May 2020
Central Valley Ag Group Bulk Whole Cottonseed Transload Facility

ANCHOR QEA

Initial Study/Mitigated Negative Declaration for the Central Valley Ag Group Bulk Whole Cottonseed Transload Facility at the Port of Stockton

Prepared for the Port of Stockton

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Prepared for
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Project Number: 160377-01.09

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ABBREVIATIONS

AB	Assembly Bill
BMP	best management practice
BPS	Best Performance Standard
CAAQS	California Ambient Air Quality Standards
CARB	California Air Resources Board
CERS	California Environmental Reporting System
CEQA	California Environmental Quality Act
CFC	chlorofluorocarbon
CFR	Code of Federal Regulations
CH_4	methane
City	City of Stockton
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	CO_2 equivalence
CVAG	Central Valley Ag Group
dB	decibel
dBA	A-weighted decibel
Delta	Sacramento-San Joaquin River Delta
DSP	Development Standards Plan
DTSC	California Department of Toxic Substances Control
EIR	Environmental Impact Report
EO	Executive Order
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FTA	Federal Transit Administration
GHG	greenhouse gas
GWP	global warming potential
HCFC	hydrochlorofluorocarbon
HFC	hydrofluorocarbon
IS	Initial Study
LOS	Level of Service
LUC	Land Use Covenant
MND	Mitigated Negative Declaration
MRZ	Mineral Resource Zone

N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NO_x	nitrogen oxide
O_3	ozone
PG&E	Pacific Gas & Electric Company
PM	particulate matter
PM_{10}	particulate matter 10 micrometers or smaller in diameter
$PM_{2.5}$	particulate matter 2.5 micrometers or smaller in diameter
Port	Port of Stockton
ROG	reactive organic gases
RTP	Regional Transportation Plan
SB	Senate Bill
SIP	State Implementation Plan
SJCOG	San Joaquin Council of Governments
SJMSCP	San Joaquin County Multi-species Habitat Conservation and Open Space Plan
SJVAB	San Joaquin Valley Air Basin
SJVAPCD	San Joaquin Valley Air Pollution Control District
SMP	Safety Management Plan
SO_X	sulfur oxide
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
USEPA	U.S. Environmental Protection Agency
VMT	vehicle miles traveled
VOC	volatile organic compound

1 Introduction

The Port of Stockton (Port) has prepared this Initial Study/Mitigated Negative Declaration (IS/MND) to address the environmental effects of developing a rail-to-truck transload facility for whole cottonseed at the Port (the proposed project). The Port is the lead agency for the proposed project under the California Environmental Quality Act (CEQA).

The proposed project was constructed and became operational in spring 2019. This IS/MND has been prepared to evaluate the impacts of the proposed project as compared to the baseline condition when the project site was developed only with a concrete pad and not operational. CEQA compliance is required for the Central Valley Ag Group (CVAG) to obtain a lease from the Port and a San Joaquin Valley Air Pollution Control District permit for the proposed outdoor stockpile.

1.1 California Environmental Quality Act Process

This document has been prepared in accordance with CEQA (Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR] Section 15000 et seq.). One of the main objectives of CEQA is to disclose the potential environmental effects of proposed activities to the public and decision-makers. CEQA requires that the potential environmental effects of a project be evaluated prior to implementation. This IS/MND includes a discussion of the proposed project's impacts on the existing environment, including the identification of avoidance, minimization, and mitigation measures.

Under CEQA, the lead agency is the public agency with primary responsibility over approval of a proposed project. The Port has directed the preparation of an environmental document that complies with CEQA and will consider the information in this document when determining whether to approve the proposed project. The preparation of initial studies is guided by Section 15063 of the State CEQA Guidelines; whereas Sections 15070 through 15075 guide the process for the preparation of a Negative or Mitigated Negative Declaration. Where appropriate and supportive to an understanding of the issues, reference will be made to the statute, the State CEQA Guidelines, or appropriate case law.

This IS/MND meets CEQA content requirements by including a project description; descriptions of the environmental setting, potential environmental impacts, and mitigation measures for any potentially significant impacts; discussion of the proposed project's consistency with plans and policies; and names of the document preparers.

1.2 Lead Responsible and Trustee Agencies

The CEQA Guidelines identify "the lead agency as the public agency which has the principal responsibility for carrying out or approving a project" (14 CCR Section 15367). The Port is the CEQA

lead agency for the proposed project and has the primary responsibility for approving the CVAG facility, including proposed project operations, and issuing a lease.

Projects or actions undertaken by the lead agency (in this case, the Port) may require subsequent oversight, approvals, or permits from other public agencies. Other such agencies are referred to as responsible agencies and trustee agencies. Pursuant to CEQA Guidelines Sections 15381 and 15386, as amended, responsible and trustee agencies are defined as follows:

- A **responsible agency** is "a public agency which proposes to carry out or approve a project, for which a Lead Agency is preparing or has prepared an EIR or Negative Declaration. For the purposes of CEQA, the term 'Responsible Agency' includes all public agencies other than the Lead Agency which have discretionary approval authority over the project." (CEQA Guidelines Section 15381).
- A **trustee agency** is "a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California" (CEQA Guidelines Section 15386). Trustee agencies have jurisdiction over natural resources held in trust for the people of California but do not have a legal authority over approving or carrying out a project. CEQA Guidelines Section 15386 identifies the following four agencies as potential trustee agencies for projects subject to CEQA:
  - California Department of Fish and Wildlife (CDFW), regarding fish and wildlife, native plants designated as rare or endangered, game refuges, and ecological reserves
  - California State Lands Commission (CSLC), regarding "state-owned "sovereign" lands, such as the beds of navigable waters and state school lands"
  - California Department of Parks and Recreation, regarding "units of the state park system"
  - University of California, regarding "sites within the Natural Land and Water Reserves System"

Table 1 summarizes the expected relevant regulatory agencies, their expected jurisdiction (i.e., trustee or responsible agency), and their statutory authority as related to the proposed project. The jurisdiction of these agencies will be confirmed through subsequent coordination.

Table 1
Regulatory Agencies and Authority

Regulatory Agency	Jurisdiction	Statutory Authority/Implementing Regulations
San Joaquin Valley Air Pollution Control District	Responsible agency	This agency has review authority under the California Clean Air Act and responsibility for implementing federal and state regulations at the local level and permitting stationary sources of air pollution. The proposed project is expected to require permits for receiving operations and to operate an outdoor stockpile (SJVAPCD 2019).
City of Stockton Fire Department	Responsible agency	This agency reviews and approves of fire protection systems.

2 Project Description

CVAG is proposing to establish a new transloading facility at the Port to receive whole cottonseed by rail and transport it out of the Port by truck. As part of the proposed project, CVAG would construct a small concrete apron pad on an existing Port concrete pad lot; fill and level holes in the existing concrete pad lot; install a portable modular-type office, truck scale, portable toilet, diesel fuel tank, fuel storage compartment, and auxiliary generator at the project site; and designate part of the project site as a parking lot. The proposed project would not require new permanent buildings or infrastructure improvements and would not include berth or in-water work. Electricity would be provided to the project site through an existing power pole at the southwest corner of the project site.

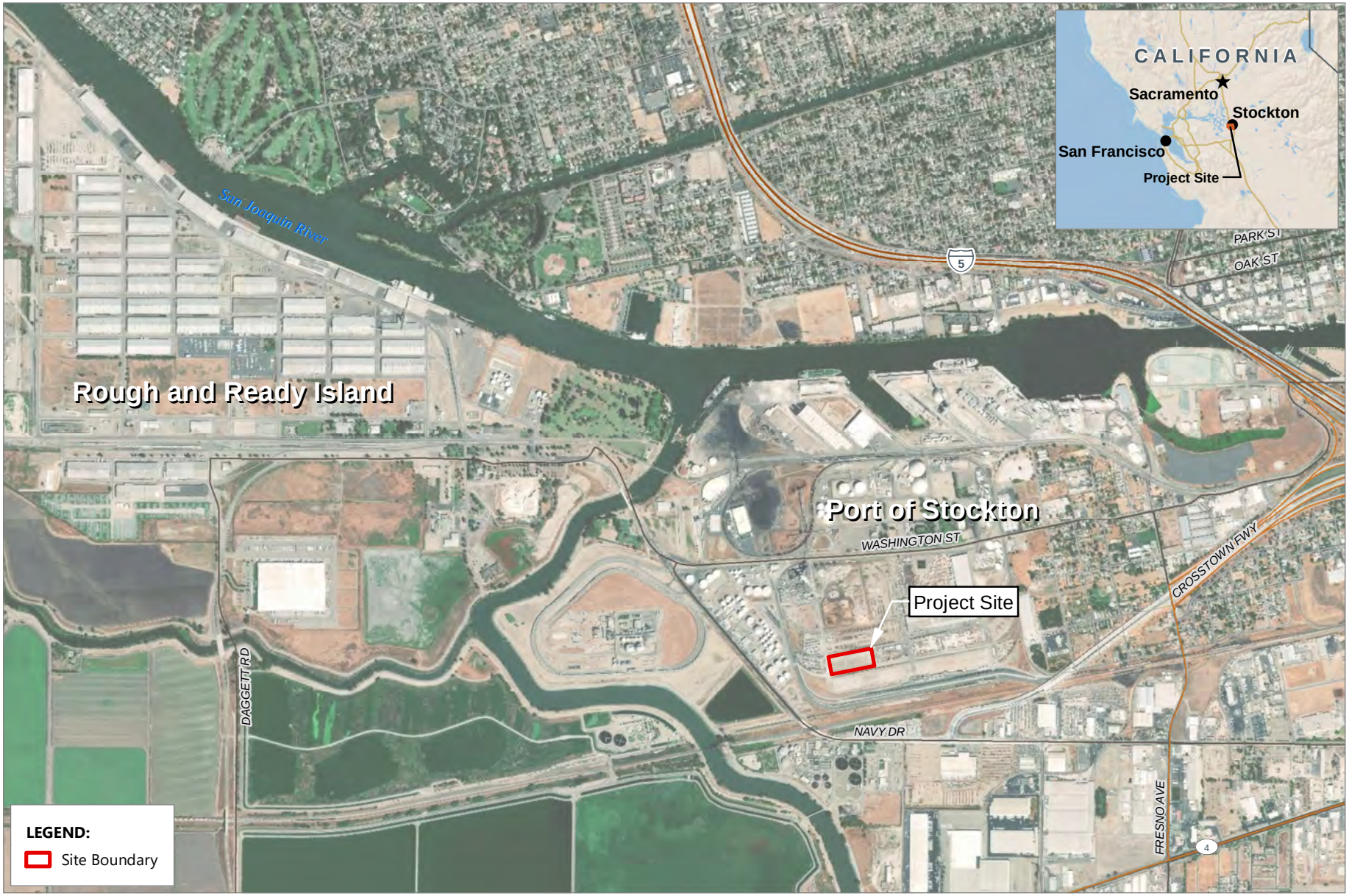
2.1 Project Location and Existing Setting

2.1.1 Regional Setting

The proposed project is located within the City of Stockton's (City's) urban core, which is characterized by a mix of heavy industrial uses with limited landscape features, older residential neighborhoods, neighborhood commercial shopping centers, and a variety of other commercial and industrial parcels. In the area surrounding the project site, the Port leases property for a variety of industrial uses characterized by storage tanks, railroad facilities, large storage buildings, and stockpiles of various commodities. The City's *Envision Stockton 2040 General Plan* designates the project site for industrial use, and the zoning classification of the project site and surrounding parcels is Port Area (PT), Industrial General (IG), or Unzoned (UNZ) (City 2018a).

2.1.2 Project Setting

The project site includes the 2.5-acre western half of an existing, vacant concrete pad lot at 530 Port Road 23, which is bordered by Port Road 23 to the west, Port Road 22 to the east, Port Road K to the north, and Port Road L to the south (Figure 1).



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Feet

Figure 1
Vicinity Map
Central Valley Ag Group Bulk Whole Cottonseed Transload Facility
Port of Stockton

2.2 Project Objectives

CVAG is seeking to transport approximately 96,000 tons per year of whole cottonseed to the Port by rail, and transload the cottonseed to trucks for use throughout the region as a livestock feed supplement.

2.3 Proposed Project Construction

2.3.1 Site Preparation

Construction of the proposed project would involve minimal site preparation work spanning approximately 1 to 2 weeks. Holes in the existing concrete pad lot would be filled and leveled, and a new concrete apron pad would be constructed between the rail tracks and the existing concrete pad lot. Site preparation would not require excavation or grading, and heavy equipment would not be required. The three existing drains that currently provide stormwater conveyance would remain in place and unchanged.

2.3.2 Site Improvements and Additions

Following site preparation, CVAG would install a portable modular-type office, truck scale, portable toilet, 500-gallon aboveground diesel fuel tank, fuel storage compartment (containing one 55-gallon drum each of hydraulic oil, antifreeze, and motor oil), and a 150-horsepower, 80-kilovolt-ampere auxiliary generator at the project site. All proposed equipment would be mobile and would not require constructing any permanent foundations or other surface improvements. The proposed arrangement of the project site is shown in Figure 2.

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Figure 2
Site Plan
Central Valley Ag Group Bulk Whole Cottonseed Transload Facility
Port of Stockton

2.4 Proposed Project Operations

Under proposed project operations, CVAG would transload 96,000 tons of cottonseed per year into the Port by rail and out of the Port by truck. The transloading process would happen in accordance with the following steps and using the quantities of vehicles listed in Table 2:

1. Gondola-type railcars would arrive at the project site via manifest rail. Railcars would be moved within the Port by the Central California Traction Company, the Port's short-line operator.
2. Railcars arriving at the project site would be offloaded by opening one end of the gondola compartment, placing down a ramp and doorholder, and then driving a small front-end loader in and out of the cars. The loader would deposit the cottonseed in the lot.
3. A second, larger front-end loader would stack the offloaded cottonseed in truck-loading piles (approximately 18 feet high) in the yard. The completed piles would be uncovered during the dry season and covered with tarps during the wet season.
4. Outbound empty trucks (approximately 16 trucks per day, 20 days per month) would arrive at the project site and would be loaded from the truck-loading piles by a front-end loader.
5. Limited use of a skid steer would occur to move whole cottonseed within tight spaces in the project site.
6. Limited use of a self-propelled stacker (less than 500 hours annually) would occur to stack whole cottonseed to an approximate height of 25 feet if additional ground space is required.

Table 2
Proposed Project Throughput

	Vehicles per Month	Cottonseed per Vehicle	Total Cottonseed Transloaded per Month
Railcars (Inbound)	80 railcars per month, 8 rail trips per month[1]	100 tons per railcar	8,000 tons (96,000 tons per year)
Trucks (Outbound)	320 trucks per month	25 tons per truck	

Note:
1. Assumes one manifest train would accommodate 10 railcars.

The proposed project would operate 5 to 6 days per week, 10 hours per day (7:00 a.m. to 5:00 p.m.). No more than two employees would be on site during typical operating conditions. A maximum operational day would result in 10 rail cars (1 train) and 40 trucks and could occur up to 1 day per month.

CVAG maintains an active Safety Management Program (SMP) for its facilities that is designed to minimize the risk of impacts to persons and the environment from facility operation. This includes a plan for spill prevention, control, and management. As part of the SMP, CVAG provides annual California Environmental Reporting System (CERS) submittals detailing quantities and management of potentially hazardous materials at its facilities. The SMP would apply to the proposed project.

3 Environmental Checklist

1.	**Project Title:**	Central Valley Ag Group Bulk Whole Cottonseed Transload Facility
2.	**Lead Agency:**	Port of Stockton 2201 West Washington Street Stockton, California 95203
3.	**Contact Person:**	Jason Cashman
4.	**Project Location:**	530 Port Road 23, Stockton, San Joaquin County, California
5.	**Project Sponsor:**	Central Valley Ag Group 5509 Langworth Road Oakdale, California 95361
6.	**General Plan Designation:**	Industrial use
7.	**Zoning:**	Port Area
8.	**Description of Project:**	CVAG is proposing to establish a new transload facility at the Port to receive whole cottonseed by rail and transport it out of the Port by truck. CVAG would construct a small concrete apron pad on an existing Port concrete pad lot, fill and level holes in the existing concrete pad, install a portable modular-type office, truck scale, portable toilet, diesel fuel tank, fuel storage compartment, and auxiliary generator at the site, and designate part of the site as a parking lot.
9.	**Surrounding Land Uses and Setting:**	Land uses surrounding the project site are industrial.
10.	**Other Public Agencies Whose Approval Is Required:**	• City of Stockton Fire Department • San Joaquin Valley Air Pollution Control District
11.	**Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**	Two Native American tribes have requested consultation under CEQA guidelines (commonly known as Assembly Bill 52): the Wilton Rancheria Tribe and the Buena Vista Rancheria Band of Me-Wuk Indians. The Port notified these tribes of the proposed project by letter on March 23, 2020, and will provide the IS/MND to the tribes. No tribal cultural resources have been identified in the project area. Consultation will be ongoing.

3.1 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by the proposed project, involving at least one impact that is potentially significant (after incorporation of mitigation measures) as indicated by the checklist.

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

3.2 Determination

On the basis of this initial evaluation:

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

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

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

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

Signature	May 12, 2020
	Date
Jason Cashman	Port of Stockton
Printed Name	For

3.3 Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off site as well as on site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
    a. Earlier Analysis Used. Identify and state where they are available for review.
    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
    a. The significance criteria or threshold, if any, used to evaluate each question; and
    b. The mitigation measure identified, if any, to reduce the impact to less than significance.

3.3.1 Aesthetics

	Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant Impact After Mitigation	Less Than Significant Impact	No Impact
a.	Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a scenic highway?	☐	☐	☐	☒
c.	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d.	Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	☐	☒

3.3.1.1 Affected Environment

3.3.1.1.1 Regional Setting

The proposed project is located within the City's urban core, which is characterized by a mix of heavy industrial uses with limited landscape features, older residential neighborhoods, neighborhood commercial shopping centers, and a variety of other commercial and industrial parcels. In the area surrounding the project site, the Port leases property for a variety of industrial uses characterized by storage tanks, railroad facilities, large storage buildings, and stockpiles of various commodities. Local regional land uses that affect the visual character include residential infill (the closest residential area, Boggs Tract, is located approximately 2,800 feet east of the project site), agricultural lands, industrial and commercial facilities, BNSF Railway rail lines and right-of-way, and the San Joaquin River (serving industrial, recreational, and natural uses).

3.3.1.1.2 Scenic Highways

California's Scenic Highway Program was created by the State Legislature in 1963 with the purpose of protecting and enhancing the natural scenic beauty of California highways and adjacent corridors through special conservation treatment. The state laws governing the Scenic Highway Program are found in the Streets and Highways Code, Sections 260 through 284. The closest scenic highway to the project site is the portion of State Route 580 from Interstate 5 to State Route 205. This roadway is located 20 miles to the southwest of the Port.

3.3.1.1.3 Study Area Setting

The project site includes the 2.5 acre western half of an existing vacant concrete pad lot at 530 Port Road 23, which is bordered by Port Road 23 to the west, Port Road 22 to the east, Port Road K to the north, and Port Road L to the south. As depicted in Photograph 1, there is no vegetation on or surrounding the existing parcel, apart from a narrow strip of disturbed ruderal vegetation immediately south of the project site.

