

Plan. Though the Project is not proposing an annexation, in the event that the Project site is annexed by the City of Tracy, the Project is consistent with other industrial developments within the City and the City's SOI including IPC Phase 1. Therefore, the Project, in conjunction with past, present, and reasonably foreseeable development, would not result in a cumulatively significant land use impact.

4.5.12 Noise

The geographic scope of the cumulative noise analysis is the immediate Project vicinity. Noise impacts tend to be localized; therefore, the area near the Project site would be the area most affected by Project activities.

The Project's construction noise levels may cause a temporary increase in noise levels at nearby receptors. Noise impacts from Project construction were found to be below Federal Transit Administration criteria of 80 dB(A), however noise from Project construction would be more than 5 dB(A) above ambient noise levels. Other projects in the project vicinity that could be under construction at the same time of the Project (such as PA-1900208, PA-2100207, and PA-1400084) could combine to expose sensitive receptors to excessive construction noise. However, noise is a localized phenomenon, and the properties of noise are not additive. Moreover, all projects would be subject to the County's or City of Tracy's noise ordinance requirements. Therefore, the Project, together with other past, present, and probably future projects, would not result in cumulatively significant construction noise impacts.

The Project would increase traffic volumes along most roadways surrounding the Project site. However, there would be essentially no change or minimal impacts in the traffic noise expected along the nearby roadways and intersections. Additionally, the Project would not generate any truck traffic on South Lammer Road and, therefore, trucks would not directly pass by residential homes or high schools. The cumulative vehicle trips from all past, present, and reasonably future projects in the area would likely use similar trucking routes to I-205 and I-580. These trucking routes mostly pass through existing or planned industrial developments and, therefore, operational noise would not be placed near existing receptors. Therefore, the Project, together with other past, present, and probably future projects, would not result in cumulatively significant operational noise impacts.

4.5.13 Population and Housing

The geographic scope for the cumulative population and housing impact would typically be the County boundaries. Population growth is not considered a significant cumulative effect because it is not a physical environmental impact. However, the direct and indirect effects, such as housing and infrastructure needs that are related to population growth, can lead to physical environmental effects. As discussed in Section 3.13, Population and Housing, the Project would not construct any new housing that would lead to the increase in population. During operation, the Project would create 4,733 jobs. As discussed in Section 3.13, the County has already exceeded employment estimates under the General Plan. Therefore, the County already experiences unplanned growth beyond what was evaluated within the General Plan. However, the Project would be consistent with the land use goals and policies guiding employment-generating uses and employees are expected to come from the local workforce.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

As shown in Table 4.4-1, there are several large industrial projects within San Joaquin County that would lead to an increase in employment in conjunction with the Project. Table 4.5-1 below shows the large industrial developments and the employment estimates.

Table 4.5-1. Cumulative Employment Estimates

Number	Lead Agency	Project Name	Project Address	Description	Status	Employees ¹
1	City of Tracy	2 Industrial Buildings (Costco Annexation)	16000 West Schulte Road	1,812,279-sf industrial use	Under City Review	1,208
5	City of Tracy	Golden State Fire - Fire Apparatus	3501, 3601, 3701 Mars Way	55,226-sf industrial use	Under City Review	37
9	City of Tracy	Martin's Paving Inc. New Building	3880 Holly Drive	58,268-sf mixed commercial and industrial use	Under City Review	38
13	City of Tracy	Schulte Warehouse/ Annexation	16286 West Schulte Road	217,466-sf mixed commercial and industrial use	Under City Review	145
14	City of Tracy	Tracy Alliance - 4 Industrial Buildings (Annexation)	6599 West Grant Line Road	122.39-acre mixed commercial and industrial use (3,352,320 sf of development)	Under City Review	2,235
26	San Joaquin County	PA-1800244	3501 West Lehman Road, Tracy, 95304	66,400-sf agricultural (nut) processing/preparation facility	Under Construction	44
41	San Joaquin County	Pacific Gateway	east of I-580; north of SR 132;	1,612.90-acre mixed use logistics plan area including 24,675,000	Pending/In Review	1,768 (Phase



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

Number	Lead Agency	Project Name	Project Address	Description	Status	Employees ¹
		(PA-2100188)	bounded by Durham Ferry Road to the north and Tracy Boulevard to the west	square feet of industrial development		One Buildout) ²
42	City of Tracy	Cordes Ranch - Marriott Courtyard, West Parkway Village	International Parkway/I-205	62,000-sf mixed commercial space, part of the larger Cordes Ranch development	Approved	41
43	City of Tracy	Cordes Ranch - Promontory Station	815 International Parkway	30,330-sf mixed commercial space, part of the larger Cordes Ranch development	Approved	20
44	City of Tracy	Cordes Ranch Building 13	6050 Promontory Parkway	150,159-sf mixed commercial and industrial space, part of the larger Cordes Ranch development	Under City Review	100
45	City of Tracy	Cordes Ranch Building 18	5070 Promontory Parkway	1,319,092-sf mixed commercial and industrial space, part of the larger Cordes Ranch development	Under City Review	880
46	City of Tracy	Cordes Ranch Building 2	6551 West Schulte Road	375,696-sf of mixed commercial and industrial space, part	Under Construction	250



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

Number	Lead Agency	Project Name	Project Address	Description	Status	Employees ¹
				of the larger Cordes Ranch development		
47	City of Tracy	Cordes Ranch Building 28	5390 Promontory Parkway	524,081-sf mixed commercial and industrial space, part of the larger Cordes Ranch development	Under City Review	349
55	City of Tracy	Tracy Hills Commerce Center	29592 South Corral Hollow Road	97.53-acre mixed commercial and industrial use (1,729,453 sf development)	Under City Review	1,153
65	City of Tracy	Hollingsworth Trailer Lot and Guardhouse	2259 East Grant Line Road	11.3-acre industrial and commercial use	Under City Review	329 ³
67	City of Tracy	Paradise Pointe Business Park	3601 Pescadero Avenue	57.2-acre mixed use development (718,165 sf of industrial development)	Under City Review	521
68	City of Tracy	Seefried - 3 New Industrial Buildings	7191 West Grant Line Road	1,035,500-sf industrial development	Under Construction	690
69	City of Tracy	Seefried LI Building (NEI)	1651 East Grant Line Road	335,157-sf industrial development	Under City Review	224
Project Employment						4,733
Large Industrial Development Cumulative Employment						17,729



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Cumulative Effects

Number	Lead Agency	Project Name	Project Address	Description	Status	Employees ¹

Notes:

¹ Unless otherwise noted, Employment is calculated assuming 1 employee per 1,500 square feet as was the assumption for the Project.

² The Pacific Gateway Project would construct approximately 24,675,000 square feet of industrial development and employ approximately 15,400 people. However, only the initial phase would be in construction or operational by Project buildout, therefore by 2035 it is anticipated that approximately 11 percent of the site would be built out resulting in approximately 1,768 employees (San Joaquin County 2025).

³ Assumed industrial space to be across entire site acreage.

As shown in the table above, the Project in conjunction with other large industrial developments in the County would result in 17,729 new employees. The other projects listed in Table 4.4-1 are residential developments and smaller commercial and industrial developments that would generate less employees than the large industrial developments. As discussed above, current employment within the County exceeds planned job growth in the General Plan. The Project would contribute to unplanned job growth, however the Project would comply with General Plan land use policies regarding the location of new employment centers and Project impacts would not be considered substantial unplanned growth. Cumulative growth would further unplanned job growth within the County. However, not all projects listed in Table 4.4-1 would be located within urban areas, near freeway interchanges, or in areas designated for commercial or industrial use consistent with General Plan Policy LU-1.6 and Goal LU-1. As such, the cumulative employment from these projects may not comply with the planned job growth trends within the General Plan and the cumulative job growth would be considered substantial. Therefore, the Project, in conjunction with other past, present, and reasonably foreseeable projects in the applicable geographic area, would have a cumulatively significant impact related to population and housing.

4.5.14 Public Services

The geographic scope of the cumulative public services is the Project vicinity or the County. Although a cumulative shortage of public services and facilities would not in and of itself represent a significant environmental impact under CEQA because these are not physical impacts on the environment, such a shortage could lead to the need to develop additional public-services facilities, which could in turn lead to significant construction- and operation-related environmental impacts. It is assumed that future development and/or development of the additional public-services facilities required to serve them would be preceded by the required environmental review. However, conducting the required CEQA review of the related projects would not necessarily guarantee that significant environmental effects associated with construction of new fire, police, school facilities, and other public services would not occur. Because of differences in the nature of the public service and utility topical areas, they are discussed separately.

Fire Protection

The geographic scope of the cumulative fire protection analysis is the Project vicinity. As discussed in Section 3.14, Public Services, the Tracy Fire District currently provides fire protection to the Project area. The existing Fire Station 94 services the Project vicinity and as discussed, once relocated within the Cordes Ranch Specific Plan area would continue to service the Project vicinity. Tracy Fire District provides fire protection services to the unincorporated areas surrounding the City of Tracy. The service



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

area for the Tracy Fire District is defined as the approximately 200-square mile region bounded by the Grant Line Canal to the north, the San Joaquin River to the east, I-850 to the south, and the Alameda County line to the west. Several projects listed in Table 4.4-1 are also located within the Tracy Rural Fire District's jurisdiction (e.g., Cordes Ranch, Tracy Hills Commerce Center, PA-2000065) and would also be serviced by the Tracy Fire District. Based on fire station coverage and the planned relocation of Station 94, existing and planned facilities are expected to provide adequate service to the Project area and other cumulative development.

The Project and other past, present, and reasonably foreseeable projects within the unincorporated County serviced by the Tracy fire district have been and would continue to be reviewed for impacts on fire protection services and also have been and would continue to be required to address any potential impact with mitigation. The Tracy Fire District plans for future service needs and facility improvements as growth occurs and identifies when additional capital facilities are required to maintain service levels. Additionally, the Tracy Fire Department plans for future service needs consistent with existing demands and growth anticipated in the County planning documents, including the need to provide mutual aid when requested for services outside the city. As such, the Tracy Fire District has not identified the need to expand existing facilities or construct new facilities. If future improvements are needed, all projects within the County would be subject to San Joaquin County Code Chapter 9-1225, Fire Protection Facilities Financing, which would require a developer fee to offset the increase in fire protection services from new development. Therefore, the Project, in conjunction with other past, present, and reasonably foreseeable development, would not have a cumulatively significant impact related to fire protection.

Police Protection

The geographic scope of the cumulative police protection analysis is the County. As discussed in Section 3.14, Public Services, the County Sheriff's Office provides police protection for the unincorporated area of the County. Several projects listed in Table 4.4-1 are also located within unincorporated San Joaquin County (e.g., PA-0500776, PA-0600630, PA-0800005) and would also be serviced by the County Sheriff's Office.

The Project and other past, present, and reasonably foreseeable projects within the unincorporated County serviced by the County Sheriff's Office have been and would continue to be reviewed for impacts on police services and also have been and would continue to be required to address any potential impact with mitigation. All projects within the County would be subject to San Joaquin County Code Chapter 9-1245, County Facilities Fee Program, which requires developers to pay a fee to offset to fund capital facilities, which includes County police facilities. Additionally, the Sheriff's office plans for service needs consistent with existing demands and growth anticipated in County planning documents. Therefore, the Project, in conjunction with other past, present, and reasonably foreseeable development, would not have a cumulatively significant impact related to police protection.

Schools

The geographic scope of the cumulative school analysis is the County. As discussed in Section 3.14, Public Services, the County is served by 14 school districts. However, the Project would not directly induce population growth and, as a result, would not impact schools within the County. Furthermore, all development projects in the County would also be subject to payment of mandatory school impact fees



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

under SB 50. As such, the Project, in conjunction with other past, present, and reasonably foreseeable development, would not have a cumulatively significant impact related to schools.

