FINAL

ENVIRONMENTAL IMPACT REPORT

FOR THE

MANTECA CIRCULATION ELEMENT UPDATE

FEBRUARY 2011

Prepared for:

City of Manteca
Community Development Department
1001 West Center Street
Manteca, CA 95337
(209) 456-8511

Prepared by:

De Novo Planning Group
4630 Brand Way
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De Novo Planning Group

A Land Use Planning, Design, and Environmental Firm

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INTRODUCTION

The City of Manteca has determined that the City of Manteca Circulation Element Update is a "Project" within the definition of CEQA. CEQA requires the preparation of an environmental impact report (EIR) prior to approving any project, which may have a significant impact on the environment. For the purposes of CEQA, the term "Project" refers to the whole of an action, which has the potential for resulting in a direct physical change or a reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 15378[a]).

An Initial Study and Notice of Preparation was prepared and circulated for public review on April 19, 2010 and a scoping meeting was held on May 11, 2010. Subsequently, a Draft EIR was prepared and circulated for public review on December 7, 2010. Comments received in response to the Initial Study and Notice of Preparation were considered in preparing the analysis in the Draft EIR. The Draft EIR contains a description of the project, description of the environmental setting, identification of project impacts, and mitigation measures for impacts found to be significant, as well as an analysis of project alternatives, identification of significant irreversible environmental changes, growth-inducing impacts, and cumulative impacts. The Draft EIR identifies issues determined to have no impact or a less than significant impact, and provides detailed analysis of potentially significant and significant impacts.

This Final EIR was prepared to address comments received in response to the Draft EIR. The City of Manteca has prepared a written response to the Draft EIR comments and made textual changes to the Draft EIR where warranted. The responses to the comments are provided in this Final EIR in Section 2.0, and all changes to the text of the EIR are summarized in Section 3.0. Responses to comments received during the comment period do not involve any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5.

PROJECT DESCRIPTION

The proposed project is the adoption and implementation of the City of Manteca Circulation Element Update (hereinafter "proposed project"). The proposed project embodies goals, objectives, policies, and implementation measures covering seven transportation topics: Level of Service Standards, Major Street Master Plan, Parking, Bicycle and Pedestrian Systems, Public Transit, Goods Movement, and Transportation Demand Management. An expanded discussion of each of these seven topics is included in Section 2.0 of the Draft EIR, along with the complete list of goals, objectives, policies, and implementation measures from the proposed project.

The proposed project reflects the broader goals of the City’s General Plan. These include improvement of the existing community, economic development, expanded tourism, improved aesthetic quality in the built environment, better public and personal health, improved safety, improved quality of life, and environmental protection.

The City's existing circulation system is a reflection of the City's historic development pattern, which has been focused on moving cars quickly through and around the City. This type of circulation system provides a high degree of mobility and access to those who have cars, but it does not adequately serve residents who cannot or choose not to drive and it is expensive to build and maintain. Additional emphasis has recently been given to alternative modes of transportation, such as bicycling, walking, and public transit. Examples include the construction of the Tidewater Bikeway, the adoption and implementation of a Bicycle Master Plan, streetscape improvements in Downtown, new street standards with improved pedestrian facilities, and the initiation of the City's own transit service. This Circulation Element stresses the need for a balanced circulation system based on the concept of "complete streets."

Complete streets describes a comprehensive approach to the practice of mobility planning. The complete street concept recognizes that transportation corridors have multiple users with different abilities and mode preferences (e.g., driving, biking, walking, and taking transit). A well-integrated street system considers the complementary relationship between land use, local and regional travel needs, and the context that it serves. Complete streets apply equally to facilities like Yosemite Avenue through downtown and commercial corridors like Main Street near the State Route 120 interchange. Complete streets consider the full range of users including vehicles, trucks, pedestrians, bicycles, children, the disabled, and seniors.

ALTERNATIVES TO THE PROPOSED PROJECT

The CEQA Guidelines require an EIR to describe a reasonable range of alternatives to the project or to the location of the project which would reduce or avoid significant impacts, and which could feasibly accomplish the basic objectives of the proposed project. Since the primary objective of the proposed project is to guide long-term transportation improvements citywide, a discussion of alternative sites is not appropriate. The alternatives analyzed in this EIR include the following four alternatives which includes the proposed project:

- No Project (Constrained) Alternative
- No Project (Unconstrained) Alternative
- Alternative Investment Strategy
- Preferred Roadway Network (proposed project)

As summarized in Table ES-1 of the Draft EIR, the Preferred Roadway Network (proposed project) is the environmentally superior alternative because it provides the greatest reduction of potential impacts in comparison to the other alternatives. The Alternative Investment Strategy is the second best alternative in terms of environmental impacts.