Photograph 1
Aerial View of Undeveloped Proposed Project Site

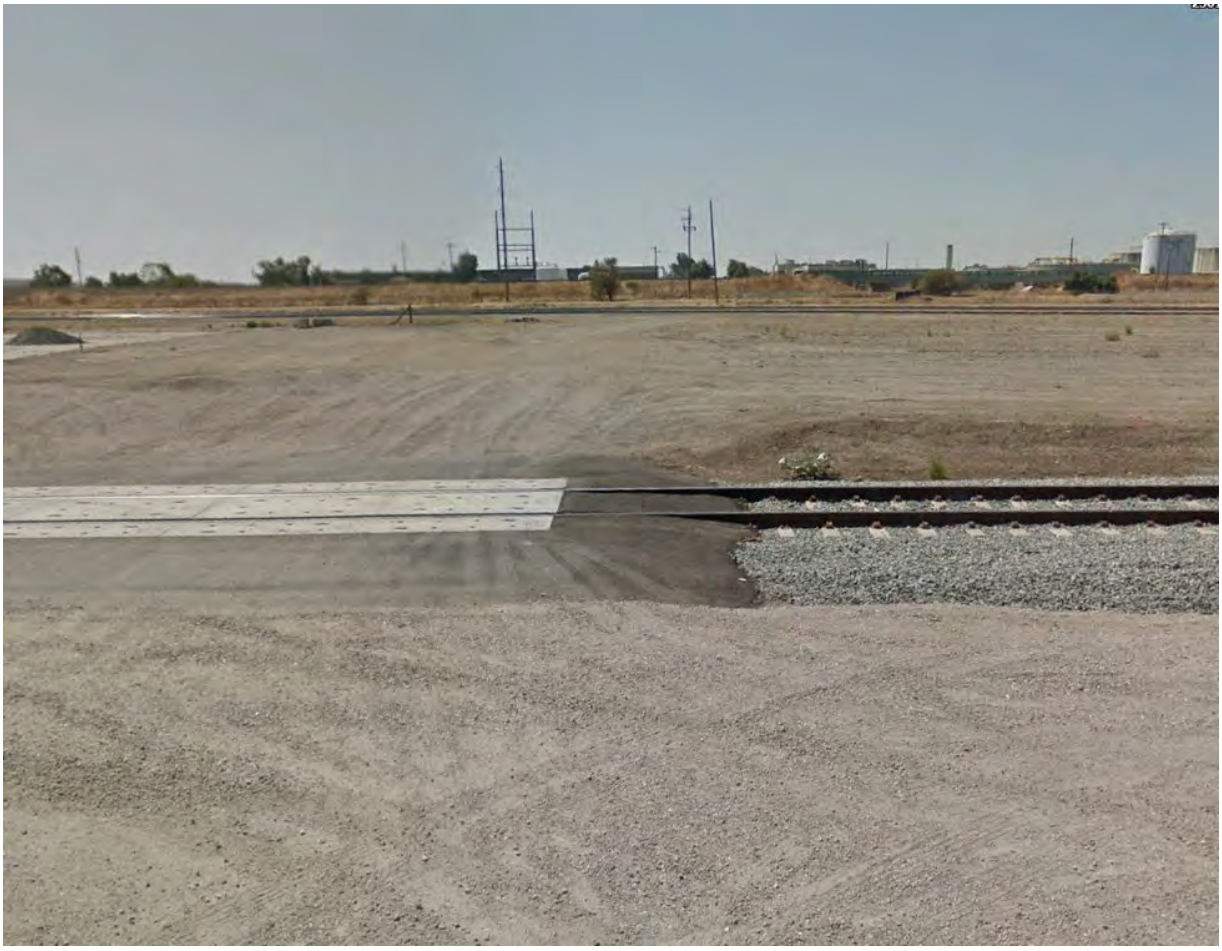
Source: Google Earth 2018

3.3.1.1.3.1 Project Viewshed

Views of the project site are largely obscured on all sides by industrial developments, rail lines, and railcars, as depicted in Photographs 2 and 3. Complete views of the project site are only available from immediately adjacent roadways, including Port Road L, Port Road K, Port Road 22, and Port Road 23. These roads exclusively serve to provide access to industrial sites in the immediate project vicinity.

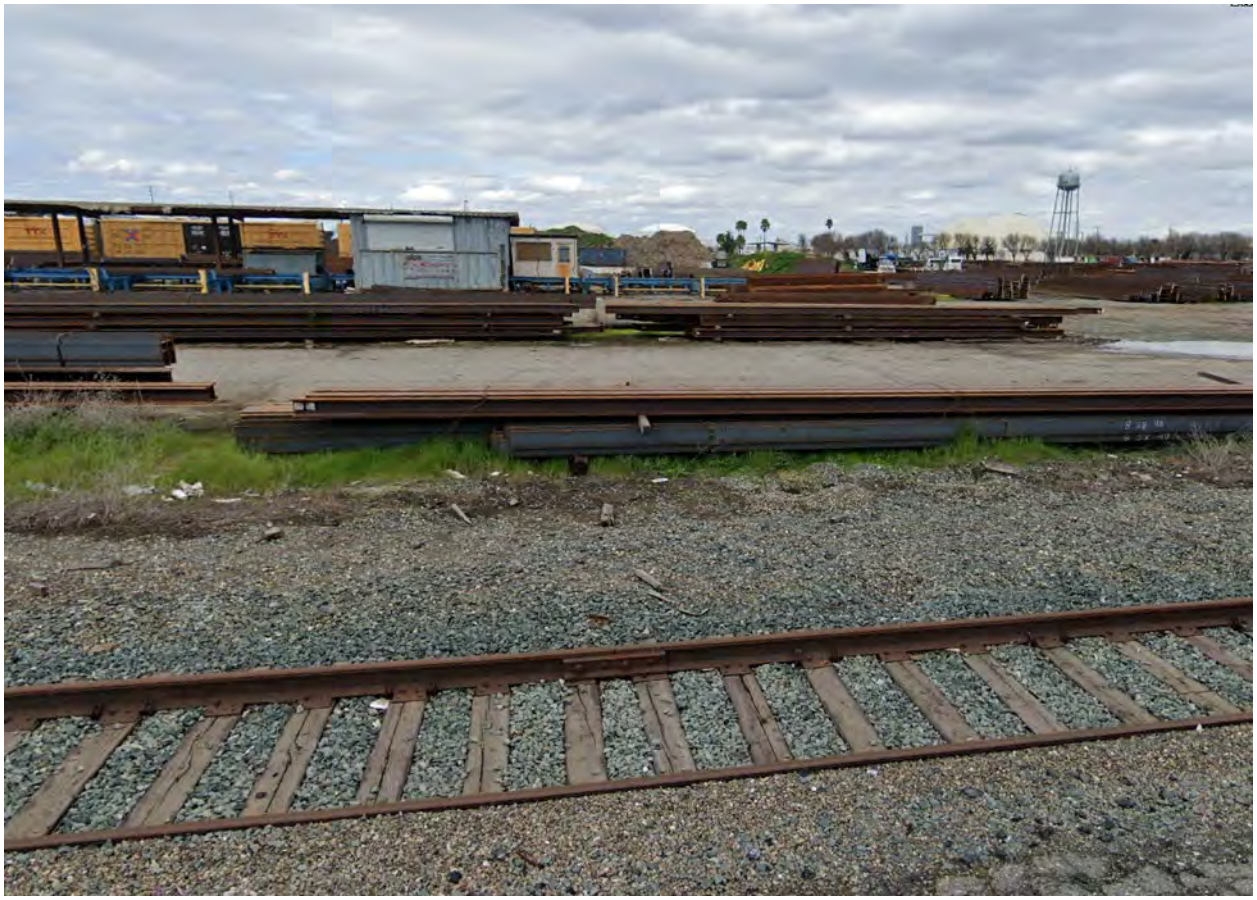
Partial views of the project site may be available from Navy Drive Road. The project site is not visible from Boggs Tract, which is the nearest residential area.

Photograph 2
View from Project Site (Southwest Corner), Looking South



Source: Google Earth 2020

Photograph 3
View from Project Site (Northeast Corner), Looking North



Source: Google Earth 2020

3.3.1.2 Impact Evaluation

A: Would the project have a substantial adverse effect on a scenic vista?

No Impact. The existing visual character in the study area is not considered scenic, nor are there any identified scenic vistas within the project area. Therefore, there would be no impact to scenic vistas.

B: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a scenic highway?

No Impact. The proposed project would not affect any rock outcroppings or historic buildings. Vegetation removal, if any, would be limited to grubbing of ruderal vegetation. There are no designated state scenic highways within the project area, and the visual character of the study area (industrial Port uses) is consistent with the proposed project. Therefore, there would be no impact to scenic resources.

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 publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

No Impact. The proposed project is located in within the City's urban core and would not conflict with applicable zoning. There are no applicable regulations governing scenic quality at the project site, and the visual character of the study area would not be changed by the proposed project.

The most prominent permanent visual change resulting from the proposed project would be from stockpiling cottonseed and installing modular buildings and mobile equipment. Although the project site is visible from adjacent service roads and may be partially visible from Navy Drive, proposed site conditions (including the cottonseed stock piles, modular buildings, and mobile equipment) would be consistent with the existing visual character of the project site and its surroundings, which includes other industrial features similar or larger in scale. The proposed project would result in a modest increase in truck and rail calls. Truck and rail operations under the proposed project would be aesthetically similar and consistent with those of existing conditions within the industrialized area.

Short-term construction activities would be similarly obscured from view by on-site and adjoining developments. Truck or other vehicle traffic generated by construction would not alter the visual character of the project site and surroundings due to its location within an industrialized area.

Based on the conditions described above, there would be no impact to the existing visual character or quality of the project site and its surroundings from the proposed project.

D: Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

No Impact. Any lighting required for facility construction or operation would be directed only onto the project site, would be the minimum necessary for safety purposes, and would not be visible from any residential areas or other sensitive visual receptors. No new sources of glare would be constructed. Therefore, the proposed project would result in no impact to daytime or nighttime views in the study area from new sources of light or glare.

3.3.2 Agricultural and Forestry Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project, and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:		**Potentially Significant Impact**	**Less Than Significant Impact After Mitigation**	**Less Than Significant Impact**	**No Impact**
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b.	Conflict with existing zoning for agricultural use or conflict with a Williamson Act contract?	☐	☐	☐	☒
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?	☐	☐	☐	☒
d.	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

3.3.2.1 Affected Environment

The City's *Envision Stockton 2040 General Plan* (City 2018a) designates the project site as "Industrial," and the zoning designation of the project area is "Port" (City 2020a). Port areas are designated for the operation of port facilities, including wharves, dockage, warehousing, and related port facilities. Neither the project site nor the immediate surrounding areas currently support agricultural use or forestry resources. There are no timberland zoned properties within San Joaquin County as of 2001 (CAL FIRE 2002). The nearest forest area is the Stanislaus Forest, which is more than 50 miles away. All property surrounding the project site has been developed for industrial or urban land uses. The project

area is zoned for non-agricultural uses, which precludes the lease area from qualifying for Williamson Act contracts.

3.3.2.2 Impact Evaluation

A: Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The proposed project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. Therefore, there would be no impact.

B: Would the project conflict with existing zoning for agricultural use or conflict with a Williamson Act contract?

No Impact. No farmland exists in the project area. The zoning designation of the project site and surrounding parcels is Port (City 2020a), and they are not subject to a Williamson Act contract. Therefore, there would be no impact.

C: Would the project conflict with existing zoning for, or cause rezoning of forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?

No Impact. The proposed project would not conflict with or change any zoning or use of forest land, timberland, or timberland zoned Timberland Production. Therefore, there would be no impact.

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

No Impact. The proposed project would not result in the conversion of forest land or timberland to non-forest use. Therefore, there would be no impact.

E: Would the project involve other changes in the existing environment that, 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?

No Impact. No forest or farmlands exist near the project area. Therefore, there would be no impact.

3.3.3 Air Quality

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

3.3.3.1 Affected Environment

3.3.3.1.1 Environmental Setting

The proposed project is located within the San Joaquin Valley Air Basin (SJVAB), which is bordered by the Sierra Nevada to the east, the Coast Ranges to the west, and the Tehachapi Mountains to the South and made up of eight counties in California's Central Valley: San Joaquin, Stanislaus, Merced, Madera, Fresno, Kings, Tulare, and the San Joaquin Valley Air Basin portion of Kern. The climate within the SJVAB is typical of inland valleys in California, with hot, dry summers and cool, mild winters. Daytime temperatures in the summer often exceed 100°F, with lows in the 60s. In winter, daytime temperatures are usually in the 50s, with lows around 35°F. Fog is common in the winter and may persist for days. Winds are predominantly up-valley (from the north) in all seasons, but more so in the summer and spring months. Winds in the fall and winter are generally lighter and more variable in direction, but generally blow toward the south and southeast.

Because of the Central Valley's unique physical characteristics, the pollution potential in the area is very high. Surrounding elevated terrain, in conjunction with temperature inversions, frequently restricts lateral and vertical dilution of pollutants. Ozone, the major component of the Central Valley's summertime smog, is formed via chemical reactions between reactive organic gases (ROG) and nitrogen oxides (NO_X) in the presence of ultraviolet radiation or sunlight. Abundant sunshine and warm temperatures in summer are ideal conditions for the formation of photochemical oxidants, leading to frequent photochemical pollution (ozone). Tiny particles of solids or liquids (excluding pure water) that are suspended in the atmosphere are known as particulate matter (PM) and are classified according to their diameter in microns as either $PM_{2.5}$ (fine particulate matter less than or equal to 2.5 microns in diameter) or PM_{10} (suspended particulate matter less than or equal to 10 microns in diameter). PM can

be emitted directly (primary PM, such as dust or soot), or can form in the atmosphere through photochemical reactions or gaseous precursors (secondary PM). Much of the Central Valley's ambient PM_{10} and $PM_{2.5}$ is secondary PM, formed in atmospheric reactions of NO_X. Due to the combined air pollution sources within the SJVAB and meteorological and geographical effects that limit dispersion of air pollution, the SJVAB can experience high air pollutant concentrations.

3.3.3.1.2 Regulatory Setting

The U.S. Environmental Protection Agency (USEPA) enforces federal air quality regulations. The federal Clean Air Act (CAA) of 1970, amended in 1990, authorized the establishment of national health-based air quality standards, set deadlines for their attainment, and established actions required of areas that exceed these standards. Air agencies in areas that exceed the National Ambient Air Quality Standards (NAAQS) are required to develop state implementation plans (SIPs) to show how they will achieve NAAQS. USEPA's responsibility to control air pollution in individual states is primarily to review submittals of SIPs prepared by each state.

In California, the California Air Resources Board (CARB) prepares and enforces federally required SIPs in an effort to achieve and maintain NAAQS and California Ambient Air Quality Standards (CAAQS), which were developed as part of the California Clean Air Act adopted in 1988. CAAQS for criteria pollutants are equal to or more stringent than NAAQS and include other pollutants for which there are no NAAQS. In addition, CARB is responsible for assigning air basin attainment and non-attainment designations in California. Air basins are designated as being in attainment if the levels of a criteria air pollutant meet CAAQS for the pollutant and are designated as being in non-attainment if the level of a criteria air pollutant is higher than CAAQS.

The San Joaquin Valley Air Pollution Control District (SJVAPCD) is the air district for SJVAB, in which the project site is located. SJVAPCD prepares air quality plans for SJVAB to comply with national and state standards that are used to assess potential air quality impacts. The San Joaquin Valley has been in attainment for carbon monoxide (CO) since 1994 and recently reached attainment for the federal PM_{10} standard in 2008. The entire air basin is classified as non-attainment for the CAAQS 24-hour and annual PM_{10} standards, the CAAQS annual $PM_{2.5}$ standard, and the CAAQS 1-hour and 8-hour ozone standards. The SJVAB is also classified as non-attainment for the NAAQS 8-hour ozone standard and the 24-hour and annual $PM_{2.5}$ standards (SJVAPCD 2015a).

The SJVAPCD recommended thresholds for determining whether projects have significant adverse air quality impacts are provided in its *Guide for Assessing and Mitigating Air Quality Impacts* (SJVAPCD 2015b). Table 3 shows SJVAPCD thresholds. These thresholds are applied separately to construction emissions, permitted operational emissions, and non-permitted operational emissions.

Table 3
San Joaquin Valley Air Pollution Control District Significance Thresholds

Pollutant/Precursor	Emissions (tons per year)
ROG	10
NO_X	10
CO	100
SO_X	27
PM_{10}	15
$PM_{2.5}$	15

Note:
Source: SJVAPCD 2015b

3.3.3.2 Impact Evaluation

Baseline conditions include a vacant project site without operational conditions and without emissions. The proposed project would generate air emissions from construction and operations. Construction would be conducted over a 2-week period and would not include the use of heavy equipment. The proposed project's operational emissions, shown in Tables 4 and 5, are a result of rail and truck emissions. As discussed in Section 2.4, there would be 80 railcars delivered per month, or eight trains, and 320 truck calls per month. Annually, there would be 96 train trips and 3,840 truck trips.

Table 4
Annual Operational Emissions in San Joaquin Valley Air Pollution Control District – Project (Tons per Year)

Source Category	PM_{10}	$PM_{2.5}$	NO_X	SO_X	CO	VOC
Year 2020						
Trucks	0.23	0.07	4.58	0.01	0.68	0.19
Rail	0.02	0.02	0.87	0.00	0.26	0.04
Employee Vehicles	0.00	0.00	0.00	0.00	0.02	0.00
Material Handling Dust	0.12	0.12				
Mobile on Site	0.01	0.01	0.33	0.00	0.35	0.03
Year 2020 Total	0.38	0.22	5.79	0.02	1.31	0.26
CEQA Impacts						
Significance Threshold	15	15	10	27	100	10
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
Emissions might not add precisely due to rounding.
PM_{10} and $PM_{2.5}$ truck emissions include exhaust and road dust.
Rail emissions reflect switcher and line-haul locomotives.
Material handling dust reflects dust emissions from product handling at the terminal.

Table 5
Average Daily Operational Emissions On Site – Project (Pounds per Day)

Source Category	PM_{10}	$PM_{2.5}$	NO_X	SO_X	CO	VOC
Year 2020						
Trucks on Site	0.15	0.0	0.4	0.0	0.1	0.0
Rail on Site	0.05	0.0	1.4	0.0	0.4	0.1
Material Handling Dust	0.7	0.7				
Mobile on Site	0.1	0.0	1.8	0.0	1.9	0.2
Year 2020 Total	0.9	0.8	3.6	0.0	2.4	0.3
CEQA Impacts						
Significance Threshold	100	100	100	100	100	100
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
Emissions might not add precisely due to rounding.
Truck emissions include truck transit on site and truck idling on site.
Rail emissions reflect 1 switching event on site.
PM_{10} and $PM_{2.5}$ truck emissions include on-site exhaust and road dust.
Material handling dust reflects dust emissions from product handling at the terminal.

