

Proposed Negative Declaration and Initial Study
Los Banos Police Station

October 3, 2018



Prepared by
EMC Planning Group



City of
Los Banos
At the Crossroads of California

NOTICE OF INTENT

**to adopt a Negative Declaration for the
Los Banos Police Station**

NOTICE IS HEREBY GIVEN THAT the City of Los Banos as Lead Agency has prepared a proposed Negative Declaration for the Project identified below. A copy of this document, which includes an initial study, is available for review at City Hall, 520 "J" Street, Los Banos and Los Banos Branch of the Merced County Public Library, 1312 7th Street, Los Banos. You may also obtain a copy of the document by contacting the Los Banos Community and Economic Development Department at (209) 827-7000 ext 118. Because of time limits mandated by State law, your response must be sent at the earliest possible date but no later than thirty (30) days from the October 5, 2018 posting date of this notice.

Please submit your response to Stacy Souza Elms, Los Banos Community and Economic Development Department, 520 J Street, Los Banos, CA 93635 by November 5, 2018 at 5:00 pm.

Project Title: Loss Banos Police Station

Project Sponsor: City of Los Banos Police Department

Project Location: The project site is located at 1111 G Street in Los Banos, California and is immediately west of the new County Courthouse.

Project Description: The Police Department proposes to consolidate operations within a new 35,000 square-foot building at 1111 G Street in Los Banos. The site is about 3.6 acres, and was formerly developed with a warehouse; the concrete footings from that warehouse remain. The site is adjacent to the Los Banos Rail Trail, formerly the Union Pacific Railroad (UPRR) Company Right-of-Way Corridor. Development would include offices, new jail cells, parking, and would house animal control and logistical facilities such as communications.

Stacy Souza Elms, Director

DATED:
PUBLISHED: October 5, 2018

PROPOSED NEGATIVE DECLARATION

LOS BANOS POLICE STATION

PREPARED FOR

City of Los Banos

Stacy Souza Elms, Director

520 J Street

Los Banos, CA 93635

Tel 209.827.7000

PREPARED BY

EMC Planning Group Inc.

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October 3, 2018

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City of
Los Banos
At the Crossroads of California

**PROPOSED
NEGATIVE DECLARATION**

Los Banos Police Station

**In compliance with the
California Environmental Quality Act (CEQA)**

Lead Agency:	City of Los Banos
Project Proponent:	City of Los Banos Police Department
Project Location:	The project site is located at 1111 G Street in the City of Los Banos, Merced County.
Project Description:	The Police Department proposes to consolidate operations within a new 35,000 square-foot building located at 1111 G Street, Los Banos. Development would include offices, new jail cells, parking, and would house animal control and logistical facilities such as communications.
Public Review Period:	Begins – October 5, 2018 Ends – November 5, 2018

Address Where Stacy Souza Elms, Director
Written Comments Community & Economic Development Department
May be Sent: City of Los Banos
520 J. Street, Los Banos, CA 93635
(209) 827-7000 (phone)
(209) 827-7006 (fax)

Proposed Finding: An initial study of this project was undertaken and prepared for the purpose of ascertaining whether this project might have a significant effect on the environment. A copy of this study is attached. The initial study did not identify potentially significant effects on the environment. On the basis of the whole record, there is no substantial evidence the project will have a significant effect on the environment. The following reasons will support these findings:

- The proposal is a logical component of the existing land use of this area.
- The proposed project is consistent with the adopted goals and policies of the General Plan of the City of Los Banos.
- City staff independently reviewed the initial study, and this Negative Declaration reflects the independent judgment of the City of Los Banos.
- The proposed project will not have any significant impacts on the environment.
- The Los Banos Community and Economic Development Department is the custodian of the documents and other material that constitute the record of proceedings upon which this decision is based.

INITIAL STUDY

LOS BANOS POLICE STATION

PREPARED FOR

City of Los Banos

Stacy Souza Elms, Director

520 J Street

Los Banos, CA 93635

Tel 209.827.7000

PREPARED BY

EMC Planning Group Inc.

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A. BACKGROUND

Project Title	Los Banos Police Station
Lead Agency Contact Person and Phone Number	City of Los Banos Community Development Department Stacy Souza Elms, Director 209-827-7000
Date Prepared	October 3, 2018
Study Prepared by	EMC Planning Group Inc. 301 Lighthouse Avenue, Suite C Monterey, CA 93940 Rachel Hawkins, J.D., Associate Planner Tanya Kalaskar, MS, Assistant Planner Sally Rideout, EMPA, Principal Planner Richard James, MUP, AICP, Principal Teri Wissler Adam, Senior Principal
Project Location	1111 G Street, Los Banos CA
Project Sponsor Name and Address	City of Los Banos Police Department 520 J Street Los Banos , CA 93635
General Plan Designation	Mixed Use
Zoning	Railroad Corridor

Setting

The City of Los Banos Police Department currently consists of two buildings located in downtown Los Banos. The main Police Department building at the corner of J Street and 5th Street was built in 1969 and the Police Department annex on J Street across from City Hall was built in 1999. Together the two buildings provide 28,600 square feet of office area. Total site area is about 1.25 acres. Police vehicles that are not in use are parked behind the main police department building. The Police Department is staffed with 40 police officers and 26 non-sworn staff; the Police Department also has a robust group of citizen volunteers. The Police Department serves about 40,000 residents in an area of about 10 square miles. Six patrol teams cover three shifts. The Police Department responded to 35,500 calls for service in 2017, including 19,000 emergency calls. The Police Department maintains a Type-1 jail facility that can house twenty inmates. Other services provided by the Police Department include communications, code enforcement, animal control, community outreach, and

participation in the Police Athletic League. The city's population has grown from about 26,000 in 2000, to about 36,000 in 2010 to its current level of about 40,000 residents. The Police Department has outgrown the existing facilities and desires to consolidate operations adjacent to the new County Courthouse.

Project Location

The project site for the new Police Department is located at 1111 G Street, immediately west of the new County Courthouse. The site is about 3.6 acres, and was formerly developed with a warehouse; the concrete footings from that warehouse remain. The site is adjacent to the Los Banos Rail Trail, formerly the Union Pacific Railroad (UPRR) Company Right-of-Way Corridor. [Figure 1, Location Map](#) shows the general location of the project site in relation to the city limits of Los Banos. [Figure 2, Aerial Photograph](#), shows the approximate boundaries of the project site on an aerial photograph.

Description of Project

The Police Department proposes to consolidate operations within a new 35,000 square-foot building with 41 sworn employees and 29 non-sworn employees. Development would include offices, new jail cells, parking, and would house animal control and logistical facilities such as communications. Access would be from G Street. A site plan has not yet been prepared.

The facilities currently housing Police Department operations will be reused, although no use has been identified at this time.

Methodology

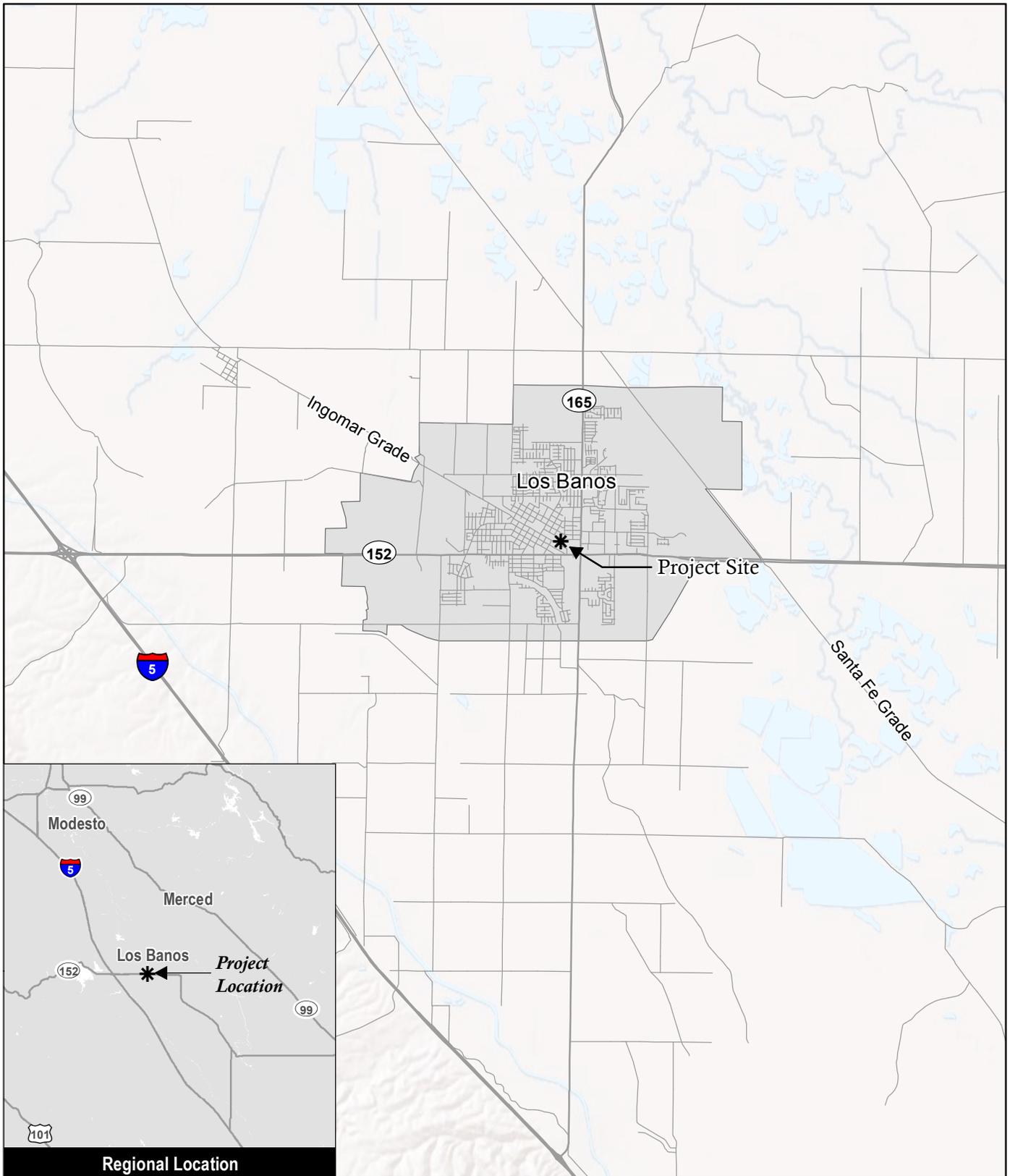
The project would likely qualify for a Class 32 Infill Exemption from further review under CEQA. The project appears to meet all Class 32 requirements and not be subject to any exceptions to this exemption. However, in order to provide additional opportunities for public comment, this initial study was prepared, and the City of Los Banos intends to prepare and circulated a negative declaration for public review and comment.

Other Public Agencies Whose Approval is Required

None.

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

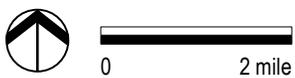
None have requested consultation.