Parks

The geographic scope of the cumulative park analysis is the County. As discussed in Section 3.14, Public Services, the County includes 500 acres of regional park and recreation areas; 1,494 acres of State parks and recreation areas; 2,632 acres of local parks and recreation areas; and 1,386 acres of State wildlife areas. However, the Project would not directly induce population growth and, as a result, would not impact parks within the County. In addition, future residential projects within the County would be subject to San Joaquin County Code Chapter 9-1230, Local Park and Recreation Facilities Financing, which requires dedication of land and/or payment of fees for local park and recreation facilities. As such, the Project, in conjunction with other past, present, and reasonably foreseeable development, would not have a cumulatively significant impact related to parks.

Other Public Services

The geographic scope of the cumulative, other public services analysis is the County. As discussed in Section 3.14, other public services include the Stockton-San Joaquin County Public Library system which has nine branch libraries. The nearest branch libraries to the Project site are located within the City of Tracy and within the unincorporated community of Mountain House. However, the Project would not induce population growth and, as a result, would not result in impacts to other public services within the County. Moreover, future projects in the County would be subject to San Joaquin County Code Chapter 9-1245, County Facilities Fee Program, which establishes a fee that finances region-serving Capital Facilities located throughout the County to ensure that new developments pay its fair share of improvements to capital facilities. As such, the Project, in conjunction with other past, present, and unreasonably foreseeable development, would not have a cumulatively significant impact related to other public services.

4.5.15 Recreation

The geographic scope for recreation would typically be the County boundaries. However, as discussed in Section 3.15, Recreation, the Project would not construct any new housing that would lead to a direct increase in population. Additionally, the Project would comply with General Plan land use policies regarding the location of new employment centers and would hire from the existing population. As such, the Project would not directly or indirectly increase the County's population that would require new or expanded recreational facilities. Furthermore, future projects within the County would be subject to San Joaquin County Municipal Code Chapter 9-1230, Local Park and Recreation Facilities Financing, requires developers to dedicate land, pay an in-lieu fee thereof, or a combination, for park and recreational purposes. Therefore, the Project, in conjunction with other past, present, and reasonably foreseeable projects in the applicable geographic area, would not have a cumulatively significant impact related to recreation.

4.5.16 Transportation

The geographic scope of the cumulative transportation analysis is the Project region, including unincorporated areas of San Joaquin County and the City of Tracy. The TIA prepared by Fehr & Peers for



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

the Project included an evaluation of impacts under cumulative conditions both with and without the Project. The cumulative conditions were developed using the refined City of Tracy travel demand model, which considers buildout of planned projects including, but not limited to, Westside, Cordes Ranch, and Tracy Hills.

With implementation of Mitigation Measure TRANS-1, which requires the Project to coordinate with San Joaquin RTD and TRACER transit service to ensure the Project site is designed to accommodate a service extension to the site, the Project would not conflict with any plans related to the circulation system. Cumulative buildout in the Project region is expected to result in additional vehicles on area roadways, pedestrians and cyclists, and transit riders. However, roadway extensions and improvements would occur in concert with development in the region, and future projects are expected to be generally carry out and/or fund the improvements planned in the SJCOG's RTP/SCS, the SJCOG Bicycle, Pedestrian, and Safe Routes to School Master Plan, the San Joaquin SRTP, and San Joaquin County Bicycle Master Plan. Additionally, development projects are subject to payment into the RTIF program, which is intended to fund transportation and transit improvements to mitigate potential impacts associated with new urban growth. Therefore, a cumulative impact would not occur related to conflicts with any program, plan, or ordinance addressing the circulation system.

Under cumulative conditions, Project VMT per employee was estimated to be 33.8, which would exceed the applicable threshold of 26.5 VMT per employee (Fehr and Peers 2024). Even with implementation of Mitigation Measure TRANS-2, which requires implementation of a TDM Plan, the cumulative impact would remain significant and unavoidable.

The Project would not include any hazardous design features or incompatible uses. Future projects in the region would be subject to County and City of Tracy design standards and, as a result, future roadways would also not include hazardous design features. However, as discussed in the TIA, the Project in conjunction with past, present, and reasonably foreseeable projects would result in an increase in truck traffic to the Project vicinity that would impact roadway operational efficiency, see Appendix O. The increases in traffic that may be beyond what existing roadways are able to accommodate resulting in a cumulative roadway hazards impact.

Implementation of Mitigation Measure TRANS-3 would ensure that the Project provides adequate emergency access to the site. Future projects in the region would be subject to the same regulatory requirements ensuring emergency access, including STAA standards, the California Fire and Building Codes, and review by the applicable fire department.

Even with Mitigation Measures TRANS-1 through TRANS-3 the Project, in conjunction with other past, present, and reasonably foreseeable projects in the applicable geographic area, would have a cumulatively significant impact related to transportation due to the significant VMT per employee and potential for cumulative impacts from increasing hazards.

4.5.17 Tribal Cultural Resources

The geographic scope of the cumulative tribal cultural resources analysis is the Project site. In general, impacts to cultural and tribal cultural resources tend to be site-specific. For example, impacts to a subsurface resource find at one project site would not generally be made worse by impacts to a resource at a different project site.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

According to CEQA, the importance of tribal cultural resources is the value of the resource to the California Native American Tribes culturally affiliated with the Project area. Therefore, the issue that must be explored in a cumulative analysis is the loss of tribal cultural resources. For tribal cultural resources that are avoided or preserved through dedication within open space, no impacts would occur. However, if avoidance or dedication of open space to preserve tribal cultural resources is infeasible, those impacts must be considered in combination with tribal cultural resources that would be impacted for other projects included in the related project list.

As discussed in Section 3.17, Tribal Cultural Resources, no tribal cultural resources have been identified during the cultural evaluation or through tribal consultation. In the event that subsurface tribal cultural resources are inadvertently discovered during construction, mitigation measures would be implemented to reduce impacts to a less than significant level. Any related project in the cumulative setting that involves ground-disturbing activities would have the potential to result in significant impacts to tribal cultural resources. However, all projects would be regulated by applicable federal, State, and local regulations to avoid the destruction of tribal cultural resources. Therefore, the Project, in conjunction with other past, present, and reasonably foreseeable projects in the applicable geographic area, would not have a cumulatively significant impact related to tribal cultural resources.

4.5.18 Utilities and Service Systems

The geographic area for cumulative utilities and service systems impacts is the service area of the utility and service systems providers. Each utility is discussed separately below.

Water

The geographic area for cumulative water supply impacts is the Project site that would be serviced by its own water district and the Tracy Subbasin. As discussed in Section 3.18, Utilities and Service Systems, the Project would require the construction of a new water treatment system on the site, and construction activities would be required to comply with Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, CUL-1, GEO-1, GEO-2, HAZ-1, HAZ-2, HAZ-3, AQ-1, and AQ-2 to reduce the environmental impacts associated with construction. The water system would include potable wells that would pump up to 58 AFY of water from the Tracy Subbasin, which is well within the sustainable yield. According to the WSA, the Project would be sufficiently served for the normal, single dry, and multi-year drought scenarios. The Tracy Subbasin provides water to other nearby private wells and to the City of Tracy Water District. The Tracy Water District would be the water provider to all projects within the City's boundaries or SOI listed in Table 4.4-1 (e.g., La Quinta Hotel, Schulte Warehouse/Annexation, Westside Specific Plan). It was determined that the Project's pumping from the Tracy Subbasin would not impact private well users or the Tracy Water District due to the vertical dispersion and distance of wells. Kier and Wright tested groundwater at three test wells across the Project site and determined that the highest quality water from the Tracy Subbasin at the Project site is at depths of 440 to 490 feet, within the confined zone of the lower aquifer. Therefore, the Project would pump groundwater from the confined zone. The closest private wells to the Project site are approximately 700 feet away and pump groundwater from depths of 305 to 330 feet, within the unconfined zone of the upper aquifer (Kier and Wright 2023a). The vertical separation between the Project and private groundwater wells would limit the hydraulic interference (Kier and Wright 2023b). Additionally, the City of Tracy Water District is planning to expand surface water use and decrease the annual groundwater use by approximately 1,000 AFY by 2030. The Project would also pump only 0.03%



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

percent of the Tracy Subbasin's sustainable yield of 178,000 AFY. With the reduction of groundwater supplies by the City of Tracy Water District and the sustainable yield of the Tracy Subbasin, adequate water supplies would be available for other projects that may rely on groundwater. Additionally, the Project is resulting in a net surplus of 1,422 AFY of surface water that would be available for reasonably foreseeable future projects. As a result, cumulative impacts would not occur.

With implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, CUL-1, GEO-1, GEO-2, HAZ-1, HAZ-2, HAZ-3, AQ-1, AQ-2, AQ-3, AQ-4, and AQ-5, the Project, in conjunction with other past, present, and reasonably foreseeable projects in the applicable geographic area, would not have a cumulatively significant impact related to water supply.

Wastewater

The geographic area for cumulative wastewater treatment impacts is the Project site that would be serviced by its own wastewater treatment facilities. As discussed in Section 3.18, Utilities and Service Systems, the Project would require the construction of a new wastewater treatment system on the site. The Project would be subject to Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, CUL-1, GEO-1, GEO-2, HAZ-1, HAZ-2, HAZ-3, AQ-1, and AQ-2 to reduce the environmental impacts associated with construction. The new wastewater system would be sized to handle the Project's wastewater generation and would not support any off-site uses. The other projects listed in Table 4.4-1 would be serviced by other wastewater treatment facilities; thus, cumulative impacts would not occur.

With implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, CUL-1, GEO-1, GEO-2, HAZ-1, HAZ-2, HAZ-3, AQ-1, and AQ-2, the Project, in conjunction with other past, present, and reasonably foreseeable projects in the applicable geographic area, would not have a cumulatively significant impact related to wastewater treatment.

Stormwater

The geographic area for cumulative stormwater impacts is the Project site. The Project would include the construction of a new stormwater drainage system on-site that would provide for treatment and detention of stormwater runoff on the Project site. All stormwater runoff from the site would be treated and stored on-site, as discussed in the Preliminary Geotechnical Exploration report prepared by ENGEO on November 4, 2021, the Project's soil type generally consists of very stiff to hard lean clay that does not allow for groundwater recharge (ENGEO 2021). Stormwater currently flows from the site and offsite to the WSID Upper Main Canal. The detention and treatment basins on the site would provide stormwater quality enhancement on the site and the Project is negotiating an agreement with the BBID that would allow for the metered discharge of the stormwater from the detention basins to the existing WSID Upper Main Canal bisecting the site during large storm events or when there is no remaining capacity to store treated stormwater on-site. The Project would be subject to Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, CUL-1, GEO-1, GEO-2, HAZ-1, HAZ-2, HAZ-3, AQ-1, and AQ-2 to reduce the environmental impacts associated with construction. The other projects listed in Table 4.4-1 would be serviced by other stormwater systems and would be required to comply with BMPs from the 2020 SWQCCP or other applicable stormwater plans. In the event other projects need to dispel stormwater into the WSID Upper Main Canal, they would similarly be required to coordinate with BBID. Thus, cumulative impacts would not occur.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

With implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, CUL-1, GEO-1, GEO-2, HAZ-1, HAZ-2, HAZ-3, AQ-1, and AQ-2, the Project, in conjunction with other past, present, and reasonably foreseeable projects in the applicable geographic area, would not have a cumulatively significant impact related to stormwater.