While not required by SJVAPCD, because the operation may result in days in which operations are higher than the average day, Table 6 presents emissions associated with a maximum day. Operational assumptions for a maximum day would include 10 rail cars (1 train a day) and 40 trucks per day and could occur up to 1 day per month. Annual throughput would not change from volumes reported in Section 2.4.

Table 6
Maximum Day Operational Emission in San Joaquin Valley Air Pollution Control District

Source Category	PM_{10}	$PM_{2.5}$	NO_X	SO_X	CO	VOC
Year 2020						
Trucks	4.7	1.5	95.5	0.3	14.2	4.0
Rail	0.2	0.2	10.1	0.0	3.1	0.4
Employee Vehicles	0.0	0.0	0.0	0.0	0.1	0.0
Material Handling Dust	2.5	2.5				
Mobile On Site	0.1	0.0	1.8	0.0	1.9	0.2
Maximum Day Total	7.5	4.2	107.4	0.3	19.4	4.5

Notes:
Emissions may not add precisely due to rounding.
PM_{10} and $PM_{2.5}$ truck emissions include exhaust and road dust.
Rail emissions reflect switcher and line-haul locomotives.
Material handling dust reflects dust emissions from product handling at the terminal.

A: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less-than-Significant Impact. SJVAPCD has established thresholds of significance for criteria pollutant emissions, which are based on New Source Review offset requirements for stationary sources. Because the SJVAB is an extreme ozone (O_3) non-attainment area, stationary sources in SJVAPCD are subject to some of the toughest regulatory requirements in the nation. Emission reductions achieved through implementation of offset requirements are a major component of SJVAPCD's air quality plans. Therefore, projects with emissions below the thresholds of significance for criteria pollutants would be determined to not conflict or obstruct implementation of the air quality plans, while emissions exceeding those thresholds would conflict with and obstruct implementation.

As construction would only take 2 weeks and no heavy equipment would be required, construction emissions would be minimal. Table 4 presents the operational emissions resulting from the proposed project. As shown, emissions would not exceed thresholds.

Because the proposed project would not exceed thresholds, it would not conflict with or obstruct implementation of SJVAPCD's O_3 attainment plans, including its most recent 2016 plan for the 2008 8-hour O_3 standard (SJVAPCD 2016). Impacts would be considered less than significant.

B: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a non-attainment area for an applicable federal or state ambient air quality standard?

Less-than-Significant Impact. Any project-level significant impacts would be considered significant at the cumulative level. As previously discussed, criteria pollutant emissions would be less than significant and therefore would not contribute to significant cumulative impacts. As discussed below, proposed project activities would neither expose sensitive receptors to substantial pollutant concentrations nor generate objectionable odors. Accordingly, no new or more severe cumulative impacts are anticipated as part of the proposed project. Therefore, impacts would be less than significant.

C: Would the project expose sensitive receptors to substantial pollutant concentrations?

Less-than-Significant Impact. SJVAPCD considers a sensitive receptor to be a residence, hospital, school, or convalescence facility where sensitive individuals could be exposed to substantial pollutant concentrations. Commercial and industrial facilities are not included in the definition of sensitive receptors because employees do not remain on site for a full 24 hours and are not considered sensitive. The nearest sensitive receptors to the project site are residential receptors located approximately 2,800 feet to the east.

Impacts to sensitive receptors are evaluated in terms of exposure to toxic air contaminants (TACs). Diesel particulate matter emitted by on- and off-road vehicles is considered the TAC of most concern from motor vehicles. The health risks of TAC emissions are typically quantified when both of the following apply: sensitive receptors are located within 1,000 feet of an emission source; and exposure would occur over

several years. The closest sensitive receptors would be approximately 2,800 feet from emissions sources during construction and operations. As there would be no heavy equipment used in construction, there would be no TAC emissions from construction. Operational emissions would occur over the entire operational period of the proposed project; however, PM emissions would increase by less than 1 pound per day over existing conditions. Due to the low level of emissions and distance between sources and emissions, the proposed project would not expose sensitive receptors to substantial pollutant concentrations. This is considered a less-than-significant impact.

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

Less-than-Significant Impact. Operations could generate odors associated with diesel exhaust from heavy-duty equipment. Odors would be highest near the source and would quickly dissipate off site. As discussed above, the nearest sensitive receptors are residences located approximately 2,800 feet east of the areas where sources of construction and operational emissions would be located. Odors would be confined to the immediate area where equipment is operating and would not affect these residences. Therefore, odor impacts would be less than significant.

3.3.4 Biological Resources

	Would the project:	Potentially Significant Impact	Less Than Significant Impact After Mitigation	Less Than Significant Impact	No Impact
a.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and 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, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
c.	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☒	☐	☐

3.3.4.1 Affected Environment

Biological conditions occurring in the project area were observed during multiple reconnaissance surveys conducted from 2015 through 2019 to assess habitat conditions and evaluate the area's potential to support special status species or sensitive habitats (Anchor QEA 2015, 2019). A search of the California Natural Diversity Database was conducted to identify recorded special status species occurrences within the U.S. Geological Survey Stockton West 7.5-minute quadrangle and surrounding quadrangles (Terminous, Lodi South, Waterloo, Stockton East, Manteca, Lathrop, Union Island, and Holt; CDFW 2020).

3.3.4.1.1 Habitat Communities

The project site includes the 2.5 acre western half of an existing vacant concrete pad lot at 530 Port Road 23, bordered by Port Road 23 to the west, Port Road 22 to the east, Port Road K to the north, and Port Road L to the south. There is no vegetation on or surrounding the existing parcel, apart from a narrow strip of disturbed ruderal vegetation immediately south of the project site.

The project site is located within a highly developed and industrialized area, and it is surrounded by existing industrial developments characterized by storage tanks, industrial buildings, concrete surfaced storage or staging areas, stockpiles of various commodities, roadways, and rail lines.

The nearest features that may provide notable wildlife habitat include a concrete-lined drainage channel and a stormwater retention basin located approximately 580 feet south and 1,000 feet west of the project site, respectively. The Burns Cutoff (tributary to the San Joaquin River) is located approximately 2,000 feet west of the project site. Runoff from the project site is conveyed to these features via a culvert system.

3.3.4.1.2 Wetlands and Jurisdictional Waters

There are no known wetlands or jurisdictional waters within the project site. The proposed project does not include any in-water work and is located entirely within an upland area. The nearest water feature is the concrete-lined drainage channel approximately 580 feet south of the project site.

3.3.4.1.3 Special Status Wildlife Species

The California Natural Diversity Database identifies 21 special status (threatened or endangered under the federal Endangered Species Act or California Endangered Species Act, state species of special concern, or California Department of Fish and Wildlife fully protected species) wildlife species within the study area, as identified through a search of the proposed project quadrangle and eight surrounding quadrangles (Appendix A). Potential species occurrence was determined based on habitat requirements and on-site conditions. The project site's developed condition and presence within a highly industrialized area precludes the presence of any special status species listed in Appendix A.

3.3.4.1.4 Special Status Plant Species

There are 20 plant species considered rare, threatened, or endangered by the California Native Plant Society (CNPS; a CNPS Rank 1 or 2 species) with recorded occurrences in the vicinity of the project site, as identified through a search of the proposed project quadrangle and eight surrounding quadrangles (Appendix B; CDFW 2020). Of these 20 species, two are state or federal endangered: palmate-bracted bird's-beak (*Chloropyron palmatum*; federal and state endangered) and Sacramento-San Joaquin River Delta (Delta) button-celery (*Eryngium racemosum*; state endangered). Due to the lack of suitable habitats within the project area, none of the special status plant species with recorded occurrences have the potential to occur within the project site.

3.3.4.2 Impact Evaluation

A: Would this project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less-than-Significant Impact After Mitigation. The proposed project improvements would be constructed or installed within an existing concrete pad lot, which does not have habitat suitable for special status species. Vegetation removal, if any, would be limited to grubbing sparse ruderal vegetation with little or no habitat value. Construction would be minimal, would not require any excavation, and is unlikely to result in substantial off-site erosion or contribution of polluted runoff. Features away from the project site may have habitat value to special status species (e.g., the Burns Cutoff, concrete-lined drainage channel, and stormwater retention basin), but these features would not be directly affected by the proposed project. Construction and operation of the proposed project are not anticipated to generate significant noise or other effects that would disturb special status species away from the project site.

If improperly managed, construction of the proposed project may result in spills, erosion, or other inputs of pollutants to downstream waterbodies. During operation of the proposed project, similar impacts could also occur. Although the risk for these hazards is low given the relatively small scale of construction and operations and the proposed facility's commodity material (whole cottonseed), impacts could be potentially significant without mitigation. The following mitigation measures would be implemented to reduce potential construction and operational impacts to off-site sensitive habitats from spills or polluted runoff:

- **BIO-MM-1:** Standard construction best management practices—including but not limited to use of storm drain inlet filters, erosion control (e.g., straw wattles), and maintenance of spill control kits—will be implemented during construction to control or respond to spills or other potential sources of construction-related pollution.
- **BIO-MM-2:** Operation of the proposed facility will include implementation of the facility SMP, which includes plans for spill prevention, control, and management. As a component of the SMP, CVAG will provide annual CERS submittals detailing quantities and management of potentially hazardous materials at the proposed facility.

While the proposed project would result in an additional 80 railcars and 320 trucks per month calling on the project site, this increase would be negligible when considered in the context of total Port facility operations. Railcars and trucks would operate on existing roads and railways and would not affect special status species or habitats for special status species. Operations within the project site would occur in an existing developed area with no habitat value to special status species.

Based on the preceding analysis and the inclusion of mitigation measures BIO-MM-1 and BIO-MM-2, the proposed project would result in less-than-significant impacts pertaining to special status species and habitats.

B: Would this project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less-than-Significant Impact After Mitigation. There are no riparian habitats or other sensitive natural communities within or directly adjacent to the project site. Without mitigation, construction and operation of the proposed project could potentially impact off-site waterbodies with adjoining riparian habitat. Potential impacts to off-site waterbodies with adjoining riparian habitat would be avoided through implementation of mitigation measures BIO-MM-1 and BIO-MM-2, which include construction and operational measures to control spills and runoff. With implementation of these mitigation measures, the proposed project would have less-than-significant impacts on riparian or other sensitive natural communities.

C: Would this project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?

Less-than-Significant Impact After Mitigation. There are no known wetlands within or adjacent to the CVAG parcel. In addition, no in-water work is required as part of the proposed project. Without mitigation, construction and operation of the proposed project could potentially impact off-site waterbodies and associated wetlands. As noted, potential impacts to off-site waterbodies and associated wetlands would be avoided through implementation of mitigation measures BIO-MM-1 and BIO-MM-2, which include construction and operational measures to control spills and runoff. With implementation of these mitigation measures, the proposed project would have less-than-significant impacts on state or federally protected wetlands.

D: Would this project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less-than-Significant Impact After Mitigation. Although the project area is along the Pacific Flyway, an established air route of waterfowl and other birds migrating between wintering grounds in Central and South America and nesting grounds in Pacific Coast states and provinces of North America, the small size and developed condition of the project site preclude its use as a stopover site during migration. The lack of aquatic features within the project site would also eliminate potential project-related direct impacts to resident and migratory fish on site. Without mitigation, construction and operation of the proposed project could potentially result in off-site impacts to waterbodies. As noted, potential impacts to off-site waterbodies—including habitat for migratory fish or fish nurseries (if

present)—would be avoided through implementation of mitigation measures BIO-MM-1 and BIO-MM-2, which include construction and operational measures to control spills and runoff. With implementation of these mitigation measures, the proposed project would have less-than-significant impacts on the movement of native wildlife or on native wildlife nursery sites.

E: Would this project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The proposed project would not require tree removal and would therefore not conflict with the Stockton Heritage Tree Ordinance. There are no other local policies or ordinances for protecting biological resources that are applicable to the project site. Therefore, the proposed project would result in no impact related to potential conflicts with local policies or ordinances protecting biological resources.

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

Less-than-Significant Impact After Mitigation. The proposed project would not conflict with the San Joaquin County Multi-species Habitat Conservation and Open Space Plan (SJMSCP; San Joaquin County 2000). Habitat at the project site is not suitable for any SJMSCP-covered species. While unlikely, construction and operation of the proposed project without mitigation could potentially impact off-site waterbodies and associated habitat. Potential impacts to off-site waterbodies and associated habitat would be avoided through implementation of mitigation measures BIO-MM-1 and BIO-MM-2, which include construction and operational measures to control spills and runoff. With implementation of these mitigation measures, the proposed project would have less-than-significant impacts on off-site habitats that could be suitable for SJMSCP-covered species.

3.3.5 Cultural Resources

Would the project:		Potentially Significant Impact	Less Than Significant Impact After Mitigation	Less Than Significant Impact	No Impact
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 archaeological resource pursuant to Section 15064.5?	☐	☐	☐	☒
c.	Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☐	☒

3.3.5.1 Affected Environment

Prior to historic land modifications, the Central Valley region was characterized by extensive wetlands, with dry land available only on small hills and natural levees (Wagner et al 1981). The project area was a slightly elevated stream terrace; to the west was the low-lying Delta, and to the east, the higher ground of the Central Valley. Soils are Yellowlark gravelly loam, which is derived from alluvium (NRCS 2001).

The Delta area has probably been occupied since the late Pleistocene to early Holocene period, beginning around 11,000 years ago. However, alluvial processes have likely erased most early archaeological sites. The earliest documented sites in the region date to about 9,000 years ago and are thought to have been mobile communities focused on hunting and fishing (Chartkoff and Chartkoff 1984; Milliken et al. 2007). Warm and dry conditions in the mid-Holocene period (about 7,000 to 3,000 years ago) are associated with a change in subsistence focus towards plant gathering; milling stones are common during this period, though communities are still thought to have been fairly mobile (Fagan 2003). Later in this period, a trend towards sedentary communities and economic diversification emerged. The late Holocene period is characterized by a continued increase in economic diversity and sociopolitical complexity, with emphasis on long-distance trade (Chartkoff and Chartkoff 1984; Moratto 1984). Cultures from this period correspond with ethnographically described cultures.

The project site is in the traditional territory of the Yokuts tribe and may also have been used or settled by Plaines Miwok and Wintun peoples. Yokuts communities were organized into a number of tribes who were united by a common language (Golla 2007). They lived throughout the San Joaquin Valley and relied on the region's rich fishing and hunting resources (Kroeber 1976). Native American communities were severely impacted by European contact (Milliken 1995); however, Yokuts people have endured and are now members of several federally recognized tribes.

The earliest European contact in the region dates to the late 1500s and was characterized by the establishment of Spanish missions and pueblos. Trappers from the Hudson's Bay Company also settled

in the area that would become Stockton in the early 1800s, founding what is still known as French Camp (Wood 1973). The new Mexican government took control of California in 1822 and began to distribute lands to private owners. In 1842, German immigrant Charles Weber passed through what would become Stockton; he settled there and established a store in 1847 (Wood 1973).

The gold rush that began in 1848 spurred a boom in the Stockton area, and the city incorporated in 1850. Hundreds of vessels, from paddlewheelers to barks, plied the area serving miners. The Swamp Land Act of 1850 (also known as the Overflow Land Act) allowed for the transfer of wetlands from federal to state ownership, which began the process of reclaiming lands through drainage, dredging, levee construction, and fill placement (Garone 2011). After the gold rush, the economy was driven by shipbuilding and agriculture, which remain primary industries today.

The project area was shown as unoccupied land on early historic maps, though levees were constructed sometime between 1850 and 1913. The Port officially opened in 1933. In 1941, the U.S. military began leasing lands at the Port, and constructed the Stockton Ordnance Depot (Sebby 2006). A warehouse structure previously occupied the project site and neighboring parcels, part of a group of four constructed for the depot. It was demolished in 2002. After demolition, the project site was temporarily used for bulk materials storage. The project site became vacant in 2011.

Subsurface investigations at the Port and nearby areas are consistent with this landform history. A number of geotechnical investigations have been conducted at the Port. At the Lehigh Hanson facility approximately 4,000 feet north of the current project area, geotechnical borings found approximately 10 feet of fill over alluvium (native or dredge spoils; Kleinfelder 2019). At the Contanda facility about 2,700 feet northwest of the current project area, geotechnical borings revealed 6 to 10 feet of fill over alluvium (SEG 2018).

There are no recorded cultural resources within the project area, and no surveys have been conducted. One archaeological site has been recorded within 1 mile of the project site. Site P-39-005238 is a historic-era archaeological site located approximately 0.75 mile south of the project area. A number of historic or potentially historic structures are located within 1 mile of the project area, primarily buildings on Rough and Ready Island and bridges. For all but one, the project area is not in view of the historic structure. The exception is 39-005115, a segment of historic rail grade. One cultural resources survey has been performed within 1 mile of the project area; no archaeological resources were encountered, but site 39-005115 was recorded (ECORP 2011).

3.3.5.2 Impact Evaluation

A: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

No Impact. No structures would be modified or demolished for the proposed project. There would be no changes to the rail adjacent to the property that has been recorded as historic site 39-005115. The proposed project would not modify the existing setting (as an industrial zone of the Port) or otherwise indirectly affect any historic structures. Therefore, there would be no impacts to historical resources.

B: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

No Impact. The proposed project would not require any excavation, grading, or ground disturbance of any kind. There is no potential to encounter archaeological resources, and there would be no impact.

C: Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

No Impact. As noted above, the proposed project would not require any excavation, grading, or ground disturbance of any kind. There is no potential to encounter human remains, and there would be no impact.

3.3.6 Energy

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

3.3.6.1 Affected Environment

Senate Bill (SB) SX1-2 requires the state of California to produce 33% of its electricity from renewable sources by December 31, 2020; SB 350 requires that the state produce 50% of its electricity from renewable sources by December 31, 2030; and SB 100 requires that the state produce all electricity from renewable sources by 2045. Local policies pertaining to energy include Policy LU-5.4B of the City's *Envision Stockton 2040 General Plan*, which mandates "all new development, including major rehabilitation, renovation, and redevelopment, to incorporate feasible and appropriate energy conservation and green building practices" (City 2018a).

In order to comply with SB SX1-2 and SB 350 standards, the Port has developed and implemented a *Renewable Portfolio Standard Procurement Plan* (Port 2016). In the plan's most recent iteration, the Port determined the most efficient and cost-effective approach to meeting these standards is through continued purchase of sufficient state-approved renewable energy products from the active California market. For the compliance period from 2021 through 2030, the Port will determine and implement the most cost-effective options for complying with newly codified laws (Port 2016).

As of July 2019, the Port also offers its tenants financial incentives to install high-efficiency equipment or systems. Incentives are paid on the energy savings and permanent peak demand reduction above and beyond baseline energy performance, which include state-mandated codes, federal-mandated codes, industry-accepted performance standards, or other baseline energy performance standards (Port 2019a).

The proposed project would obtain energy from local providers using existing Port power infrastructure, including electricity from the Pacific Gas and Electric Company (PG&E). There is an existing pole-mounted transformer located at the southwest corner of the project site.