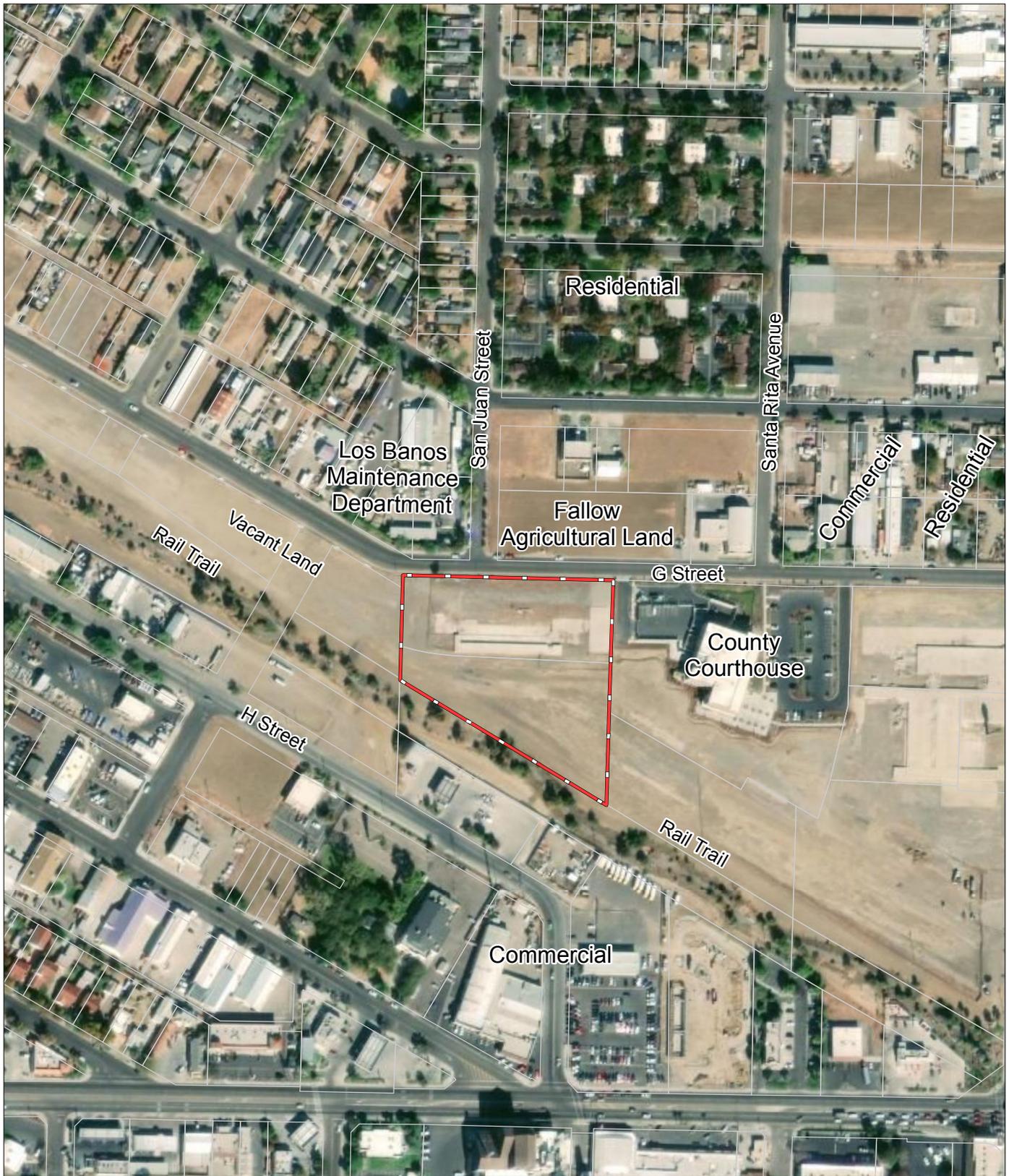
Source: ESRI 2018

Figure 1
Location Map

Los Banos Police Station Initial Study



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Source: ESRI 2018, City of Los Banos 2015

Figure 2

Aerial Photograph



Los Banos Police Station Initial Study

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Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission’s Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

B. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- | | | |
|---|--|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Population/Housing |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Noise | <input type="checkbox"/> Utilities/Service Systems |
| <input type="checkbox"/> Mandatory Findings of Significance | | |

C. DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (2) 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.

Stacy Souza Elms,
Community & Economic Development Director

Date

D. EVALUATION OF ENVIRONMENTAL IMPACTS

Notes

1. A brief explanation is provided for all answers except “No Impact” answers that are adequately supported by the information sources cited 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 is 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 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 it has been determined that a particular physical impact may occur, then the checklist answers 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 Impact with Mitigation Measures Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less-Than-Significant Impact.” The mitigation measures are described, along with a brief explanation of how they reduce the effect to a less-than-significant level (mitigation measures from section XVII, “Earlier Analyses,” may be cross-referenced).
5. Earlier analyses are used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier document or negative declaration. [Section 15063(c)(3)(D)] In this case, a brief discussion would identify the following:
 - a. “Earlier Analysis Used” identifies and states where such document is available for review.
 - b. “Impact Adequately Addressed” identifies which effects from the checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and states whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. “Mitigation Measures” —For effects that are “Less-Than-Significant Impact with Mitigation Measures Incorporated,” mitigation measures are described which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances, etc.) are incorporated. Each reference to a previously prepared or outside document, where appropriate, includes a reference to the page or pages where the statement is substantiated.
7. "Supporting Information Sources" — A source list is attached, and other sources used or individuals contacted are cited in the discussion.
8. The explanation of each issue identifies:
 - 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 significant.

1. AESTHETICS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista? (1, 2, 5, 18)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway? (1, 2, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings? (1, 2, 5, 17, 18)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area? (1, 2, 5, 18)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

- a. **Scenic Vistas.** Scenic vistas in Los Banos include views of peripheral agricultural lands, grasslands, and wetlands as seen from public viewing areas. The project site was previously developed, is located within an infill area, and is surrounded by urban development such that development would not obstruct views from public viewing areas of agricultural lands, grasslands, or wetlands.
- b. **State Scenic Highway.** No scenic highways exist within or near Los Banos.
- c. **Visual Character.** The *City of Los Banos 2030 General Plan Environmental Impact Report* (general plan EIR) determined that visual degradation could occur due to implementation of the general plan due to redevelopment or new development proposed on vacant sites within Los Banos. However, the general plan EIR determined that the *City of Los Banos 2030 General Plan* (general plan) policies and programs would minimize negative aesthetic impacts. Policy LU-I-22 would require that the scale, operation, location, and other characteristics of community facilities enhance the character and quality of neighborhoods so that there would not be long term visual impacts. In addition to general plan policies, the project development would be required to adhere to the detailed *Los Banos Rail Trail Corridor Regulating*

Code. Because the site is vacant, devoid of landscaping, and contains old concrete footings, development of the new police station on the site could actually enhance the visual character of the site.

Additionally, the general plan EIR identified short term visual impacts resulting from development include blockage or disrupting of views by construction equipment and scaffolding, removal of vegetation, temporary route changes for transportation improvements, exposed excavation, and construction staging areas.

Short term impacts are less than significant because they are temporary in nature and tend to only affect a localized area at any one time. In addition, there are policies in the general plan that would ensure that construction-related adverse impacts on visual resources are minimized.

- d. **Light and Glare.** The project would include lighting for the parking lot and police vehicle storage area. While the proposed project would contribute some new light or glare to the immediate vicinity, the project consists of redevelopment of an infill location surrounded by other development. The project's contribution to the light and glare in the area would therefore be insignificant.

2. AGRICULTURE AND FOREST RESOURCES

In determining whether impacts on agricultural resources are significant environmental effects and in assessing impacts on agriculture and farmland, 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 with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use? (1, 2, 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract? (3, 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))? (1, 2, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use? (1, 2, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use? (1, 2, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. **Convert Important Farmland.** According to the California Department of Conservation's Merced County 2016 Important Farmland Map, the project site is identified as Urban and Built-Up Land and does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the proposed project would not result in the conversion of important farmland.

- b-e. **Conflict with Williamson, Zoning, or Agricultural or Forestry Production.** There are no Williamson Act conservation easements on the project site and the project site is not zoned for agricultural, forestland, or timberland uses. Therefore, the proposed project would not result in the conversion, loss of, or conflict with any agricultural or forestry timberland production or forest land uses.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan? (22,23)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation? (18,22,23)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)? (22,23)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations? (5, 18, 22)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people? (18)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

- a. **Conflict with Air Quality Plan.** Los Banos is located in the San Joaquin Valley Air Basin (“air basin”), which is under the jurisdiction of the San Joaquin Valley Air Pollution Control District (“air district”). The air district is responsible for monitoring air pollution levels and ensuring compliance with federal and state air quality regulation within the air basin. The air basin is in “severe” nonattainment for the state 1-hour ozone standards and in nonattainment for the state 8-hour ozone, PM₁₀, and PM_{2.5} standards. The air basin is in “extreme” nonattainment for the federal 8-hour ozone standards and in nonattainment for the federal PM_{2.5} standards. The air district has attainment plans in place for nonattainment criteria pollutants that identify strategies to bring regional emissions into compliance with federal and state air quality standards.

In order to evaluate ozone and other criteria air pollutant emissions and support attainment goals for those pollutants designated as nonattainment in the area, the air district has established significance thresholds associated with development projects for emissions of reactive organic gases (ROG), nitrogen oxide (NO_x), and particulate matter (PM₁₀ and PM_{2.5}). Therefore, projects with emissions below the thresholds of significance criteria would be deemed to not conflict with or obstruct implementation of the air district's air quality plan.

The proposed project does not exceed the thresholds of significance criteria (see "b" below) and therefore, would not conflict with or obstruct implementation of applicable air quality plans.

- b. **Violate Air Quality Standards.** As discussed in "a" above, the air basin is in nonattainment for the state 1-hour ozone, 8-hour ozone, PM₁₀, and PM_{2.5} standards and for the federal 8-hour ozone and PM_{2.5} standards.

Additionally, the air district has adopted regulations establishing control over air pollutant emissions associated with land development and related activities. Applicable air district rules and regulations include:

- Air District Rule 9510 (Indirect Source Review) is intended to mitigate a project's impact on air quality through project design elements or by payment of applicable off-site mitigation fees. Any applicant subject to District Rule 9510 is required to submit an Air Impact Assessment (AIA) application to the air district no later than applying for final discretionary approval, and to pay any applicable off-site mitigation fees.
- Air District Regulation VIII (Fugitive PM₁₀ Prohibitions) requires the project proponent to submit a Construction Notification Form or submit and receive approval of a Dust Control Plan, if applicable prior to commencing any earthmoving activities as described in District Rule 8021 – Construction Demolition, Excavation, Extraction, and Other Earthmoving Activities.

Table 2 of the air district's *Guidance for Assessing and Mitigating Air Quality Impacts* establishes thresholds for criteria pollutants for determining whether a project would have a significant air quality impact. The proposed project would generate criteria air pollutants during construction and operation.