Solid Waste

The geographic area for cumulative solid waste impacts is the County. Tracy Delta Solid Waste Management currently provides services to the southeastern portion of the County for the collection, transportation, and disposal of refuse and garbage. Solid waste is collected at the Tracy Material Recovery Facility and Transfer Station before being transported to the Foothill Sanitary Landfill.

Projects within the County would have their solid waste go to the Foothill Sanitary Landfill, North County Landfill, or Forward Landfill. As discussed in Section 3.18, Utilities and Service Systems, solid waste from the Project would represent approximately three percent of the daily capacity at the Foothill Sanitary Landfill. The Foothill Sanitary Landfill has a daily permitted capacity of 1,500 tons per day and a total permitted capacity of 138 million cubic yards with a remaining capacity to accommodate 125 million cubic yards of solid waste. In 2024, the Foothill Sanitary Landfill received an average daily volume of 1,194 tons of waste per day and as such is below its daily permitted capacity. Currently, it indicates a closure year of 2082 (CalRecycle 2026a, San Joaquin County 2026a). The North County Landfill has a daily permitted capacity of 1,200 tons per day and a total permitted capacity of 41.2 million cubic yards with a remaining capacity to accommodate 35.4 million cubic yards of solid waste (CalRecycle 2026b, San Joaquin County 2026b). In 2024, the North County Landfill received an average daily volume of 789 tons of waste per day and as such is below its daily permitted capacity. Currently, it indicates a closure year of 2065 (San Joaquin County 2026c). Finally, the Forward Landfill has a daily permitted capacity of 8,668 tons per day and a total permitted capacity of 59.2 million cubic yards with a remaining capacity to accommodate 24.7 million cubic yards of solid waste. The Forward Landfill accepts approximately 4,000 tons of waste per day and as such is below its daily permitted capacity. Currently, it indicates a closure year of 2036 (CalRecycle 2026c, Republic Services 2026).

As shown in Table 4.5-2, there are several large industrial projects within San Joaquin County that would lead to an increase in employment in conjunction with the Project. Table 4.5-2 below shows the large industrial developments and the employment estimates.

Table 4.5-2. Cumulative Solid Waste Estimates

Number	Lead Agency	Project Name	Project Address	Solid Waste (lbs/day) ¹	Solid Waste (tons/day)	Solid Waste (tons/year)
1	City of Tracy	2 Industrial Buildings (Costco Annexation)	16000 West Schulte Road	16,695	8.35	3,047
2	City of Tracy	4-Story Hotel (Tru by Hilton)	2605 West Grant Line Road	156	0.08	28
3	City of Tracy	GH Logistics Truck Repair	1428 Mariani Court	61	0.03	11
4	City of Tracy	Golden Springs and Corbett Lane	South side of I-205, at Golden Springs Drive	1,003	0.50	183



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Cumulative Effects

Number	Lead Agency	Project Name	Project Address	Solid Waste (lbs/day) ¹	Solid Waste (tons/day)	Solid Waste (tons/year)
5	City of Tracy	Golden State Fire - Fire Apparatus	3501, 3601, 3701 Mars Way	511	0.26	93
6	City of Tracy	Johnny's Diner-Outdoor Eatery	22 East 9 th Street	40	0.02	7
7	City of Tracy	La Quinta Hotel	565 Clover Road	174	0.09	32
8	City of Tracy	Larkspur Basin Lots	DeBord Drive and Cairo Court	140	0.07	26
9	City of Tracy	Martin's Paving Inc. New Building	3880 Holly Drive	525	0.26	96
10 ²	City of Tracy	Monopine-250 W Mt. Diablo Ave	250 West Mount Diablo	0	0	0
11	City of Tracy	Retail Center and Apartments (The Station)	NEC South Tracy Boulevard and Gandy Dancer Drive	2,735	1.37	499
12	City of Tracy	Rocking Horse (Version 2)	Lammers Road, north of West Schulte Road	2,764	1.38	504
13	City of Tracy	Schulte Warehouse/Annexation	16286 West Schulte Road	2,004	1.00	366
14	City of Tracy	Tracy Alliance - 4 Industrial Buildings (Annexation)	6599 West Grant Line Road	30,888	15.44	5,637
15	City of Tracy	Tracy Pavilion	Lammers Road, north of Grant Line Road	9,185	4.59	1,676
16	City of Tracy	Tracy Village	SEC Valpico Road and Corral Hollow Road	7,265	3.63	1,326
17	City of Tracy	Westside Ranch	SEC 11 th Street and Lammers Road	4,150	2.08	757
18	City of Tracy	Westside Specific Plan	SWC Lammers Road and 11 th Street	149	0.07	27
19	City of Tracy	PA-2300194	30022 S State Route 33	247	0.12	45
20	City of Tracy	PA-1900085	21356 S Naglee Road	338	0.17	62
21	City of Tracy SOI	Gateway/Westside Specific Plan	Lammers Road and 11 th Street	10,481	5.24	1,913
22	San Joaquin County	PA-0500776	24500 South Macarthur Drive, Tracy, 95376	718	0.36	131
23	San Joaquin County	PA-0600630	11770 West Clover Road, Tracy, 95304	137	0.07	25



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Cumulative Effects

Number	Lead Agency	Project Name	Project Address	Solid Waste (lbs/day) ¹	Solid Waste (tons/day)	Solid Waste (tons/year)
24	San Joaquin County	PA-0800005	30703 South MacArthur Drive, Tracy, 95377	540	0.27	98
25	San Joaquin County	PA-1400084	26955 South Hansen Road, Tracy, 95377	387	0.19	71
26	San Joaquin County	PA-1800244	3501 West Lehman Road, Tracy, 95304	608	0.30	111
27	San Joaquin County	PA-1800305	26106 South Patterson Pass Road, Tracy, 95377	365	0.18	67
28	San Joaquin County	PA-1800316	7300 West Delta Avenue, Tracy, 95304	142	0.07	26
29	San Joaquin County	PA-1900127	16151 West Grant Line Road, Tracy, 95304	422	0.21	77
30	San Joaquin County	PA-1900208	14800 West Schulte Road, Tracy, 95377	9,647	4.82	1,761
31	San Joaquin County	PA-2000065	17400 West Bethany Road, Tracy, 95391	170	0.09	31
32	San Joaquin County	PA-2000185	13347 West Middle Road, Tracy, 95304	126	0.06	23
33	San Joaquin County	PA-2100126	24707 South Bird Road, Tracy, 95304	425	0.21	78
34 ²	San Joaquin County	PA-2100207	26901 South Hansen Road, Tracy, 95377	0	0	0
35	San Joaquin County	PA-2100209	28524 South Kasson Road, Tracy, 95304	1,007	0.50	184
36	San Joaquin County	PA-2100238	12925 West Bethany Road, Tracy, 95304	189	0.09	34
37	San Joaquin County	PA-2100275	7500 West 11 th Street, Tracy, 95304	102	0.05	19
38 ²	San Joaquin County	PA-2200137	20042 West Patterson Pass Road, Tracy, 95377	0	0	0
39 ²	San Joaquin County	PA-2200143	31013 South Tracy Boulevard, Tracy, 95377	0	0	0



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Cumulative Effects

Number	Lead Agency	Project Name	Project Address	Solid Waste (lbs/day) ¹	Solid Waste (tons/day)	Solid Waste (tons/year)
40	San Joaquin County	PA-2200149	23751 South Bird Road, Tracy, 95304	304	0.15	56
41	San Joaquin County	Pacific Gateway (PA-2100188)	east of I-580; north of SR 132; bounded by Durham Ferry Road to the north and Tracy Boulevard to the west	24,434	12.22	4,459
Cordes Ranch Specific Plan Projects						
42	City of Tracy	Cordes Ranch - Marriott Courtyard, West Parkway Village	International Parkway/I-205	567	0.28	103
43	City of Tracy	Cordes Ranch - Promontory Station	815 International Parkway	276	0.14	50
44	City of Tracy	Cordes Ranch Building 13	6050 Promontory Parkway	1,382	0.69	252
45	City of Tracy	Cordes Ranch Building 18	5070 Promontory Parkway	12,162	6.08	2,219
46	City of Tracy	Cordes Ranch Building 2	6551 West Schulte Road	3,455	1.73	631
47	City of Tracy	Cordes Ranch Building 28	5390 Promontory Parkway	4,823	2.41	880
48	City of Tracy	Cordes Ranch Central Green	Cordes Ranch	0	0.00	0
49	City of Tracy	Cordes Ranch West Parkway Village Multi-Tenant Building	Cordes Ranch	63	0.03	11
50	City of Tracy	Cordes Ranch – Gas Station, Convenience Store, and Car Wash – Chevron (West Parkway Village)	International Parkway/I-205	61	0.03	11
Ellis Specific Plan						
51	City of Tracy	Ellis Phase 2	Ellis Town Drive	4,354	2.18	795
52	City of Tracy	Ellis Phase 3	4260 Lammers Road	3,767	1.88	687
53	City of Tracy	Ellis RE Lots/Limited Use Area	SE area of Ellis Specific Plan	110	0.06	20
54	City of Tracy	Avenues	12650 West Valpico Road	1,920	0.96	350
City of Tracy Specific Plan						
55	City of Tracy	Tracy Hills Commerce Center	29592 South Corral Hollow Road	15,934	7.97	2,908
56	City of Tracy	Tracy Hills KT Project (Hillview)	Tracy Hills Drive, east of Corral Hollow	2,617	1.31	478



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Cumulative Effects

Number	Lead Agency	Project Name	Project Address	Solid Waste (lbs/day) ¹	Solid Waste (tons/day)	Solid Waste (tons/year)
57	City of Tracy	Tracy Hills Phase 1A (includes revision to 7C)	Tracy Hills Drive, west of Corral Hollow	14,713	7.36	2,685
58	City of Tracy	Tracy Hills Phase 1B	Tracy Hills Drive, west of Phase 1A	1,736	0.87	317
59	City of Tracy	Tracy Hills Phase 1C	Lammers Road, southeast of California Aqueduct	1,172	0.59	214
60	City of Tracy	Tracy Hills Phase 2	Tracy Hills, south of I-580	6,068	3.03	1,107
61	City of Tracy	Tracy Hills Phase 5	Lammers Road, between the Delta Mendota Canal and California Aqueduct	5,560	2.78	1,015
I-205 Corridor Specific Plan						
62	City of Tracy	Commercial Building Shell	Auto Plaza Drive, west of Naglee Road	164	0.08	30
63	City of Tracy	Marriot Hotel	3550 North MacArthur Drive	216	0.11	39
64	City of Tracy SOI	I-205 Expansion	Naglee and Larch Roads	0	0	0
Northeast Specific Plan						
65	City of Tracy	Hollingsworth Trailer Lot and Guardhouse	2259 East Grant Line Road	45,509	22.75	8,305
66 ²	City of Tracy	NEI Building 4	1269 East Grant Line Road	0	0	0
67	City of Tracy	Paradise Pointe Business Park	3601 Pescadero Avenue	7,200	3.60	1,314
68	City of Tracy	Seefried - 3 New Industrial Buildings	7191 West Grant Line Road	9,536	4.77	1,740
69	City of Tracy	Seefried LI Building (NEI)	1651 East Grant Line Road	3,096	1.55	565
Project Solid Waste				76,112	38.06	13,890
Total Cumulative Solid Waste				351,806	176	64,205

Notes:

¹ Solid Waste amounts calculated through CalRecycle Estimated Solid Waste Generation Rates (CalRecycle 2026d).

² Assumed to generate 0 solid waste as a construction only project or no employees anticipated onsite.