In addition to these state- and Port-specific measures, the City's *Envision Stockton 2040 General Plan* includes new policies that pertain to energy and resource conservation such as the following (City 2018a):

- **Policy TR-3.2:** "Require new development and transportation projects to reduce travel demand and greenhouse gas emissions, support electric vehicle charging, and accommodate multi-passenger autonomous vehicle travel as much as feasible."
- **Policy CH-5.2:** "Expand opportunities for recycling, re-use of materials, and waste reduction."
  - ***Action CH-5.2A:*** "Use recycled materials and products for City projects and operations where economically feasible, and work with recycling contractors to encourage businesses to use recycled products in their manufacturing processes and encourage consumers to purchase recycled products."
  - ***Action CH-5.2B:*** Continue to require recycling in private and public operations, including construction/demolition debris."

3.3.6.2 Impact Evaluation

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

Less-than-Significant Impact After Mitigation. Constructing and operating the proposed project would use equipment that consumes fossil fuels. However, the proposed project would not require any unusual or excessive equipment or practices compared to projects of similar type and size. Notably, construction would not require any heavy equipment.

The proposed project does not currently include project-level measures that comply with the City's Envision Stockton 2040 General Plan policies pertaining to energy use. Impacts would therefore be considered significant without mitigation. The following mitigation measures would be implemented to address energy consumption and reduce GHG emissions in compliance with the City's *Envision Stockton 2040 General Plan*:

- **ENG-MM-1: Truck Idling Reductions.** CVAG will require trucks to minimize idling time to 2 minutes where available while on terminal. Truckers will be required to shut down trucks while waiting more than 2 minutes while on the terminal or CVAG will implement programs, such as appointment systems in periods of congestion. Exceptions include vehicles in a queue waiting for work at the truck rack.
- **ENG-MM-2: Use of Clean Trucks.** Where possible, CVAG will encourage the use of clean trucks (defined as model year 2017 or newer) to transport fuel. CVAG will educate customers about the SJVAPCD Truck Replacement Program during contract discussions.

- **ENG-MM-3: Energy/Waste Audit.** CVAG will develop a plan for reducing overall energy use at its terminal. The plan will incorporate the following measures at a minimum:
  - Replace less-efficient bulbs with energy-efficient light bulbs, where applicable.
  - Identify areas for waste reduction, including reductions in single use products in terminal buildings.

Implementation of ENG-MM-1, ENG-MM-2, and ENG-MM-3 would ensure efficient consumption of resources and reduce the proposed project's impacts to a less-than-significant level.

B: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less-than-Significant Impact After Mitigation. Continued implementation of the Port's *Renewable Portfolio Standard Procurement Plan* (Port 2016) would ensure that the proposed project does not conflict with state regulations pertaining to renewable energy. As noted, the Port currently operates in compliance with 2020 standards, and plans will be developed to ensure compliance with 2030 standards. The Port will continue to offer its tenants financial incentives to install high-efficiency equipment or systems consistent with local policies for energy efficiency. Because the proposed project does not currently include project-level measures that comply with the City's *Envision Stockton 2040 General Plan* policies pertaining to energy use, impacts would be considered significant without mitigation. With implementation of ENG-MM-1, ENG-MM-2, and ENG-MM-3, the proposed project would result in less-than-significant impacts.

3.3.7 Geology and Soils

Would the project:		Potentially Significant Impact	Less Than Significant Impact After Mitigation	Less Than Significant Impact	No Impact
a.	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
	ii. Strong seismic ground shaking?	☐	☐	☒	☐
	iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
	iv. Landslides?	☐	☐	☐	☒
b.	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c.	Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

3.3.7.1 Affected Environment

3.3.7.1.1 Soils

The project site has been mapped by the National Resources Conservation Service as entirely underlain with Yellowlark gravelly loam with 2% to 5% slopes (NRCS 2019). Yellowlark gravelly loam is well-drained with slow infiltration rates and is also associated with a high water table (3 to 4 feet below ground surface).

3.3.7.1.2 Fault Rupture

Surface fault rupture is defined as slip on a fault plane that has spread to the Earth's surface and caused a rupture or disturbance. Fault rupture almost always follows pre-existing faults, which are zones of weakness. No known active faults (defined by the state of California as faults that show evidence of movement during the past 10,000 years) are within 25 miles of the project area (Caltrans and Port 2013), and the project site is not located within a currently designated Alquist-Priolo Earthquake Fault Zone (Stockton Port District 2012). However, numerous active and potentially active faults are identified east and west of the project site. The nearest active fault is the Greenville Fault, which is considered part of the San Andreas Fault system. The portion of this fault that has experienced historic displacement is located approximately 26 miles to the west of the project site (Caltrans and Port 2013).

3.3.7.1.3 Ground Shaking

Ground shaking is the most widespread effect of earthquakes. The most likely sources of strong ground shaking are from the San Andreas, Hayward, Calaveras, Midland, Green Valley-Concord, and Tracy-Stockton faults. The project site is within a moderately low level of earthquake hazard region. Such regions are distant from known, active faults and would experience lower levels of shaking less frequently. In most earthquakes, only weaker masonry buildings would be damaged. However, very infrequent earthquakes could still cause strong shaking in the project area (California Department of Conservation 2016). Given the soil depths in the City, ground shaking would mostly affect taller structures (3 to 4 stories high; San Joaquin County 2010).

3.3.7.1.4 Liquefaction

Liquefaction is the transformation of a granular material (sediments or soils) from a solid into a liquefied state, often resulting from strong seismic ground shaking in areas with susceptible soils. Factors known to affect the liquefaction potential of soils are the characteristics of the materials, including grain size distribution, relative density, and degree of saturation; the initial stresses acting on the soils; and the characteristics of the earthquake such as the intensity and duration of the ground shaking. Low-density sandy soils with water tables less than 20 feet below ground surface may be susceptible to liquefaction. The project site is mapped as containing well-drained gravelly loam, which has low liquefaction vulnerability. In addition, the type of ground motion expected from large earthquakes in San Joaquin County is expected to be a rolling type of motion, which would be less likely to cause liquefaction (San Joaquin County 2010). However, site-specific exploratory investigations for the proposed project have not been conducted, and liquefaction prone soils may be present; this conclusion is supported by exploratory investigations conducted for the nearby Endicott Biofuel Production Facility on Navy Drive, which identified liquefiable soils in areas also mapped by NRCS as containing Yellowlark gravely loam soils (Stockton Port District and TRC Solutions 2013).

3.3.7.1.5 Lateral Spreading

Lateral spreading is a form of liquefaction that results in lateral movement of ground in which cohesive soil layers may fracture, subside, rotate, or disintegrate as a result of seismic activity. During an earthquake, lateral spreading usually takes place along weak shear zones that have formed within a liquefiable soil layer. Lateral spreading has generally been observed to take place in the direction of a free face (i.e., retaining wall, slope, and channel) but has also been observed to a lesser extent on ground surfaces with very gentle slopes. As noted, the project site may be susceptible to liquefaction and therefore may also be susceptible to lateral spreading. However, this susceptibility is reduced given the flat topographic conditions of the project site.

3.3.7.1.6 Slope Failure and Slope Stability

Earthquakes can cause significant slope stress, potentially resulting in earthquake-induced landslides. Landslides most commonly occur in areas with steep slopes or within slide-prone geologic units that contain excessive amounts of water. Other factors that affect slope stability include site geology, climate, and human activity. Steep slopes are not present on the project site, and this area is not likely to be susceptible to seismic-induced slope failure.

3.3.7.1.7 Expansive Soils

Expansive soils are high in clay content and increase and decrease in volume upon wetting and drying, respectively. The change in volume exerts stress on buildings and other loads placed on these soils. Expansive soils are common throughout California and can cause damage to foundations and slabs unless properly treated during construction. Site preparations and backfill operations associated with subsurface structures can often eliminate the potential for expansion. The project site is mapped as containing gravelly loam, which does not exhibit expansive properties. The existing concrete pad lot at the project site does not exhibit signs of damage from expansive soils.

3.3.7.1.8 Subsidence and Settlement

Subsidence involves a sudden sinking or gradual settling and compaction of soil and other surface material with little or no horizontal motion. Land surface subsidence can result from natural and artificial phenomena, including tectonic deformation, consolidation, hydrocompaction, collapse of underground cavities, oxidation of organic-rich soils, rapid sedimentation, and the withdrawal of groundwater. Expansive soils and materials, including estuarine sediments, organic detritus, or thick organic deposits, are more susceptible to subsidence. Settlement occurs when ground shaking reduces the amount of pressure existing between soil particles, resulting in a reduction of the volume of the soil. Areas are susceptible to differential settlement if they are underlain by compressible sediments such as poorly engineered artificial fill. Differential settlement can damage structures, pipelines, and other subsurface entities. Earthquakes and seismic activity can accelerate and accentuate settlement. As noted, the project site has not been mapped as containing clay soils or other soil types susceptible to

expansion or subsidence. However, soil investigations of the project site have not been completed, and subsidence- or settlement-prone materials such as artificial fill (which are commonly present in the region) may be present in the project area.

3.3.7.1.9 Erosion

Erosion is the detachment and movement of soil materials through natural processes or human activities. The project site resides within a Mediterranean climate, which is exemplified by moist winters and dry summers. Therefore, during the winter, the area is more prone to water erosion, while in the summer the area is more prone to wind erosion. The project site is essentially flat and surfaced in concrete or compacted surfaces, which would not be particularly susceptible to erosion. None of the drainage features serving the project site exhibit evidence of erosion, including the concrete drainage channel to the south.

3.3.7.2 Impact Evaluation

A: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: 1) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42); 2) strong seismic ground shaking; 3) seismic-related ground failure, including liquefaction; or 4) landslides?

Less-than-Significant Impact. The project area is not located within a currently designated Alquist-Priolo Earthquake Fault Zone, and no known surface expression of active faults is believed to cross the project site; therefore, fault rupture through the project site is not anticipated, and there would be no impact related to this hazard.

In the event of a major earthquake, San Joaquin County could experience strong ground shaking, which has the potential to damage buildings and structures. Proposed improvements would be limited to on-site mobile structures (modular-type office, truck scale, portable toilet, diesel fuel tank, fuel storage compartment, and a generator). Damage to these structures is possible in the event of a large earthquake. Proposed improvements would be constructed or installed in adherence with applicable seismic standards and would not increase the potential for human injury or loss of life. CVAG also maintains and implements the SMP designed to minimize the risk of impacts to persons and the environment from facility operation. Therefore, the proposed project would result in less-than-significant impacts related to seismic ground shaking.

Soils mapped as occurring at the project site are not notably susceptible to liquefaction, although geotechnical investigations conducted for the Endicott Biofuel Production Facility have identified liquefiable soils in nearby parcels, and liquefiable conditions may be present at the project site. No grading would be performed as part of the proposed project, and the proposed improvements would

be constructed or installed in adherence with applicable seismic standards. Therefore, the proposed project would result in less-than-significant impacts related to liquefaction.

The proposed project site and surrounding parcels are flat and do not contain any steep slopes or other features suggesting susceptibility to slope failure or landslides. The proposed project would not result in changes that would increase the potential for slope failure or landslides, and there would be no impact related to these hazards.

B: Would the project result in substantial soil erosion or the loss of topsoil?

No Impact. Because the project site is generally flat and consists of a concrete pad lot, the potential for substantial soil erosion during operations is considered minimal. Construction of the proposed project would not involve any excavation, and erosion impacts are unlikely to occur. Therefore, there would be no impact.

C: Would the project be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project and potentially result in an on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less-than-Significant Impact. As previously discussed, the proposed project would have no effect on the potential for slope failures or landslides, and risk from lateral spreading is minimal due to the project site's flat topography. Soils mapped as occurring on site are not notably susceptible to liquefaction or subsidence. However, a soils investigation of the project site has not been conducted, and geotechnical investigations conducted for the Endicott Biofuel Production Facility have identified liquefiable soils in nearby parcels. Fill soils potentially susceptible to subsidence are also common in the area. Proposed improvements would be constructed or installed in adherence with applicable seismic standards. Exposure to unstable geologic hazards would be typical to the region and limited to the minimal amount of on-site personnel. Therefore, the proposed project would have a less-than-significant impact related to unstable geological units or soils.

D: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

No Impact. Soil types identified as occurring within the project site do not exhibit expansive properties, and the existing concrete pad lot does not exhibit signs of damage from expansive soils. The proposed site improvements would be mobile and would not include foundations that could be damaged by soil expansion. Therefore, there would be no impact.

E: Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?

No Impact. The proposed improvements would be served by a portable toilet, and the proposed project would not require the use of septic tanks or alternative wastewater disposal systems or affect any such systems. Therefore, there would be no impact.

F: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No Impact. There are no known unique geological or paleontological resources in the project area. The proposed project does not include any excavation during construction and operations. Due to its geomorphological history, the project area is not likely to contain any fossils other than invertebrate fossils that are in a redeposited context. Therefore, there would be no impact.

3.3.8 Greenhouse Gas Emissions

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

3.3.8.1 Environmental Setting

Global climate change results from greenhouse gas (GHG) emissions caused by several activities, including fossil fuel combustion, deforestation, and land use change. GHGs trap infrared radiation emitted from the Earth's surface, which otherwise escapes to space. The most prominent GHGs contributing to this process include carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Certain refrigerants, including chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs), and hydrofluorocarbons (HFCs), also contribute to climate change. The greenhouse effect keeps the Earth's atmosphere near the surface warmer than it would be otherwise and allows for successful habitation by humans and other forms of life.

Fossil fuel combustion removes carbon stored underground and releases it into the atmosphere. Emissions of GHGs are responsible for the enhancement of the greenhouse effect and contribute to what is termed "global warming," a trend of unnatural warming of the Earth's natural climate. Increased concentrations of GHGs in the earth's atmosphere increase the absorption of radiation and further warm the lower atmosphere. This process increases evaporation rates and temperatures near the surface. Climate change is a global problem, and GHGs are global pollutants, unlike criteria pollutants (such as O_3, CO, and PM) and TACs, which are pollutants of regional and local concern.

Global warming potential (GWP) is a measure of how much a given mass of GHG contributes to global warming. A relative scale is used to compare the gas in question to CO_2 (whose GWP is defined as 1). In this analysis, CH_4 is assumed to have a GWP of 21 and N_2O is assumed to have a GWP of 310. Refrigerants have GWPs ranging from 76 to 12,240. Consequently, using each pollutant's GWP, emissions of CO_2, CH_4, N_2O, CFCs, HCFCs, and HFCs can be converted into CO_2 equivalence (CO_2e).

Recent environmental changes linked to global warming include rising temperatures, shrinking glaciers, thawing permafrost, a lengthened growing season, and shifts in plant and animal ranges (IPCC 1995; CCCC 2012; USGCRP 2014). In California, an assessment of climate change impacts predicts that temperatures will increase between 4.1°F to 8.6°F by 2100, based on low and high global GHG emission

scenarios (CCCC 2012). Predictions of long-term negative environmental impacts in California include worsening of air quality problems, a reduction in municipal water supply from the Sierra snowpack, sea level rise, an increase in wild fires, damage to marine and terrestrial ecosystems, and an increase in the incidence of infectious diseases, asthma, and other human health problems (CCCC 2012).

3.3.8.2 Regulatory Setting

Executive Order (EO) S-3-05, signed by then-Governor Schwarzenegger on June 1, 2005, established the following GHG reduction targets for California: 1) by 2010, reduce GHG emissions to 2000 levels; 2) by 2020, reduce GHG emissions to 1990 levels; and 3) by 2050, reduce GHG emissions to 80% below 1990 levels. EO S-3-05 also called for the California Environmental Protection Agency to prepare biennial reports on progress made towards achieving these goals, impacts to California from global warming, and mitigation and adaptation plans to combat these impacts.

The California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32) required CARB to develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB was directed to set a GHG emission limit, based on 1990 levels, to be achieved by 2020. AB 32 set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner. AB 32 also required CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions.

On December 11, 2008, CARB adopted the AB 32 Scoping Plan, which set forth the framework for meeting the state's GHG reduction goal set by EO S-3-05. On October 20, 2011, CARB adopted the final cap-and-trade regulation. CARB also approved an adaptive management plan that monitors the progress of reductions and recommends corrective actions if progress is not as planned or there are unintended consequences in other environmental areas (e.g., concentration of local criteria pollutants).

In 2014, CARB adopted an update to the 2008 AB 32 Scoping Plan that builds upon that initial plan with new strategies and recommendations. The 2008 AB 32 Scoping Plan and 2014 Scoping Plan Update require that reductions in GHG emissions come from virtually all sectors of the economy and be accomplished from a combination of policies, regulations, market approaches, incentives, and voluntary efforts. These efforts target GHG emission reductions from cars and trucks, electricity production, fuels, and other sources.

In 2017, CARB prepared an update to the Scoping Plan. The update established a set goal to reduce GHG emissions to 40% below 1990 inventory levels by 2030 (CARB 2017).

In August 2008, SJVAPCD adopted the Climate Change Action Plan to assist lead agencies in assessing and reducing the impacts of project-specific GHG emissions on global climate change. The Climate Change Action Plan relies on the use of performance-based standards, otherwise known as Best Performance Standards (BPSs), to assess the significance of project-specific GHG emissions on global

climate change. Projects implementing BPS are determined to have a less-than-significant impact. Otherwise, demonstration of a 29% reduction in GHG emissions from business as usual is required to classify a project's impact as less than significant. In 2009, SJVAPCD adopted the *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA* (SJVAPCD 2009a) and the *District Policy: Addressing GHG Emission Impacts for Stationary Source Projects Under CEQ*A (SJVAPCD 2009b). SJVAPCD was not able to determine a specific quantitative level of GHG emissions increase above which a project would have a significant impact on the environment, and below which it would have an insignificant impact. SJVAPCD staff concluded that impacts of project-specific emissions on global climatic change are cumulative in nature, and the significance thereof should be examined in that context. SJVAPCD requires all projects to reduce their GHG emissions, whether through project design elements or mitigation. Projects achieving performance-based standards that have been demonstrated to be BPS would be considered to have a less-than-cumulative significant impact on global climate change (SJVAPCD 2009a).

The City updated and adopted its *Envision Stockton 2040 General Plan* on December 4, 2018; it has new GHG measures to comply with a 2008 Settlement Agreement with the state and the Sierra Club that requires the City to address GHG reductions, including through specific provisions in the *Envision Stockton 2040 General Plan*. The *Envision Stockton 2040 General Plan* represents a substantial change in the policy framework for future development in the City compared to the 2035 General Plan (City 2007). The fundamental shift is from emphasizing growth in "outfill" areas at the periphery of the City to focusing new construction and redevelopment in existing "infill" neighborhoods. This change is reflected in the land use map, an associated map depicting the transportation network required to serve future development, and in the goals, policies, and actions throughout the document. In addition, the *Envision Stockton 2040 General Plan* includes the following policies regarding GHG and climate change that are applicable to the proposed project:

- **Policy TR-3.2:** "Require new development and transportation projects to reduce travel demand and greenhouse gas emissions, support electric vehicle charging, and accommodate multi-passenger autonomous vehicle travel as much as feasible."
- **Policy CH-5.1:** "Accommodate a changing climate through adaptation, mitigation, and resiliency planning and projects."
  - ***Action CH-5.1B:*** "Maintain and implement the City's Climate Action Plan and update the CAP to include the following:
    - Updated communitywide GHG emissions inventory;
    - 2030 GHG emissions reduction target, consistent with SB 32;
    - Estimated 2030 GHG emissions reduction benefits of State programs;
    - Summary of the City's progress toward the 2020 local GHG emissions reduction target;

    - New and/or revised GHG reduction strategies that, when quantified, achieve the 2030 reduction target and continue emission reductions beyond 2030; and
    - New or updated implementation plan for the CAP."
- **Policy CH-5.2: "**Expand opportunities for recycling, re-use of materials, and waste reduction."
    - ***Action CH-5.2A: "***Use recycled materials and products for City projects and operations where economically feasible, and work with recycling contractors to encourage businesses to use recycled products in their manufacturing processes and encourage consumers to purchase recycled products."
    - ***Action CH-5.2B:*** "Continue to require recycling in private and public operations, including construction/demolition debris."