Construction Emissions. Construction emissions associated with the proposed project include mobile source exhaust emissions, emissions generated during the application of asphalt paving material and architectural coatings, as well as emissions of fugitive dust associated with earthmoving equipment. The proposed project's

construction emissions were estimated using California Emissions Estimator Model (CalEEMod) and reviewed against the air district thresholds. The results are summarized in [Table 1, Unmitigated Construction Criteria Pollutant Emissions](#). Detailed emissions modeling results are presented in [Appendix A](#).

Table 1 Unmitigated Construction Criteria Pollutant Emissions

Emissions	ROG	NO _x	PM ₁₀	PM _{2.5}	CO
Project	0.51	1.99	0.15	0.11	1.66
Air District Thresholds	10	10	15	15	100

SOURCE: EMC Planning Group 2018, San Joaquin Valley Air Pollution Control District 2015

As shown in Table 1 above, the proposed project would not exceed the applicable air district thresholds during project construction.

Operational Emissions. The development of the proposed project would result in operational emissions, including smog-forming and particulate emissions. The proposed project’s operational emissions were estimated using California Emissions Estimator Model (CalEEMod) and reviewed against the air district thresholds. The results are summarized in [Table 2, Unmitigated Operational Criteria Pollutant Emissions](#). Detailed emissions modeling results are presented in [Appendix A](#).

Table 2 Unmitigated Operational Criteria Pollutant Emissions

Emissions	ROG	NO _x	PM ₁₀	PM _{2.5}	CO
Project	0.20	0.37	0.07	0.02	0.31
Air District Thresholds	10	10	15	15	100

SOURCE: EMC Planning Group 2018, San Joaquin Valley Air Pollution Control District 2015

As shown in Table 2 above, the proposed project would not exceed the applicable air district thresholds during operation.

From Tables 1 and 2, the proposed project would generate criteria air pollutants that could contribute to the violation of air quality standards. However, criteria air pollutant emissions associated with construction and operation of the proposed project would not exceed the air district thresholds, resulting in a less than significant impact on violation of air quality standards.

- c. **Cumulative Increase of Criteria Pollutant.** The air district’s application of thresholds of significance for criteria pollutants is relevant to the determination of whether a project’s individual emissions would have a cumulatively significant impact on air quality. Pursuant to the air district’s guidance, if project specific emissions would be

less than the thresholds of significance for criteria pollutants, the project would not be expected to result in a cumulatively considerable net increase of any criteria pollutant for which the air district is in non-attainment.

The proposed project does not exceed the air district's thresholds for criteria air pollutants (see "b" above). Therefore, the proposed project would result in a less-than-significant cumulatively considerable impacts.

- d. **Sensitive Receptors.** According to the air district's CEQA guidelines, a sensitive receptor is generally defined as a place where human populations, especially children, seniors, and sick persons are located. These typically include residences, hospitals, and schools.

Operation of the proposed project is not expected to cause any localized emissions that could expose sensitive receptors to unhealthy air pollutant levels, because no significant operational sources of pollutants are proposed onsite. Construction activities would result in localized emissions of dust and diesel exhaust that could result in temporary impacts to adjacent sensitive receptors. The project site is located approximately 550 feet from the homes to the north and approximately 1,000 feet from the homes to the west. Emissions generated during construction activities are short term because they would be limited to the periods of site development and construction. Project construction would be subject to air district rules related to control of construction emissions, including the various rules comprising Regulation VIII. The application of these rules to the project would further limit the potential air quality effects of the project. Therefore, emissions during construction would result in a less-than-significant impact on sensitive receptors.

- e. **Odors.** The proposed police station is not anticipated to produce any objectionable odors during its operation. Construction activities associated with the proposed project, such as paving and painting, may temporarily generate objectionable odors. Since odor-generating construction activities would be temporary, this impact is anticipated to be less than significant.

4. BIOLOGICAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service? (1, 2, 5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 US Fish and Wildlife Service? (1, 2, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands, as defined by section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.), through direct removal, filling, hydrological interruption, or other means? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (1, 2, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a-d. **Special Status Species and Habitat, Sensitive Natural Communities, Wetlands and Waterways, Wildlife Movement.** The project site is identified by the general plan as “Urban” on Figure 5-3 Special Status Species and Habitat, based on the California Natural Diversity Database. The project site was previously developed and consists of dirt and concrete footings from a warehouse that was demolished. The property is devoid of sensitive habitat and the project would not have an 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, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service. There is no riparian habitat, federally protected wetlands, or other sensitive natural community within the project site vicinity and the project would not interfere with wildlife movement.

- e. **Local Policies/Ordinances.** The city’s tree ordinance regulates street tree easements, trees within the public right-of-way, and trees granted the Heritage tree status. Trees are given heritage status based on history, girth, height, species or unique quality. The few trees that are on the project site appear to be young non-native ornamental trees that would unlikely qualify as heritage trees. Therefore, removal of any of the trees in the developed portion of the project site, if any, would not result in impacts. The proposed project will not conflict with the city’s general plan policies or local ordinances protecting biological resources.

- f. **Habitat Conservation Plans.** No adopted Habitat Conservation Plan includes the project area. Therefore, the proposed project will not conflict with any adopted habitat conservation plan.

5. CULTURAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource as defined in section 15064.5? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of dedicated cemeteries? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

- a. **Historic Resources.** According to the general plan, the project site does not contain any designated historical resources and is not within the vicinity of any historical resources. The project site is vacant and thus no demolition of structures would occur. There are existing concrete footings from a warehouse that was previously demolished that will be removed. Even if the prior building had been historic at the time of its demolition, the foundations would not be considered historic because the building has been altered to the extent that it could no longer retain any historic value. The proposed project would have no effect on historic resources.
- b-d. **Archaeological and Paleontological Resources and Human Remains.** According to the general plan, archival research indicates that most prehistoric settlement in the area was focused along Los Banos Creek, and therefore, this is the area in which archaeological resources are expected to occur. The project site is not located within the Los Banos Creek Archaeological District. There remains the possibility for unknown significant archaeological resources, paleontological resources, or human remains to be discovered on the project site during ground disturbing activities such as grading, trenching, or staging areas. A substantial adverse change to these resources would be a significant impact. General plan policy POSR-G-12 would require that in the event of a discovery, appropriate avoidance or protection measures are implemented, or where preservation is infeasible or unnecessary, such resources are appropriately documented. This would ensure that impacts would be less than significant.

6. GEOLOGY AND SOILS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Expose people or structures to 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? (1, 2, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(2) Strong seismic ground shaking? (1, 2, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(3) Seismic-related ground failure, including liquefaction? (1, 2, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(4) Landslides? (1, 2, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil? (1, 2, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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? (1, 2, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, creating substantial risks to life or property? (1, 2, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? (1, 2, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

a. **(1) Fault Rupture.** Los Banos is not located within a delineated Alquist-Priolo Earthquake Fault Zone. Although a larger earthquake is likely to occur in the region, no surface rupture is likely because there are no active or potentially active faults traversing Los Banos.

(2) Seismic Ground Shaking. Strong seismic ground shaking is expected at the site during a large seismic event. However construction is required to comply with current seismic development standards in the building code, which would minimize the potential for severe damage and loss of life.

(3) Liquefaction. No specific liquefaction hazard areas have been identified in Los Banos. However, there is still the potential for liquefaction on the project site. Compliance with general plan policies and seismic development requirements in the building code would minimize the potential for impacts.

(4) Landslide. Los Banos is relatively flat and slope failure and earthquake induced landslides are considered a very low risk. The project site is entirely level. Therefore, there is no risk of landslides at the project site.

b. **Erosion.** According to general plan Figure 3.6-2, Erosion Hazards, the project site is located in a very high erosion hazard area. Implementation of the following proposed general plan policies would help to reduce this impact to a level that is less than significant:

S-I-6 Control erosion of graded areas with revegetation or other acceptable methods. Plant materials for revegetation should not be limited to hydro seeding and mulching with annual grasses. Trees add structure to the soil and take up moisture while adding color and diversity. Other acceptable methods to reduce erosion from grading may include construction techniques that utilize site preparation best management practices that provide erosion and sediment control to prevent construction-related contaminants from leaving development sites and polluting local waterways.

Implementation of general plan policies would minimize on-site erosion risks to a less-than-significant level.

c, d. **Unstable or Expansive Soils.** Soils with moderate to high shrink-swell potential do exist within the Los Banos area. Expansive soils require particular engineering design, site preparation, and construction practices in order to prevent structure damage from soil movement associated with moisture level changes. When these

practices are employed on a project by project basis the potential for structural damage is minimal. The following general plan policies minimize the potential for impacts:

S-I-1 Review proposed development sites at the earliest stage of the planning process to locate any potential geologic or seismic hazard.

S-I-2 Facilitate greater safety provisions for important or critical-use structures (such as hospitals, schools, fire, police, and public assembly facilities; substations and utilities) through input during site selection and a comprehensive geotechnical investigation.

S-I-4 Require utilities be designed to withstand probable seismic forces to be encountered in Los Banos.

S-I-5 Require preparation of a soils report as part of the development review and/or building permit process.

Implementation of general plan policies would reduce potential to a level that is less than significant.

- e. **Septic Tanks.** The proposed project would connect to the city's wastewater collection and treatment system. There is no impact associated with septic tanks or alternative wastewater disposal systems.

7. GREENHOUSE GAS EMISSIONS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (18,23,24)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (1,2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. **GHG Emissions.** AB 32, the California Global Warming Solutions Act of 2006, was amended by SB 32, which was signed in September 2016. SB 32 requires that the California Air Resources Board reach the goal that statewide greenhouse gas (GHG) emissions are reduced to 40 percent below the 1990 level by the end of the year 2030. The California Air Resources Board, along with other state agencies, is also in the process of preparing an updated Climate Change Scoping Plan.

The proposed project is located within the San Joaquin Valley Air Pollution Control District (“air district”). Although the air district adopted a guidance document in 2009 for assessing and reducing greenhouse gas emissions impacts from development projects, the results of a California Supreme court case in 2015 on a project in southern California suggests another approach would be more adequate. In light of the recent court case, guidance provided by the Bay Area Air Quality Management District (BAAQMD) is used as reference. According to BAAQMD’s 2017 CEQA guidelines, the threshold of significance for land use development projects is annual operational emissions less than 1,100 metric tons (MT) of CO₂e per year. If annual emissions of operational-related GHGs exceed 1,100 MT of CO₂e per year, the proposed project would result in a cumulatively considerable contribution of GHG emissions and a cumulatively significant impact to global climate change. BAAQMD does have an adopted threshold of significance for construction-related GHG emissions.

The proposed project would result in greenhouse gas emissions during its construction and operational phases. Construction emissions would be generated by equipment used during the site preparation and building construction processes.

Operational emissions would be generated primarily by vehicle trips of police officers and public accessing the site, and indirectly by use of electricity, natural gas, and water, the generation of wastewater, and disposal of solid waste.

The proposed project’s GHG emissions were estimated using California Emissions Estimator Model (CalEEMod). The total unmitigated annual GHG emissions that would be attributable to the proposed project consist of the sum of amortized construction emissions and unmitigated operational emissions. The results are summarized in [Table 3, Summary of Unmitigated GHG Emissions Attributable to the Project](#). Detailed emissions modeling results are presented in [Appendix A](#).

