

**CITY OF LATHROP
NOTICE OF PREPARATION
OF A SUBSEQUENT ENVIRONMENTAL IMPACT REPORT
AND NOTICE OF PUBLIC SCOPING MEETING
FOR THE
RIVER ISLANDS AT LATHROP PHASE 2 PROJECT/UPDATE TO THE
WEST LATHROP SPECIFIC PLAN**

Date: March 6, 2020

To: Responsible Agencies, Trustee Agencies, and Interested Persons

Subject: Notice of Preparation of a Subsequent Environmental Impact Report for the River Islands at Lathrop Phase 2 Project/Update to the West Lathrop Specific Plan (State Clearinghouse No. 1993112027)

Lead Agency: City of Lathrop

Contact: Mark Meissner, Director of Community Development
390 Towne Centre Drive
Lathrop, CA 95330
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Comment Period: March 6, 2020 to April 8, 2020

River Islands Development, LLC (project applicant) is proposing changes to the River Islands at Lathrop Phase 2 Project (Phase 2 Project or project), which includes development of the second phase of the River Islands at Lathrop Project (River Islands Project), a mixed-use, water-oriented master planned community on Stewart Tract and Paradise Cut in Lathrop, CA. The Phase 2 Project includes an amendment to the existing West Lathrop Specific Plan (WLSP). The City of Lathrop (City) will prepare a Subsequent Environmental Impact Report (SEIR) for the project to satisfy the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.) and will serve as the lead agency for CEQA compliance.

PURPOSE OF THIS NOTICE OF PREPARATION

In accordance with the State CEQA Guidelines (14 California Code of Regulations [CCR] Section 15082), the City has prepared this notice of preparation (NOP) to inform agencies and interested parties that an SEIR will be prepared for the above-referenced project. The purpose of an NOP is to provide sufficient information about the proposed project and its potential environmental impacts to allow agencies and interested parties the opportunity to provide a meaningful response related to the scope and content of the EIR, including mitigation measures that should be considered and alternatives that should be addressed (State CEQA Guidelines 14 CCR Section 15082[b]).

The project location, description (including proposed changes to the Phase 2 Project), and potential environmental effects of those changes are summarized below.

PUBLIC REVIEW PERIOD

This NOP is being circulated for public review and comment for a period of 34 days beginning March 6, 2020 and ending on April 8, 2020. The City will hold a public scoping meeting to inform interested parties about the project and to provide agencies and the public with an opportunity to provide comments on the scope and content of the SEIR.

Scoping Meeting

Wednesday, April 1, 2020

4:30 p.m.

Lathrop City Hall, Council Chambers

390 Towne Centre Drive

Lathrop, CA 95330

Copies of the NOP may be reviewed at the following locations:

- ▲ Stockton-San Joaquin County Public Library–Lathrop Branch Library, 450 Spartan Way, Lathrop, CA 95330, during library hours;
- ▲ Lathrop City Hall, Front Counter in the Lobby; 390 Towne Centre Drive, Lathrop, CA 95330 between 8:00 a.m. and 6:00 p.m. Monday through Thursday or 8:00 a.m. and 5:00 p.m. on Friday; or
- ▲ Online at: <https://www.ci.lathrop.ca.us/com-dev/page/public-review-documents>.

PROVIDING COMMENTS ON THIS NOTICE OF PREPARATION

Written and/or email comments on the NOP should be provided at the earliest possible date, but must be received by no later than 5:00 p.m. on April 8, 2020. Please send all comments on the NOP to:

City of Lathrop
Attn: Mark Meissner, Director of Community Development
390 Towne Centre Drive
Lathrop, CA 95330
E-mail: mmeissner@ci.lathrop.ca.us

Your views and comments on how the project may affect the environment are welcomed. Please contact Mr. Meissner if you have any questions about the environmental review process for the River Islands at Lathrop Phase 2 Project and the corresponding amendment to the WLSP.

Comments provided by e-mail should include the name and mailing address (e-mail or physical) of the commenter in the body of the e-mail. If you are from an agency that will need to consider the SEIR when deciding whether to issue permits or other approvals for the project, please provide the name of a contact person in any comments.