As shown in Table 4.5-2, implementation of the Project in conjunction with past, present, and reasonably foreseeable projects would result in approximately 176 tons per day of solid waste or 64,205 tons per year. The daily capacity of Foothill Sanitary Landfill, North County Landfill, or Forward Landfill would be sufficient for the cumulative solid waste. While Forward Landfill is anticipated to close in 2036, Foothill Sanitary Landfill and North County Landfill have sufficient total capacity to serve the County. Moreover, as the expected landfill closure date approaches, the County would determine where solid waste would



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Cumulative Effects

be directed as part of its standard planning process. Moreover, regulations such as SB 1016 and SB 1383 would reduce the amount of solid waste generated in future years.

Therefore, County landfills have substantial remaining capacity to continue to accept solid waste from the Project in addition to past, present, and reasonably foreseeable projects in the area, and no cumulative impact would occur.

Other Utilities

The geographic area for other utilities is the service areas of each service provider. For instance, electrical and gas services to the Project site would be provided by PG&E, and the geographic area would be the PG&E service area.

Future development within the Project area would increase demand for electricity and natural gas services and require the development of new utility infrastructure to deliver services to future development. Individual projects would be responsible to ensure that PG&E has sufficient electrical and natural gas supplies to meet individual project demand. In the event PG&E does not have substantial supplies for past, present, and reasonably foreseeable projects, additional infrastructure may be required which would be assessed in either an individual project's environmental review or within environmental review for the new infrastructure. Construction of all utility infrastructure, including electrical and gas facilities, would be designed and constructed in accordance with all applicable regulations and standards as well as meet any mitigation requirements established by the environmental review. For example, the Project would construct a new substation on-site. The substation would comply with all County and state building codes, air quality rules and regulations, local ordinances, and implement Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, CUL-1, GEO-1, GEO-2, HAZ-1, HAZ-2, HAZ-3, AQ-1, and AQ-2 to reduce the environmental impacts associated with construction. Therefore, while cumulative projects would result in the construction of new electrical and natural gas facilities, the construction and/or relocation of these facilities from the Project in addition to past, present, and reasonably foreseeable projects in the area would be less than significant.

4.5.19 Wildfire

The geographic area for cumulative wildfire impacts is the Project vicinity. The County and the Project site are surrounded by open space areas that are susceptible to wildfire which may encroach into County communities. The communities of Bellota, Clements, Linden and Lockeford are identified by the County as communities at risk to wildland fire, due to their location near areas susceptible to wildfires (San Joaquin County 2016). In addition, the area of San Joaquin County south of I-580, approximately 1.25 miles southwest of the Project site, includes regions identified as Moderate, High, and Very High FHSZs. However, the Project site is not located within a SRA or VHFHSZ. The Project would not include any features that would exacerbate the risk of wildfire and would incorporate fire safety design features such as sprinkler systems in the proposed buildings and vegetation management for on-site landscaping. Additionally, urban development, including roadways, are known to act as fire breaks and would preclude the uncontrolled spread of fire. As a result, the conversion of the Project site from vegetated agricultural land to urban development may result in a reduced risk of wildfire in the cumulative environment. Implementation of other projects in the vicinity would be subject to the same regulations related to fire



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Cumulative Effects

safety, including the California Building Code, California Fire Code, and San Joaquin County Municipal Code. Overall, a cumulative impact related to wildfire would not occur.



5.0 ALTERNATIVES TO THE PROPOSED PROJECT

5.1 INTRODUCTION

The purpose of an alternatives analysis pursuant to CEQA is to identify feasible options that would attain most of the basic objectives of a proposed project while reducing its significant effects. Provisions of CEQA Guidelines (Section 15126.6) that address the number of project alternatives required in an EIR state the following:

The range of alternatives required in an EIR is governed by a “rule of reason;” the EIR must evaluate only those alternatives necessary to permit a reasonable choice. The alternatives shall be limited to those that would avoid or substantially lessen any of the significant effects of a proposed project while meeting most of the underlying project objectives.

5.2 REQUIREMENTS FOR THE CONSIDERATION OF ALTERNATIVES

An important aspect of EIR preparation is the identification and assessment of alternatives to the proposed project that have the potential to avoid or substantially lessen potentially significant impacts. In addition to mandating consideration of the no project alternative, CEQA Guidelines (Section 15126.6(e)) emphasize the selection of a reasonable range of feasible alternatives and adequate assessment, which allows decision-makers to use a comparative analysis. CEQA Guidelines (Section 15126.6(a)) states:

An EIR shall describe a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.

In accordance with CEQA Guidelines 15126.6, this EIR contains a comparative impact assessment of alternatives to the proposed project. The primary purpose of this assessment is to provide decision-makers and the public with a reasonable number of feasible project alternatives that could attain most of the basic project objectives while avoiding or reducing any of the project's significant adverse environmental effects. Important considerations for these alternatives' analyses are provided below:

- An EIR need not consider every conceivable alternative to a project;
- An EIR should identify alternatives that were considered by the Lead Agency, but rejected as infeasible during the scoping process;
- Reasons for rejecting an alternative include:
- Failure to meet most of the basic project objectives
- Infeasibility



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Alternatives to the Proposed Project

- Inability to avoid significant environmental effects

5.2.1 No Project Alternative

CEQA Guidelines require that the alternatives be compared to the Project's environmental impacts and that the "no project" alternative be considered (CEQA Guidelines Section 15126.6(d)(e)). Section 15126.6(d)(e)(1) states:

The specific alternative of "no project" shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The no project alternative analysis is not the baseline for determining whether the proposed project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline.

The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed Project with the impacts of not approving the proposed Project.

5.2.2 Consistency with Project Objectives

A project's statement of objectives describes the purpose of the project and the reasons for undertaking the project. To be considered for detailed analysis in the EIR, an alternative must meet most of the project objectives. Among the suite of project objectives identified by the applicants, the County as Lead Agency has identified the following as the basic objectives for purposes of screening potential alternatives to the proposed project:

- Implement a Specific Plan development supporting industrial and logistics-based uses providing a broad range of long-term employment opportunities, which are much closer to County residents than Bay area job centers requiring long commutes and associated environmental impacts.
- Implement industrial and logistics-based uses providing a broad range of additional construction employment opportunities.
- Provide safe and convenient access for trucks in a manner that minimizes any potential disruption to residential areas.
- Provide industrial uses near existing roadways and infrastructure to reduce traffic congestion and air emissions.
- Facilitate goods movement locally and regionally by placing industrial uses in close proximity to Interstate 205 (I-205), which connects with both Interstate 580 (I-580) and Interstate 5 (I-5).
- Provide land uses that are compatible with surrounding land uses.
- Support the General Plan vision for increased urbanization and uses that increase the County tax base in the area of the County where the Project is located, adjacent to the jurisdictional boundaries of the City of Tracy.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Alternatives to the Proposed Project

- Establish new development that would further the County's near-term and long-range fiscal goal, by significantly increasing property tax to the County, in addition to other financial benefits.
- Improve the regional jobs/housing balance.

5.2.3 Redevelop underutilized agricultural land adjacent to other existing and planned industrial, commercial and other urbanized uses. Feasibility

According to CEQA Guidelines (Section 15126.6(f)(1):

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

Based on CEQA Guidelines, "feasible" is defined as, "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" (CEQA Guidelines Section 15364). CEQA does not require that an EIR determine the ultimate feasibility of a selected alternative, but rather that an alternative be potentially feasible.

For the screening analysis, the potential feasibility of potential alternatives was assessed using the following considerations:

Technological Feasibility: Is the alternative feasible from a technical perspective, considering available technology? Are there any construction, operation, or maintenance constraints that cannot be overcome?

Legal Feasibility: For example, do legal protections on lands or financing strategies preclude or substantially limit the feasibility of constructing the alternative?

Economic Feasibility: Is the alternative so costly that its costs would prohibit its implementation?

In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, an EIR must contain a discussion of "potentially feasible" alternatives, the ultimate determination whether an alternative is feasible or infeasible is made by the Lead Agency's decision-making body (PRC Section 21081[a][3]).

5.3 METHODOLOGY AND SCREENING CRITERIA

A range of potential alternatives was developed and subjected to the screening criteria. Several representative alternatives were considered. There was no attempt to include every conceivable alternative. The following criteria were used to screen potential alternatives:

- Does the alternative meet most of the project objectives?



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Alternatives to the Proposed Project

- Is the alternative potentially feasible?
- Would the alternative substantially reduce one or more of the significant impacts associated with the project?

5.4 ALTERNATIVES CONSIDERED AND REJECTED FROM FURTHER CONSIDERATION

As described above, State CEQA Guidelines Section 15126.6(c) provides that the range of potential alternatives for the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. Alternatives that fail to meet the fundamental project purpose need not be addressed in detail in an EIR. In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by Lead Agency decision-makers. (See PRC, § 21081[a][3]). At the time of action on the project, the decision-makers may consider evidence beyond that found in this EIR in addressing such determinations. The decision-makers, for example, may conclude that a particular alternative is infeasible (i.e., undesirable) from a policy standpoint, and may reject an alternative on that basis provided that the decision-makers adopt a finding, supported by substantial evidence, to that effect, and provided that such a finding reflects a reasonable balancing of the relevant economic, environmental, social, and other considerations supported by substantial evidence.

The EIR should also identify any alternatives that were considered by the Lead Agency but were rejected during the planning or scoping process and briefly explain the reasons underlying the Lead Agency's determination. The following alternative (alternative site location) was considered by the County but are not evaluated further in this Draft EIR for the reasons discussed below.

5.4.1 Alternative Site Location

CEQA does not require that an analysis of alternative sites be included within an EIR. However, CEQA Guidelines Section 15126.6(f)(2) sets forth considerations to be used in evaluating an alternative location. The section states that the "key question" is whether any of the significant effects of the Project would be avoided or substantially lessened by relocating the Project. The CEQA Guidelines identify the following factors that may be considered when addressing the feasibility of an alternative location: (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) General Plan consistency; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the project applicant can reasonably acquire, control, or otherwise have access to the alternative site.

The Project site is situated in a location that would take advantage of the existing transportation network with access to I-580 and I-5 and is located in an area that is transitioning from agriculture to industrial. Therefore, suitable sites would be located within the Project vicinity. Review of undeveloped land near the Project site demonstrates that there is not available land that is owned, controlled, or otherwise accessible to the Project applicant. Most land surrounding the Project site is developed or has planned



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Alternatives to the Proposed Project

industrial development including IPC Phase 1 and Westside Gateway Specific Plan Area. Other undeveloped land uses would not be suitable based on the available acreage or would result in similar significant impacts as the Project. For example, the majority of Project air and GHG emissions are derived from mobile sources, and the amount of traffic generated would be based on the end uses and size of the Project, not the location. Moreover, moving the Project site to an alternative location further from freeway access would likely increase the travel distance for employees and trucks resulting in an increase in VMT as well as air and GHG emissions as compared to the Project. As noted above, only locations that would avoid or substantially lessen a Project's significant environmental impact need to be considered. Therefore, because having an alternative location would not reduce the Project's impact to agriculture, VMT, air, or GHG emissions, a more detailed analysis of alternative site locations is not warranted.

5.5 ALTERNATIVES CONSIDERED

Section 15126 of CEQA Guidelines requires an EIR to identify and discuss a No Project Alternative, as well as a reasonable range of alternatives to the Project that would feasibly attain most of the basic objectives of the Project and would avoid or substantially lessen any of the significant environmental impacts.

Alternatives to the Project considered for analysis in this Draft EIR are:

- No Project Alternative
- Reduced Size Alternative
- Increased Cold Storage Alternative

5.5.1 No Project Alternative

The No Project Alternative assumes that no development would occur on the Project site. Under this alternative, the Project site would remain undeveloped and operate as an almond orchard.