Table 3 Summary of Unmitigated GHG Emissions Attributable to the Project

Amortized Construction	Annual Operations	Annual Project Emissions
8.85	220.01	228.86

SOURCE: EMC Planning Group 2018
 NOTES:
 1. Results may vary due to rounding.
 2. MT of CO₂e per year.

As shown in Table 3, the proposed project is not expected to exceed the threshold of 1,100 MT of CO₂e per year. The proposed police station would not be expected to make a substantial contribution of GHG emissions and therefore, the impact would be less than significant.

- b. **Conflict with Applicable Plan.** Neither the city nor the air district has adopted a qualified climate action plan. The City of Los Banos enforces the provisions of the Green Building Standards Code and Title 24, Energy Code. The proposed project would be required to meet requirements of the Green Building Standards Code and the Title 24, Energy Code. Therefore, the project would not conflict with implementation of an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

8. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (18)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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? (8, 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, create a significant hazard to the public or the environment? (10, 11)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or a public-use airport, result in a safety hazard for people residing or working in the project area? (1, 2, 5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area? (1, 2, 5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. **Transport, Use, or Disposal of Hazardous Materials.** Development of the site may involve the use and transport of hazardous materials during project construction. These materials may include fuels, oils, mechanical fluids, and other chemicals typically used during construction. Transportation, storage, use and disposal of hazardous materials during construction activities would be required to comply with applicable federal, state, and local statutes and regulations. All construction activities on sites larger than one acre are subject to the National Pollutant Discharge Elimination System (NPDES) permit process that requires the preparation of a storm water pollution prevention plan (SWPPP), which would be reviewed and approved by the Regional Water Quality Control Board.

A police station would not routinely transport, use, or dispose of hazardous materials during operations, with the exception of common residential-grade hazardous materials such as household cleaners, paint, etc. Enforcement of hazardous material regulations and rapid response by local agencies would ensure the project's household hazardous materials transportation, use, and disposal impacts and ensure that the risk of potential hazard to the public and the environment are less than significant.

- b. **Release of Hazardous Materials.** Soil samples were collected by Brusca Associates, Inc. on August 31, 2015 and by Ardent Environmental Group, Inc. on March 14, 2017. A report of Results of Additional Soil Sampling was published on May 2, 2018 by Ardent Environmental Group, Inc. that includes the findings of the 2015 report. Initial sampling indicated that the site had surface arsenic concentrations up to 54 mg/kg. Additional sampling reported similar surface concentrations and concentrations at two-foot depth less than 7 mg/kg of arsenic. Soluble Threshold Limit Concentration (STLC) testing was conducted on samples from the only location found to have total arsenic concentrations over 50 mg/kg. The STLC result was below the regulatory arsenic STLC of 5 milligrams per liter (mg/L) indicating that the arsenic would not be considered soluble above regulatory limits. An Arsenic Affected Soil Remediation Work Plan (work plan) dated May 18, 2018 was prepared by Provost & Pritchard Consulting to be implemented during excavation and offsite disposal of soils with elevated (above site specific background) arsenic concentrations. Previous investigations have been performed at the site, which characterized soil conditions and revealed areas of elevated arsenic concentrations. The elevated concentrations were documented in the surface soils, likely originating from historic railroad use of arsenic-based herbicides. Provost & Pritchard submitted a work plan dated October 18, 2017 for the Los Banos Rail Trail which is adjacent to the site. In that work plan, a cleanup goal of 28.2 milligrams per kilogram (mg/kg) of

arsenic was selected and approved by the Regional Water Quality Control Board. Statistical comparison indicated that there is not a statistically significant difference between the datasets of the Rail Trail and 1111 G Street sites. This data supports the use of the 28.2 mg/kg value for G Street cleanup goal. The affected soil will be excavated and removed from the site and disposed at an off-site landfill permitted to accept such soil. The work plan specifies procedures for removing the soils with arsenic concentrations that exceed the site-specific cleanup goal of 28.2 mg/kg including dust control and storm water Best Management Practices to ensure that impacts will be less than significant.

- c. **Hazardous Emissions, Materials, Substances, or Waste within One-Quarter Mile of a School.** The closest school to the project site is Los Banos Elementary school, which is approximately 2,195 feet (0.42 miles) from the site. This school is not within a quarter mile of the project site; therefore, there would be not be significant hazardous emissions, materials, substances, or waste impacts within one-quarter mile of a school.
- d. **Hazardous Site.** According to Envirostor there are no cleanup sites within 1,000 feet of the project site. However, Geotracker identified six cleanup sites within 1,000 feet of the project site. All sites have undergone cleanup and are closed cases aside from one site identified as cleaning ongoing where arsenic was identified in the soil. These impacts are discussed in section b above.
- e, f. **Airport Land Use Plan.** The project site is 1.7 miles from the Los Banos Municipal Airport. According to the Merced County Airport Land Use Compatibility Plan Compatibility Factors Map for Los Banos Municipal Airport, the project site is located outside of the Airport Influence Area. Therefore, air traffic does not pose a safety hazard for those who would be working on site, and the proposed project does not present a hazard to aircraft operations.
- g. **Emergency Response Plan.** The site is adequate for the operation of general police operations and would not directly interfere with emergency response. The proposed project would assist in the city's emergency response by providing a location from which emergency response could be efficiently managed.
- h. **Wildland Fire.** The general plan does not identify wildlands within or around Los Banos and wildfire is not identified as a concern. The project site is not adjacent to, or intermixed with, wildlands and there is no risk associated with wildland fires.

9. HYDROLOGY AND WATER QUALITY

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements? (1, 2, 14, 15)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., would the production rate of preexisting nearby wells drop to a level which would not support existing land uses or planned uses for which permits have been granted? (1, 2, 16, 25)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in <i>substantial erosion or siltation on- or off-site?</i> (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface run-off in a manner which would result in <i>flooding on- or off-site?</i> (1, 2, 13)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create or contribute run-off water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted run-off? (1, 2, 13)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Place housing within a 100-year flood hazard area as mapped on Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j. Be subject to inundation by seiche, tsunami, or mudflow? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. **Water Quality Standards.** In general, water quality is regulated by the State Water Resources Control Board through the National Pollutant Discharge Elimination System (NPDES) program. The goal of the program is to control and reduce pollutants entering water bodies from point and non-point discharges for both long-term project activities and construction activities. Los Banos lies within the jurisdiction of the Central Valley Regional Water Quality Control Board (RWQCB), which has adopted the Water Quality Control Plan for the San Joaquin River Region (Basin Plan) to implement plans, policies, and provisions for water quality management. The RWQCB issues and enforces NPDES permits for discharges to water bodies.

The State NPDES General Construction Permit requires development and implementation of a storm water pollution prevention plan (SWPPP) that uses storm water “Best Management Practices” to control runoff, erosion and sedimentation from the site both during and after construction. The SWPPP has two major objectives: (1) to help identify the sources of sediments and other pollutants that affect the quality of storm water discharges; and (2) to describe and ensure the implementation of practices to reduce sediment and other pollutants in storm water discharges. In addition, according to the storm water management plan, the project applicant would be required to submit a grading and construction runoff plan that identifies best management practices to reduce the amount of construction runoff and pollution entering the storm drainage system. Because the future development of the project site must go through the NPDES permit process for construction and comply with the Regional Water Quality Control Board’s Post-Construction Stormwater Management Requirements, any impacts would be less than significant. The proposed project would not violate any water quality standards or otherwise substantially degrade water quality during construction or during project operation.

Waste Discharge Requirements. The Los Banos Public Works Department evaluates the adequacy of wastewater collection and treatment in areas where development is anticipated to occur, and require construction of backbone infrastructure consistent with the Wastewater Master Plan and Storm Drain Master Plan. Individual projects are responsible for construction of all collection lines for wastewater, storm drainage, and sewerage. The proposed project would result in minimal wastewater discharge volumes, and existing municipal wastewater infrastructure is anticipated to be adequate to transport and treat waste.

- b. **Groundwater.** Los Banos extracts its groundwater from the Delta-Mendota Subbasin, a geographical depression with an estimated total storage capacity of 30,400,000 acre feet to a depth of 300 feet, and 81,800,000 acre feet to the base of fresh groundwater. The Delta-Mendota Subbasin water levels have remained relatively stable over the years, and actually rose from 1970 to 1995 by 2.2 feet. After flood control measures were put in place in the mid-1960s, groundwater became the primary source of the city's water supply, particularly for drinking water. According to the *2015 Urban Water Management Plan*, in 2015, the annual gross water use was 6,657 acre-feet. According to the general plan, during peak months the water usage is still well below capacity. The City of Los Banos formed a Groundwater Sustainability Agency (GSA) and is developing a Groundwater Sustainability Plan with other local entities. However, the city works closely with the other local water suppliers to monitor and manage groundwater within the area. The city and the Department of Water Resources monitor water levels in the area wells monthly. During the 2011-2015 droughts, groundwater levels have remained stable. Wells are known to be 150 to 300 feet in depth. The city did not report a drop in the water table from 2010 to 2015. Implementation of the project would result in a nominal increase in water use that would not result in significant lowering of the groundwater table. There would be no impacts.
- c. **Erosion/Siltation.** Urban development is generally accompanied by decreases in natural ground cover and an increase in impervious surfaces (such as paved areas and buildings). Increasing the area of impervious surface reduces the amount of rain that can be absorbed by the land and increases storm water runoff. Development may also cause erosion, such as when ground is cleared for construction, resulting in the siltation of creeks and reduction of their capacity to accommodate storm water flows. Implementation of general plan policy S-1-6 would minimize on-site erosion risks by requiring implementation of acceptable methods to reduce erosion associated with grading and construction such as site preparation best management practices that provide erosion and sediment control to prevent construction-related contaminants from leaving development sites and polluting local waterways. Implementation of general plan policies will ensure impacts are less than significant.

- d, e. **Flooding/Storm Water.** The project site was previously substantially developed and therefore, redevelopment of the site would not substantially alter the existing drainage pattern of the site or area or substantially increase the rate or amount of surface run-off in a manner which would result in flooding on- or off-site. The project site is not in a flood zone, and the general plan and Storm Water Master plan found that existing storm drainage infrastructure in the area of the project site is generally adequate to serve existing development. The storm drain master plan outlines improvements to accommodate future growth including development of the project site. Flooding and storm drainage impacts would be less than significant.
- f. **Water Quality.** The proposed project would not otherwise degrade water quality. Refer to section a.
- g, h. **Flood Hazard.** According to the general plan, flood zone mapping by the Federal Emergency Management Agency (FEMA) indicates Los Banos is located outside of the 100 and 500-year floodplains. The relatively flat topography, low incidence of rain and availability of various drainage management facilities make sudden floods by rain unlikely. There is no housing proposed as a part of the project.
- i. **Dam Failure.** The City of Los Banos is within the inundation area for a catastrophic dam failure of the San Luis Reservoir and Los Banos Creek Detention area. According to the general plan the State Department of Water Resources has deemed all of the dams in Merced County to be safe and the possibility of dam failure remote. In addition, the city maintains emergency plans and an early warning system.
- j. **Seiche/Tsunami/Mudflow.** The project site is located more than 56 miles from the coast and is not located adjacent to a lake or reservoir; therefore, Los Banos is not at risk of flooding due to a tsunami or seiche. The project site is not located in a landslide hazard area where mudflows could occur.