Focus of Input

The City relies on responsible and trustee agencies to provide information relevant to the analysis of resources within their respective jurisdictions. The City encourages input on the SEIR, with a focus on the following topics:

- ▲ **Scope of Environmental Analysis.** Guidance on the scope of analysis for this SEIR, including identification of specific issues that will require closer study due to the location, scale, and character of the River Islands at Lathrop Phase 2 Project;
- ▲ **Mitigation Measures.** Ideas for feasible mitigation that could potentially be imposed by the City to avoid, eliminate, or reduce potentially significant or significant impacts;

- ▲ **Alternatives.** Suggestions for alternatives to the River Islands at Lathrop Phase 2 Project that could potentially reduce or avoid potentially significant or significant impacts; and
- ▲ **Interested Parties.** Identification of public agencies, public and private groups, and individuals that the City should contact directly regarding the River Islands at Lathrop Phase 2 Project and the accompanying SEIR.

PROJECT LOCATION

Lathrop is located within the Interstate 5 (I-5) corridor, within an approximately 50-minute drive (or less) of the cities of Tracy, Manteca, Stockton, Lodi, Modesto, Livermore, and Pleasanton.

The project area is the Phase 2 development area of the River Islands at Lathrop Project, located on Stewart Tract within the WLSP in the city of Lathrop. The Phase 2 development area includes approximately 3,100 acres of land and open space located on Stewart Tract (an inland island bounded by Paradise Cut, the San Joaquin River, and Old River) (Figure 1).

PROJECT BACKGROUND

The River Islands at Lathrop Project is a mixed-use, water-oriented master planned community, on approximately 4,905 acres on Stewart Tract and Paradise Cut. Project construction is split among two primary development phases, following an approximately 20-year buildout schedule. Phase 1, currently under construction, includes 4,284 residential dwelling units, a Town Center, a portion of a Business Park, lakes, parks, schools, and other open space. Much of the Phase 1 area has already been completed. As evaluated in the 2003 SEIR (State Clearinghouse No. 1993112027), Phase 2 includes 6,716 dwelling units, the balance of the Business Park (Employment Center), a neighborhood commercial area, lakes, parks, golf courses, marinas, schools, and additional open space areas.

In 2003, the City certified the SEIR for the River Islands at Lathrop Project and approved various entitlements, including amendments to the General Plan, WLSP, a Vesting Tentative Map for Phase 1, and an Amended and Restated Development Agreement.

The 2003 SEIR included a project-level analysis for Phase 1 as well as a project-level analysis for Phase 2 with the exception of the issue of recycled water storage and disposal during Phase 2, which was evaluated at a program-level. Since certification of the SEIR in 2003, the City has prepared various addenda to evaluate modifications to the River Islands project and confirm that the modifications were covered by the SEIR and that there would be no new significant or substantially more severe environmental impacts under CEQA resulting from the project modifications.

The applicant has applied to the City for a number of related project-level entitlements that will update the land use program for Phase 2, including the following:

- ▲ City of Lathrop General Plan Amendments for Land Use and Circulation
- ▲ Zoning Map Amendment
- ▲ WLSP Amendment
- ▲ Potential Development Agreement Amendment
- ▲ Urban Design Concept Amendment
- ▲ Vesting Tentative Map

The applicant proposes to densify proposed residential development within the Phase 2 area, accommodate additional retail and commercial development, and add a mixed-use Transit Village to the proposed Valley Link commuter rail station location in the Employment Center District. The amendments will include these changes, as well as other project refinements and updates proposed to accommodate changes in the flood protection program, transportation and circulation changes, changes in school construction, and other similar issues. The overall project boundary of the River Islands Project would not change from that analyzed in the 2003 SEIR.

EXISTING CONDITIONS AND LAND USES

The project site (Phase 2 area) is mostly undeveloped and/or agricultural land. There are a few single-family residences, a horse ranch, and related agriculture-related buildings located in discrete portions of the project site. The project site also contains the Central Drainage Ditch, a long agricultural ditch that bisects Stewart Tract, along with a small pond located near Paradise Cut. Both areas are considered wetlands and are designated as waters of the U.S. by the U.S. Army Corps of Engineers. As development occurs within the Phase 2 area, these wetland areas will be avoided. Flood protection improvements consisting of levees surrounding the Phase 2 area have been completed, consistent with the existing entitlements and 2003 SEIR.