Impact Analysis

Aesthetics

Under the No Project Alternative, the Project site would continue to operate as an almond orchard with 36,270 trees. The Project would not develop 5.36 million square feet of industrial spaces, water and wastewater treatment facilities, or new roadways. As such, the No Project Alternative would not add additional exterior lighting or new sources of glare to the Project site. Therefore, the No Project Alternative would have less impact on aesthetics, light, and glare than the Project.

Agriculture and Forestry Resources

Under the No Project Alternative, the Project site would continue to operate as an almond orchard with 36,270 trees. Therefore, the No Project Alternative would have less impact on agriculture and forestry resources.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Alternatives to the Proposed Project

Air Quality

Under the No Project Alternative, the Project site would continue to operate as almond orchard that would continue to emit air emissions from orchard upkeep and harvesting operations. The No Project Alternative would avoid air emissions generated during Project construction. Additionally, the No Project Alternative would not generate air emissions from industrial uses, water treatment facilities, or wastewater treatment facilities. Moreover, the No Project Alternative would not result in additional vehicle and truck trips that would generate criteria air pollutant emissions. The existing almond orchard would generate lower annual criteria air pollutant emissions than the Project. Therefore, the No Project Alternative would have less impact on air quality as compared to the Project.

Biological Resources

The No Project Alternative would not have any ground disturbing activities. Therefore, the No Project Alternative would have less impact on biological resources as compared to the Project.

Cultural Resources

The No Project Alternative would not have any ground disturbing activities. Therefore, the No Project Alternative would have less impact on cultural resources as compared to the Project.

Energy

Under the No Project Alternative, the Project site would continue to operate as almond orchard that would consume energy in the form of petroleum fuel for orchard upkeep and harvesting operations. The No Project Alternative would avoid energy consumed during construction. Additionally, the No Project Alternative would not consume energy to light, heat, or cool industrial land uses or to treat water and wastewater. Moreover, the No Project Alternative would not result in additional vehicle and truck trips that would increase the amount of petroleum fuel required. The existing almond orchard would consume less petroleum fuel per year than the Project during construction or operation. Therefore, the No Project Alternative would have less impact on energy resources as compared to the Project.

Geology and Soils

The No Project Alternative would not have any ground disturbing activities. Therefore, the No Project Alternative would have less impact on geologic resources as compared to the Project.

Greenhouse Gas Emissions

Under the No Project Alternative, the Project site would continue to operate as almond orchard that would continue to emit GHG emissions from orchard upkeep and harvesting operations. The No Project Alternative would avoid GHG emissions generated during Project construction. Additionally, the No Project Alternative would not generate GHG emissions from industrial, water treatment facilities, or wastewater treatment facilities. Moreover, the No Project Alternative would not result in additional vehicle and truck trips that would generate GHG emissions. The existing almond orchard would generate lower annual GHG emissions than the Project. Therefore, the No Project Alternative would have less impact on GHGs as compared to the Project.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Alternatives to the Proposed Project

Hazards and Hazardous Materials

The No Project Alternative would not result in any construction and would continue to operate as an almond orchard. Thus, the No Project Alternative would avoid the potential for hazardous material releases during construction and operation of an industrial development. The almond orchard would continue to operate that would require the use of pesticides and fertilizers that may cause harm to orchard workers. Therefore, the No Project Alternative would have similar impacts on hazards and hazardous materials as the Project.

Hydrology and Water Quality

Under the No Project Alternative, the Project site would continue to operate as an almond orchard with 36,270 trees. Water for the almond trees would continue to be provided by the Byron-Bethany Irrigation District. The No Project Alternative would not construct a new water or wastewater treatment facility, extract water from the Tracy Subbasin, or change the drainage pattern of the existing site. Therefore, the No Project Alternative would have less impacts on hydrology and water quality than the Project.

Land Use

Under the No Project Alternative, the existing land use would remain the same and no GPA or rezone would be required. Therefore, the No Project Alternative would have less impacts on land use than the Project.

Noise

The No Project Alternative would not include any construction and would avoid any construction noise and vibration. The Project site would continue to operate as an almond orchard and would not include any industrial land uses or increase the amount of vehicle and truck trips in the Project vicinity. Therefore, the No Project Alternative would have less impact on noise than the Project.

Population and Housing

Under the No Project Alternative, the existing land use would remain the same and would not result in an increase in population or housing. Therefore, the No Project Alternative would have similar impacts on population and housing as the Project.

Public Services

Under the No Project Alternative, the existing land uses would remain the same. There would be no increase in demand for fire protection and police protection. Therefore, the No Project Alternative would have less impacts on public services than the Project.

Recreation

The No Project Alternative would not introduce new residents to the area that would increase the demand of parks or other recreational uses. Therefore, the No Project Alternative would have similar impacts on recreation as the Project.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Alternatives to the Proposed Project

Transportation

Under the No Project Alternative, the Project site would continue to operate as an almond orchard and would not increase the amount of vehicle or truck trips in the Project vicinity. Therefore, the No Project Alternative would have a lesser impact on transportation than the Project.

Tribal Cultural Resources

The No Project Alternative would not have any ground disturbing activities. Therefore, the No Project Alternative would have less impact on tribal cultural resources as compared to the Project.

Utilities and Service Systems

Under the No Project Alternative, the existing land uses would remain the same. Water resources would still be required for the almond orchard, but water would continue to be supplied from Byron Bethany Irrigation District and a water treatment facility would not be required. The almond orchard would continue to require approximately 1,500 AFY of surface water from BBID but would not pump any groundwater as compared to the Project that would pump up to 58 AFY. There would be no increase in electric power, natural gas, wastewater, or solid waste generation as compared to the Project. Therefore, the No Project Alternative would have less impact on utilities than the Project.

Wildfire

The Project site is not located in an SRA or VHFHSZ. However, the current orchard contains vegetation that could be the origin of a fire or add to a fire on surrounding land, that might threaten nearby urban development, compared to the Project having only limited landscaping. Therefore, the No Project Alternative would have a potentially greater risk and impact on wildfire compared to the Project.

Project Objectives

The No Project Alternative would not advance Project objectives, including: improving the regional jobs/housing balance; providing land uses that are compatible with surrounding land uses; facilitating goods movement locally and regionally by placing industrial uses in close proximity to I-205, which connects with both I-580 and I-5; supporting the General Plan vision for increased urbanization and uses that increase the County's tax base in the area of the County where the Project is located, adjacent to the jurisdictional boundaries of the City of Tracy; or redeveloping underutilized agricultural land adjacent to other existing and planned industrial, commercial, and other urbanized uses.

5.5.2 Reduced Size Alternative

The Reduced Size Alternative assumes that the proposed build-out would be reduced to 4.02 million square feet of industrial space, an approximate 25 percent reduction in industrial buildout. The Project boundaries and industrial end uses would remain the same. However, the on-site developed area (including disturbance) would be reduced. The Project would continue to buildout Pavilion Parkway and Promontory Parkway and provide roadway improvements on West Schulte Road. Additionally, the Project would continue to develop on-site water and wastewater treatment facilities.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Alternatives to the Proposed Project

Table 5.5-1 summarizes the Reduced Size Alternative. Each type of use is reduced by 25 percent. The purpose of this alternative is to evaluate a smaller project with end uses identical to the Project that may avoid or substantially lessen the severity of significant project impacts.

Table 5.5-1. Reduced Size Alternative

Scenario	Total Square Feet	Square Footage Breakdown	
		Industrial Use	Square Footage
Reduced Size Alternative	4,020,000	Warehousing	3,015,000
		Cold Storage Warehousing	402,000
		General Light Industrial	402,000
		Manufacturing	201,000
Proposed Project	5,360,000	Warehousing	4,020,000
		Cold Storage Warehousing	536,000
		General Light Industrial	536,000
		Manufacturing	268,000

Impact Analysis

Aesthetics

The Reduced Size Alternative consists of developing 4.02 million square feet of industrial space, water and wastewater treatment plants, and roadways on the Project site. Similar exterior light fixtures as the Project would be installed and Mitigation Measure AES-1 would be implemented. The buildings developed under this alternative would retain a similar appearance to the Project's structures; however, there would be a 1.34 million square foot reduction in industrial space. Therefore, the Reduced Size Alternative would have less impact on aesthetics, light, and glare than the Project.

Agriculture and Forestry Resources

The Reduced Size Alternative would have a smaller development footprint than the Project. However, the Reduced Size Alternative would still remove the existing almond orchard. As a result, the Project's impact would continue to be significant and unavoidable with implementation of Mitigation Measure AGR-1.

Air Quality

The Reduced Size Alternative would result in less construction activity and 3,674 fewer daily vehicle (passenger cars and trucks) trips. As such, the Reduced Size Alternative would result in less construction and operational criteria air pollutant emissions. Mitigation Measures AQ-1 through AQ-21 would still be implemented to reduce Project construction and operational emissions. The Project would continue to exceed SJVAPCD thresholds and a VERA would still be required per Mitigation Measure AQ-27 to reduce impacts to less than significant levels. Based on the reduced Project size, the alternative would require less emission offsets under a VERA. The Project applicant has already been in discussions with the SJVAPCD to create the VERA based on the Project emissions. As such, the VERA could be updated



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Alternatives to the Proposed Project

to account for less emissions offsets under this alternative. The Reduced Size Alternative would also result in less TAC emissions which would reduce the health risks posed to nearby sensitive receptors. Compliance with Air District and OSHA regulations would still be required to limit Valley Fever exposure to on-site construction workers. Additionally, Mitigation Measure AQ-28 would still be implemented to reduce the risk of odors. Therefore, the Reduced Size Alternative would have less impact on air quality as compared to the Project.

Biological Resources

The Reduced Size Alternative Impact would have similar ground disturbing activities but with a smaller development footprint than the Project. Mitigation Measures BIO-1, BIO-2, BIO-3, and BIO-4 would still be implemented to reduce impacts to special status species, sensitive natural communities, and migratory corridors.. Therefore, the Reduced Size Alternative would have a similar impact on biological resources as the Project.

Cultural Resources

The Reduced Size Alternative Impact would have similar ground disturbing activities but with a smaller development footprint than the Project. Mitigation Measures CUL-1 and CUL-2 would still be implemented to reduce potential impacts to any unknown archaeological resources or human remains. Therefore, the Reduced Size Alternative would have a similar impact on cultural resources as the Project.

Energy

The Reduced Size Alternative would result in less construction activity, 3,674 fewer daily vehicle trips, and less building space during Project operation. As such, the Reduced Size Alternative would require less petroleum fuel for off-road construction equipment and employee and hauling trips than the Project. Additionally, based on the 1.34 million square foot reduction in building size, the Project would require less electricity and natural gas for lighting, heating, and cooling. Therefore, the Reduced Size Alternative would have less impact on energy resources than the Project.

Geology and Soils

The Reduced Size Alternative Impact would have similar ground disturbing activities but with a smaller development footprint than the Project. Mitigation Measures GEO-1 and GEO-2 would still be implemented to reduce potential adverse impacts from ground shaking or seismic related failure and to protect any unknown paleontological resources. Therefore, the Reduced Size Alternative would have a similar impact on geologic resources as the Project.