10. LAND USE AND PLANNING

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Physically divide an established community? (1, 2, 5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with any applicable land-use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? (1, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. **Divide Established Community.** The project site is within an urban core area. The County Courthouse is located to the east, vacant land to the west, the rail trail and commercial uses to the south, and fallow agricultural land to the north. The project would not divide an established community.
- b. **Land Use Conflicts.** The general plan designation for the project site is mixed use and the zoning designation is rail corridor (R-C). The mixed-use designation is intended for mixed-use development, located downtown, allowing for a mixture of commercial, office, institutional, public/semi-public, and residential uses. The rail corridor zoning designation allows for public/civic buildings. A police station is a public/civic use and would be consistent with the general plan and zoning designations. The proposed project would not conflict with the current land use designation for the project site or those nearby, and would not conflict with any applicable land-use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect.
- c. **Conservation Plans.** There are no habitat conservation plans or natural community conservation plans adopted for the project area. Therefore, the proposed project would not conflict with any applicable habitat conservation plan or natural community conservation plan.

11. MINERAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Result in loss of availability of a known mineral resource that would be of value to the region and the residents of the state? (1,2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated in a local general plan, specific plan, or other land-use plan? (1,2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a, b. **Mineral Resources.** According to the general plan, the Department of Conservation Mines and Geology did not identify significant mineral resources located within Los Banos.

12. NOISE

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or in applicable standards of other agencies? (1, 2, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in exposure of persons to or generation of excessive ground-borne vibration or ground borne noise levels? (1, 2, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? (1, 2, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? (1, 2, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or public-use airport, expose people residing or working in the project area to excessive noise levels? (1, 2, 3, 5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project located within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels? (1, 2, 5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

a, c, d. **Construction Noise.** The proposed project would generate noise during construction that would result in a short-term increase in ambient noise levels. The project site is not adjacent to land uses that are sensitive to noise. Construction related noise is intermittent in nature and would not generate continuous noise levels above the Municipal Code standards if project construction occurs beyond the hours of 7:00 AM and 9:00 PM Mondays through Fridays, and 8:00 AM and 5:00 PM on Saturdays and Sundays. Construction activities must comply with noise requirements for exterior and interior noise levels outlined in the Municipal Code and general plan. Therefore, construction noise impacts would be less than significant.

Operational Noise. The project site is adjacent to G Street to the north, the open space rail trail to the south and west, and the County Courthouse to the east. Beyond the uses immediately adjacent to the site, the project area is generally commercial in nature with residential pre-existing uses more than 350 feet away. The proposed project would not produce significant temporary or continuous operational noise that would significantly raise existing ambient noise levels. Although police vehicles may occasionally leave the project site with sirens on, in most cases the vehicle are already on the beat when calls are initiated. The proposed project does not include point sources of high intensity noise or sources that are unique or excessive relative to types of surrounding commercial uses. The project site is not within proximity to any noise sensitive uses and compliance with the general plan Noise Element policies and programs and with standards contained in the Municipal Code would ensure that on-site operations do not generate noise with an intensity that exceeds city standards at the noise sensitive land uses. Therefore, operational noise impacts would be less than significant.

Traffic Noise. Increases in traffic generation as a result of construction and operation of the proposed project would result in slightly elevated noise levels along local roadways. The general plan EIR includes evaluation of transportation noise impacts from buildout of the general plan, including development of the project site with mixed uses. General plan policy N-I-2 requires a noise study and mitigation measures for all projects that have noise exposure greater than “normally acceptable” levels. The general plan identifies the project sites as being within the 55 dBA for traffic noise. For a mixed use land use designation, this is considered a normally acceptable noise level. There would be less than significant impacts related to traffic noise.

- b. **Vibration.** Standard construction methods are anticipated, and these methods do not involve significant vibration-causing activities. Vibration levels generated during project construction activities may at times be perceptible at neighboring land uses, but vibration levels would not be excessive causing cosmetic or structural damage to buildings. Therefore, the proposed project would not result in exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels.
- e, f. **Public Air Strip Noise Exposure.** The project site is 1.7 miles from the publicly owned Los Banos Municipal Airport. The airport is open 24 hours a day and receives mainly small twin engine passenger aircrafts and private jets. A police station is not a noise sensitive use and according to the Merced County Airport Land Use Compatibility Plan/Los Banos Municipal Airport Plan Compatibility Factors Map for Los Banos Municipal Airport, the project site is located outside of the Airport Influence Area. Therefore, the proposed project would not expose people working in the project area to excessive noise levels associated with airport operations.

Private Airstrip Noise Exposure. The project site is not located within the vicinity of a private airstrip; therefore, the proposed project would not expose people working in the project area to excessive noise levels associated with private airstrip operations.

13. POPULATION AND HOUSING

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)? (1, 2, 18)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? (1, 2, 5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? (1, 2, 5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. **Population Growth.** The proposed project is the construction of a new police station and will not result in direct population growth. The proposed project is located in an infill site and does not require the extension of roads or other infrastructure. Therefore, there would be no impacts related to construction of infrastructure as a result of population growth.
- b, c. **Displacement of Housing or People.** With the exception of remaining concrete footings left from a warehouse previously on the site, the project site is undeveloped. There is no housing on the site and development of the project would not displace people or housing and would not necessitate the construction of replacement housing elsewhere. Therefore, there would be no impacts related to the construction of replacement housing.

14. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of or 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 following public services:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Fire protection? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Police protection? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Parks? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Other public facilities? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. **Fire Protection Services.** The project is development of a new police station to allow for the existing employees to a move to a new larger location. There will be a nominal increase in demand for fire protection services associated with the project. The existing fire stations at 1160 I Street and 1150 West I Street would be adequate to serve the proposed project. Construction of new fire facilities to accommodate the project would not be required and there would be no associated impacts.
- b. **Police Protection Services.** The proposed project is the construction of a new, larger police station in order to better serve the growing population and consequent increased demand of police services in Los Banos. The impacts of such development are analyzed in this initial study.
- c-e. **Schools, Parks and Other Public Facilities.** The proposed project is not population generating and would not individually or cumulatively result in the need for the construction of other new public facilities. Therefore, there would be no impacts associated with construction of new parks or other public facilities.

15. RECREATION

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a, b. **Recreational Facilities.** The proposed project is not population generating and would not result in an increase in the use of neighborhood or regional parks such that substantial physical deterioration of the facility would occur or that construction or expansion of new facilities would be required. Consequently, no significant change in the demand for use of recreation facilities is expected and there would be no associated environmental impacts.

16. TRANSPORTATION/TRAFFIC

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? (19)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? (19)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (1, 2, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Result in inadequate emergency access? (1, 2, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decreased the performance or safety of such facilities? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a, b. **Conflict with Applicable Plan/LOS.** According to the *Traffic Impact Assessment: Los Banos Police Department Project, Los Banos, California*, prepared by KD Anderson & Associated Inc. (September 13, 2018), which is included as [Appendix B](#) of this initial study, a new police station will increase traffic in the immediate vicinity of the project

site. In general the routes used to reach the new station during peak traffic periods will reflect the distribution of residences throughout the community, and given the project's location in east-central Los Banos it is likely that trips will be oriented to both the east and west on G Street. As a result, the volume of traffic added to local intersections is unlikely to result in appreciable increases in delay, and the city's minimum Level of Service standards are likely to be maintained. Therefore, impacts would be less than significant.

- c. **Air Traffic Pattern.** The proposed project would not result in a change in air traffic patterns. Therefore, the proposed project would not result in a safety risk associated with air traffic.
- d, e. **Design Hazard/Emergency Access** In order to ensure that the proposed project does not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) the proposed project will adhere to city roadway design standards and guidelines when designing pedestrian facilities, roadway widths, turn radii and intersections where the project driveway(s) intersect with existing roadways.
- f. **Conflict with Plans or Programs Related to Transit, Bicycle, Pedestrian Facilities.** The project site is located in an urban infill area and furthers the general plan's policies of compact development and locating complimentary land uses close to each other. Development will include frontage improvements including sidewalks to provide for pedestrian connectivity. This encourages cycling and walking and creates a beneficial impact on circulation. The general plan found that implementation of the general plan, including development of the project site would have a beneficial impact on circulation. According to the general plan EIR, given the projected increase in transit demand, more routes will need to be added to the current five that traverse Los Banos. Existing routes will need more frequent service or larger capacity busses.

While the City of Los Banos ultimately does not control service providers' decisions regarding route planning or service frequency, the general plan contains policies which ensure that the city will work closely with Merced County on transit planning to reduce any growth impacts to public transit to a less than significant level. Development of the project site was anticipated in the general plan and therefore would not result in any impacts not already addressed.

17. TRIBAL CULTURAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, or 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:				
(1) 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 (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

- a. **Tribal Cultural Resources.** No California Native American Tribes have requested consultation with the City of Los Banos regarding development projects in Los Banos.

18. UTILITIES AND SERVICES SYSTEMS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (1, 2, 14)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (1, 2, 13)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? (1, 2, 15)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (1, 2, 14)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid-waste disposal needs? (1, 2, 20)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste? (1, 2, 21)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. **Wastewater Treatment Requirements.** Los Banos Wastewater Treatment Plant adheres to wastewater standards set forth by Central Valley Regional Water Quality Control Board (RWQCB). Current discharge standards to regulate the system's treatment process require monitoring effluent pH, total dissolved solids, heavy metals, and biological oxygen. The proposed project will connect to the municipal sewer so is not subject to RWQCB Waste Discharge Requirements. The proposed

project would not affect the city's ability to continue to operate the treatment plant in compliance with those requirements. Therefore, there would be no impacts related to exceedance of wastewater treatment requirements.

- b, e. **Wastewater Treatment Facilities.** The City of Los Banos collects, treats, and disposes of wastewater originating from the residential, commercial, institutional, and industrial dischargers within the service area. The city owns, maintains, and operates all wastewater facilities within the service area. The collection system includes sanitary sewer lines and 13 lift stations. In addition to the collection system, the City of Los Banos also operates a wastewater treatment plant located northeast of the city. The general plan EIR determined that the general plan includes policies to ensure that an upgraded treatment plant would effectively accommodate the growth anticipated by the general plan. The project site is within the urban core area well-served by existing utility infrastructure and would be consistent with the general plan designation.

According to the *City of Los Banos Wastewater Collection System Master Plan* (March 2010) civic/institutional uses create 925 gallons per day/acres of wastewater. At 3.6 acres, the project is anticipated to create 3,330 gallons per day of wastewater. The capacity of the wastewater system at the time of the Master Plan for Wastewater Collection Systems update was 6.1 million gallons per day with a daily flow of 3.55 million gallons per day. The wastewater system would have sufficient capacity to accommodate an additional 3,330 gallons per day and there would, therefore, be no impacts.

Water Treatment Facilities. The city relies entirely on groundwater and according to the general plan (page 8-6), the quality of water pumped is adequate and does not require treatment.