COMMENTS RECEIVED

This Draft EIR addresses environmental impacts associated with the proposed project that are known to Manteca, were raised during the Notice of Preparation (NOP) process, or raised during preparation of the Draft EIR. This Draft EIR discusses potentially significant impacts associated with agricultural resources, air quality, biological resources, cultural resources, greenhouse gas

emissions, land use and population, noise, and transportation. During the NOP process, comments were received from the California Energy Commission, California Department of Transportation, California Energy Commission, City of Lathrop, Public Utilities Commission, Ripon Consolidated Fire District, City of Ripon, San Joaquin Valley Air Pollution Control District, and the San Joaquin Council of Governments.

NOP Comments

The City of Manteca received several comment letters on the NOP. A copy of each letter is provided in Appendix B of the Draft EIR and the comments are summarized below.

California Energy Commission (CEC). The CEC noted that they would like to assist with the reduction of energy usage associated with the Circulation Element Update. Included in the comment letter was Appendix F of the California Environmental Quality Act for how to achieve energy conservation. The CEC also noted that the CEC's Energy Aware Planning Guide is also a planning tool that is available for land use planning efforts.

California Department of Transportation (Caltrans). Caltrans provided information on system planning for various freeway segments. The commentor noted that the concept facility and the Ultimate Transportation Concept (UTC) from I-205 to State Route (SR) 120 to north of Lathrop is 10 lanes, and other treatments such as High Occupancy Vehicle (HOV) and ramp meters will be needed. On SR 120, the concept facility is a 6 lane freeway and the UTC is an 8 lane freeway. On SR 99 from north of Lathrop to south of SR 120, the concept and UTC is an 8 lane freeway. Further widening of this segment is not feasible due to right of way needs. Lastly, the commentor noted that the circulation element should address mitigating additional traffic in light of restrictions imposed by insufficient right of way available to accommodate forecasted traffic volumes on these facilities.

City of Lathrop. The City of Lathrop indicated that they do not oppose the Circulation Element provided that impacts to their community are appropriately addressed and mitigated. The City of Lathrop specifically noted public services/utilities, and transportation impacts. They requested that current and future impacts on public services, specifically police and public works services, be addressed. They are concerned that Manteca residents would use Louise Ave, E. Lathrop Rd., and Roth Rd. as short-cut pass through routes between I-5 and Manteca, and that these trips would have direct and indirect impacts on public services. The City of Lathrop also requested the preparation of a comprehensive circulation/traffic impact analysis that addresses the current and long-range impacts on the following roadways: Roth Road (between Airport Way and I-5), Lathrop Road (between Airport Way and I-5), Louise Avenue (between Airport Way and I-5), and Yosemite Avenue (between Airport Way and SR 120). Lastly, the City of Lathrop requests that they can review the vehicle distribution patterns work scope relative to these roadways and that they receive notification of all project hearings and meetings related to the project.

Public Utilities Commission (PUC). The PUC noted that they are the State agency responsible for rail safety and that they recommend that development projects proposed near rail corridors be planned with the safety of these corridors in mind. The PUC identified several consequences of

development, and suggested that working with the PUC staff early in the planning process would help identify potential project impacts and appropriate mitigation. The PUC noted that the traffic impact study within the Draft EIR needs to consider safety issues to at-grade railroad crossings, as well as cumulative rail safety-related impacts created by other projects. The PUC provided a variety of measures that could reduce adverse impacts to rail safety. Lastly, the PUC noted that any modification to existing highway-rail crossings or the construction of a new crossing would require PUC approval.

Ripon Consolidated Fire District (RCFPD). The RCFPD noted that the project includes areas that lie within their jurisdiction and the jurisdiction of the Lathrop Manteca Fire District, which receives service from the RCFPD. The RCFPD requested adequate notification of future meetings that may involve their agency.

City of Ripon. The City of Ripon identified concerns with the inter-regional connectivity between Manteca and Ripon. The commentor noted that cooperation amongst the two agencies has important impacts on both communities that should be addressed within the Draft EIR. The City of Ripon provided a historical account of the State Route 99 Feasibility Study that was prepared in coordination with Manteca and Ripon, among other agencies, and indicates that the Figure 3 Manteca Major Street Master Plan provided in the NOP does not reflect the location of the McKinley interchange or how it complies with the requirements for one mile spacing between interchanges. The commentor requests that the Caltrans spacing requirements between interchanges be addressed in the Draft EIR. The City of Ripon notes that the cities of Manteca and Ripon entered into a Memorandum of Understanding (MOU) to work cooperatively with one another with regard to planning and land use issues. The commentor indicates that the NOP does not mention this MOU and that it should be addressed within the EIR. Lastly, the City of Ripon requests notification of public hearings regarding this project**.**