Greenhouse Gas Emissions

The Reduced Size Alternative would result in less construction activity and 3,674 fewer daily vehicle trips, which have corresponding reductions in the severity of construction and operational GHG emissions. This alternative would lessen the severity of GHG impacts by emitting fewer emissions during construction and operational activities. However, GHG impacts would continue to be significant and unavoidable. Therefore, the Reduced Size Alternative would have less impact on GHGs than the Project.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Alternatives to the Proposed Project

Hazards and Hazardous Materials

The Reduced Size Alternative would have the same development footprint as the Project. Mitigation Measures HAZ-1, HAZ-2, and HAZ-3 would still be implemented to reduce the risk from the transport, use, disposal, or accidental spill of hazardous materials. This alternative would result in a 1.34 million square-foot reduction in industrial space and, thus, would reduce the potential for hazardous material releases during construction and operations. Therefore, the Reduced Size Alternative would have less impacts on hazards and hazardous materials than the Project.

Hydrology and Water Quality

The Reduced Size Alternative would have the have a reduced footprint as the Project. Mitigation Measures HYD-1 and HYD-2 would still be implemented to comply with water quality and waste discharge standards, reduce the risk off-site erosion and polluted water runoff from increased impervious surfaces, and demonstrate consistency with the sustainable groundwater management plan. This alternative would result in a 1.34 million square-foot reduction in industrial space and, thus, would reduce the need for on-site water during Project operations. As a result, under the Reduced Size Alternative the Project would extract less groundwater to support Project buildout. Therefore, the Reduced Size Alternative would have less impacts on hydrology and water quality.

Land Use

The Reduced Size Alternative would develop similar land uses to the Project and, therefore, would yield similar conclusions in terms of consistency with the General Plan. Therefore, the Reduced Size Alternative would have similar impacts on land use.

Noise

The Reduced Size Alternative would result in less construction activity and 3,674 fewer daily vehicle trips, which would have corresponding reductions in the severity of construction and operational noise and vibrational impacts. Therefore, the Reduced Size Alternative would have less impact on noise than the Project.

Population and Housing

The Reduced Size Alternative would result in a 1.34 million square feet reduction of industrial buildout. As a result, the Reduced Size Alternative would result in approximately 1,183 fewer jobs than the Project. However, similar to the Project it is anticipated that employees would come from the local population. Therefore, the Reduced Size Alternative would not be expected to introduce new residents to the area. The Reduced Size Alternative would continue to construct new roadways as well as the water and wastewater treatment systems and similar to the Project would not result in the extension of roads into areas not currently served by existing roadways and would not provide water or wastewater offsite that would induce unplanned growth. Therefore, the Reduced Size Alternative would have a similar impact on population and housing as the Project.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Alternatives to the Proposed Project

Public Services

Under the Reduced Size Alternative, end uses would be similar to the Project. However, this alternative would result in less demand for fire protection and police protection through the 1.34 million square foot reduction in industrial development. Similar to the Project, no new or expanded fire or police facilities would be required. Therefore, the Reduced Size Alternative would have less impact on public services than the Project.

Recreation

The Reduced Size Alternative would result in a 1.34 million square feet reduction of industrial development. As a result, the Reduced Size Alternative would result in approximately 1,183 fewer jobs than the Project. However, similar to the Project it is anticipated that employees would come from the local population. Therefore, the Reduced Size Alternative would not be expected to introduce new residents to the area that would increase the demand of parks or other recreational uses. Therefore, the Reduced Size Alternative would have a similar impact on recreation as the Project.

Transportation

The Reduced Size Alternative would result in 3,674 fewer vehicle trips per day. Employees and trucks were anticipated to travel the same distances as under the Project. As such, the Reduced Size Alternative would result in decreased total VMT and a better LOS at study intersections as compared to the Project. Mitigation Measures TRANS-1, TRANS-2, and TRANS-3 would still be required to reduce impacts. However, average per employee VMT and per truck VMT would be similar. Therefore, the Reduced Size Alternative would have a lesser impact on transportation than the Project.

Tribal Cultural Resources

The Reduced Size Alternative Impact would have similar ground disturbing activities but with a smaller development footprint than the Project. Therefore, the Reduced Size Alternative would have a similar impact on tribal cultural resources as the Project.

Utilities and Service Systems

The Reduced Size Alternative Impact would result in a 1.34 million square foot reduction of industrial buildout which would result in less demand for electric power, natural gas, water, and wastewater and would generate less solid waste during operation. The Reduced Size Alternative would also include new water and wastewater treatment facilities and stormwater drainage developed on the Project site. The development of new water and wastewater treatment facilities and stormwater drainage would continue to be subject to Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, CUL-1, GEO-1, GEO-2, HAZ-1, HAZ-2, HAZ-3, AQ-1, AQ-2, AQ-3, AQ-4, and AQ-5 to reduce the environmental impacts associated with construction. Therefore, the Reduced Size Alternative would have less impact on utilities than the Project.

Wildfire

The Reduced Size Alternative would have the same boundaries as the Project. The Project site is not located in an SRA or VHFHSZ and all new construction would be required to comply with applicable fire



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Alternatives to the Proposed Project

and building codes. Therefore, the Reduced Size Alternative would have a similar impact on wildfire as the Project.

Project Objectives

The Reduced Size Alternative would advance Project objectives, including: improving the regional jobs/housing balance; providing land uses that are compatible with surrounding land uses; facilitating goods movement locally and regionally by placing industrial uses in close proximity to I-205, which connects with both I-580 and I-5; supporting the General Plan vision for increased urbanization and uses that increase the County's tax base in the area of the County where the Project is located, adjacent to the jurisdictional boundaries of the City of Tracy; and redeveloping underutilized agricultural land adjacent to other existing and planned industrial, commercial, and other urbanized uses. However, the Reduced Size Alternative would have a smaller industrial buildout than the Project and would achieve these objectives to a lesser degree than the Project.

5.5.3 Increased Cold Storage Alternative

The Increased Cold Storage Alternative assumes that the maximum buildout of the site would continue to be approximately 5.36 million square feet of industrial space but assumes that 60 percent of the maximum industrial buildout would be cold storage warehousing (approximately 2.68 million more square feet of cold storage compared to 10 percent (536,000 square feet) in the Project). The Project boundaries and layout (including disturbance) would remain the same. The Project would continue to buildout Pavilion Parkway and Promontory Parkway and provide roadway improvements on West Schulte Road. Additionally, the Project would continue to develop on-site water and wastewater treatment facilities.

Table 5.5-2 summarizes the Increased Cold Storage Alternative. The purpose of this alternative is to evaluate a different set of end uses that may avoid or substantially lessen the severity of significant Project impacts.

Table 5.5-2. Increased Cold Storage Alternative

Scenario	Total Square Feet	Square Footage Breakdown		
		Industrial Use	Square Footage	Percentage
Increased Cold Storage Alternative	5,360,000	Warehousing	1,786,000	33.3%
		Cold Storage Warehousing	3,216,000	60%
		General Light Industrial	238,000	4.4%
		Manufacturing	120,000	2.2%
Proposed Project	5,360,000	Warehousing	4,020,000	75%
		Cold Storage Warehousing	536,000	10%
		General Light Industrial	536,000	10%
		Manufacturing	268,000	5%



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report
Alternatives to the Proposed Project

Impact Analysis

Aesthetics

The Increased Cold Storage Alternative consists of developing a higher percentage of cold storage warehouses on the Project site. Total buildout would include 5.36 million square feet of industrial space, water and wastewater treatment plants, and roadways on the Project site. Similar exterior light fixtures as the Project would be installed and Mitigation Measure AES-1 would be implemented. The buildings developed under this alternative would retain a similar appearance to the Project's structures and buildout would be the same size as the Project. Therefore, the Increased Cold Storage Alternative would have a similar impact on aesthetics, light, and glare than the Project.

Agriculture and Forestry Resources

The Increased Cold Storage Alternative would have the same development footprint as the Project and, as a result, would still remove the existing almond orchard and Prime Farmland. This alternative would place approximately 3.2 million square feet of cold storage near existing agriculture in the region, compared with the Project's 560,000 square feet. In alignment with the San Joaquin County General Plan, which seeks to protect existing agricultural lands and industries while providing support for advancement and diversification of agriculturally-related uses, the Increased Cold Storage Alternative would provide more support than the Project for the region's existing agricultural production (San Joaquin County 2016).

In essence, the increased amount of on-site cold storage proposed in the Increased Cold Storage Alternative contributes more to the local agricultural industry than the Project. However, since the Increased Cold Storage Alternative would continue to remove the existing almond orchard and Prime Farmland, even with implementation of Mitigation Measure AGR-1, the impact would continue to be significant and unavoidable.

Air Quality

The Increased Cold Storage Alternative would construct approximately 5.36 million square feet of industrial space and therefore would have similar construction emissions as the Project. Once operational the Increased Cold Storage Alternative would generate 3,095 less daily vehicle trips (automobile, heavy duty truck, and medium duty truck trips) in total compared to the Project. However, the Increased Cold Storage Alternative would also result in 1,216 additional heavy duty truck trips per day compared to the Project. Heavy duty trucks produce criteria air pollutant emissions at a higher rate than automobiles (CARB 2023). The increase in cold storage uses would also increase the amount of heavy duty trucks equipped with TRUs. Therefore, while the Increased Cold Storage Alternative would result in less overall vehicle trips, this alternative would emit more criteria air pollutants than the Project due to the additional heavy duty trucks, TRUs, and generation of increased electricity required for operation of the cold storage uses. Mitigation Measures AQ-1 through AQ-19 would still be implemented to reduce Project construction and operational emissions. The alternative would continue to exceed thresholds and Mitigation Measure AQ-27 which requires a VERA would still be required. The Project applicant has already been in discussions with the SJVAPCD to create the VERA based on the Project emissions. Under this alternative, the emissions would increase resulting in a larger VERA cost and more emissions reduction measures by the SJVAPCD. The Increased Cold Storage Alternative would also result in higher



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Alternatives to the Proposed Project

emissions of TACs as compared to the Project. As such, the Increased Cold Storage Alternative would result in higher health risks to nearby sensitive receptors from additional DPM emissions generated by heavy duty diesel trucks and TRUs and potential risks from CO hotspots. Additional mitigation may be required to reduce the risks posed from DPM and CO. Compliance with Air District and OSHA regulations would still be required to limit Valley Fever exposure to on-site construction workers. Additionally, Mitigation Measure AQ-28 would still be implemented to reduce the risk of odors. Therefore, the Increased Cold Storage Alternative would have a greater impact on air quality compared to the Project.

Biological Resources

The Increased Cold Storage Alternative would have similar ground disturbing activities within the same development footprint as the Project. Mitigation Measures BIO-1, BIO-2, BIO-3, and BIO-4 would still be implemented to reduce impacts to special status species, sensitive natural communities, and migratory corridors. Therefore, the Increased Cold Storage Alternative would have a similar impact on biological resources as the Project.

Cultural Resources

The Increased Cold Storage Alternative would have similar ground disturbing activities within the same development footprint as the Project. Mitigation Measures CUL-1 and CUL-2 would still be implemented to reduce potential impacts to any unknown archaeological resources or human remains. Therefore, the Increased Cold Storage Alternative would have a similar impact on cultural resources as the Project.

Energy

The Increased Cold Storage Alternative would construct approximately 5.36 million square feet of industrial space. As such, the Increased Cold Storage Alternative would require similar levels of petroleum fuel for off-road construction equipment as the Project. Once operational the Increased Cold Storage Alternative would generate 3,095 less daily vehicle trips (automobile, heavy duty truck, and medium duty truck trips) in total compared to the Project. However, the Increased Cold Storage Alternative would also result in 1,216 additional heavy duty truck trips per day compared to the Project. The increase in cold storage uses would also increase the amount of heavy duty trucks equipped with TRUs. Therefore, during operation, the Project would require less gasoline for automobiles but an increase in diesel fuel for the additional heavy duty diesel trucks and TRUs. Moreover, the Project would require additional electricity to power the additional square footage of refrigeration. Therefore, the Increased Cold Storage Alternative would have a greater impact on energy resources than the Project.