- c. **Adequate Storm Drainage Facilities.** Construction of storm drainage infrastructure generally involves excavation, placement of storm drainage conveyance mains or subsurface vaults, installation of LID facilities/features, and backfilling excavations with engineered fill. The construction process does not involve unique equipment or processes that would result in significant environmental impacts that are not addressed as part of the overall project impact analyses included in other sections of this initial study.
- d. **Sufficient Water Supply.** Per the *City of Los Banos Water Distribution System Master Plan* (March 2010), the average daily demand for Civic/Institutional use is 2,500 gallons per day per acre. At 3.6 acres, the project would create demand for 9,000 gallons per day. At the time of the water distribution master plan update, average

demand was 7,558,000 gallons per day or 8,467 acre feet per year. The Los Banos Public Works Department currently derives all of its water from groundwater from the Delta-Mendota Sub-basin. The Sub-basin is connected to one of the deepest water basins in California and is not adjudicated. Therefore, there are no limitations placed on pumpage volumes. The Delta-Mendota Sub-basin water levels have remained relatively stable and actually rose during the 1970 to 2000 period. In addition, it is also not anticipated that a single or multiple dry year period will reduce the availability of water to Los Banos up to a period of 4 years. There would be no environmental impacts..

- f. **Solid Waste.** Los Banos' solid waste disposal is managed by the Merced County Association of Governments and the majority of its waste is taken to Billy Wright Landfill. According to the CalRecycle SWIS Facility Detail, the landfill has a capacity 11,370,000 cubic yards, and an expected life span to the year 2054. The County is studying the future needs of solid waste services including expansion of the Billy Wright Landfill versus a transfer station or closing the Billy Wright facility and relocating all waste services to the Highway 59 Landfill, located east of Los Banos. In 2016, Merced County had a disposal rate of 5.0 pounds per day per resident and 17.1 pounds per day per employee. With a total of 70 employees the police stations is expected to create 1,197 pounds per day of solid waste which is less than 0.5 cubic yards per day. With over 11 million cubic yards of capacity, the landfill could accommodate the project. The general plan supports working with the County to ensure adequate landfill space is available to meet future demands. The proposed project can be served by a landfill with sufficient permitted capacity to accommodate the project's solid-waste disposal needs.
- g. **Solid Waste Requirements.** In accordance with AB 939 cities and counties must achieve diversion rates of 50 percent through source reduction, recycling, and composting activities. Disposal rates are used as a factor to determine a jurisdiction's compliance with the intent of AB 939. Merced County has a goal of less than 10.7 pounds per day disposal rate per resident and 38.8 pounds per day per employee. In 2016, Merced County met this goal with 5.0 pounds per day per resident and 17.1 pounds per day per employee. The general plan includes policies to improve solid waste diversion rates to ensure compliance with federal, state, and local statutes and regulations. The project would be subject to these policies. Therefore, the proposed project would comply with applicable federal, state, and local statutes and regulations related to solid waste.

19. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Does the project have the potential to 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 an endangered, rare, or threatened species; or eliminate important examples of the major periods of California history or prehistory? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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) (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly? (1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

- a. As described in the Biological Resources section, the project site does not contain habitat for special-status plant or animal species. Therefore, the proposed project would not affect sensitive biological resources, either individually or cumulatively. As described in the Cultural Resources section, the proposed project site is not known to contain important cultural, tribal cultural resources, or human remains. In the event of accidental discovery of unknown resources, general plan policies require specific measures to protect the resources.
- b. As discussed throughout this initial study, the proposed project does not have the potential to result in have impacts that are individually limited, but cumulatively considerable.
- c. As discussed throughout this initial study, the proposed would not result in substantial adverse effects on human beings, either directly or indirectly.

E. SOURCES

1. **City of Los Banos 2030 General Plan. September 2007.**
2. **City of Los Banos 2030 General Plan Final Environmental Impact Report. December 2007.**
3. **City of Los Banos. Municipal Code. May 2018.**
4. Caltrans. List of Eligible and Officially Designated State Scenic Highways. <http://www.dot.ca.gov/design/lap/livability/scenic-highways/index.html>. 2017.
5. Google Maps. <https://www.google.com/maps>. Accessed August 1, 2018.
6. California Department of Conservation. Merced County Important Farmland Map 2016. February 2018. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/mer16_so.pdf
7. California Department of Conservation. Merced County Williamson Act FY 2013/2014. 2013. ftp://ftp.consrv.ca.gov/pub/dlrp/wa/Merced_s_13_14_WA.pdf
8. **Ninyo & Moore. Limited Phase II Environmental Site Assessment Proposed New Los Banos Courthouse Gateway Development Site. January 30, 2012.**
9. **Provost & Prichard Consulting Group. Arsenic Affected Soil Remediation Work Plan. May 18, 2018.**
10. Department of Toxic Substances Control. Envirostor. <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=1111+G.+Street+Los+Banos>
11. State Water Resources Control Board. GeoTracker. <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=1111+G.+St+Los+Banos>
12. Merced County Airport Land Use Plan. June 21, 2012. http://web2.co.merced.ca.us/pdfs/planning/aluc/alucp_july2012/chap_6_los_banos_background.pdf
13. **City of Los Banos. Master Plan for Storm Drainage System. September 2008.**
14. **City of Los Banos. Master Plan for Wastewater Collection System. March 2010.**
15. **City of Los Banos. Master Plan for Water Distribution System. March 2010.**
16. **City of Los Banos. Urban Water Management Plan 2015 Update. May 2016.**

17. **City of Los Banos. Rail Trail Regulating Code. February 2012.**
18. **Williams & Paddon. Conceptual Site Plan-Gateway Center AOC Los Banos. 2018.**
19. **KD Anderson & Associates, Inc. Traffic Impact Assessment: Los Banos Police Department Project, Los Banos California. September 24, 2018.**
20. CalRecycle. SWIS Facility Detail: Billy Wright Disposal Site (24-AA-0002).
<https://www2.calrecycle.ca.gov/SWFacilities/Directory/24-AA-0002/Detail/>.
Accessed September 11, 2018.
21. CalRecycle. Jurisdiction Diversion/Disposal Rate Summary.
<https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram/JurisdictionDiversionPost2006>. Accessed September 11, 2018.
22. San Joaquin Valley Air Pollution Control District. March 19, 2015. *Guidance for Assessing and Mitigating Air Quality Impacts*.
http://www.valleyair.org/transportation/GAMAQI_3-19-15.pdf
23. EMC Planning Group. August 30, 2018. *Los Banos Police Station – Air Quality (AQ) and Greenhouse Gas (GHG) Emissions Assessment*. Monterey, CA.
24. Bay Area Air Quality Management District. May 2017. *California Environmental Quality Act Air Quality Guidelines*. http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en
25. Personal communication with Stacy Souza Elms, Director of Community & Economic Development Department. October 2, 2018.

All documents indicated in bold are available for review at the **City of Los Banos, 520 J Street, Los Banos, CA 93635, 209-827-7000** during normal business hours.

All documents listed above are available for review at EMC Planning Group Inc., 301 Lighthouse Avenue, Suite C, Monterey, California 93940, (831) 649-1799 during normal business hours.

APPENDIX A

CALEEMOD RESULTS



EMC PLANNING GROUP INC.
A LAND USE PLANNING & DESIGN FIRM

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To: Richard James, Project Manager
From: Tanya Kalaskar, Assistant Planner
Cc: File
Date: August 30, 2018

Re: Los Banos Police Station – Air Quality (AQ) and Greenhouse Gas (GHG) Emissions Assessment

Project Description

The City of Los Banos Police Department currently operates out of two buildings on a 1.25-acre site located in downtown Los Banos. The main Police Department building is located at the corner of J Street and 5th Street and a Police Department annex is located on J Street across from City Hall. The combined floor area of the two buildings is 28,600 square feet. The proposed project is the construction of a new 35,000-square-foot police station in a new location that would consolidate operations. The 3.6-acre project site is located at 1111 G Street, immediately west of the new Merced County courthouse. The project site was formerly developed with a warehouse but only the concrete footings from that use remain.

The project site is located within the San Joaquin Valley Air Basin, which is within the jurisdiction of the San Joaquin Valley Air Pollution Control District (air district).

Scope of Assessment

This assessment provides an estimate of the proposed project's criteria air pollutant and greenhouse gas (GHG) emissions using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 software, a modeling platform recommended by the California Air Resources Board (CARB) and accepted by the air district. Model results are attached to this memorandum. For modeling purposes, data inputs to the model take into account the type and size of

proposed uses utilizing CalEEMod default land uses based on the size metrics provided by the City of Los Banos and trip generation information provided by the project traffic consultant (KD Andersons & Associates 2018).

Emissions Model

The CalEEMod software utilizes emissions models USEPA AP-42 emission factors, CARB vehicle emission models studies and studies commissioned by other California agencies such as the California Energy Commission and CalRecycle. The CalEEMod platform allows calculations of both construction and operational criteria pollutant and GHG emissions from land use projects. The model also calculates indirect emissions from processes “downstream” of the proposed project such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. CalEEMod also calculates a one-time only change in the carbon sequestration potential of the site that would result from changes in land use such as converting vegetation to built or paved surfaces, and is also capable of calculating estimated changes to the carbon sequestration potential that would result from planting new trees.

Project Emissions Sources

The size and type of proposed sources of criteria air pollutant and GHG emissions on the project site and their respective CalEEMod land use default modeling categories are presented in [Table 1, Project Characteristics](#).

Table 1 Project Characteristics

Project Components	CalEEMod Land Use ¹	Proposed
Police Station	Government Office Building	35,000 square feet
Parking	Parking Lot	85 spaces

SOURCE: City of Los Banos 2018, EMC Planning Group 2018, William + Paddon 2011

NOTE:

1. CalEEMod default land use subtype. Descriptions of the model default land use categories and subtypes are found in the User's Guide for CalEEMod Version 2016.3.2 available online at: <http://www.aqmd.gov/caleemod/user's-guide>

Methodology

Unless otherwise noted, model inputs are based upon the information provided by the City staff regarding the proposed activities. The proposed project is located on a site that was

formerly developed as a warehouse and would not result in the conversion of vegetation to urban uses. Project-specific data related to proposed tree replacement plantings that would be part of the future development of the site is not available in detail sufficient to model estimates of changes in carbon sequestration potential from planting new trees. Therefore an analysis of changes in the carbon sequestration potential of the site is not included in this assessment.

Construction and operational criteria pollutant and GHG emissions estimates are derived for the proposed project based on the project characteristics information presented in Table 1. The model estimates unmitigated construction and operational emissions that would be generated by the proposed project.