3.3.8.3 Methodology for Determining Impacts

In determining the significance of a project's impacts, the lead agency may consider a project's consistency with the state's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is consistent with those plans, goals, or strategies (CEQA Guidelines Section 15064.4[b][3]).

In December 2018, the California Natural Resources Agency clarified several points regarding the method for determining GHG impacts in CEQA documents. CEQA Guidelines, Section 15064.4, includes the following provisions as summarized by the Governor's Office of Planning and Research (OPR 2020):

- "Lead agencies must analyze the greenhouse gas emissions of proposed projects" (CEQA Guidelines Section 15064.4[a]).
- "The focus of the lead agency's analysis should be on the project's effect on climate change, rather than simply focusing on the quantity of emissions and how that quantity of emissions compares to statewide or global emissions" (CEQA Guidelines Section 15064.4[b]).
- "Lead agencies may rely on plans prepared pursuant to Section 15183.5 (Plans for the Reduction of Greenhouse Gases) in evaluating a project's greenhouse gas emissions" (CEQA Guidelines Section 15064.4[b][3]).

Based on the above guidance, the analysis herein analyzes the GHG emissions that would be generated as a result of the proposed project and addresses how potential emissions as well as the project design would compare to state, regional, and local plans to address climate change.

3.3.8.4 Impact Evaluation

As the project site was vacant during the baseline years, there were no emissions associated with baseline conditions. The proposed project would generate air emissions from construction and operations. Construction would be conducted over a 2-week period and would not include the use of

heavy equipment. The proposed project's operational emissions, shown in Table 7, are a result of truck and rail movements.

Table 7
Operational Greenhouse Gas Emissions (Metric Tons per Year)

Source Category	CO_2	CH_4	N_2O	CO_2e
Year 2020				
Trucks	1,275	0.00	0.20	1,337
Rail	270	0.02	0.01	272
Employee Vehicles	7	0.00	0.00	7
Mobile on Site	85	0.01	0.00	85
Year 2020 Total	**1,636**	**0.03**	**0.21**	**1,701**

Notes:
Emissions might not add precisely due to rounding.
Rail emissions reflect switcher and line-haul locomotives.

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

Less-than-Significant Impact. SJVAPCD has established GHG thresholds for projects subject to CEQA. For projects implementing SJVAPCD's BPS, quantification of project-specific GHGs is not required (SJVAPCD 2009a). SJVAPCD's BPS generally apply to projects with stationary industrial emission sources. Most the proposed project's emissions are from transportation sources; therefore, SJVAPCD's BPS do not apply. SJVAPCD has not established BPS for the wide variety of land use sources that can occur within the San Joaquin Valley. Instead, SJVAPCD recommends determining whether the GHG emissions applied to a project would result in a 29% reduction compared to business as usual.

Table 7 shows the proposed project's total operational GHG emissions, as estimated using CalEEMod. Operational emissions include line-haul locomotives, switching locomotives, and on-road vehicles. As shown in Table 7, the proposed project's total net increase in GHG emissions would equal 1,701 metric tons of CO_2e per year, which is well below the 10,000 metric tons per year threshold. Therefore, impacts are considered less than significant.

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

Less-than-Significant Impact After Mitigation. The proposed project would not conflict with the goals and objectives of the City's Climate Action Plan (City and ICF International 2014). The proposed project will be subject to future state and local requirements imposed by CARB's 2017 Climate Change Scoping Plan Update (CARB 2017). The Scoping Plan Update describes how California will reduce its GHG emissions by 40% below 1990 levels by 2030. The City's *Envision Stockton 2040 General Plan*

includes several policies that are applicable to the proposed project, specifically Policy TR-3.2, which requires new development and transportation projects to reduce GHG emissions, and Policy CH-5.2, which expands opportunities for recycling, re-use of materials, and waste reduction.

The proposed project does not currently include project-level measures that comply with the City's *Envision Stockton 2040 General Plan*. Impacts would therefore be considered significant without mitigation. Mitigation measures ENG-MM-1, ENG-MM-2, and ENG-MM-3 would be implemented to reduce GHG emissions in compliance with the City's *Envision Stockton 2040 General Plan*. These include measures pertaining to truck idling reductions, use of clean trucks, and completing an energy/waste audit. Impacts pertaining to GHG plans and regulations would be less than significant with implementation of these measures.

3.3.9 Hazards and Hazardous Materials

Would the project:		Potentially Significant Impact	Less Than Significant Impact After Mitigation	Less Than Significant Impact	No Impact
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c.	Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	☐	☐	☒
d.	Be located on a site that 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.	Be located within an airport land use plan area or, where such a plan has not been adopted, be within 2 miles of a public airport or public use airport, and 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?	☐	☐	☐	☒

3.3.9.1 Affected Environment

3.3.9.1.1 Port Hazardous Materials Regulations

The Port maintains contractual requirements for the use, handling, and storage of hazardous materials by all of its tenants, in part through the standard tenant terms and conditions listed in the Port's General Tariff No. 1 (Port 2019b). Per General Tariff No. 1, tenants are required to notify the Port immediately of the presence of any hazardous materials on or below property leased from the Port, must "comply with all affirmative legal requirements concerning Hazardous Materials," and must provide the Port with an up-to-date list of all hazardous materials on leased property at least once per year and before any new hazardous materials are brought onto Port property (Port 2019b).

3.3.9.1.2 Listed Hazardous Material Sites

Surrounding sites potentially containing hazardous materials were identified through a search of the California Department of Toxic Substances Control (DTSC) EnviroStor (DTSC 2020) and SWRCB GeoTracker (SWRCB 2020) databases. Within a 2-mile radius of the proposed project footprint, the EnviroStor database lists 33 cleanup sites and the GeoTracker database identifies 68 cleanup sites with active, open, or unidentified statuses (with some sites occurring in both databases). The GeoTracker database additionally identifies five DTSC hazardous waste sites and three land disposal sites within the 2-mile radius.

The project site occurs within the Stockton Ordnance Depot military evaluation site. Two sites listed on the EnviroStor (DTSC 2020) and GeoTracker (SWRCB 2020) databases occur within 1,000 feet of the project site: the former Learner Company site at 2711 Navy Drive (listed on both databases); and the NuStar terminal at 2941 Navy Drive (listed on GeoTracker). These sites are described in Sections 3.3.9.1.2.1 through 3.3.9.1.2.3.

3.3.9.1.2.1 Stockton Ordnance Depot

The former Stockton Ordnance Depot includes 518.7 acres within the Port's East Complex, West Complex, and a portion of Roberts Island. The East Complex former Stockton Ordnance Depot area includes the project site. The former Stockton Ordnance Depot was used for military purposes from 1941 through 1973. No hazards or potential environmental liabilities from past use by the Department of Defense remain based upon records research, site inspections, and removal actions (Vincent 2012). However, the GeoTracker database still identifies the site as under investigation with explosives identified as the potential contaminant of concern (DTSC 2020).

3.3.9.1.2.2 The Learner Company

This site is located at 2711 Navy Drive. The former Learner Company site was operated as a scrap metal salvage facility since 1976. Between the years of 1978 to 1984, an auto-shredding operation was conducted at the site. A Voluntary Cleanup Agreement was executed on August 3, 2009. A Removal Action Workplan for soil excavation and off-site disposal was completed and reported in a Removal Action Implementation Report approved by DTSC on March 7, 2012 (DTSC 2020). The cleanup site remains open, and a Land Use Covenant (LUC) was issued by DTSC to address soil contamination by lead, cadmium, and polychlorinated biphenyls (DTSC 2015). The LUC describes allowable site uses and excavation requirements. These requirements would apply to any project construction or operation within the former Learner Company site.

DTSC concluded that the former Learner Company site, as remediated and subject to the restrictions of the LUC, does not present an unacceptable threat to human health or safety or the environment, if limited to commercial or industrial land use. The LUC prohibits use of the former Learner Company site

as a residence, hospital, school for persons under the age of 21, or daycare center. Other applicable LUC environmental restrictions include the following (DTSC 2015):

- No activities that will disturb the soil at or below grade (e.g., excavation, grading, removal, trenching, filling, earth movement, mining, or drilling) shall be allowed at the property without a Soil Management Plan preapproved by DTSC in writing.
- Any soil brought to the surface by grading, excavation, trenching, or backfilling shall be managed in accordance with all applicable provisions of state and federal law.

Groundwater monitoring well data from the Learner Company site does not show exceedances of any of the constituents measured, as reported in the most recent monitoring reports from 2003. The LUC does, however, identify soils as containing arsenic and vanadium (documented as naturally occurring and not related to the former site activities) and groundwater as containing methyl tert-butyl ether (DTSC 2015).

3.3.9.1.2.3 NuStar Terminal

The NuStar terminal is located at 2941 Navy Drive and has been used for fuel distribution since the 1960s. The terminal includes a containment area that stores liquid product received via pipeline. Ethanol is stored in three 33,000-barrel tanks at the NuStar site. Gasoline releases at the terminal occurred in March 2002, and in June 2002, 1,000 gallons of diesel were released at the facility. Fuel-impacted soil was excavated and removed. The NuStar terminal remains identified on the GeoTracker database as an open cleanup site with verification monitoring as of June 29, 2018 (SWRCB 2020).

A Monitoring and Reporting Program (No. R5-2017-0808) for the NuStar terminal monitoring wells was issued by the Central Valley Regional Water Quality Control Board on April 5, 2017, and groundwater monitoring continues (SWRCB 2020). Chemical concentrations have generally decreased over time but remain higher than the Central Valley Regional Water Quality Control Board objectives in certain wells (Cascadia 2019).

3.3.9.1.3 Potentially Hazardous Materials On-Site

Under baseline conditions, the project site was vacant and not known to contain any potentially hazardous materials. Based on review of historic aerials, the project site may have been formerly used for storage of tire remnants or railroad ties, which could present an environmental hazard if improperly managed. However, these materials do not appear to be present within the vacant site under baseline conditions.

3.3.9.1.4 Sensitive Receptors

There are no schools, airstrips, airports, or other sites potentially sensitive to hazards or hazardous materials within the proposed project vicinity. The nearest school is George Washington Elementary

School, located approximately 0.8 mile to the east. The closest airport is the Stockton Municipal Airport, located approximately 5 miles to the southeast.

3.3.9.1.5 Emergency Response Plans

CVAG maintains an active SMP for its facilities designed to minimize the risk of impacts to persons and the environment from facility operation. The SMP would apply to the proposed project. The CVAG SMP addresses compliance with the CERS submittal and reporting requirements and includes a plan for spill prevention, control, and management.

Regional emergency response plans are detailed in the 2008 San Joaquin County Office of Emergency Services' *Hazardous Materials Area Plan* (SJCOES 2008). The plan discusses topics such as natural hazards, emergency management, mitigation programs, emergency preparedness, and state roles and responsibilities. Under the plan, considerations have been made for the area, including for hazardous materials. Additionally, Appendix 5 of the plan addresses non-routine emergency responses, including responses to industrial chemical hazards and terrorist chemical release (SJCOES 2009). Other hazard plans for the region and throughout California would also apply to the proposed project.

3.3.9.1.6 Wildfire Hazards

The project site is not within any fire hazard severity zones (CAL FIRE 2019a, 2019b). There are no wildlands within the project area, and wildland fires do not pose a risk to the project site.

3.3.9.2 Impact Evaluation

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

Less-than-Significant Impact After Mitigation. The purpose of the proposed project would be transloading of whole cottonseed, a nonhazardous material. Project-related construction work would involve surface preparation (i.e., filling holes) and construction of a small concrete apron pad, none of which require excavation and therefore would not expose workers to any hazards. Site construction and operations would require small quantities of common industrial materials, some of which may be hazardous if improperly managed. The proposed project would include a 500-gallon aboveground liquid storage vault for diesel fuel. Other common hazardous materials would be stored securely in appropriate metal drums. The City Fire Department is equipped to provide response in the unlikely event of a site accident, and response plans have been developed for the region.

If improperly managed, there remains the risk for construction of the proposed project to result in spills, erosion, or other inputs of common industrial pollutants to downstream waterbodies. During operation of the proposed project, similar impacts could also occur. Although the risk for these hazards is low given the relatively small scale of construction and operations and commodity materials handled (whole cottonseed), impacts could be considered potentially significant without mitigation. Mitigation

measures BIO-MM-1 and BIO-MM-2 would be implemented to control spills and runoff during construction and operation. With implementation of these mitigation measures, the proposed project would have less-than-significant impacts from construction or operational use of common industrial materials.

B: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less-than-Significant Impact After Mitigation. As described under Item A, while the proposed facility would handle nonhazardous cottonseed, small quantities of potentially hazardous common industrial materials would be required for site construction and operations. Without mitigation, the proposed project could potentially result in impacts associated with the accidental upset of hazardous common industrial materials. The potential for accidental upset of common industrial materials would be reduced through implementation of mitigation measures BIO-MM-1 and BIO-MM-2, which include construction and operational measures to control spills and runoff. In addition, the proposed project would operate in compliance with all applicable regulations, including Port requirements for the storage of hazardous materials (Port 2019b). The City Fire Department is equipped to provide response in the unlikely event of a site accident, and emergency response plans have been developed for the region. Therefore, with implementation of mitigation measures BIO-MM-1 and BIO-MM-2, the proposed project would result in a less-than-significant impact related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

C: Would the project emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

No Impact. The nearest school is George Washington Elementary School, located approximately 0.8 mile to the east. No school is proposed within the 0.25-mile radius of the project site. Because of the area's zoning (Port Area), it is unlikely that a school would be constructed within this radius. Off-site transport of cottonseed by rail and truck would not pose a hazard to any schools because cottonseed is nonhazardous. Therefore, the proposed project would result in no impacts related to hazardous material emissions or handling in the vicinity of a school.

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

Less-than-Significant Impact. The project site occurs within the 518.7-acre former Stockton Ordnance Depot military evaluation site; however, recent investigations and historic site use indicate that this designation would not pose a hazardous material risk during construction and operations. No hazards or potential environmental liabilities from past use by the Department of Defense remain based upon records research, site inspections, and removal actions (Vincent 2012).

The project site has previously been developed and used for commodity storage, and construction of the concrete apron pad and concrete repair would result in minimal ground disturbance in already disturbed areas.

Potential hazards from construction in these types of areas are typically addressed through adherence with the Occupational Safety and Health Administration and federal and state regulations developed to protect workers and other receptors from exposure to hazardous materials. In consideration of this, the project site's history, recent investigations, and the minimal ground disturbance needed for construction, there would be a less-than-significant impact related to the project site's location within the Stockton Ordnance Depot military evaluation site.

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

No Impact. The project site is not located within an airport land use plan area, and the nearest airport or airstrip is located approximately 5 miles to the southeast. Although rail or truck transport may occur in proximity to airports, the proposed project entails transport of non-hazardous cottonseed. Therefore, the proposed project would result in no impact related to aviation.

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

No Impact. CVAG maintains an SMP for its facilities at the Port, which addresses safety and emergency preparedness. The SMP would apply to the proposed facility, and the proposed project would not interfere with implementation of the SMP at other sites. Regional emergency response plans, including but not limited to the San Joaquin County *Hazardous Materials Area Plan* (SJCOES 2008), were developed in consideration of activities occurring within industrial areas of the City. The proposed project would not interfere with implementation of these response plans. Therefore, there would be no impact related to impairment of emergency plans.

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

No Impact. The project site is not within any fire hazard severity zones, and there are no wildlands or other areas susceptible to wildfire in the project area. Therefore, there would result be no impact related to wildland fires.

3.3.10 Hydrology and Water Quality

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

3.3.10.1 Affected Environment

3.3.10.1.1 Surface and Stormwater

Most of the project site is surfaced in impermeable concrete, with some small areas surfaced in low-permeability compacted earth. Stormwater is collected via a system of grated inlets throughout the project site, which convey stormwater to a system of culvert pipes that extend north to south beneath the project site before outletting to a concrete-lined drainage channel immediately south of the project site. The concrete-lined drainage channel conveys stormwater westward until it is ultimately pumped into a stormwater retention basin across Navy Drive from the project site. During years when the retention basin reaches a high level, stormwater is pumped to the San Joaquin River.

3.3.10.1.2 Flood Hazards

San Joaquin County maintains Flood Insurance Rate Maps (FIRMs), as required by the Federal Emergency Management Agency (FEMA). These FIRMs indicate the potential of flooding for various locations. The project site is located in a "Zone X Other Flood Area," which indicates an area with 0.2% annual chance of flood or an area with 1% annual chance of flood with average depths of less than 1 foot or with drainage areas less than 1 square mile, as well as areas protected by levees from a 1% annual chance of flood (FEMA 2009).

Upstream dam failures could cause flooding in the project area, which is within the dam inundation zone of three major dams, including the New Malones, Camanche, and New Hogan dams (City 2018a). Failure of any of these dams would give residents about 7 hours to evacuate. Other major regional dams could also affect the City but would have longer evacuation lead times (City 2018a). California SB 92 (2017) requires emergency action plans for all dams, except those classified as "low hazard."

The project area is protected by a levee system along the San Joaquin River and Burns Cutoff. Levee failure has a relatively small probability of occurrence. The Port is responsible for the levee system and has established an annual levee monitoring and inspection program intended to determine whether reinforcement of the structural integrity of the perimeter levee is required (Stockton Port District 2012). FEMA has certified and accepted most of the levees within the City as meeting minimum standards (City 2007). Tsunamis and seiches are not considered to be significant threats in the Stockton area (City 2007).

3.3.10.1.3 Groundwater

The project area occurs within the San Joaquin Valley Groundwater Basin, which is a subsection of the Greater Central Valley Basin. Groundwater in the area is recharged by local precipitation and through percolation from the surrounding surface waters. Groundwater overdraft conditions have existed in the San Joaquin County Basin since the 1920s, although elevations have recovered and stayed relatively constant since 1999 (Stockton Port District 2012). Runoff within the project area is conveyed to a system of culvert pipes that outlet to a concrete-lined drainage channel immediately south of the project site. Stormwater from this channel is ultimately pumped into a stormwater retention basin, where it may percolate into the groundwater table.

3.3.10.1.4 Port of Stockton's Storm Water Development Standards Plan

The Port's Storm Water Development Standards Plan (DSP; Port 2009) covers new and substantial redevelopments of properties within three subareas to ensure compatibility with the California State Resources Control Board-issued Municipal Separate Storm Water Sewer System National Pollutant Discharge Elimination System Permit. Port DSP review includes assessment of technical stormwater submittals from project proponents.