Geology and Soils

The Increased Cold Storage Alternative would have similar ground disturbing activities within the same development footprint as the Project. Mitigation Measures GEO-1 and GEO-2 would still be implemented to reduce potential adverse impacts from ground shaking or seismic related failure and to protect any unknown paleontological resources. Therefore, the Increased Cold Storage Alternative would have a similar impact on geologic resources as the Project.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Alternatives to the Proposed Project

Greenhouse Gas Emissions

The Increased Cold Storage Alternative would construct approximately 5.36 million square feet of industrial space and therefore would have similar construction emissions as the Project. Once operational the Increased Cold Storage Alternative would generate 3,095 less daily vehicle trips (automobile, heavy duty truck, and medium duty truck trips) in total compared to the Project. However, the Increased Cold Storage Alternative would also result in 1,216 additional heavy duty truck trips per day compared to the Project. The increase in cold storage uses would also increase the amount of heavy duty trucks equipped with TRUs. Heavy duty trucks produce criteria air pollutant emissions at a higher rate than automobiles (CARB 2023). The increase in cold storage uses would also increase the amount of heavy duty trucks equipped with TRUs. Therefore, while the Increased Cold Storage Alternative would result in less overall vehicle trips, this alternative would emit more criteria air pollutants than the Project due to the additional heavy duty trucks, TRUs, and energy intensity of cold storage uses. The Increased Cold Storage Alternative would also require additional refrigerants that produce GHGs. This alternative would increase the severity of GHG impacts. Therefore, the Increased Cold Storage Alternative would have a greater impact on GHGs than the Project.

Hazards and Hazardous Materials

The Increased Cold Storage Alternative would have the same development footprint as the Project. Mitigation Measures HAZ-1, HAZ-2, and HAZ-3 would still be implemented to reduce the risk from the transport, use, disposal, or accidental spill of hazardous materials. This alternative would result in an additional 2.68 million square-feet of cold storage which would require additional refrigerants and increase the risk of hazardous material releases during operations. Therefore, this alternative would have a greater impact on hazards and hazardous materials than the Project.

Hydrology and Water Quality

The Increased Cold Storage Alternative would have the same development footprint as the Project. The Increased Cold Storage Alternative would require the same amount of water as the Project and continue to construct the water and wastewater treatment facilities. Mitigation Measures HYD-1 and HYD-2 would still be implemented to comply with water quality and waste discharge standards, reduce the risk off-site erosion and polluted water runoff from increased impervious surfaces, and demonstrate consistency with the sustainable groundwater management plan. Therefore, the Increased Cold Storage Alternative would have similar impacts on hydrology and water quality.

Land Use

The Increased Cold Storage Alternative would develop similar land uses to the Project and, therefore, would yield similar conclusions in terms of consistency with the General Plan. Therefore, the Increased Cold Storage Alternative would have similar impacts on land use.

Noise

The Increased Cold Storage Alternative would have the same development footprint and buildout as the Project. Therefore, noise from construction would result in similar impacts as the Project. However, the Increased Cold Storage Alternative would also result in 1,326 additional heavy duty trucks compared to



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Alternatives to the Proposed Project

the Project. The increase in heavy duty and medium duty truck trips would slightly increase noise and vibration impacts compared to the Project. Therefore, the Increased Cold Storage Alternative would have a greater impact on noise than the Project.

Population and Housing

The Increased Cold Storage Alternative would result in the same number of jobs as the Project. The Project employment numbers were calculated using a ratio of one employee per every 1,500 square feet of building space for warehouse uses and one employee per every 200 square feet of building space for office areas, since the Increased Cold Storage Alternative would result in a similar buildout to the Project, it can be assumed that the number of jobs would be the same. Similar to the Project it is anticipated that employees would come from the local population. Therefore, the Increased Cold Storage Alternative would not be expected to introduce new residents to the area. The Increased Cold Storage Alternative would continue to construct new roadways as well as the water and wastewater treatment systems and similar to the Project would not result in the extension of roads into areas not currently served by existing roadways and would not provide water or wastewater off-site that would induce unplanned growth. Therefore, the Increased Cold Storage Alternative would have a similar impact on population and housing as the Project.

Public Services

Under the Increased Cold Storage Alternative, end uses would be similar to the Project. This alternative would result in similar demand for fire protection and police protection as the Project and no new or expanded fire or police facilities would be required. Therefore, the Increased Cold Storage Alternative would have a similar impact on public services as the Project.

Recreation

The Increased Cold Storage Alternative would result in a similar buildout and the same number of jobs as the Project. Similar to the Project it is anticipated that employees would come from the local population. Therefore, the Increased Cold Storage Alternative would not be expected to introduce new residents to the area that would increase the demand for parks or other recreational uses. Therefore, the Increased Cold Storage Alternative would have a similar impact on recreation as the Project.

Transportation

The Increased Cold Storage Alternative would generate 3,095 less daily vehicle trips (automobile, heavy duty truck, and medium duty truck trips) in total compared to the Project. However, the Increased Cold Storage Alternative would also result in 1,216 additional heavy duty truck trips per day compared to the Project. Employees and trucks were anticipated to travel the same distances as under the Project. The increased cold storage would serve local agriculture more than the Projects, but shipment distances from the site from the Increased Cold Storage Alternative would not be expected to change. As such, the Increased Cold Storage Alternative would result in a better LOS at study intersections as compared to the Project and would decrease employee VMT. Mitigation Measures TRANS-1, TRANS-2, and TRANS-3 would still be required to reduce impacts. Therefore, the Increased Cold Storage Alternative would have a lesser impact on transportation than the Project.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Alternatives to the Proposed Project

Tribal Cultural Resources

The Increased Cold Storage Alternative would have similar ground disturbing activities within the same development footprint as the Project. Therefore, the Increased Cold Storage Alternative would have a similar impact on tribal cultural resources as the Project.

Utilities and Service Systems

The Increased Cold Storage Alternative would result in the same square footage buildout as the Project. However, the Increased Cold Storage Alternative would include 60 percent of the total as cold storage compared to 10 percent in the Project, which would result in a higher demand for electric power. However, the Increased Cold Storage Alternative would require or generate similar levels of natural gas, water, wastewater, and solid waste. The Increased Cold Storage Alternative would also include new water and wastewater treatment facilities and stormwater drainage developed on the Project site. The development of new water and wastewater treatment facilities and stormwater drainage would continue to be subject to Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, CUL-1, GEO-1, GEO-2, HAZ-1, HAZ-2, HAZ-3, AQ-1, AQ-2, AQ-3, AQ-4, and AQ-5 to reduce the environmental impacts associated with construction of new water and wastewater facilities. Therefore, the Increased Cold Storage Alternative would have a similar impact on utilities as the Project.

Wildfire

The Increased Cold Storage Alternative would have the same development footprint as the Project. The Project site is not located in an SRA or VHFHSZ and all new construction would be required to comply with applicable fire and building codes. Therefore, the Increased Cold Storage Alternative would have a similar impact on wildfire as the Project.

Project Objectives

The Increased Cold Storage Alternative would advance Project objectives, including: improving the regional jobs/housing balance; providing land uses that are compatible with surrounding land uses; facilitating goods movement locally and regionally by placing industrial uses in close proximity to I-205, which connects with both I-580 and I-5; supporting the General Plan vision for increased urbanization and uses that increase the County's tax base in the area of the County where the Project is located, adjacent to the jurisdictional boundaries of the City of Tracy; and redeveloping underutilized agricultural land adjacent to other existing and planned industrial, commercial, and other urbanized uses. The Increased Cold Storage Alternative would achieve these objectives to a similar degree as the Project.

5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6(e)(2) requires an EIR to identify an "environmentally superior alternative." The qualitative environmental effects of each alternative in relation to the Project are summarized in Table 5.6-1. Additionally, Table 5.6-2 provides a comparison of the alternatives with the project objectives. Accordingly, the alternative with the fewest amounts of impacts and the ability to achieve the most project objectives is the environmentally superior alternative.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report
Alternatives to the Proposed Project

Table 5.6-1. Project Alternative Impact Comparison

Environmental Resource Topic	No Project Alternative	Reduced Size Alternative	Increased Cold Storage Alternative
Aesthetics	Less impact.	Less Impact.	Similar Impact.
Agriculture and Forestry Resources	Less impact.	Similar Impact.	Less Impact.
Air Quality	Less impact.	Less impact.	Greater Impact.
Biological Resources	Less impact.	Similar impact.	Similar impact.
Cultural Resources	Less impact.	Similar impact.	Similar impact.
Energy	Less impact.	Less impact.	Greater impact
Geology and Soils	Similar impact.	Similar impact.	Similar impact.
Greenhouse Gases	Less impact.	Less impact.	Greater impact.
Hazards and Hazardous Materials	Similar impact.	Less impact.	Greater impact.
Hydrology and Water Quality	Less impact.	Less impact.	Similar impact.
Land Use and Planning	Less impact.	Similar impact.	Similar impact.
Noise	Less impact.	Less impact.	Greater impact.
Population and Housing	Less impact.	Similar impact.	Similar impact.
Public Services	Less impact.	Less impact.	Similar impact.
Recreation	Less impact.	Similar impact.	Similar impact.
Transportation	Less impact.	Less impact.	Less impact.
Tribal Cultural Resources	Less impact.	Similar impact.	Similar impact.
Utilities and Service Systems	Less impact.	Less impact.	Similar impact.
Wildfire	Greater impact.	Similar impact.	Similar impact.

Table 5.6-2: Project Alternatives Comparison to Project Objectives

Project Objective	Project	No Project Alternative	Reduced Size Alternative	Increased Cold Storage Alternative
Implement a Specific Plan development supporting industrial and logistics-based uses maximizing and providing a broad range of long-term employment opportunities, which are much closer to County residents than Bay area job centers requiring long commutes and associated environmental impacts.	Consistent.	Not Consistent.	Consistent to a lesser degree.	Consistent.
Implement industrial and logistics-based uses providing a broad range of additional construction employment opportunities.	Consistent.	Not Consistent.	Consistent to a lesser degree.	Consistent.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Alternatives to the Proposed Project

Project Objective	Project	No Project Alternative	Reduced Size Alternative	Increased Cold Storage Alternative
Provide safe and convenient access for trucks in a manner that minimizes any potential disruption to residential areas.	Consistent.	Not Consistent.	Consistent.	Consistent.
Provide industrial uses near existing roadways and infrastructure to reduce traffic congestion and air emissions.	Consistent.	Not Consistent.	Consistent to a lesser degree	Consistent
Facilitate goods movement locally and regionally by placing industrial uses in close proximity to I-205, which connects with both I-580 and I-5.	Consistent.	Not Consistent.	Consistent to a lesser degree.	Consistent.
Provide land uses that are compatible with surrounding land uses.	Consistent.	Not Consistent.	Consistent.	Consistent.
Support the General Plan vision for increased urbanization and uses that increase the County's tax base in the area of the County where the Project is located, adjacent to the jurisdictional boundaries of the City of Tracy.	Consistent.	Not Consistent.	Consistent to a lesser degree.	Consistent.
Establish new development that would further the County's near-term and long-range fiscal goal, by significantly increasing property tax to the County, in addition to other financial benefits.	Consistent.	Not Consistent.	Consistent to a lesser degree.	Consistent.
Improve the regional jobs/housing balance.	Consistent.	Not Consistent.	Consistent to a lesser degree.	Consistent.
Redevelop underutilized agricultural land adjacent to other existing and planned industrial, commercial and other urbanized uses.	Consistent	Not Consistent	Consistent to a lesser degree	Consistent

CEQA Guidelines Section 51526(e)(2) requires an EIR to identify an environmentally superior alternative. If the No Project Alternative is the environmentally superior, the EIR must also identify an environmentally superior alternative from the other alternatives.