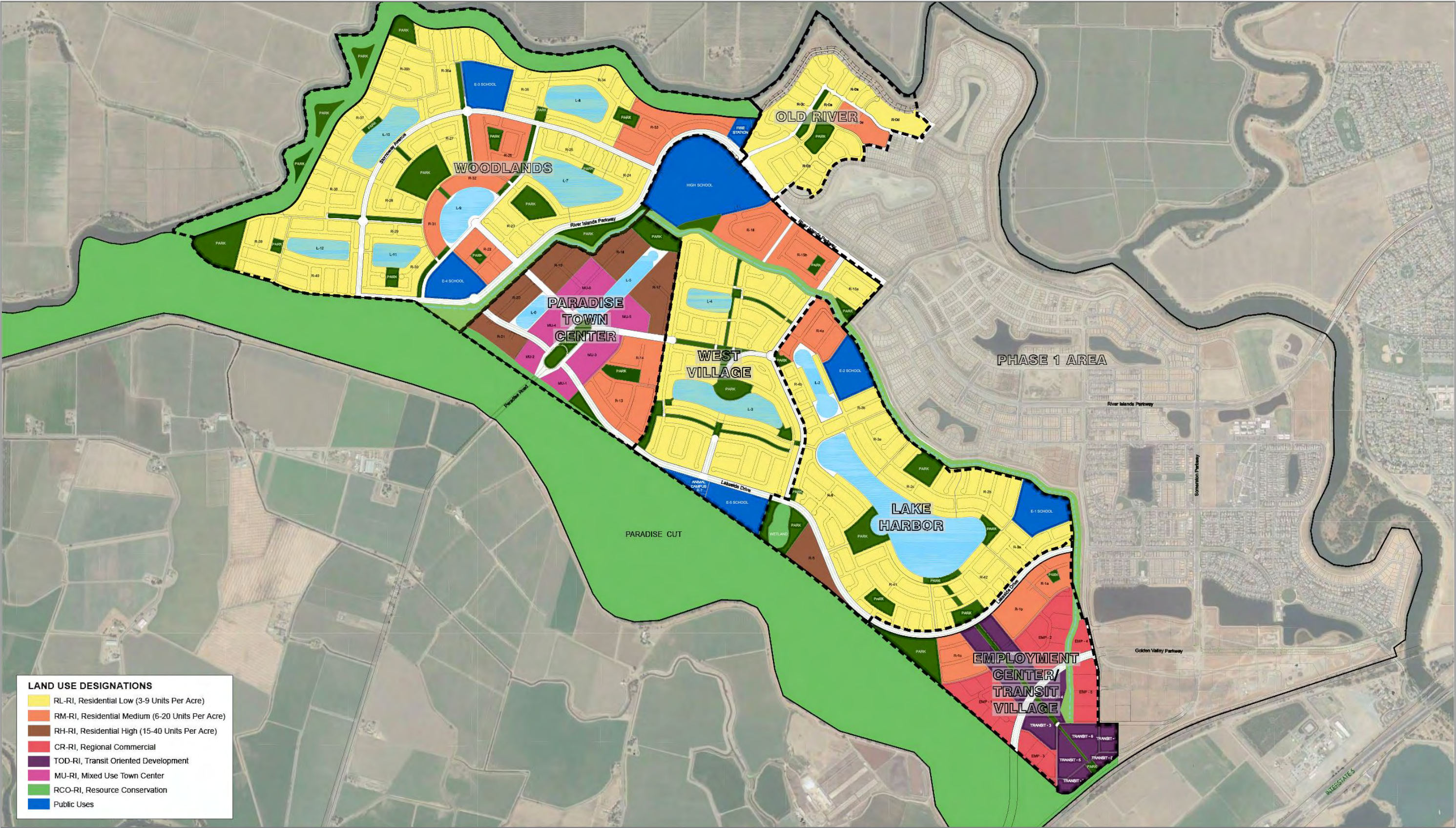
PROJECT OBJECTIVES

The overall objective of the River Islands Project is the orderly and systematic development of an integrated, mixed-use community in the City of Lathrop generally consistent with goals and policies of the City's adopted General Plan and the WLSP. The specific project objectives for the Phase 2 Project, listed below, borrow from and update the objectives originally identified in the 2003 SEIR:

- ▲ Provide to Lathrop (and the surrounding region) long-term community benefits, including generation of substantial permanent employment opportunities.
- ▲ Reinforce and enhance the City's positive image.
- ▲ Contribute a new variety of mixed-use/commercial land uses that could become a citywide and regional focal point.
- ▲ Continue to create a community that is consistent with many of the original goals of the Lathrop General Plan and WLSP including employment generation.
- ▲ Develop a well-integrated and harmonious pattern of resident-oriented and visitor-oriented land uses in West Lathrop that provides local jobs, homes, and revenue-generating uses that complement other Lathrop development.
- ▲ Arrange phases of development to allow ongoing agricultural operations in the plan area to continue as long as feasible while allowing initial phases to act as catalysts for subsequent development.
- ▲ Incorporate water in its many forms throughout the project area to reinforce the area's Delta setting.
- ▲ Phase the provision of habitat preservation areas with overall development phases.
- ▲ Provide a wide range of housing types that could accommodate most income levels.
- ▲ Provide a variety of recreational opportunities focused on outdoor uses.
- ▲ Provide a high-density Transit Oriented Development in the vicinity of the planned Valley Link commuter rail station on the project site.

PROJECT DESCRIPTION

The City is considering a number of related project-level entitlements that will update the land use program for the River Islands Phase 2 project area. These changes constitute the project to be analyzed in the SEIR and are summarized below.



Source: Image produced by the Dahlin Group in 2019

Figure 1 River Islands Phase 2 Masterplan Concept

Revised River Islands at Lathrop Phase 2 Project

The approved River Islands at Lathrop Project includes a mix of residential, commercial, office, recreational, educational, and open space uses on approximately 4,905 acres on Stewart Tract and Paradise Cut. The overall project, first approved in 2003, has been updated and amended for Phase 1 development in particular, in 2005, 2007, 2012, 2014, 2015, and 2018. The 2012 and 2018 updates also included minor changes to Phase 2.

The approved Phase 2 area, as contemplated in the 2003 SEIR and Lathrop General Plan, provides for the development of a total of 6,716 residential dwelling units, a 211-acre employment center (Business Park), a neighborhood commercial area, additional lakes, parks, golf courses, marinas, schools, an expansion of the transportation/circulation system, and completion of the flood protection system. As part of the overall project, River Islands would establish the biological habitat restoration/creation habitat areas and preserve natural lands in Paradise Cut if federal and state approvals could be obtained. However, because proposed construction of the Phase 2 area avoids delineated wetlands and waters of the U.S., completion of the urban development of River Islands is not predicated on biological habitat restoration/creation activities.

The proposed revisions to the Phase 2 Project would densify the Phase 2 area by including additional multi-family dwellings (condominiums, apartments, etc.) as well as more attached single-family residences similar to units already constructed as part of Phase 1. The proposed modified development would also create a smaller “town center” mixed-use area at Paradise Road (at the west entry to the project area) and a mixed-use Transit Village as part of the Employment Center District that would complement the future planned Valley Link (formerly ACE) transit station.

Other proposed Phase 2 modifications include changes in the circulation pattern from the adopted WLSP and General Plan, with River Islands Parkway, Lakeside Drive, and Paradise Road shifting locations to the updated land use pattern. Other land use shifts include the Old River Road District, currently part of the Phase 1 development boundary, being included as proposed development within Phase 2. Golden Valley Parkway would still serve its purpose as a regional alternative roadway as proposed in the current plan. An additional arterial from the existing terminus of Golden Valley Parkway in the Employment Center would continue into the Phase 2 area for internal circulation.

Table 1 shows the existing land use program for the Phase 2 Project, along with the proposed plan and a comparison of the changes.

Table 1 River Islands Phase 2 Project Development Summary

General Plan Designation/Land Use		Existing Phase 2 Project			Proposed Phase 2 Project			Difference		
		Acres ¹	Dwelling Units ⁴	Non-Res. Floor Area (s.f.)	Acres ¹	Dwelling Units ⁴	Non-Res. Floor Area (s.f.)	Acres ¹	Dwelling Units ⁴	Non-Res. Floor Area (s.f.)
MU-RI	Town Center (Mixed Use)	0.0	0	0	166.7	2,448	358,288	166.7	2,448	358,288
CR-RI	Employment Center (Regional Commercial)	125.0	0	1,800,000	86.6	0	1,477,500	(38.4)	0	(322,500)
CN-RI	Neighborhood Commercial	17.7	0	180,000	0	0	0	(17.7)	0	(180,000)
RL-RI	Residential - Low	1,486.3	4,916	0	857.8	4,241	0	(628.5)	(675)	0
RM-RI	Residential - Medium	70.4	1,200	0	195.4	1,795	0	125	595	0
RH-RI	Residential - High	34.9	600	0	11.9	260	0	(23)	(340)	0
TOD-RI	Transit Oriented Development ²	0.0	0	0	94.4	1,626	0	94.4	1,626	0
RCO/OS-RI	Resource Conservation - Open Space	703.8	0	0	703.8	0	0	0.0	0	0