Assumptions

Unless otherwise noted, data inputs for the project model are based on the following primary assumptions:

1. The assumed operational date for the proposed project is 2021.
2. Parking information is based on the conceptual site plan in the *Gateway Center AOC Los Banos California Site Studies*.
3. Construction emissions and operational mobile- and area-source emissions generated by the proposed project were estimated using the following CalEEMod default land use subtypes:
 - a. Emissions generated by the proposed police station are assumed to be similar to emissions that would be generated by the CalEEMod default land use subtype "Government Office Building", which is defined as an individual building containing either the entire function or simply one agency of a city, county, state, federal, or other governmental unit. The model default trip generation rate for government office building use has been modified based on information provided by the traffic consultant (KD Anderson & Associates 2018);
 - b. Emissions generated by the proposed parking lot are assumed to be similar to the emissions that would be generated by the CalEEMod default land use subtype "Parking Lot", which is defined as a single surface parking lot typically covered with asphalt.
4. The model's default CO₂ intensity factor of 641 pounds/megawatt hour is adjusted to 290 pounds/megawatt hour to reflect Pacific Gas & Electric energy intensity projections

for 2020, which is the horizon year for the provider's energy intensity factor projections. The intensity factor has been falling, in significant part due to the increasing percentage of Pacific Gas & Electric's energy portfolio obtained from renewable energy. Emissions intensity data is from Pacific Gas & Electric's *Greenhouse Gas Factors: Guidance for PG&E Customers*, dated November 2015.

Model Baseline

The baseline for criteria air pollutant emissions that affect air quality are already quantified in air quality management plans. CalEEMod default values for baseline conditions assume new development on a vacant site.

Operational Emissions Data Inputs

Unmitigated operational emissions were modeled for the proposed uses identified in Table 1. The model default trip generation rate for the proposed government office building use was adjusted based on information provided by the traffic consultant (KD Anderson & Associates 2018). Other than the information identified above, model defaults were used for operational emissions estimates.

Construction Emissions Data Inputs

The CalEEMod program models construction emissions associated with land use development projects and allows for the input of project-specific construction information including phasing and equipment information, if known. CalEEMod default construction parameters allow estimates of short term construction emissions based upon empirical data collected and analyzed by the California Air Resources Board.

Information regarding type of construction equipment by phase for the proposed project was not yet available in detail sufficient to provide data inputs to the model; therefore, the model defaults were utilized for construction equipment, based on the project size and land use data presented in Table 1. For reporting purposes GHG construction emissions are amortized over a 30-year time period to yield an annual emissions volume. The modeling results for unmitigated construction emissions volumes are attached to this memorandum.

Results

Criteria air pollutant construction and operational emissions results are reported in tons per year. GHG construction and operational emissions model results are reported on in metric tons of carbon dioxide equivalent (MT CO_{2e}). Detailed model results for annual criteria pollutant and GHG emissions are included as an attachment to this assessment.

Criteria Pollutant Emissions

Unmitigated construction criteria pollutant emissions for the proposed project conditions are presented in [Table 2, Unmitigated Construction Criteria Pollutant Emissions](#). Unmitigated operational criteria air pollutant emissions for the proposed project conditions are presented in [Table 3, Unmitigated Operational Criteria Pollutant Emissions](#).

Table 2 Unmitigated Construction Criteria Pollutant Emissions^{1,2}

Reactive Organic Gases (ROG)	Nitrogen Oxides (NO _x)	Particulate Matter (PM ₁₀)	Particulate Matter (PM _{2.5})	Carbon Monoxide (CO)
0.51	1.99	0.15	0.11	1.66

SOURCE: CalEEMod Annual Emissions Results, EMC Planning Group 2018

NOTES:

1. Results may vary due to rounding.
2. Tons per year

Table 3 Unmitigated Operational Criteria Pollutant Emissions^{1,2}

Reactive Organic Gases (ROG)	Nitrogen Oxides (NO _x)	Particulate Matter (PM ₁₀)	Particulate Matter (PM _{2.5})	Carbon Monoxide (CO)
0.20	0.37	0.07	0.02	0.31

SOURCE: CalEEMod Annual Emissions Results, EMC Planning Group 2018

NOTES:

1. Results may vary due to rounding.
2. Tons per year

GHG Emissions

Construction Emissions

Construction activity would generate an estimated 265.50 MT CO₂e of unmitigated GHG emissions. When averaged over thirty-years the annual amortized emissions equal 8.85 MT CO₂e per year.

Operational Emissions

Unmitigated operational GHG emissions for the proposed project are presented in [Table 4, Annual Operational GHG Emissions](#).

Table 4 Annual Operational GHG Emissions^{1,2}

Emissions Sources	Bio CO ₂	NBio CO ₂	CH ₄	N ₂ O	CO ₂ e
Area	0.00	<0.01	<0.01	0.00	<0.01
Energy	0.00	67.93	<0.01	<0.01	68.45
Mobile	0.00	118.49	0.01	0.00	118.75
Waste	6.61	0.00	0.39	0.00	16.37
Water	2.21	6.91	0.23	<0.01	16.44
Total	8.82	193.33	0.63	<0.01	220.01

Source: CalEEMod Annual Emissions Results, EMC Planning Group 2018

Note:

1. Results may vary due to rounding.
2. MT per year.

The estimated total GHG emissions that would be attributable to the proposed project consist of the sum of amortized construction emissions and the unmitigated operational emissions. The annual GHG emissions attributable to the proposed project are presented in [Table 5, Summary of Unmitigated GHG Emissions Attributable to the Project](#).

Table 5 Summary of Unmitigated GHG Emissions Attributable to the Project^{1,2}

Amortized Construction	Annual Operations	Annual Project Emissions
8.85	220.01	228.86

SOURCE: CalEEMod Annual Results, EMC Planning Group 2018

NOTES:

1. Results may vary due to rounding.
 2. MT per year.
-

As illustrated by Table 5, the unmitigated GHG emissions volume attributable to the proposed project would be 228.86 MT CO_{2e} per year.

Sources

1. Trinity Consultants. California Emissions Estimator (CalEEMod) Version 2016.3.2. November 2017. Available online at: <http://www.aqmd.gov/caleemod/home>
2. Trinity Consultants. CalEEMod User's Guide (Version 2016.3.2). November 2017. Available online at: <http://www.aqmd.gov/caleemod/user's-guide>
3. San Joaquin Valley Air Pollution Control District. March 19, 2015. Guidance for Assessing and Mitigating Air Quality Impacts. http://www.valleyair.org/transportation/GAMAQI_3-19-15.pdf
4. Anderson, Ken, KD Anderson & Associates. Email communication with consultant, 27 August 2018.
5. Pacific Gas & Electric. Greenhouse Gas Factors: Guidance for PG&E Customers. November 2015. Accessed online August 1, 2018 at: https://www.pge.com/includes/docs/pdfs/shared/environment/calculator/pge_ghg_emission_factor_info_sheet.pdf

Los Banos Police Station - San Joaquin Valley Unified APCD Air District, Annual

Los Banos Police Station
San Joaquin Valley Unified APCD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Government Office Building	35.00	1000sqft	0.80	35,000.00	0
Parking Lot	85.00	Space	0.76	34,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.7	Precipitation Freq (Days)	45
Climate Zone	3			Operational Year	2021
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MW hr)	290	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics - PG&E CO2 Intensity Factor for 2020

Land Use -

Vehicle Trips - trip generation rate from traffic consultant

Energy Use -

Construction Off-road Equipment Mitigation -

Water Mitigation - Compliance with MWEL0

Table Name	Column Name	Default Value	New Value
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tblProjectCharacteristics	CO2IntensityFactor	641.35	290
tblVehicleTrips	WD_TR	68.93	4.23

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2019	0.1027	0.8134	0.6205	1.1300e-003	0.0252	0.0435	0.0687	0.0106	0.0415	0.0521	0.0000	97.2598	97.2598	0.0185	0.0000	97.7212
2020	0.4087	1.1768	1.0411	1.9800e-003	0.0197	0.0588	0.0785	5.3500e-003	0.0567	0.0621	0.0000	167.0945	167.0945	0.0274	0.0000	167.7793
Maximum	0.4087	1.1768	1.0411	1.9800e-003	0.0252	0.0588	0.0785	0.0106	0.0567	0.0621	0.0000	167.0945	167.0945	0.0274	0.0000	167.7793

Total 265.5

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.1640	1.0000e-005	1.1100e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.1400e-003	2.1400e-003	1.0000e-005	0.0000	2.2900e-003
Energy	2.4600e-003	0.0224	0.0188	1.3000e-004		1.7000e-003	1.7000e-003		1.7000e-003	1.7000e-003	0.0000	67.9274	67.9274	4.8200e-003	1.3500e-003	68.4497
Mobile	0.0332	0.3492	0.2860	1.2700e-003	0.0692	1.1500e-003	0.0703	0.0186	1.0800e-003	0.0197	0.0000	118.4853	118.4853	0.0105	0.0000	118.7466
Waste						0.0000	0.0000		0.0000	0.0000	6.6074	0.0000	6.6074	0.3905	0.0000	16.3694
Water						0.0000	0.0000		0.0000	0.0000	2.2059	6.9110	9.1169	0.2273	5.4900e-003	16.4352
Total	0.1997	0.3716	0.3059	1.4000e-003	0.0692	2.8500e-003	0.0720	0.0186	2.7800e-003	0.0214	8.8133	193.3259	202.1392	0.6330	6.8400e-003	220.0032

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0332	0.3492	0.2860	1.2700e-003	0.0692	1.1500e-003	0.0703	0.0186	1.0800e-003	0.0197	0.0000	118.4853	118.4853	0.0105	0.0000	118.7466
Unmitigated	0.0332	0.3492	0.2860	1.2700e-003	0.0692	1.1500e-003	0.0703	0.0186	1.0800e-003	0.0197	0.0000	118.4853	118.4853	0.0105	0.0000	118.7466

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Government Office Building	148.05	0.00	0.00	181,349	181,349
Parking Lot	0.00	0.00	0.00		
Total	148.05	0.00	0.00	181,349	181,349

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Government Office Building	9.50	7.30	7.30	33.00	62.00	5.00	50	34	16
Parking Lot	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Government Office Building	0.506092	0.032602	0.169295	0.124521	0.019914	0.005374	0.021664	0.110051	0.001797	0.001623	0.005307	0.000969	0.000792
Parking Lot	0.506092	0.032602	0.169295	0.124521	0.019914	0.005374	0.021664	0.110051	0.001797	0.001623	0.005307	0.000969	0.000792

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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Category	tons/yr								MT/yr							
Electricity Mitigated					0.0000	0.0000			0.0000	0.0000	0.0000	43.5535	43.5535	4.3600e-003	9.0000e-004	43.9309
Electricity Unmitigated					0.0000	0.0000			0.0000	0.0000	0.0000	43.5535	43.5535	4.3600e-003	9.0000e-004	43.9309
NaturalGas Mitigated	2.4600e-003	0.0224	0.0188	1.3000e-004	1.7000e-003	1.7000e-003			1.7000e-003	1.7000e-003	0.0000	24.3739	24.3739	4.7000e-004	4.5000e-004	24.5188
NaturalGas Unmitigated	2.4600e-003	0.0224	0.0188	1.3000e-004	1.7000e-003	1.7000e-003			1.7000e-003	1.7000e-003	0.0000	24.3739	24.3739	4.7000e-004	4.5000e-004	24.5188