The No Project Alternative reduces impacts on most categories and, thus, would be the environmentally superior alternative. Of the remaining alternatives, the Reduced Size Alternative achieves the greatest reduction in impacts by reducing buildout potential. Therefore, the Reduced Size Alternative is the environmentally superior alternative.



6.0 OTHER CEQA CONSIDERATIONS

This section describes the other statutorily required topics including growth inducing impacts, significant and unavoidable impacts, significant irreversible environmental changes, and mandatory findings of significance.

6.1 GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the CEQA Guidelines requires that an EIR evaluate the growth-inducing impacts of a proposed action:

Discuss the way in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects that would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

The State CEQA Guidelines do not distinguish between planned and unplanned growth for purposes of considering whether a project would foster additional growth. Therefore, for purposes of this EIR, to reach the conclusion that a project is growth-inducing as defined by CEQA, the EIR must find that it would foster (i.e., promote, encourage, or allow) additional growth in economic activity, population, or housing, regardless of whether the growth is already approved by and consistent with local plans. The conclusion does not determine that induced growth is beneficial or detrimental, consistent with Section 15126.2(d) of the State CEQA Guidelines. If the analysis conducted for the EIR results in a determination that a project is growth-inducing, the next question is whether that growth may cause adverse effects on the environment. Environmental effects resulting from induced growth (i.e., growth-induced effects) fit the CEQA definition of “indirect” effects in Section 15358(a)(2) of the State CEQA Guidelines. These indirect or secondary effects of growth may result in significant environmental impacts. CEQA does not require that the EIR speculate unduly about the precise location and site-specific characteristics of significant, indirect effects caused by induced growth, but a good-faith effort is required to disclose what is feasible to assess. Growth-inducing impacts can occur when development of a project imposes new burdens on a community by directly inducing population growth, or by leading to the construction of additional development in the project area.

Also included in this category are projects that would remove physical obstacles to population growth, such as the construction of a new roadway into an undeveloped area or a wastewater treatment plant with excess capacity to serve additional new development. Construction of these types of infrastructure projects cannot be considered isolated from the immediate development that they facilitate and serve. Projects that physically remove obstacles to growth or projects that indirectly induce growth are those that may provide a catalyst for future unrelated development in the area (such as a new residential community that requires additional commercial uses to support residents). The growth-inducing potential of a project



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Other CEQA Considerations

could also be considered significant if it fosters growth in excess of what is assumed in the local master plans and land use plans, or in projections made by regional planning agencies.

6.1.1 Population Growth

The decision to approve projects that result from induced growth (e.g., new commercial areas, new housing) is the subject of separate discretionary processes by the Lead Agency responsible for considering such projects, in this case, the San Joaquin County Board of Supervisors. Projects resulting from induced growth would themselves be discretionary and subject to CEQA. Therefore, the following discussion is intended to disclose the potential for environmental effects that could occur more generally because of the project rather than the site-specific impacts of induced growth. Its purpose is to inform the decision-makers that additional environmental effects may be a possibility if growth-inducing projects are approved. However, the decision of whether projects are approved, and the impacts associated with them, still rests with the Lead Agency.

As discussed in Section 3.13, Population and Housing, the Project does not include a residential component, and therefore, would not directly generate population growth through the provision of housing. The Project would result in a net increase in square footage of nonresidential floor area, which would generate increased employment opportunities, which in turn could generate indirect population growth. However, Project employees are anticipated to come from the local population, and the Project is not expected to introduce new residents to the area.

The General Plan EIR identified that under the 2035 General Plan, 51,000 new jobs would be created from 2010 to 2035 for a total of 271,685 jobs in the County by 2035 (San Joaquin County 2014). However, according to the EDD in 2025, the labor force in San Joaquin County in August 2025 was 376,800 people with the total number of employed at 351,400 people (EDD 2025). As such, in 2025 the County's total employment has already exceeded the projected numbers within the General Plan. By 2035, employment is anticipated to be approximately 426,678 jobs within the County. The Project anticipates 4,733 employees at buildout. The anticipated 4,733 employees at the site would represent approximately 9.3 percent of the job growth projected by the General Plan by 2035. However, the County has already exceeded employment estimates under the General Plan. As shown in Table 3.13-4, the total number of jobs within the County by 2035 is estimated to be approximately 426,678, approximately 155,000 more jobs than estimated within the General Plan released in 2014. Therefore, the County already experiences employment growth beyond what was evaluated within the General Plan. However, the Project would be consistent with the projected growth under more recent data. From the most recent available data in 2025 to 2035, the County is estimated to add 75,278 jobs. The anticipated 4,733 employees at the site would represent approximately 6.3 percent of the actual job growth projected in the County over the next decade.

Although the Project would increase employment opportunities, the anticipated workforce demand is within the range of regional employment growth occurring and is expected to be met by the existing local labor force. The Project would not induce substantial population growth in the area, either directly or indirectly, and growth-related impacts would be less than significant.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report
Other CEQA Considerations

6.1.2 Removal of Barrier to Growth

The elimination of either physical or regulatory obstacles to growth is considered to be a growth inducing effect. A physical obstacle to growth typically involves the lack of public service infrastructure. The extension of public service infrastructure, including roadways, water mains, and sewer lines, into areas that are not currently provided with these services, would be expected to support new development. Similarly, the elimination or change to a regulatory obstacle, including existing growth and development policies, could result in new growth.

As discussed in Section 3.18, Utilities and Service Systems, the Project would involve construction of new water, wastewater treatment, and stormwater drainage facilities, as well as expanded electricity and natural gas systems. However, all facilities would be located entirely within the Project site and have been sized to accommodate on-site development only. Consequently, the construction of on-site utility infrastructure would not result in removal of barriers to population growth.

The Project would also include roadway construction and improvements; however, it would not result in the extension of roads into areas not already served by existing roadways and would not result in increased potential for indirect population growth. Furthermore, implementation of the new and/or improved roadways are essential to support circulation in and around the Project, and the improvements would not eliminate obstacles to growth in a manner that would encourage previously unplanned growth.

Finally, the Project would require a GPA and rezone from agriculture to allow for the development of the Project. Conversion of the Project site would align with the guiding principles of the General Plan including to focus new, higher-density growth within incorporated cities and adjacent areas out of cities with full urban services and to promote infill and redevelopment, including economic development, within unincorporated communities. The Project site is designated agricultural, but is surrounded to the north, south, and west with industrial or planned industrial uses adjacent to the City of Tracy. Therefore, it aligns with the General Plan's guiding principles. The Project would comply with all municipal codes governing how to apply for a GPA and rezone. Implementation of the GPA or the rezone would not remove any regulatory obstacle as future projects would also be required to comply with all County municipal code to make a GPA or rezone.

6.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126.2(b) requires an EIR to “describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.” This section identifies significant impacts that could not be eliminated or reduced to a less-than-significant level by mitigation measures imposed by the County. The final determination of the significance of impacts and the feasibility of mitigation measures would be made by the County as part of the County's certification action and decision whether to approve the Project.

Section 3.0, Environmental Impact Analysis, provides a description of the potential environmental impacts of the Project and recommends mitigation measures to reduce impacts to a less than significant level, where possible. Section 4.0, Cumulative Effects, determines whether the incremental effects of the



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report Other CEQA Considerations

Project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects. The significant and unavoidable impacts of the Project are listed below.

- The Project would cause the conversion of a 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.
- The Project would conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) regarding vehicle miles traveled.
- The Project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
- The Project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.
- The Project would generate noise from construction that exceed ambient noise by over 5 dB(A).
- The Project, in conjunction with other past, present, and reasonably foreseeable projects in the applicable geographic area, would have a cumulatively significant impact related to population and housing.

6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126(c) requires an EIR to address any significant irreversible environmental change that would result from implementation of the proposed project. Guidelines Section 15126.2(c) describes the types of irreversible environmental changes that might occur:

- The project would involve a large commitment of nonrenewable resources;
- Land area is irreversibly committed to new project facilities;
- Irreversible damage can result from environmental accidents associated with the project; and
- The proposed consumption of resources is not justified (e.g., the project results in the wasteful use of energy).

Determining whether the Project may result in significant irreversible environmental changes requires a determination of whether key non-renewable resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. The Project would likely result in, or contribute to, the following significant irreversible environmental changes:

- Conversion of prime agricultural land to a fully built-out industrial development, thus precluding alternative land uses in the future; and
- Irreversible consumption of energy and natural resources. These include water, electricity, petroleum fuel, and natural gas, associated with Project construction and ongoing operations. However, as discussed in further detail in Section 3.6, Energy, Project consumption of energy



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

Other CEQA Considerations

resources would not be wasteful and/or inefficient due to consistency with mitigation measures and State and federal regulations.



7.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

Pursuant to the CEQA Guidelines, the discussion of the potential effects on the physical environment within this Draft EIR is focused on those impacts that may be significant or potentially significant. CEQA allows a Lead Agency to limit the details of discussion of the environmental effects that are not considered potentially significant (CEQA Guidelines Section 15126.2[a] and 15128). CEQA requires that the discussion of any significant effects on the environment, as defined in PRC Section 21060.5, be limited to substantial or potentially substantial adverse changes in physical conditions that exist within the affected area. Effects determined to be insignificant or unlikely to occur need not be discussed further in the Draft EIR unless the Lead Agency subsequently receives information inconsistent with the finding (CEQA Guidelines Section 15143).

The NOP was circulated for public review from March 31, 2023 to May 1, 2023, and is contained in Appendix A of this Draft EIR. The Public Scoping Meeting on the Draft EIR for the Project was held on April 10, 2023. The scope of this Draft EIR was tailored based on the analysis included in the Initial Study, the written comments received during the NOP public review period, and verbal comments received during the Public Scoping Meeting. It was determined that implementation of the Project would result in no impact or a less-than-significant impact related to the following general resource areas, and the following resource areas are not discussed at further length in this Draft EIR. Additional analysis supporting the conclusions for the following topics is included in the Initial Study, included as part of Appendix A of this Draft EIR.

Agricultural Resources

Loss of Forest Land

The Project site is currently designated as General Agricultural (A/G) per the County's General Plan and is zoned as General Agriculture 40-acres (AG-40). The site is currently used for agriculture and, specifically, the entirety of the 284-acre site is developed with an almond orchard. Therefore, the Project site is not designated as forest land, and implementation of the Project would not result in the loss of forest land or conversion of forest land to non-forest use.

Mineral Resources

Loss of Resources

The Stockton-Lodi Production-Consumption Region, which encompasses much of San Joaquin and Stanislaus counties, is known to contain significant sand and gravel deposits. However, according to the State Mining and Geology Board's Updated Designation in the Stockton-Lodi Production-Consumption (P-C) Region, which is a document that provides information on the availability of aggregate deposits in the regions, the Project site is located in an area where little likelihood exists for the presence of significant mineral resources (State Mining and Geology Board 2017). Therefore, implementation of the Project would not 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.



INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report
Effects Found Not to be Significant

Resource Recovery Zone

The County General Plan does not identify the Project site as being located within an area with locally important mineral resources, and the Project site is not identified by the State Division of Mines and Geology as Mineral Resource Zone-2. As such, implementation of the Project would not 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.



8.0 LIST OF PREPARERS AND ORGANIZATIONS CONSULTED

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INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

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Draft Environmental Impact Report

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INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

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Draft Environmental Impact Report

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INTERNATIONAL PARK OF COMMERCE PHASE 2

Draft Environmental Impact Report

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