General Plan Designation/Land Use		Existing Phase 2 Project			Proposed Phase 2 Project			Difference		
		Acres ¹	Dwelling Units ⁴	Non-Res. Floor Area (s.f.)	Acres ¹	Dwelling Units ⁴	Non-Res. Floor Area (s.f.)	Acres ¹	Dwelling Units ⁴	Non-Res. Floor Area (s.f.)
	Parks	155.4			136.4			(19)		
	Lakes	235.0			200.4			(34.6)		
	Schools	106.4			120.8			14.4		
	Streets	382.3			437.9			55.6		
	Other Open Space/ Public Uses ³	129.7			434.8			305.1		
Total Land Use Parcels		3,446.9	6,716	1,980,000	3,446.9	10,370	1,835,788	0	3,654	(144,212)

Notes:

¹ The acreage shown includes Paradise Cut and adjacent waterways that may not be evaluated in the SEIR.

² This area was identified as "transit village" in the 2003 SEIR project description. The new title as shown should be used to be consistent with the Valley Link Transit Project.

³ The acreage estimated includes public uses such as fire stations and other City facilities, as well as open space areas not included with other land use designations.

⁴ Dwelling units tabulated are shown as per the City's existing and proposed land use categories and not in their physical location (e.g. districts).

Among the entitlements evaluated in the SEIR, the adopted WLSP would be amended to reflect the modified Phase 2 Project development unit projections.