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Government Office Building	456750	2.4600e-003	0.0224	0.0188	1.3000e-004		1.7000e-003	1.7000e-003		1.7000e-003	1.7000e-003	0.0000	24.3739	24.3739	4.7000e-004	4.5000e-004	24.5188
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		2.4600e-003	0.0224	0.0188	1.3000e-004		1.7000e-003	1.7000e-003		1.7000e-003	1.7000e-003	0.0000	24.3739	24.3739	4.7000e-004	4.5000e-004	24.5188

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Government Office Building	319200	41.9881	4.2000e-003	8.7000e-004	42.3520
Parking Lot	11900	1.5654	1.6000e-004	3.0000e-005	1.5789
Total		43.5535	4.3600e-003	9.0000e-004	43.9309

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.1640	1.0000e-005	1.1100e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.1400e-003	2.1400e-003	1.0000e-005	0.0000	2.2900e-003
Unmitigated	0.1640	1.0000e-005	1.1100e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.1400e-003	2.1400e-003	1.0000e-005	0.0000	2.2900e-003

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0250					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.1389					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.0000e-004	1.0000e-005	1.1100e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.1400e-003	2.1400e-003	1.0000e-005	0.0000	2.2900e-003
Total	0.1640	1.0000e-005	1.1100e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.1400e-003	2.1400e-003	1.0000e-005	0.0000	2.2900e-003

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	9.1169	0.2273	5.4900e-003	16.4352
Unmitigated	9.1169	0.2273	5.4900e-003	16.4352

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e

Land Use	Mgal	MT/yr			
Government Office Building	6.95309 / 4.26157	9.1169	0.2273	5.4900e-003	16.4352
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		9.1169	0.2273	5.4900e-003	16.4352

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	6.6074	0.3905	0.0000	16.3694
Unmitigated	6.6074	0.3905	0.0000	16.3694

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Government Office Building	32.55	6.6074	0.3905	0.0000	16.3694
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Total		6.6074	0.3905	0.0000	16.3694

APPENDIX B

TRAFFIC IMPACT ASSESSMENT

September 24, 2018

Ms. Shoshana Wangerin, Assistant Planner
EMC PLANNING GROUP INC.
301 Lighthouse Avenue, Suite C
Monterey, California 93940

**RE: TRAFFIC IMPACT ASSESSMENT: LOS BANOS POLICE DEPARTMENT
PROJECT, LOS BANOS, CALIFORNIA**

Dear Ms. Wangerin:

Thank you for contacting our firm regarding the **Los Banos Police Department project** in Los Banos. The project includes construction of a new police station for the City of Los Banos on a site located at 1111 G Street and includes consolidation of their two existing facilities elsewhere in the City into a single 35,000 square foot building.

Overview. The proposed project will serve as the base for approximately 40 sworn officers and 26 non-sworn staff. Those personnel will serve the City on a 24/7 basis, and project trips generated will be spread throughout the day. As a result, the amount of traffic occurring during traditional peak commute hours is likely to be limited, and initial consultation with affected agencies (i.e., Caltrans District 10) has indicated that unless access to a state highway is proposed a comprehensive traffic impact analysis is not needed.

Approach to Assessment

Our approach to this assessment makes use of current traffic volume information to generally describe current traffic conditions in the area of the site. We have identified project daily and peak hour trip generation and suggested the routes that will be used by project trips. We have reviewed this traffic contribution to qualitatively suggest whether this additional traffic is likely to create a significant traffic impact.

Background Conditions

The Police Station site lies on the south side of G Street west of the new Courthouse building in the area between 7th Street and Mercey Springs Road (SR 165).

Mercey Springs Road (SR 165). SR 165 is an Arterial road providing north/south circulation to the eastern portion of Los Banos. The highway also provides regional access to the north to SR 99 and the City of Turlock and to the south to an interchange on Interstate 5. Currently Mercey Springs Road is a two-lane road in the vicinity of the project south of the existing commercial area along Pacheco Boulevard. The road is ultimately planned to be a five-lane facility and

construction to this standard has been completed near the SR 152 intersection and in those locations to the north where recent development has occurred. The most recent Caltrans traffic counts reveal that SR 165 carries an Annual Average Daily Traffic (AADT) volume of 12,000 vehicles per day in the commercial area immediately south of Pacheco Blvd and 16,000 AADT immediately north of Pacheco Blvd. The volumes range from 12,000 to 14,700 ADT north from the commercial district through the study area. Trucks comprise 8% of the daily traffic on SR 165.

7th Street. 7th Street extends from Madison Avenue in the south to Willmott Road in the north, although only the portion north of SR 152 is designated an arterial street. 7th Street crosses the railroad corridor. The width of pavement on 7th Street varies, and in the area of the G Street intersection 7th Street has two travel lanes, center turn lane, bike lanes and on-street parking. Current daily traffic volumes on 7th Street were reported to be 11,300 ADT north of H Street.

G Street. G Street is a portion of the City's downtown grid system that runs east-west along the north side of the rail corridor trail in two segments from an intersection on Willmott Avenue to F Street and from an intersection on 7th Street to its terminus on Mercey Springs Road. In the area of the project G Street is a two-lane street with on-street parking. No current traffic volume counts are available for the road. The City's General Plan Circulation Element¹ indicates that G Street carried 2,450 ADT from Santa Rita Road to SR 165 in 2006 and that at General Plan Buildout the volume would be 3,200 ADT. The traffic study completed in 2005 for the Rail Corridor EIR² indicated that the road carried 2,080 ADT and suggested that the road could eventually carry as much as 11,400 ADT at General Plan Build Out.

Two intersections control access to the new Police Station site.

The **7th Street / G Street intersection** is a "tee" controlled by a stop sign on the G Street approach. Southbound 7th Street has a separate left turn lane. A signalized pedestrian crossing serving the rail corridor trail exists on 7th Street about 200 feet from the G Street intersection. No information is available regarding the peak hour operation of the intersection, but based on the likely daily traffic volume on both streets it is reasonable to conclude that the Level of Service at this location meets the City's minimum LOS D standard and that traffic signal warrants are not satisfied.

The **Mercey Springs Road (SR 165) / G Street intersection** is a "tee" controlled by a stop sign on the G Street approach. A continuous Two-Way Left-Turn (TWLT) lane is available on Mercey Springs Road. While the operation of this intersection has not been assessed quantitatively, other traffic studies have indicated that conditions at other un-signalized locations to the north (i.e., San Luis Street) and south (i.e., Canal Farm Road) are problematic, and traffic signal warrants are met at the San Luis Street intersection. Based on the daily traffic volumes on G Street and on SR 165, as well as the presence of the TWLT lane it is unlikely that current

¹ City of Los Banos 2030 General Plan Update, Los Banos (7/15/2009)

² *Traffic Impact Assessment for the City of Los Banos Rail Corridor Redevelopment Project*, KDA (9/29/2005)

KDA

conditions at this intersection exceed the City's minimum LOS D standard, and peak hour traffic signal warrants are unlikely to be met.

City of Los Banos General Plan Circulation Element, Transportation Master Plan and Traffic Impact Fee Program

Various documents provide guidance as the City's long term plans for this area of the community.

The General Plan Land Use / Circulation Element Plan indicates that Santa Rita Avenue was to be extended southerly across G Street through the Rail Corridor to H Street. This route was eliminated with construction of the new Courthouse.

The City's Transportation Master Plan³ suggests the level of improvements needed to address long term growth in Los Banos assuming regional improvements are made (i.e., SR 152 Los Banos Bypass). The Master Plan addresses the Mercey Springs Road / San Luis Street intersection (traffic signal) but does not include improvements to the Mercey Springs Road / G Street intersection. The City collects impact fees for designated improvements from new development, but public projects, such as the police station, would not pay impact fees.

Trip Generation

Approach to Trip Generation Estimate. The amount of additional traffic associated with the project can be expressed in terms of the number of vehicle "trips" caused by travel to and from the site over the course of the day. Each "trip" represents movement from a trip origin to destination and each round trip creates two trips ends. The number of trips associated with new developments is typically estimated based on observation of similar uses operating elsewhere and interpolation of those observations to the new facility. Nationally published information is available for many types of land uses, and the Institute of Transportation Engineers (ITE) publication *Trip Generation Manual, 10th Edition* is the most commonly accepted source. However, there is no information available that is specific to new police stations, and the characteristics of the most similar land use categories (i.e., fire / rescue stations, prisons, government office building) are not the same.

Lacking published data we estimated trip generation based on the probable travel associated with typical activities at a police station. Travel would be generated by:

- employees commuting to and from work
- patrols dispatched to and from the site
- travel by other sworn personnel
- travel by the public to and from the station

³ City of Los Banos Traffic Model and Transportation Master Plan, Prism Engineering, (5/5/2010)

KDA

Employee Commute Travel. The number of daily trips caused by employee travel has been estimated, and the share of that travel occurring during typical peak commute hours has been estimated from a summary of employee / shifts schedules provided by the City of Los Banos. A total of 35 employees work at the station each day. Their commute information is tallied in a summary in the appendix and is noted in Table 1.

Patrols. Each patrol vehicle has been assumed to come and go twice over the course of a day.

Other Travel. Other sworn personnel will travel throughout the community over the course of the day. We assumed one inbound and one outbound trip end for each person.

Trips Made by Members of the General Public. Members of the public will have business at the station from time to time. We assumed on average a transaction each hour.

Total Estimate. Based on these assumptions the new station is likely to generate 148 daily trips, with 38 trips in the a.m. peak hour and 36 trips in the p.m. peak hour.

TABLE 1 LOS BANOS POLICE STATION TRIP GENERATION ESTIMATE									
Activity	Classification	Quantity	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Commute	Sworn	20	40	8	4	12	0	12	12
	Non-sworn	15	30	10	2	12	0	10	10
	<i>Subtotal</i>	35	70	18	6	24	0	22	22
Patrol	Sworn	12	24	4	4	8	4	4	8
Other Travel	Sworn	8	16	1	1	2	1	1	2
Business at Station	Public	24	48	2	2	4	2	2	4
Total			148	25	13	38	7	29	36

Impact Assessment

Traffic Operations Impacts. As suggested by the trip generation estimate, the new police station will create limited trip generation, and the overall volume of traffic in the immediate area of the new station will increase slightly. In general the routes used to reach the new station during peak traffic periods will reflect the distribution of residences throughout the community, and given the project's location in east-central Los Banos it is likely that trips will be oriented to both the east and west on G Street. As a result the volume of traffic added to local intersections is unlikely to result in appreciable increases in delay, and the City's minimum Level of Service standards are likely to be maintained. Thus, the project's impact under this metric are not significant.

KDA

Frontage Improvement. New development in Los Banos contributes its fair share to the cost of city-wide improvements and mitigates its cumulative impact by paying adopted traffic impact fees and by constructing frontage improvements to their ultimate standard. The Police Station project would contribute by installing applicable frontage improvements as determined by the City of Los Banos, including applicable sidewalks and pavement. With these improvements the project's cumulative impact is not significant.

Thank you again for considering our firm for this assignment. Please feel free to contact us at (916) 660-1555 if you have any questions or need more information.

Sincerely yours,

KD Anderson & Associates, Inc.

A handwritten signature in black ink, appearing to read 'K D Anderson', with a long horizontal flourish extending to the right.

Kenneth D. Anderson, P.E.
President