San Joaquin Valley Air Pollution Control District (SJVAPCD). The SJVAPCD notes that their agency will act as Trustee Agency for the proposed project, and potentially as Responsible Agency for individual projects under the proposed project. The commentor notes that individual projects may be subject to various SJVAPCD rules and regulations, and that the project proponent of individual projects should contact the District prior to construction. The SJVAPCD provides a list of various documents that they have prepared to assist local agencies in amending their general plan. Lastly, the commentor indicates that compliance with the Fugitive Dust Prohibition and Indirect Source Review requirements may not be sufficient to reduce individual project level construction emissions to below the SJVAPCD's thresholds of significance. As such, the SJVAPCD suggests that a policy be included in the proposed project that would mitigate construction impacts to a level below District thresholds or buildout of the proposed project would have cumulatively significant impacts on air quality. The commentor provides a list of various project level construction related impacts.

San Joaquin Council of Governments (SJCOG). SJCOG indicated that their agency is the County's designated Congestion Management Agency, which monitors the roadway network that is adopted within the Regional Congestion Management Program (RCMP). They specifically noted that the following roadways located within the Manteca city limits are monitored as part of the

RCMP: Yosemite Avenue, Airport Way, Lathrop Road, and State Routes 99 and 120 (and McKinley Avenue once constructed). SJCOG cited requirements to prepare a Deficiency Plan if a segment becomes deficient, and noted that the proposed project includes policies that may allow a roadway to become deficient under certain circumstances. SJCOG requests that the EIR disclose, mitigate, and make Overriding Considerations, if necessary. Additionally, SJCOG recommends that the mitigation measures include a Deficiency Plan to justify that the deficiencies are "planned." The commentor describes two types of deficiency plans (Direct-fix and System-wide) and that the requirement only applies to deficient roadways that are within the CMP roadway network. Lastly, SJCOG notes that the thresholds in Appendix G of the CEQA Guidelines are required to be used to address potential impacts to roadways.

Draft EIR Comments

During the Draft EIR review process, the City of Manteca received five (5) comment letters from the following: California Department of Transportation (Caltrans),Governor's Office of Planning and Research, San Joaquin County Environmental Health Department, San Joaquin Valley Air Pollution Control District, and Louie Tallerico.

Acting as lead agency, the City of Manteca has prepared a response to the Draft EIR comments. The responses to the comments are provided in this Final EIR in Section 2.0, Comments on Draft EIR and Responses, and all changes to the text of the Draft EIR are summarized in Section 3.0, Errata. Responses to comments received during the comment period do not involve any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5.

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1.1 MANTECA CIRCULATION ELEMENT UPDATE

CIRCULATION ELEMENT

A Circulation Element consists of the general location and extent of existing and proposed major thoroughfares, transportation routes, terminals, and other local public utilities and facilities within a community, all correlated with the Land Use Element of the General Plan for that community. (Government Code Section 65302).

The Circulation Element addresses all aspects of transportation including commuter and truck traffic, intra-city vehicle traffic, rail, buses, bicycles, and pedestrians. Circulation master planning has traditionally focused on automobiles and truck traffic by ensuring that the road system will be adequate to accommodate future traffic demands. While automobile and truck traffic will continue to be important modes of transportation in the time horizon for this General Plan, the future is not necessarily a simple continuation of past trends. Several factors suggest that the conventional use of automobiles will change in significant ways within the planning horizon. While these factors cannot be predicted with assurance, the General Plan seeks to provide a balanced transportation system that accommodates all modes of travel, while supporting the City's goals of remaining a vibrant community where people want to live, work, shop, and recreate.

RELATIONSHIP TO OTHER GENERAL PLAN ELEMENTS

Circulation and land use are closely linked elements that provide the framework for much of the General Plan. The policies and strategies should demonstrate a balance between land uses and the transportation facilities that serve them. The location and intensity of land uses determines the need for circulation system components and, in turn, the capacity of the circulation system often determines the location and feasibility of land uses. Within the context of the General Plan, the circulation policies are also interwoven with economic, housing, open space, air quality, noise, and safety policies.

Coordination between the Land Use Element and the Circulation Element:

- encourages walking and bicycle trips by promoting a compact urban form with neighborhood destinations close to residents;
- makes public transit feasible through coordination of the intensity and location of land uses; and
- reduces the length and number of vehicle trips outside of the community by promoting mixed-use development and by providing employment centers, shopping, and services within the city.

RELATIONSHIP TO THE REGIONAL TRANSPORTATION SYSTEM

The Circulation Element is intended to be compatible with the San Joaquin County Regional Transportation Plan and to support local transportation linkages to the regional transportation

network. These linkages include the Altamont Commuter Express train and the regional bus systems as well as future opportunities for rail and bus transportation.