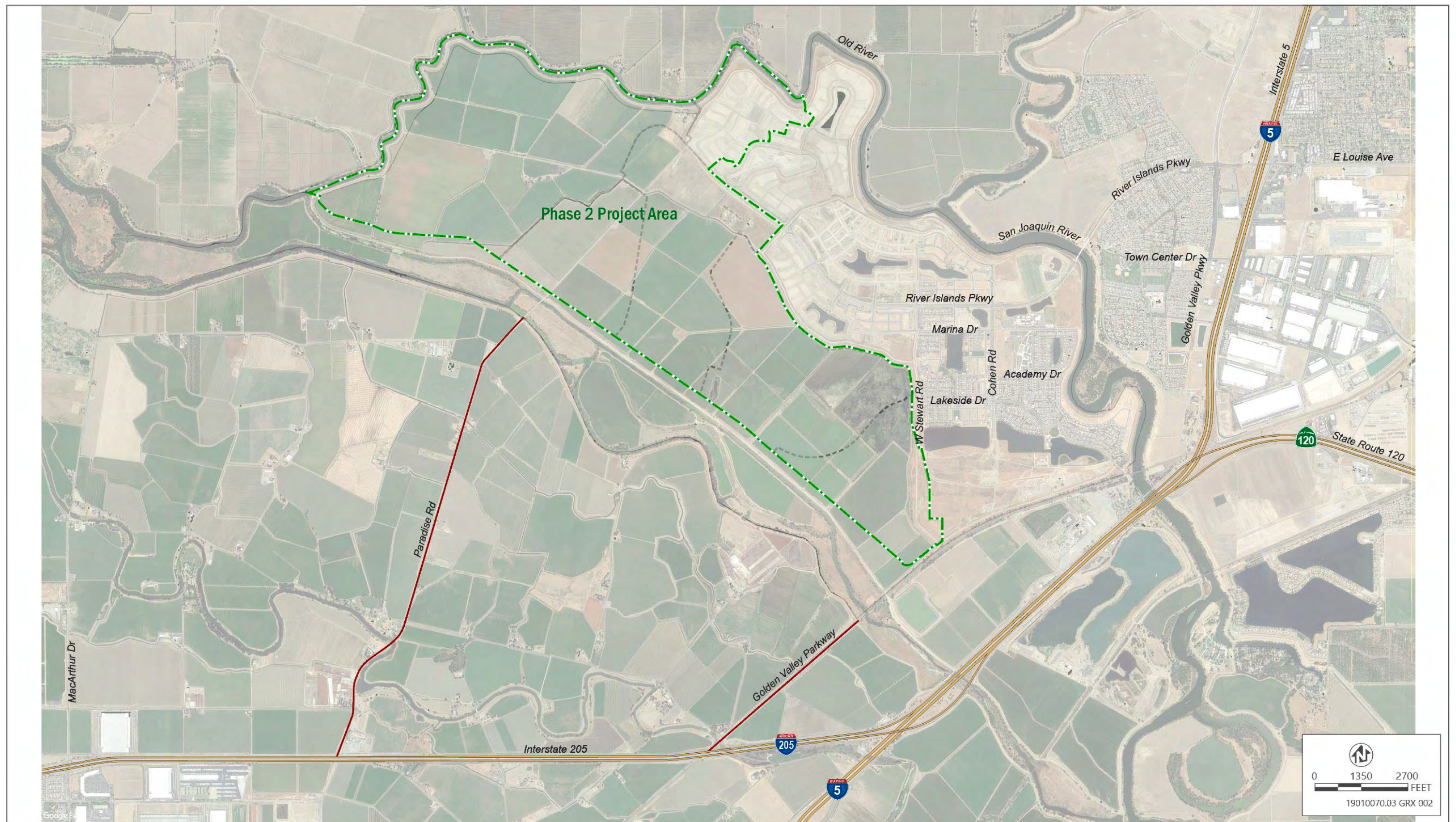
Offsite Elements

There are also two potential offsite elements located outside of Stewart Tract that may be considered in the SEIR, both consisting of road extensions to Interstate 205 (I-205) (Figure 2). One of these offsite elements consists of the widening of Paradise Road from the project site to I-205 at a new interchange proposed by the City of Tracy (Paradise Road/Chrisman Road interchange). The second offsite element is an extension of Golden Valley Parkway included in San Joaquin County's inter-regional system and part of its Regional Transportation Improvement Fee (RTIF) program. This roadway would be constructed as a multi-agency effort and the River Islands applicant would be required to continue to contribute funding towards this roadway as part of the RTIF program (fee payments). This extended portion of Golden Valley Parkway may also connect to I-205 via the proposed Paradise Road/Chrisman Road interchange. The SEIR will evaluate the project's contribution to the need for these facilities.

POTENTIAL APPROVALS AND PERMITS REQUIRED

The following is a list of approvals and/or permits that may be required to implement the project:

- ▲ California Department of Transportation (Caltrans): Review of mitigation measures related to Manthey Road/Mossdale Road Interchange and the closure of Stewart Road
- ▲ California Department of Education: Approval of site acquisition and construction plans for proposed school facilities that are proposed to be non-charter
- ▲ Central Valley Regional Water Quality Control Board (RWQCB): Clean Water Act Section 401 water quality certification; construction activity stormwater permit; National Pollutant Discharge Elimination System permit
- ▲ San Joaquin County: Approval of an encroachment permit for the widening of Paradise Road from the Lathrop City limits to Paradise Road/Chrisman Road Interchange with I-205



Source: Image produced by Ascent Environmental in 2020

Figure 2 Potential Offsite Elements

- ▲ City of Lathrop: Approval of a general plan amendment, zoning map amendment, WLSP amendment, Urban Design Concept amendment, vesting tentative map, and potential development agreement amendment between the applicant and the City
- ▲ Banta Elementary School District: Approval of site acquisition and construction plans for proposed K-8 school facilities
- ▲ Tracy Unified School District: Approval of site acquisition and construction plans for proposed high school facilities, if the proposed unification of Banta Elementary School District does not take place
- ▲ Tri-Valley - San Joaquin Valley Regional Rail Authority (Valley Link): Approval of proposed Valley Link transit station

POTENTIAL ENVIRONMENTAL EFFECTS

Pursuant to PRC Section 21166 and CEQA Guidelines Section 15162, when a lead agency concludes that a project may have the potential to result in new significant adverse effects that were not analyzed in previous EIRs, an SEIR should be prepared. The 2003 SEIR comprehensively analyzed potential impacts relating to the creation of a large mixed-use, master plan community; thus, the focus of this SEIR will be to analyze the potential environmental impacts that may result from the proposed changes to the Phase 2 land use plan and densification of residential uses that were not addressed by the previously prepared 2003 SEIR and in the subsequent addenda (in 2012 and 2018).