3.3.10.2 Impact Evaluation

A: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less-than-Significant Impact After Mitigation. Construction activities associated with the proposed project do not include any excavation or grading, and there would be no in-water work. Therefore, there is a low potential for water quality impacts from runoff or spills in waterbodies during construction. The proposed project operations entail storage and transfer of whole cottonseed, which is non-hazardous and does not pose an inherent risk to water quality.

Site construction and operations would require use of small quantities of common industrial materials, which could enter waterbodies through the existing drainage system and impact water quality if improperly managed. During operation of the proposed project, similar impacts related to use of common industrial materials could also occur. Although the risk for these hazards is low given the relatively small scale of construction and operations and commodity material handled (whole cottonseed), these impacts could be potentially significant without mitigation. Mitigation measures BIO-MM-1 and BIO-MM-2 would be implemented to control spills and runoff during construction and operation. With implementation of these mitigation measures, the proposed project would have less-than-significant impacts to water quality.

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

No Impact. The project site is entirely developed with impermeable concrete or very low-permeability compacted earth. The proposed project would install a new concrete apron pad between the rail tracks and the existing concrete pad, which would have little or no effect on groundwater recharge given the small area of effect and low permeability of existing surfaces. Under the proposed project, stormwater runoff would continue to be conveyed to the concrete-lined drainage channel and ultimately to the existing stormwater retention basin, where percolation into the groundwater table can continue to occur. Therefore, there would be no impact pertaining to groundwater.

C: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i) result in a substantial erosion or siltation on- or off-site; ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or 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?

Less-than-Significant Impact After Mitigation. Stormwater runoff would continue to be conveyed to the concrete-lined drainage channel and, ultimately, to the existing stormwater retention basin via the existing culvert pipe system and concrete-lined drainage channel. Construction of the proposed concrete apron pad is unlikely to significantly affect drainage, as existing surfaces are low- or non-permeable. Storm drains would be equipped with filters, which would help control sediment or other pollutant inputs to the drainage system. There is no evidence of erosion within the concrete-lined drainage channel or other drainage features that would serve the project site, and the proposed project is unlikely to increase runoff. The proposed project would not result in any alteration to the course of any stream, river, or other waterbodies.

As noted for Item A, site construction and operations would require use of small quantities of common industrial materials, which could contribute polluted runoff if improperly managed. Although the risk for these hazards is low given the relatively small scale of construction and operations and commodity material handled, impacts could be potentially significant without mitigation. Mitigation measures BIO-MM-1 and BIO-MM-2 would be implemented to control spills and runoff during construction and operation. With implementation of these mitigation measures, the proposed project would have less-than-significant impacts from inputs of polluted runoff.

D: Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. The project area is within the dam inundation zone for several dams, and levee systems protect the project site from inundation. There is a low probability for failure of existing dams and levees, and existing inspection and response plans are in place to address these hazards. The project site is not within a FEMA-designated flood hazard area. The proposed project would not exacerbate risks related to flood hazards, and the SMP would minimize the potential for release of pollutants under the proposed project. Therefore, there would be no impact.

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

No Impact. As previously described, the proposed project would not result in any water quality or groundwater impacts. The proposed project would be subject to Port review for compliance with the DSP. Therefore, there would be no impact.

3.3.11 Land Use and Planning

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

3.3.11.1 Affected Environment

The City's *Envision Stockton 2040 General Plan* designates the project site for the operation of port facilities, and the zoning classification of the project site and surrounding parcels is Port Industrial (City 2007, 2018a). There is no housing within the project site.

3.3.11.2 Impact Evaluation

A: Would the project physically divide an established community?

No Impact. The project area is zoned for industrial use and does not include any residences, hospitals, schools, convalescent facilities, or other features that would constitute an established community. The proposed project is a Port tenant industrial use, which is consistent with the project site's current zoning and existing use. Therefore, there would be no impact to communities.

B: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. Development of the project site for the purpose of receiving, stockpiling, and exporting whole cottonseed is consistent with its existing zoning and use. Accordingly, the proposed project would be consistent with applicable land use plans and policies, and there would be no impact.

3.3.12 Mineral Resources

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

3.3.12.1 Affected Environment

Important extractive resources in San Joaquin County include sand, gravel, natural gas, peat soil, placer gold, and silver. Extraction of these minerals is focused in the southwestern portion of San Joaquin County in the vicinity of the San Joaquin River (Stockton Port District 2013). The project area is classified as a Mineral Resource Zone (MRZ)-1 (City 2007); adequate information indicates that no significant mineral deposits are present, or it is judged that little likelihood exists for their presence. The project site does not contain any known mineral resources, including any rock, sand, or gravel resources.

3.3.12.2 Impact Evaluation

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

No Impact. Due to the proposed project's location in an MRZ-1, continued development of the area would not limit access to any known mineral resources. As a result, the proposed project would neither interfere with any existing extraction operations nor reduce the availability of any known mineral resources. Therefore, there would be no impact.

B: Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. The project area does not include a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Therefore, there would be no impact.

3.3.13 Noise

	Would the project result in:	Potentially Significant Impact	Less Than Significant Impact After Mitigation	Less Than Significant Impact	No Impact
a.	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b.	Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c.	Be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, be within 2 miles of a public airport or public use airport, and expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

3.3.13.1 Affected Environment

3.3.13.1.1 Regulatory Setting

Sound may be thought of as mechanical energy of a vibrating object transmitted by pressure waves through a medium to the human ear. Noise is most simply defined as unwanted sound. Sound is measured in decibels (dB) and accounts for variations, such as frequency and amplitude, using a relative scale adjusted to the human range for hearing (referred to as the A-weighted decibel [dBA]). More specifically, the dBA scale measures sound reflective of how the average human ear responds to sound. Human hearing typically ranges from 0 dBA (the threshold of hearing) to about 140 dBA (the threshold for pain).

A given noise may be more or less tolerable depending on the duration exposure and the time of day that the noise occurs. The community noise equivalent level (CNEL) measures the cumulative 24-hour noise exposure, considering not only the variation of the dBA noise level but also the duration and the time of day of the noise. Various state and local agencies have adopted CNEL as the measure of community noise, including the State Department of Aeronautics and the California Commission on Housing and Community Development.

The Occupational Safety and Health Administration has established acceptable occupational noise exposure levels (29 Code of Federal Regulations [CFR] Part 1910.95). These regulations state that employees shall not be exposed to occupational noise levels greater than 90 dBA without adequate hearing protection. If occupational noise levels exceed 85 dBA, the employer must establish a hearing conservation program as described under 29 CFR Part 1910.95(c-o). For occupational noise exposure

levels greater than 90 dBA, the daily period of noise exposure must be decreased from 8 hours, as described in 29 CFR Part 1910.95(b).

The *State of California General Plan Guidelines,* published by the Governor's Office of Planning and Research, also provide guidance for projects within areas exposed to specific noise levels. For areas zoned for industrial, manufacturing, utilities, and agricultural land uses, the normally acceptable level of community noise exposure is less than 75 CNEL, with 70 to 80 CNEL considered conditionally acceptable (OPR 2017). The *State of California General Plan Guidelines* also present adjustment factors that may be used to further define noise acceptability standards reflective of noise control goals of a community and the community's sensitivity to noise (OPR 2017).

The City has developed "community noise control regulations and standards which are consistent with, or exceed, the guidelines of the State Office of Noise Control and the standards adopted by the Federal Highway Administration (FHWA), [Caltrans], and other government and regulatory agencies" (Stockton Municipal Code Title 16, Division 3, Chapter 16.60.010). Regarding construction, the City prohibits "operating or causing the operation of tools or equipment on private property used in alteration, construction, demolition, drilling, or repair work between the hours of 10:00 p.m. and 7:00 a.m., so that the sound creates a noise disturbance across a residential property line, except for emergency work of public service utilities."

The Noise Element of the City's *Envision Stockton 2040 General Plan* establishes goals, policies, and criteria for determining land use compatibility with major noise sources within the community (City 2018a). The *Envision Stockton 2040 General Plan* includes the following central policy:

- **Policy SAF-2.5:** "Protect the community from health hazards and annoyance associated with excessive noise levels." (City 2018a)

To achieve compliance with this policy, the *Envision Stockton 2040 General Plan* includes the following five actions (City 2018a):

- ***Action SAF-2.5A*** prohibits "new commercial, industrial, or other noise-generating land uses adjacent to existing sensitive noise receptors such as residential uses, schools, health care facilities, libraries, and churches if noise levels are expected to exceed 70 dBA … when measured at the property line of the noise sensitive land use."
- ***Action SAF-2*.5B** requires "projects that would locate noise-sensitive land uses where the projected ambient noise level is greater than the 'normally acceptable' noise level indicated in the [*Envision Stockton 2040 General Plan*] to provide an acoustical analysis."
- ***Action SAF-2.5C*** requires "noise produced by commercial uses to not exceed 75 dB L_{dn}/CNEL at the nearest property line."

- ***Action SAF-2.5D*** grants "exceptions to the noise standards for commercial and industrial uses only if a recorded noise easement is conveyed by the affected property owners."
- ***Action SAF-2.5E*** requires "all new habitable structures to be set back from railroad tracks to protect residents from noise, vibration, and safety impacts."

The *Envision Stockton 2040 General Plan* also establishes acceptable noise levels (dBA) for various land use types. For industrial areas, this includes "normally acceptable" levels of 0 to 70 dBA and "Conditionally Acceptable" levels of 71 to 80 dBA. To be "Conditionally Acceptable" in this noise range, new construction or development should be undertaken only after "a detailed analysis of the noise reduction requirements is made and needed insulation features have been included in the design". Levels of 81 dBA or higher are considered "unacceptable." In addition, if "existing noise standards are currently exceeded, a proposed project shall not incrementally increase noise levels by more than 3 dBA" (City 2018a).

3.3.13.1.2 Environmental Setting

Existing noise in the project area can be attributed to various stationary and mobile sources, including ship traffic, tractor-trailer truck traffic, rail activity, and squawks from various bird species (Port 2004). Other sources that contribute to the existing noise environment in the general site vicinity include recreational boating along the San Joaquin River (reduced during fall and winter months), landscaping activities (e.g., leaf blowing and lawn mowing), and local and regional roadway traffic on nearby local roads and highways (i.e., Interstate 5 and State Routes 4 and 99). Noise monitoring previously conducted for the West Complex Development Plan Final Environmental Impact Report (EIR) (Port 2004) concluded that the equivalent continuous noise level on Rough and Ready Island near the project site generally ranges between 60 dBA and 84 dBA, with higher levels from short-term increases in noise levels reaching 85 dBA or higher.

Some land uses are considered more sensitive to ambient noise levels than others. Land uses often associated with sensitive receptors generally include residences, schools, libraries, and hospitals. The nearest sensitive receptor includes a residential area approximately 2,800 feet east of the project site.

3.3.13.2 Impact Evaluation

A: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

***Construction*. <u>No Impact.</u>** Construction would be limited to a 1- to 2-week period and would not involve the use of heavy equipment. Construction activities would be minor and would not be audible from the nearest sensitive receptor located 2,800 feet from the project site. Therefore, there would be no construction-related impacts.

***Operation*. Less-than-Significant Impact.** The City's noise regulations and standards apply to operations of the proposed project. Specifically, the City's *Envision Stockton 2040 General Plan* regulates industrial uses with day-night noise levels of 70 dBA and below as "normally acceptable," and between 70 and 80 dBA as "conditionally acceptable" after a detailed analysis of the noise reduction requirements is made and needed insulation features have been included in the design (City 2018a). Noise levels above 81 dBA are considered unacceptable. The *Envision Stockton 2040 General Plan* also requires that the maximum sound level generated by industrial land uses, or other permitted noise-generating activities within any industrial zoning district, remain below 81 dBA. However, the *Envision Stockton 2040 General Plan* notes that if existing noise standards are currently exceeded, a proposed project shall not incrementally increase noise levels by more than 3 dBA. Previous noise monitoring conducted determined that the existing average day-night noise level nearby the project site ranges between 60 and 84 dBA.

The *Envision Stockton 2040 General Plan* further defines noise standards for industrial uses located adjacent to noise-sensitive land uses such as residential and zoning districts (City 2018a). In this case, the project site does not occur adjacent to noise-sensitive land uses. While the proposed project would result in new operations at the project site, proposed operations would be consistent with the types of existing nearby activities (truck and rail trips). In addition, the project site is surrounded by fences, stockpiles, staged equipment, buildings, and structures that would help shield noise and would not likely be heard at the closest residential receptor. For these reasons, noise associated with operation of the proposed project would result in a less-than-significant impact.

B: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

No Impact. Construction would be limited to a 1- to 2-week period and would not involve the use of heavy equipment. Construction activities would be minor and would not cause groundborne vibration or noise.

Overall proposed project operations would generate groundborne vibration and noise from operation of project equipment, including trucks and trains. This groundborne vibration and noise would be comparable to baseline conditions, as the project site is located in an industrialized area commonly services by truck, trains, and other large equipment. Trucks and trains would operate on existing roadways and rails designed to accommodate associated vibration. The nearest sensitive receptor, Boggs Tract 2,800 feet east of the project site, would be unaffected by project-related groundborne vibration and noise.

For these reasons, the proposed project would result in no impact related to vibration.

C: Would the project be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, be within 2 miles of a public airport or public use airport, and expose people residing or working in the project area to excessive noise levels?

No Impact. There is no public airport located within 2 miles of the project site. The closest airport is the Stockton Municipal Airport, located approximately 5 miles to the southeast. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels associated with public airport activities.

3.3.14 Population and Housing

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

3.3.14.1 Affected Environment

The City's *Envision Stockton 2040 General Plan* (City 2018a) designates the project site as Industrial. There is no housing within the project area.

The project site is near the Port's West Complex, for which growth was analyzed in the West Complex Development Plan Final EIR (Port 2004). Growth at the Port's West Complex is expected to increase direct employment opportunities; however, this increase in employment is not expected to result in a significant need for additional housing in the area because of the large number of workers that already reside within the area and the relatively high rate of unemployment for the Stockton-Lodi Metropolitan Statistical Area (5.7% for December 2019; CEDD 2020) compared to the state of California (3.7% for December 2019; CEDD 2020) and the United States (3.5% for December 2019; BLS 2020; Port 2004).

3.3.14.2 Impact Evaluation

A: Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. No new homes would be constructed as part of the proposed project. The proposed project would not induce population growth. Therefore, there would be no impact.

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

No Impact. There are no housing units in the project area. The nearest residential area is located approximately 2,800 feet east of the project site. The proposed project would have no effect on existing residential areas, and the project site's zoning precludes the potential for future housing developments. Therefore, the proposed project would have no impact on housing.

3.3.15 Public Services

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

3.3.15.1 Affected Environment

3.3.15.1.1 Fire Protection

The City's Fire Department provides fire protection to the City and contiguous areas, including the project site. The department has 12 fire stations, and each fire station has one fire engine. The department's goal for response time, per the *Envision Stockton 2040 General Plan* (City 2018a), is to arrive at fire suppression incidents within 4 minutes of notification. Nearby fire stations include Station 6 at 1501 Picardy Drive (1.5 miles northeast of the project site) and Station 2 at 110 West Sonora Street (2 miles north of the project site; City 2018b).

3.3.15.1.2 Police Protection

The Port maintains the Port Police Department, an independent certified police agency (Port 2020). The Port Police Department patrols on a 24-hour basis and is currently served by 13 staff. At least three Port police officers are on duty at any one time (two on patrol and one in charge of communications). The Port Police Department has mutual aid agreements with the City Police Department, the San Joaquin Sheriff's Department, and the California Highway Patrol in case additional police response is needed (Port 2004). The Stockton Police Department, maintained by the City, also provides police service throughout the City and has an officer to citizen ratio of about 1 to 650 (City 2020b). The department responds to emergencies within approximately 3 to 5 minutes, depending on time of day, location, and the number of requests for services (Stockton Port District 2012).

3.3.15.1.3 Schools

The Stockton Unified School District is divided into seven trustee areas and includes 37 Head Start classes, 53 state preschool classes, three First 5 Preschool classes, 41 K-8 schools, eight high schools, a special education school, an adult education school, and five charter schools (SUSD 2019). A number of colleges, universities, and vocational training schools are located in Stockton, including California State University, Stanislaus's Stockton Center, the San Joaquin Delta College, the University of the Pacific, Humphreys University, Christian Life College, and UEI College (Stockton Port District 2012). The nearest school is George Washington Elementary School, located approximately 0.8 mile to the east of the project site.

3.3.15.1.4 Parks

The City's *Envision Stockton 2040 General Plan* (City 2018a) designates the project area for industrial use. The nearest park to the project area is Boggs Tract Park, located approximately 3,200 feet east of the project site.

3.3.15.2 Impact Evaluation

A: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services: 1) fire protection; 2) police protection; 3) schools; 4) parks; or 5) other public facilities?

No Impact. The proposed project would not result in increased demand on any existing facilities or services, including fire protection, police, schools, or parks. The project area is adequately served by the City Fire Department, City Police Department, and Port police. There would be no impact to fire protection, police, schools, parks, or other public facilities.

3.3.16 Recreation

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

3.3.16.1 Affected Environment

The City operates and maintains 66 parks ranging in size from 2 to 64 acres. Recreational activities can also be found on the waterways in the region, which includes the Delta; natural rivers and creeks; and manufactured canals, channels, sloughs, and ditches (City 2015). There are limited park resources within the immediate project area, likely due to the industrial zoning. Nearby parks include Boggs Tract Park (approximately 0.6 mile east) and All Star Sports indoor batting cages (1.2 miles northwest). In addition, the Burns Cutoff and San Joaquin River to the west and north of the project site (respectively) are used for recreational purposes (Stockton Port District 2013).

3.3.16.2 Impact Evaluation

A: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. Neither construction nor operation of the proposed project would increase the use of existing neighborhood and regional parks or other recreational facilities. Therefore, there would be no impact.

B: Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The proposed project does not include construction or expansion of any recreational facilities and would not result in increased demand or other effects to recreational facilities. Therefore, the proposed project would result in no impact to recreational facilities.

3.3.17 Transportation/Traffic

	Would the project:	Potentially Significant Impact	Less Than Significant Impact After Mitigation	Less Than Significant Impact	No Impact
a.	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b.	Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b)?	☐	☐	☐	☒
c.	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d.	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e.	Result in inadequate emergency access?	☐	☐	☐	☒

3.3.17.1 Affected Environment

3.3.17.1.1 Regulatory Setting

Traffic analyses in California are overseen by the California Department of Transportation and local jurisdictions. This agency has developed a *Guide for the Preparation of Traffic Impact Studies* (Caltrans 2002) to provide a summary of goals and policies. The San Joaquin Council of Governments (SJCOG) has developed a Regional Transportation Plan (RTP; SJCOG 2018), which guides the region's transportation development over a 20-year period and covers all modes of transportation. The RTP is updated every 3 years to reflect changes in available funding, economic activity and population, and to incorporate findings from corridor studies and major infrastructure investments. The projects included in the RTP are also assessed as to their effect on air quality, as the RTP is used in the SIP to ensure states are meeting federal conformity standards. If a project is included in the RTP, its effect on regional conformity goals has been accounted for. The current RTP was adopted by the SJCOG Board of Directors.