As required by CEQA, the SEIR will describe existing conditions and evaluate the potential environmental effects of the project and a reasonable range of alternatives, including the no-project alternative. It will also address direct, indirect, and cumulative effects. The SEIR will identify feasible mitigation measures, if available, to reduce potentially significant impacts. The SEIR will also discuss potential growth-inducing impacts and summarize significant and unavoidable environmental effects. The City has determined that the SEIR will evaluate the following environmental impact areas:

Land Use Consistency and Compatibility. The SEIR will include a discussion of the project relative to the City of Lathrop General Plan's designations for the site, goals, and policies, as well as the WLSP and the San Joaquin Council of Governments' (SJCOC) Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). The discussion will address the consistency of the project with adopted plans and policies and compatibility with adjacent land uses. Because a General Plan amendment and an amendment to the WLSP are proposed as part of the project, consistency with these plans will assume adoption of the proposed changes. The analysis will acknowledge that Lathrop is currently in the process of updating its general plan; therefore, evaluation will be of the project's consistency with the existing general plan adopted in December 1991 and amended in November 2004. The SEIR will identify increases in residential units and densities and will evaluate their corresponding effects on other environmental impact areas.

Population, Employment, and Housing. The SEIR will discuss the population, housing, and employment assumptions used in the 2003 SEIR and compare the Phase 2 Project against the baseline of the 2003 baseline conditions and against existing conditions. This section will include a discussion of the jobs-housing balance for the approved project and the Phase 2 Project, as well as consistency with adopted housing policies (e.g., the December 2019 General Plan housing element update).

Traffic and Transportation. The SEIR will include an updated traffic impact study that evaluates project-specific and cumulative impacts and appropriate mitigation measures, including potential impacts from construction traffic (including traffic safety associated with use of residential streets), and project-generated traffic, as well as impacts from the proposed new roadway network. In addition, the SEIR will include a discussion of potential bicycle, pedestrian, and transit-related impacts and consistency with the City's Master Bicycle Plan. Transportation impacts will be evaluated based on vehicles miles traveled (VMT) thresholds required pursuant to Senate Bill (SB) 743.

Air Quality. The SEIR will evaluate the potential construction and operational emissions of the project, including a qualitative evaluation of project-generated operational-related emissions of carbon monoxide. The analysis will be conducted in accordance with San Joaquin Valley Air Pollution Control District (SJVAPCD) recommended methodologies and thresholds. Because the project does not involve industrial uses or other stationary sources that could generate substantial toxic air contaminants (TACs), potential stationary sources will be qualitatively discussed in relation to adopted SJVAPCD rules and regulations. Increases in criteria air pollutants, precursors, and exposure to TACs and odors will be compared to applicable thresholds.

Geology, Soils, and Mineral Resources. The EIR will evaluate the potential for significant impacts related to seismic events and soil stability. The potential for the project to limit access to important mineral resources will also be considered.

Noise. The SEIR will evaluate the potential increases in ambient noise levels on and near the project site as a result of project implementation. The SEIR will analyze potential short-term construction source and long-term operational source (e.g., trip generation) impacts. While construction noise is generally described as “short-term,” the discussion will acknowledge the potential for extended noise effects from a drawn-out construction project. For project-related changes in traffic volumes, noise increases (or decreases) at existing noise-sensitive receptors and potential land use compatibilities at proposed noise-sensitive receptors will be determined (to the extent the project itself exacerbates these noise levels) based on the results of the traffic analysis. Vibration levels during construction will be estimated to determine potential effects on nearby structures.

Hydrology and Water Quality. The SEIR will evaluate potential flooding impacts associated with development at the project site to reflect current conditions, including the improved levee system recently completed by Reclamation District (RD) 2062. The SEIR will summarize the analysis and conclusions of the 2003 SEIR and General Plan EIR as they pertain to the project site. The SEIR will provide analysis for compliance with the Central Valley Flood Protection Act of 2007, enacted by SB 5, as amended that requires that jurisdictions located in the Sacramento-San Joaquin Valley incorporate plans for the attainment of a 200-year Urban Level of Flood Protection.

Hazardous Materials and Public Health. The SEIR will address the potential for project-related construction and operations to create a significant hazard to the public or the environment through use of hazardous materials or cause reasonably foreseeable upset and accident conditions involving the release of hazardous materials.

Public Services. The SEIR will discuss the project’s anticipated demand and analyze the capacity of emergency services (police and fire), school services, library facilities and other public services. The SEIR will also describe the potential for implementation of the project to result in increased demands for public services such that new or expanded facilities might be constructed or that proposed facilities would result in significant impacts to the environment.

Public Utilities. The anticipated demand for water, wastewater and recycled water, stormwater conveyance, electricity, and natural gas under the project will be compared with the discussion from the 2003 SEIR. Based on the land uses proposed for the previously approved project, utility demand is expected to increase because of the denser residential development pattern. A water supply assessment will be prepared (SB 610/SB 221); because of the complexities surrounding water supply and the potential sources, the water supply analysis will evaluate potential for reduced groundwater water supply and the implications to the project, including the increased demand for potable water due to the increase in overall residential development.

Recreation. The SEIR will determine the required parkland acreage based on the proposed Phase 2 project and evaluate whether the project includes sufficient parkland of various categories to meet these requirements.

Agricultural Resources. There are no longer any Williamson Act Contracts in effect in the Phase 2 area. The SEIR will summarize the analysis and conclusions from the 2003 SEIR and determine if the proposed project alters any impacts or conclusions.

Terrestrial Biology. The SEIR will include a review of existing biological surveys prepared for River Islands project since the 2003 SEIR, including previously conducted studies for the River Islands environmental impact statement (EIS). The SEIR will describe the potential for any special-status plant, animal, or habitat to occur, including riparian habitat and elderberry shrubs, on the project site, as well as the project's potential to adversely affect any identified biological resources. The SEIR will rely on the San Joaquin County Habitat Conservation Plan (SJMSCP) to mitigate for wildlife and habitat impacts.

Fisheries. The SEIR will summarize the analysis and conclusions from the 2003 SEIR and provide an update regarding permitting and other activities that have occurred since certification of the 2003 SEIR.

Cultural and Tribal Cultural Resources. The SEIR will describe the cultural and tribal cultural resources that are known or have the potential to occur on the project site based largely on the previous environmental analysis. Background research will include an updated record search from the California Historical Resources Information System, as well as new searches of the Native American Heritage Commission's Sacred Lands database. The SEIR will also document the results of required consultation and any agreements on mitigation measures for tribal cultural resources. The SEIR will summarize the results of these studies and provide appropriate measures for the protection of known and/or undiscovered resources, including steps to be taken in the event of an unanticipated discovery during construction.

Aesthetics. The SEIR will evaluate whether the proposed land use changes could result in any new or substantially more significant effects related to aesthetics compared to the analysis in the 2003 SEIR. Issues to be examined include whether there would be changes in maximum building heights and whether that would change the significance determinations from the 2003 SEIR.

Energy. Since certification of the 2003 SEIR, the CEQA Guidelines Appendix G checklist has been revised to include an energy section. Based on the checklist and the guidance included in CEQA Guidelines Appendix F regarding energy conservation, the SEIR will include an analysis of the anticipated energy demands of the project and determine whether the project would result in the wasteful or inefficient use of energy.

Greenhouse Gas. The 2003 SEIR did not include an analysis of the project's greenhouse gas (GHG) emissions as it was not yet required for CEQA analyses and no comments on the 2003 SEIR suggested that GHG emissions be addressed. This SEIR will calculate the anticipated emissions from the approved project and the proposed project to determine whether the proposed project would result in a significant increase in emissions as compared with the approved project. The GHG analysis for the project will consider changed circumstances associated with the adoption of SB 32, current City efforts related to climate change, and the California Air Resources Board's 2017 Climate Change Scoping Plan Update.

Wildfire. The SEIR will evaluate the project's potential effects related to wildfire using the questions included in the recently updated CEQA Guidelines Appendix G checklist.

ALTERNATIVES TO BE EVALUATED IN THE SUBSEQUENT EIR

The SEIR will include an evaluation of a reasonable range of potentially feasible alternatives to the project, as well as a No Project Alternative. Consistent with CEQA requirements, alternatives evaluated in the SEIR will be based on their potential to reduce the significant environmental impacts of the project. The SEIR will also identify any alternatives that were considered but rejected by the City as infeasible and briefly explain the reasons why.