SB 743, signed by former Governor Brown in 2013, is intended to better align congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of GHG emissions. SB 743 has set the stage for moving away from Level of Service (LOS)—which measures delay to motorists—to vehicle miles traveled (VMT) as the metric to evaluate transportation network performance and land use and transportation planning decisions, with investments oriented toward reducing VMT. SB 743 creates a process to change the way that transportation impacts are analyzed under CEQA. Specifically, SB 743 requires the Governor's Office of

Planning and Research to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. Particularly within areas served by transit, those alternative criteria must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (PRC 21099[b][1]). Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated" (PRC 21099[b][1]). Once the CEQA Guidelines are amended to include those alternative criteria, auto delay will no longer be considered a significant impact under CEQA (PRC 21099[b][2]). Transportation impacts related to air quality, noise, and safety must still be analyzed under CEQA where appropriate (PRC 21099[b][3]). SB 743 also amended congestion management law to allow cities and counties to opt out of LOS standards within certain infill areas.

Per the updated 2018 CEQA Guidelines, the CEQA analysis must consider the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. However, because transportation planning is done on a regional level, lead agencies will have a grace period until July 1, 2020, before the VMT metric for analyzing transportation impacts becomes mandatory on a statewide basis.

The *Envision Stockton 2040 General Plan* includes the following policies related to integrating SB 743 into future planning:

- **Policy TR-4.1:** "Utilize LOS information to aid understanding of potential major increases to vehicle delay at key signalized intersections."
  - ***Action TR-4.1A*:** "Strive for LOS D or better for both daily roadway segment and peak hour intersection operations, except when doing so would conflict with other land use, environmental, or economic development priorities, and with the following additional exceptions:"
    - "In the Greater Downtown, strive for LOS E or better, but LOS F may be acceptable after consideration of physical or environmental constraints and other City goals and policies."
    - "Roadway segments determined to be operating at deficient LOS by SJCOG in the Regional Congestion Management Program"
    - "Accept worse than adopted-standard LOS at intersections where widening the intersection would reduce bicycle and pedestrian safety and/or increase pedestrian crossing times such that they would create longer traffic delays due to signal timing."
  - ***Action TR-4.1B*:** "Amend the City's Transportation Impact Analysis Guidelines to reflect the updated LOS goals under Action TR-4.1.A and to refine the threshold at which a project needs to evaluate LOS impacts."

- **Policy TR-4.2:** "Replace LOS with: 1) VMT per capita; and 2) impacts to non-automobile travel modes, as the metrics to analyze impacts related to land use proposals under CEQA, in accordance with SB 743."
  - ***Action TR-4.2A:*** "To evaluate the effects of new development and determine mitigation measures and impact fees, require projects to evaluate per capita VMT and impacts to transit, bicycle, and pedestrian modes."
  - ***Action TR-4.2B*:** "Amend the City's Transportation Impact Analysis Guidelines to include alternative travel metrics and screening criteria."
- **Policy TR-4.3:** "Use the threshold recommended by the Governor's Office of Planning and Research for determining whether VMT impacts associated with land uses are considered significant under state environmental analysis requirements. Amend the City's Transportation Impact Analysis Guidelines to:
  - Establish a threshold of 15% below baseline VMT per capita to determine a significant transportation impact under CEQA.
  - Identify screening criteria that will streamline certain types of development and/or development in certain areas by not requiring a VMT analysis."

While the policies call for amending the City's Transportation Impact Analysis Guidelines (City 2003), new guidelines are not yet available. In the absence of new Transportation Impact Analysis Guidelines or SB 743 guidance, the proposed project would be required to adhere to the City's existing transportation policies (City 2003). The City requires traffic impact analyses for projects generating 100 or more vehicle trips during the morning or evening peak hours. LOS is used by transportation planners and engineers as the standard measure for determining traffic congestion on roadways and intersections. Because the project area is within the City's jurisdiction, it is subject to LOS standards used by the City. The City identifies the minimum acceptable operations criteria for roadway segments and signalized intersections to be LOS D.

3.3.17.2 Impact Evaluation

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

***Construction*. No Impact.** The proposed project would be constructed on site and, except for the initial movement of any construction materials to the project site at the start of construction and eventual movement from the project site at the end of construction, it would not affect roads or other transportation corridors. Construction would result in minimal trips and would be well under the 100 trips during the peak hours threshold. Accordingly, a traffic study is not required for the proposed project. Therefore, there would be no impact to existing traffic during construction.

***Operation*. <u>Less-than-Significant Impact.</u>** As discussed in Section 2.4, truck trips would increase as a result of the proposed project. The proposed project would generate approximately 11 new truck trips per day. This number is below the 100 trips during the peak hours threshold, so a traffic study is not required. Operation of the proposed project would not conflict with an applicable plan, ordinance, or policy. Therefore, there would be a less-than-significant impact to traffic from operations.

B: Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3(b)?

<u>No Impact</u>. The proposed project would generate new trips on the roadway system. However, these trips would be below the 100 trips during peak hours threshold triggering the requirement for a traffic study. The proposed project would not result in any loss of LOS, consistent with the City's Transportation Impact Analysis Guidelines (City 2003). Therefore, there would be no impact.

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

<u>No Impact</u>. The proposed project does not include any modifications to the existing transportation network and is consistent with overall land uses at the Port. Therefore, there would be no impact.

D: Would the project result in inadequate emergency access?

<u>No Impact</u>. As stated above, the proposed project would result in minor levels of new traffic within an existing industrial area served by existing emergency vehicles. Therefore, there would be no impact.

3.3.18 Tribal Cultural Resources

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

3.3.18.1 Affected Environment

The project site is in the traditional territory of the Yokuts tribe and may also have been used or settled by Plains Miwok and Wintun peoples. Yokuts communities were organized into a number of tribes united by a common language (Golla 2007). They lived throughout the San Joaquin Valley and relied on the region's rich fishing and hunting resources (Kroeber 1976). Native American communities were severely impacted by European contact (Milliken 1995). However, Yokuts people who have endured are now members of several federally recognized tribes.

Two Native American tribes have requested consultation under the CEQA guidelines (commonly known as AB 52): the Wilton Rancheria Tribe and the Buena Vista Rancheria Band of Me-Wuk Indians. The Port notified these tribes of the proposed project by letter on March 23, 2020, and will provide the IS/MND to the tribes. No tribal cultural resources have been identified in the project site. Consultation will be ongoing.

3.3.18.2 Impact Analysis

A1-2: Would the proposed project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: (a) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or (b) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Public Resources Code Section 5024.1(c)? In applying the criteria set forth in Public Resource Code Section 5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe.

No Impact. No tribal cultural resources have been identified in the project area. Previously unrecorded archaeological resources or human remains could potentially constitute tribal cultural resources; however, the proposed project does not include any excavation. Therefore, there is no potential to encounter archaeological resources or human remains.

3.3.19 Utilities and Service Systems

Would the project:		Potentially Significant Impact	Less Than Significant Impact After Mitigation	Less Than Significant Impact	No Impact
b.	Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
d.	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☐	☒
e.	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
f.	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?	☐	☐	☐	☒
g.	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

3.3.19.1 Affected Environment

3.3.19.1.1 Stormwater

Stormwater from the project site would be conveyed to the Port's stormwater drainage system, which conveys stormwater to the retention basin adjacent to Navy Drive. The drainage system comprises grated inlets throughout the project site.

3.3.19.1.2 Water Supply

Water service providers in the Stockton metropolitan area include the Stockton Municipal Utilities Department and the California Water Service (City 2018a). Approximately 22% of the City's water supply originates from groundwater wells, with the remaining water supply from treated surface water supplied by the Stockton East Water District (Cal Water 2016). The Delta Water Supply Project was completed in 2012 to provide the City with a reliable water supply to meet both current and future water needs (City 2020c). California Water Service provides domestic water in the area. Non-potable water obtained directly from the San Joaquin River is used for most non-domestic Port development needs.

3.3.19.1.3 Wastewater Infrastructure

The Stockton Regional Wastewater Control Facility (located just off State Route 4 on both sides of the San Joaquin River) provides secondary and tertiary treatment of municipal wastewater throughout the City. The Stockton Regional Wastewater Control Facility is a tertiary treatment facility that handles 55 million gallons per day. The facility serves the City and outlying San Joaquin County areas and currently processes an average of 33 million gallons per day (City 2019).

3.3.19.1.4 Solid Waste

Solid waste within the City and Port is transported and disposed of primarily in the privately owned Forward Landfill and San Joaquin County-owned Foothill Sanitary Landfill and North County Landfill & Recycling Center. The City's *Envision Stockton 2040 General Plan Update and Utility Master Plan Supplements Draft EIR* indicates that all three landfills have sufficient capacity to serve the region's needs (City 2018c). The most recently reported remaining capacity and acceptable waste types for these facilities are listed in Table 8.

Table 8
Project Vicinity Landfills

Landfill	Remaining Capacity	Waste Type
Forward Landfill	Unit 1: 22,100,000 cubic yards (reported December 31, 2012) Unit 3: 40,031,058 cubic yards (reported June 1, 2002)	Agricultural, asbestos, friable, ash, construction/ demolition, contaminated soil, green materials, industrial, mixed municipal, sludge (biosolids), tires, shreds
Foothill Sanitary Landfill	125,000,000 cubic yards (reported June 10, 2010)	Agricultural, construction/demolition, dead animals, industrial, mixed municipal, tires, wood waste
North County Landfill & Recycling Center	35,400,000 cubic yards (reported December 31, 2009)	Construction/demolition, industrial, mixed municipal, tires, other designated, agricultural, metals, wood waste

Note:
Source: CalRecycle SWIS 2020

3.3.19.1.5 Utilities

Electricity is available from PG&E via an existing pole-mounted transformer located at the southwest corner of the project site. There would be no natural gas service.

3.3.19.2 Impact Evaluation

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

No Impact. The proposed project would not require relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, natural gas, or telecommunications facilities. Electric power would be supplied from an existing pole-mounted transformer and would not require construction or expansion of existing facilities. A portable restroom would be installed to accommodate employees. Therefore, there would be no impact.

B: Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

No Impact. The proposed project would have no connection to Port water supplies. The proposed project would use small quantities of potable water for drinking and wash water and non-potable water for dust control, all of which would be delivered to the project site by CVAG. This limited water use can be accommodated by existing water resources and would not require new or expanded entitlements. Therefore, the proposed project would have no impact pertaining to water supply entitlements.

C: Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

No Impact. The proposed project entails installation and use of a portable bathroom, which will not impact wastewater treatment providers. Facility runoff would continue to be conveyed to the exiting drainage system, and the proposed project would not contribute additional runoff to this system. Therefore, there would be no impact.

D: Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

No Impact. Construction of the proposed project would generate very little solid waste, as construction entails minor surface improvements and installation of mobile structures and equipment. There would be no excavation. The amount of solid waste generated by the operation of the proposed project would be negligible and limited to nonhazardous waste generated by personnel on site and through facility maintenance. The landfills in the area have adequate capacity to meet the region's need and are authorized to accept waste materials that may be generated during construction of the proposed project. Therefore, there would be no impact related to landfill capacities.

E: Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. The proposed project would be constructed within the parameters of applicable federal, state, and local solid waste regulations. As described, area landfills are authorized to accept the types of waste potentially generated by proposed project construction and operation. Therefore, there would be no impact.

3.3.20 Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:		Potentially Significant Impact	Less Than Significant Impact After Mitigation	Less Than Significant Impact	No Impact
a.	Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b.	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c.	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d.	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

3.3.20.1 Affected Environment

According to the Fire Hazard Severity Zone Maps maintained by the California Department of Forestry and Fire Protection, the project area and other nearby communities within San Joaquin County are not located within the zones that present a moderate to very high fire hazard severity risk. Therefore, the project area and nearby communities are generally considered to have lower wildfire risk (CAL FIRE 2019a). The project and nearby communities are located in a local responsibility area (CAL FIRE 2019b).

Existing fire response services are described in Section 3.3.15. As noted throughout, there are regional emergency response plans for the proposed project area. Additionally, CVAG maintains an active SMP for its facilities designed to minimize the risk of impacts to persons and the environment from facility operation.

3.3.20.2 Impact Evaluation

A: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The proposed project would be located in a local responsibility area, not a state responsibility area, and would not be in or near lands classified as very high fire hazard severity zones (CAL FIRE 2019b). The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. As discussed in Section 3.3.17, there would be no impact on traffic that could affect emergency response. Therefore, there would be no impact.

B: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The risk of wildfire is related to a variety of parameters, including fuel loading (vegetation), fire weather (winds, temperatures, humidity levels, and fuel moisture contents), and topography. For instance, steep slopes can contribute to fire hazard by intensifying the effects of wind and making fire suppression difficult (Estes et al. 2017). Fuels, such as grass, are highly flammable (Estes et al. 2017). The project site is located in an area that is industrialized, generally flat, and contains very limited vegetation, which is not considered to pose a significant risk of wildfire. The proposed project would be located in a local responsibility area, not a state responsibility area, and would not be in or near lands classified as very high fire hazard severity zones (CAL FIRE 2019b). Although the proposed project entails storage of cottonseed and usage of common industrial materials that may be flammable, the existing SMP addresses operational hazards, and adequate fire response services are in place to respond during an emergency. Therefore, there would be no impact.

C: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The proposed project would be located in a local responsibility area, not a state responsibility area, and would not be in or near lands classified as very high fire hazard severity zones (CAL FIRE 2019b). The proposed project would use existing roads and an existing power line adjacent to the project site and would not require construction of other utilities that may exacerbate fire risk or result in wildfire-related impacts. Therefore, there would be no impact.

D: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The proposed project would not result in downstream flooding or landslides as a result of changes in runoff, post-fire slope instability, or drainage. Because the project site is essentially flat and located in an existing urbanized area of the City, downstream landslides would not occur; therefore, neither people nor structures would be exposed to significant risks. Additionally, the proposed project would be located in a local responsibility area, not a state responsibility area, and would not be in or near lands classified as very high fire hazard severity zones (CAL FIRE 2019b). Therefore, there would be no impact.

3.3.21 Mandatory Findings of Significance

		Potentially Significant Impact	Less Than Significant Impact After Mitigation	Less Than Significant Impact	No Impact
a.	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b.	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
c.	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

3.3.21.1 Impact Evaluation

A: Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less-than-Significant Impact After Mitigation. The potential impacts of the proposed project on fish, wildlife, and other biological resources are described in detail in Section 3.3.4. Habitat for wildlife at the project site is extremely limited, and there is no habitat suitable for special status species. The proposed project entails very limited construction and relatively benign operations (i.e., receipt, storage, and transfer of whole cottonseed) that would not affect wildlife habitat away from the project site. While unlikely, proposed project construction and operations could potentially significantly impact off-site waterbodies that may support wildlife without mitigation. Mitigation measures BIO-MM-1 and BIO-MM-2, which include construction and operational measures to control spills and runoff, would be implemented to reduce potential impacts to off-site waterbodies that may support wildlife. With

implementation of these mitigation measures, there would be less-than-significant impacts to biological resources.

The potential impacts of the proposed project on historical resources are described in detail in Section 3.3.5. In brief, the proposed project does not include any excavation or demolition of any structures and impacts to historic or cultural resources are not expected to occur.

B: Does the project have impacts that are individually limited but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less-than-Significant Impact. The proposed project would result in minimal less-than-significant impacts, some of which require mitigation. The proposed project's operations were specifically designed to avoid significant air quality, GHG, noise, and traffic impacts. Therefore, the proposed project would result in less-than-significant impacts as related to cumulative impacts.

C: Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Less-than-Significant Impact. As noted throughout, the proposed project would result in minimal less-than-significant construction and operational impacts. A purpose of the proposed project is to distribute cottonseed throughout the region for use as livestock feed supplement, which constitutes an overall long-term benefit to communities living in the region as compared to without project conditions. Therefore, the proposed project would result in less-than-significant impacts associated with environmental effects that could adversely affect human beings.

4 References

Anchor QEA (Anchor QEA, LLC), 2015. *Navy Drive Widening Waters and Wetlands Delineation Draft Report*. October 2015.

Anchor QEA, 2019. Site visit notes for NuStar Marine Oil Terminal Engineering and Maintenance Standards (MOTEMS) Development and Vessel Service Project Draft Environmental Impact Report by Anchor QEA planner and biologist Nicolas Duffort. August 6, 2019.

BLS (U.S. Bureau of Labor Statistics), 2020. "Labor Force Statistics from the Current Population Survey." Accessed February 11, 2020. Available at: https://data.bls.gov/timeseries/LNS14000000.

California Department of Conservation, 2016. *Earthquake Shaking Potential for California*. Map Sheet 48.

CAL FIRE (California Department of Forestry and Fire Protection), 2002. *Timberland Site Class on Private Lands Zoned for Timber Production*. CAL FIRE and Resource Assessment Program (FRAP). Technical Working Paper 1-03-02. Available at: http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.626.4149&rep=rep1&type=pdf.

CAL FIRE, 2019a. "Is Your Home In a Fire Hazard Severity Zone?" Updated August 28, 2019. Accessed February 11, 2020. Available at: https://www.arcgis.com/home/item.html?id=5e96315793d445419b6c96f89ce5d153.

CAL FIRE, 2019b. State Responsibility Areas for Fire Protection. Updated June 20, 2019. Accessed February 11, 2020. Available at: https://www.arcgis.com/home/item.html?id=5ac1dae3cb2544629a845d9a19e83991.

CalRecycle SWIS (California Department of Resources Recycling and Recovery Solid Waste Information System), 2020. Entries for Forward Landfill, Foothill Sanitary Landfill, and North County Landfill & Recycling Center. Accessed February 17, 2020. Available at: https://www2.calrecycle.ca.gov/swfacilities/Directory.

Caltrans (California Department of Transportation), 2002. *Guide for the Preparation of Traffic Impact Studies*.

Caltrans and Port (Port of Stockton), 2013. *Initial Study with Mitigated Negative Declaration/Environmental Assessment and Programmatic Section 4(f) Evaluation with Finding of No Significant Impact*. September 2013.

Cal Water (California Water Service), 2016. *California Water Service 2015 Urban Water Management Plan, Stockton District*. June 2016. Available at: https://www.calwater.com/docs/uwmp2015/stk/2015_Urban_Water_Management_Plan_Final_(STK).pdf.

CARB (California Air Resources Board), 2017. *The 2017 Climate Change Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target*.

Cascadia (Cascadia Associates, LLC), 2019. *First Semi-Annual 2019 Groundwater Monitoring Report: NuStar Terminals Operating Partnership L.P. Stockton Facility, Stockton, California*. June 2019. Available at: https://geotracker.waterboards.ca.gov/esi/uploads/geo_report/8857134342/SL0607733381.PDF.

CDFW (California Department of Fish and Wildlife), 2020. Rarefind 5 Program Search of Stockton West Terminous, Lodi South, Waterloo, Stockton East, Manteca, Lathrop, Union Island, and Holt quadrangles.

CCCC (California Climate Change Center), 2012. "Our Changing Climate 2012: Vulnerability & Adaptation to the Increasing Risks from Climate Change in California." Available at: http://www.energy.ca.gov/2012publications/CEC-500-2012-007/CEC-500-2012-007.pdf.

CEDD (California Employment Development Department), 2020. Monthly Labor Force Data for California Counties and Metropolitan Areas December 2019 – Preliminary. January 24, 2020. Available at: https://www.labormarketinfo.edd.ca.gov/file/lfmonth/1912pmsa.pdf.

Chartkoff, J.L., and K.K. Chartkoff, 1984. *The Archaeology of California*. Stanford, California: Stanford University Press. 1984.

City (City of Stockton), 2003. *City of Stockton Transportation Impact Analysis Guidelines*. July 2003. Available at: http://www.stocktongov.com/files/Appendix%20-%20Transportation%20Impact%20Analysis%20Guidelines.pdf.

City, 2007. *Stockton General Plan 2035 Background Report*. December 2007. Available at: http://www.stocktongov.com/files/FinalBackgroundReport.pdf.

City, 2015. *City of Stockton General Plan Baseline Conditions*. August 2015.

City, 2018a. *Envision Stockton 2040 General Plan*. December 4, 2018. Available at: http://www.stocktongov.com/files/Adopted_Plan.pdf.

City, 2018b. "Neighborhood Fire Stations." Last modified November 5, 2018; accessed February 17, 2020. Available at: http://www.stocktongov.com/government/departments/fire/neighb.html.

City, 2018c. *Envision Stockton 2040 General Plan Update and Utility Master Plan Supplements Draft Environmental Impact Report*. Public Review. June 2018. Available at: http://www.stocktongov.com/files/EnvisionStockton2040GP_DEIR.pdf.

City, 2019. "City of Stockton Municipal Utility Services – Wastewater (Sewer)." Last modified November 27, 2019; accessed February 17, 2020. Available at: http://www.stocktongov.com/government/departments/municipalUtilities/utilSewer.html.

City, 2020a. City of Stockton, CA: LandMaster Online. Zoning map overview. Accessed February 11, 2020. Available at: https://stocktonca.mapgeo.io/datasets/properties?abuttersDistance=100&latlng=37.973764%2C-121.284422&themes=%22%5B%5C%22zoning%5C%22%5D%22&zoom=12.

City, 2020b. "Stockton Police Department Personnel and Vehicle Information." Accessed February 13, 2020. Available at: http://ww1.stocktonca.gov/Departments/Police/About-the-Department/Department-Information.

City, 2020c. "City of Stockton Municipal Utility Services – Water." Last modified January 22, 2020; accessed February 17, 2020. Available at: http://www.stocktongov.com/government/departments/municipalUtilities/utilWater.html.

City and ICF International, 2014. *City of Stockton Climate Action Plan*. August 2014.

DTSC (Department of Toxic Substances Control), 2015. *Land Use Covenant and Agreement, Environmental Restrictions, County of San Joaquin, Assessor Parcel Number(s): Portions of APN 145-03-11 and 145-03-12, Formerly The Learner Company, 2711 Navy Drive, Stockton, California, Department Site Code 101994*. January 8, 2015. Available at: https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/9397720158/LUC%20Doc.%20No.%202015-001754%20APN%20145-03-12.pdf.

DTSC, 2020. EnviroStor database search for proposed project site. Accessed February 18, 2020. Available at: https://www.envirostor.dtsc.ca.gov/public/.

ECORP (ECORP Consulting), 2011. *Cultural Resources Inventory Report, Stockton "A" Reconductoring Project, San Joaquin County, California*. ECORP Project No. 2011-123.

Estes, B.L., E.E. Knapp, C.N. Skinner, J.D. Miller, and H.K. Preisler, 2017. "Factors influencing fire severity under moderate burning conditions in the Klamath Mountains, northern California, USA." *Ecosphere* 8(5):e01794. Available at: https://esajournals.onlinelibrary.wiley.com/doi/abs/10.1002/ecs2.1794.

Fagan, B., 2003. *Before California: An Archaeologist Looks at our Earliest Inhabitants*. Lanham, Maryland: Rowman and Littlefield Publishers, Inc.

FEMA (Federal Emergency Management Agency), 2009. Flood Insurance Rate Map San Joaquin County, California and Incorporated Areas, Panel 455 of 950. Updated October 19, 2009.

Garone, P., 2011. *The Fall and Rise of the Wetlands of California's Great Central Valley*. Berkeley and Los Angeles: University of California Press.

Golla, V., 2007. "Linguistic Prehistory." *California Prehistory: Colonization, Culture, and Complexity*. Editors, T.L. Jones and K.A. Klar. Plymouth, United Kingdom: AltaMira Press.

IPCC (Intergovernmental Panel on Climate Change), 1995. *Climate Change 1995*. Second Assessment Report.

Kleinfelder Inc., 2019. *Preliminary Geotechnical Investigation Report, Lehigh Hanson Cement Receiving and Distribution Terminal, Proposed New Cement Storage Dome and Tank, Port of Stockton, Stockton, California*, Report on file at the Port of Stockton, Stockton, California.

Kroeber, A.L., 1976. *Handbook of the Indians of California*. New York: Dover Publications.

Milliken, R., 1995. *A Time of Little Choice. The Disintegration of Tribal Culture in the San Francisco Bay Area 1769-1810*. Menlo Park, California: Ballena Press.

Milliken, R., R.T. Fitzgerald, M.G. Hykema, R. Groz, T. Origer, D.G. Bieling, A. Levental, R.S. Wiberg, A. Gottsfield, D. Gillette, V. Bellifemine, E. Strother, R. Cartier, and D.A. Fredrickson, 2007. "Punctuated culture change in the San Francisco Bay area." *California Prehistory: Colonization, Culture, and Complexity*. Editors, T.L. Jones and K.A. Klar. Plymouth, United Kingdom: AltaMira Press.

Moratto, M.J., 1984. *California Archaeology*. Orlando, Florida: Academic Press.

NRCS (United States Department of Agriculture Natural Resources Conservation Service), 2001. *Dierssen Series*. Available at: https://soilseries.sc.egov.usda.gov/OSD_Docs/D/DIERSSEN.html.

NRCS, 2019. Web Soil Survey. Available at: https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm.

OPR (Governor's Office of Planning and Research), 2017. *State of California General Plan Guidelines*. Available at: http://opr.ca.gov/planning/general-plan/guidelines.html.

OPR, 2020. "CEQA and Climate Change." *Governor's Office of Planning and Research*. Accessed March 2, 2020. Available at: http://opr.ca.gov/ceqa/climate-change.html.

Port (Port of Stockton), 2004. *Port of Stockton West Complex Development Plan Final Environmental Impact Report*. May 2004.

Port, 2009. *Port of Stockton Storm Water Development Standards Plan*. June 1, 2009.

Port, 2016. *Renewable Portfolio Standard Procurement Plan 2016 Update*. August 11, 2016.

Port, 2019a. *2019 Energy Efficiency Program Offering Procedures Manual*. July 1, 2019.

Port, 2019b. *Port of Stockton General Tariff No. 1, Naming Rates, Rules and Regulations at Port of Stockton.* Effective July 1, 2019. Available at: http://port.tgt.npa.mybluehost.me//wp-content/uploads/2019/06/General-Tariff-1-2019-2020.pdf.

Port, 2020. "Port Police Department." Accessed March 3, 2020; modified February 26, 2020. Available at: https://www.portofstockton.com/port-police/.

San Joaquin County, 2000. *San Joaquin County Multi-Species Habitat Conservation and Open Space Plan*. Available at: https://www.sjcog.org/DocumentCenter/View/5/Habitat-Planpdf?bidId=.

San Joaquin County, 2010. *San Joaquin County General Plan 2010*. Adopted by the San Joaquin County Board of Supervisors July 29, 1992.

SEG (Salem Engineering Group), 2018. Geotechnical Engineering Investment, Proposed Stockton Phase B Expansion, Stockton, California. Report on file at the Port of Stockton, Stockton, California.

SJCOES (San Joaquin County Office of Emergency Services), 2008. *Hazardous Materials Area Plan*. November 2008.

SJCOES, 2009. *Hazardous Materials Area Plan, Appendix 5 – Non-Routine Emergency Response Plan*. October 2009.

SJCOG (San Joaquin Council of Governments), 2018. 2018 *Regional Transportation Plan Sustainable Communities Strategy*. Adopted June 2018. Available at: https://www.sjcog.org/DocumentCenter/View/4156/Final-Compiled-RTPSCS-2018.

SJVAPCD (San Joaquin Valley Air Pollution Control District), 2009a. *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA*. December 17, 2009. Available at: https://www.valleyair.org/Programs/CCAP/12-17-09/3%20CCAP%20-%20FINAL%20LU%20Guidance%20-%20Dec%2017%202009.pdf.

SJVAPCD, 2009b. *District Policy: Addressing GHG Emission Impacts for Stationary Source Projects Under CEQA*. December 17, 2009. Available at: https://www.valleyair.org/Programs/CCAP/12-17-09/2%20CCAP%20-%20FINAL%20District%20Policy%20CEQA%20GHG%20-%20Dec%2017%202009.pdf.

SJVAPCD, 2015a. *Guidance for Assessing and Mitigating Air Quality Impacts*. March 19, 2015. Available at: http://www.valleyair.org/transportation/GAMAQI_3-19-15.pdf.

SJVAPCD, 2015b. *Final Staff Report: Update to District's Risk Management Policy to Address OEHHA's Revised Risk Assessment Guidance Document*. May 28, 2015. Available at: http://www.valleyair.org/busind/pto/staff-report-5-28-15.pdf.

SJVAPCD, 2016. Available at: 2016 Ozone Plan for 2008 8-Hour Ozone Standard. June 16, 2016. Available at: http://valleyair.org/Air_Quality_Plans/Ozone-Plan-2016/Adopted-Plan.pdf.

SJVAPCD, 2019. Notice of Consideration for Permit Exemption Project Numbers: N-1190085 and N-1191807. June 3, 2019.

Sebby, D.M., 2006. *Historic California Posts, Camps, Stations and Airfields: Stockton Ordnance Depot*. Available at: http://www.militarymuseum.org/StocktonOrdDepot.html.

Stockton Port District, 2006. *Stormwater Development Standards Plan*. April 17, 2006.

Stockton Port District, 2012. *Targa Stockton Terminal Project Tiered Initial Study and Proposed Mitigated Negative Declaration*. February 2012.

Stockton Port District, 2013. *Endicott Biofuel Production Facility Project Initial Study and Proposed Mitigated Negative Declaration*. November 2013.

Stockton Port District and TRC Solutions, 2013. *Endicott Biofuel Production Facility Project Initial Study and Proposed Mitigated Negative Declaration*. November 2013.

SUSD (Stockton Unified School District), 2019. *Stockton Unified School District Annual Report 2018–2019*. Available at: https://www.stocktonusd.net/cms/lib/CA01902791/Centricity/Domain/160/2018-19%20Annual%20Report.pdf.

SWRCB (State Water Resources Control Board), 2020. GeoTracker database search for the project site. Accessed February 18, 2020. Available at: https://geotracker.waterboards.ca.gov/.

USGCRP (U.S. Global Change Research Program), 2014. *National Climate Assessment: Climate Change Impacts in the United States*. Available at: http://nca2014.globalchange.gov/.

Vincent, G. (U.S. Army Corps of Engineers), 2012. Letter to Carolyn Tatoian-Cain, Department of Toxic Substances Control. Regarding: Property No Department of Defense Actions Indicated (NDAI) at Former Stockton Ordnance Depot, San Joaquin, CA, FUDS Number J09CA7294, FUDSMIS Projects: 01-HTRW. November 29, 2012. Available at: https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/9417376458/StocktonOrdDepot%20NDAI%20Master.pdf.

Wagner, D.L., C.W. Jennings, T.L. Bedrossian, and B.L. Bortungo, 1981. *Geologic Map of the Sacramento Quadrangle, Scale 1:250,000*. Sacramento, California: Department of Conservation, Division of Mines and Geology.

Wood, R.C., 1973. "The Rise of Stockton." *San Joaquin Historian* 9(1):1-6.

Appendix A
Special Status Species Potentially Present in the Project Area

Table A-1
Special Status Species Potentially Present in the Project Area

Species	Federal	State	Habitat Association	Potential to Occur
Invertebrates				
Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*)	T	-	Riparian scrub in association with blue elderberry (*Sambucus mexicana*)	No potential to occur. Habitat not present.
Vernal pool tadpole shrimp (*Lepidurus packardi*)	E	-	Valley and foothill grassland; vernal pool; wetland	No potential to occur. Habitat not present.
Amphibians				
California tiger salamander (*Ambystoma californiense*)	T	T	Cismontane woodland; meadow and seep; riparian woodland; valley and foothill grassland	No potential to occur. Habitat not present.
Western pond turtle (*Emys marmorata*)	-	SSC	Aquatic; flowing waters; standing waters; wetland	No potential to occur. Habitat not present.
Birds				
Tricolored blackbird (*Agelaius tricolor*)	-	CE; SSC	Freshwater marsh; marsh and swamp; swamp; wetland	No potential to occur. Habitat not present.
Burrowing owl (*Athene cunicularia*)	-	SSC	Prairie; scrub; grassland	No potential to occur. Habitat not present.
White-tailed kite (*Elanus leucurus*)	-	FP	Open grasslands; savanna; open woodlands; marshes; desert grassland; partially cleared lands; cultivated fields	No potential to occur. Habitat not present.
Swainson's hawk (*Buteo swainsoni*)	-	T	Great basin grassland; riparian forest; riparian woodland; valley and foothill grassland	No potential to occur. Habitat not present.
Least Bell's vireo (*Vireo bellii pusillus*)	E	E	Riparian forest; riparian scrub; riparian woodland	No potential to occur. Habitat not present.
California black rail (*Laterallus jamaicensis coturniculus*)	-	T; FP	Brackish marsh; freshwater marsh; marsh and swamp; salt marsh; wetland	No potential to occur. Habitat not present.
Song sparrow ("Modesto" population) (*Melospiza melodia*)	-	SSC	Riparian shrub-scrub	No potential to occur. Habitat not present.

Species	Federal	State	Habitat Association	Potential to Occur
Yellow-headed blackbird (*Xanthocephalus xanthocephalus*)	-	SSC	Marsh and swamp; wetland	No potential to occur. Habitat not present.
Loggerhead shrike (*Lanius ludovicianus*)	-	SSC	Broadleaved upland forest, Desert wash, Joshua tree woodland, Mojavean desert scrub, Pinon and juniper woodlands, Riparian woodland, Sonoran desert scrub	No potential to occur. Habitat not present.
Mammals				
Riparian brush rabbit (*Sylvilagus bachmani riparius*)	E	E	Riparian forest	No potential to occur. Habitat not present.
American badger (*Taxidea taxus*)	-	SSC	Variety of terrestrial habitats	No potential to occur. Habitat not present.
Fish				
Delta smelt (*Hypomesus transpacificus*)	T	E	Aquatic; estuary	No potential to occur. Habitat not present.
Steelhead, Central Valley DPS (*Oncorhynchus mykiss irideus*)	T	-	Aquatic; Sacramento/San Joaquin flowing waters	No potential to occur. Habitat not present.
Longfin smelt (*Spirinchus thaleichthys*)	C	T; SSC	Aquatic; estuary	No potential to occur. Habitat not present.
Reptiles				
Giant garter snake (*Thamnophis gigas*)	T	T	Marsh and swamp; riparian scrub; wetland	No potential to occur. Habitat not present.
Plants				
Palmate-bracted salty bird's-beak (*Chloropyron palmatum*)	E	E; 1B.1	Chenopod scrub; meadow and seep; valley and foothill grassland; wetland	No potential to occur. Habitat not present.
Delta button-celery (*Eryngium racemosum*)	-	E; 1B.1	Riparian scrub; wetland	No potential to occur. Habitat not present.

Notes:
Rare Plant Rank 1B.1 – rare, threatened, or endangered in California and elsewhere; seriously threatened in California (more than 80% of occurrences threatened/high degree and immediacy of threat)
Source: CDFW 2020 search of project area and surrounding quadrangles (Stockton West, Terminous, Lodi South, Waterloo, Stockton East, Manteca, Lathrop, Union Island, and Holt).
C: candidate
E: endangered
FP: California Department of Fish and Wildlife fully protected
SSC: state species of special concern
T: threatened

Appendix B
CNPS List of Plant Species with the Potential to Occur in the Study Area

Table B-1
CNPS List of Plant Species with the Potential to Occur in the Study Area

Common Name	Scientific Name	California Rare Plant Rank
Alkali milk-vetch	*Astragalus tener var. tener*	1B.2
Heartscale	*Atriplex cordulata var. cordulata*	1B.2
Big tarplant	*Blepharizonia plumosa*	1B.1
Watershield	*Brasenia schreberi*	2B.3
Bristly sedge	*Carex comosa*	2B.1
Palmate-bracted salty bird's-beak	*Chloropyron palmatum*	1B.1 (Federal Endangered; State Endangered)
Slough thistle	*Cirsium crassicaule*	1B.1
Recurved larkspur	*Delphinium recurvatum*	1B.2
Delta button-celery	*Eryngium racemosum*	1B.1 (State Endangered)
San Joaquin spearscale	*Extriplex joaquinana*	1B.2
Woolly rose-mallow	*Hibiscus lasiocarpos var. occidentalis*	1B.2
Delta tule pea	*Lathyrus jepsonii var. jepsonii*	1B.2
Mason's lilaeopsis	*Lilaeopsis masonii*	1B.1
Delta mudwort	*Limosella australis*	2B.1
Sanford's arrowhead	*Sagittaria sanfordii*	1B.2
Side-flowering skullcap	*Scutellaria lateriflora*	2B.2
Suisun Marsh aster	*Symphyotrichum lentum*	1B.2
Wright's trichocoronis	*Trichocoronis wrightii var. wrightii*	2B.1
Saline clover	*Trifolium hydrophilum*	1B.2
Caper-fruited tropidocarpum	*Tropidocarpum capparideum*	1B.1

Notes:
Source: CDFW, 2020. California Native Diversity Database Rarefind 5 Program Search of Stockton West Terminous, Lodi South, Waterloo, Stockton East, Manteca, Lathrop, Union Island, and Holt quadrangles.
Rare Plant Rank 1B.1: rare, threatened, or endangered in California and elsewhere; seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat)
Rare Plant Rank 1B.2: rare, threatened, or endangered in California and elsewhere; fairly threatened in California (20-80% occurrences threatened/moderate degree and immediacy of threat)
Rare Plant Rank 2B.1: rare, threatened, or endangered in California, but more common elsewhere; seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat)
Rare Plant Rank 2B.2: rare, threatened, or endangered in California, but more common elsewhere; moderately threatened in California (20-80% occurrences threatened/moderate degree and immediacy of threat)
Rare Plant Rank 2B.3: rare, threatened, or endangered in California, but more common elsewhere; not very threatened in California (less than 20% of occurrences threatened/low degree and immediacy of threat or no current threats known)
CNPS: California Native Plant Society