PLANNING HORIZON

Perhaps more than other elements in the General Plan, the Circulation Element must take a very long-term view. Physical infrastructure, such as the road system, establishes a framework that is very difficult to alter. Land uses may change and buildings may be torn down and reconstructed, but the route of the public streets and utility corridors are typically fixed in place over time. Therefore, the circulation system components must be carefully considered for their long-term impacts on land use and community form. Major new roads are relatively expensive and must be planned long in advance in order to obtain sufficient funding and sufficient right-of-way. For these reasons, the Circulation Element must look beyond the twenty-year horizon typical of other elements in the General Plan.

1.2 PURPOSE AND INTENDED USES OF THE EIR

CEQA REQUIREMENTS FOR A FINAL EIR

This Final Environmental Impact Report (FEIR) for the proposed project has been prepared in accordance with the California Environmental Quality Act (CEQA) and State CEQA Guidelines. State CEQA Guidelines Section 15132 requires that an FEIR consist of the following:

- the Draft Environmental Impact Report (Draft EIR) or a revision of the draft;
- comments and recommendations received on the Draft EIR, either verbatim or in summary;
- a list of persons, organizations, and public agencies commenting on the Draft EIR;
- the responses of the lead agency to significant environmental concerns raised in the review and consultation process; and
- any other information added by the lead agency.

In accordance with State CEQA Guidelines Section 15132(a), the Draft EIR is incorporated by reference into this Final EIR.

An EIR must disclose the expected environmental impacts, including impacts that cannot be avoided, growth-inducing effects, impacts found not to be significant, and significant cumulative impacts, as well as identify mitigation measures and alternatives to the proposed project that could reduce or avoid its adverse environmental impacts. CEQA requires government agencies to consider and, where feasible, minimize environmental impacts of proposed development, and an obligation to balance a variety of public objectives, including economic, environmental, and social factors.

PURPOSE AND USE

The City of Manteca, as the lead agency, has prepared the Draft EIR and this Final EIR to disclose the expected environmental impacts, including impacts that cannot be avoided, growth-inducing

effects, impacts found not to be significant, and significant cumulative impacts, as well as identify mitigation measures and alternatives to the proposed project that could reduce or avoid its adverse environmental impacts. CEQA requires government agencies to consider and, where feasible, minimize environmental impacts of proposed projects, and confers an obligation to balance a variety of public objectives, including economic, environmental, and social factors.

This document and the Draft EIR, as amended herein, constitute the Final EIR, which will be used as a programmatic-level environmental document to evaluate subsequent planning and permitting actions associated with the proposed project. Many subsequent actions will require subsequent and/or supplemental analysis as the details of the action become clear from the development of detailed project planning, design, and engineering. Subsequent actions that may be associated with the proposed project are identified in Chapter 2.0 of the Draft EIR.

1.3 ENVIRONMENTAL REVIEW PROCESS

The review and certification process for the EIR has involved, or will involve, the following general procedural steps:

NOTICE OF PREPARATION AND INITIAL STUDY

The City of Manteca circulated a Notice of Preparation (NOP) of an EIR for the proposed project and an Initial Study on April 19, 2010 to trustee and responsible agencies, the State Clearinghouse (SCH# 2010042055), and the public. A scoping meeting was held on May 11, 2010 in the City of Manteca. Those present at the scoping meeting included representatives from the following: the City of Lathrop, the City of Manteca, and De Novo Planning Group. The NOP, Initial Study, and Scoping Meeting Notes are presented in Appendix A of the Draft EIR.

NOTICE OF AVAILABILITY AND DRAFT EIR

The City of Manteca published a public Notice of Availability (NOA) for the Draft EIR on December 7, 2010, inviting comment from the general public, agencies, organizations, and other interested parties. The NOA was filed with the State Clearinghouse (SCH# 2010042055) and the County Clerk, and was published in the local newspaper pursuant to the public noticing requirements of CEQA. The Draft EIR was available for public review from December 7, 2010 through January 25, 2011. The Draft EIR contains a description of the project, description of the environmental setting, identification of project impacts, and mitigation measures for impacts found to be significant, as well as an analysis of project alternatives, identification of significant irreversible environmental changes, growth-inducing impacts, and cumulative impacts. The Draft EIR identifies issues determined to have no impact or a less than significant impact, and provides detailed analysis of potentially significant and significant impacts.

RESPONSE TO COMMENTS/FINAL EIR

The City of Manteca received five (5) comment letters regarding the Draft EIR, one from a Manteca citizen, and four from public agencies. No additional comments were received. In accordance with CEQA Guidelines Section 15088, this Final EIR responds to the comments received. The Final

EIR also contains minor edits to the Draft EIR, which are included in Section 3.0, Errata. This document and the Draft EIR, as amended herein, constitute the Final EIR.

CERTIFICATION OF THE EIR/PROJECT CONSIDERATION

The City of Manteca will review and consider the Final EIR. If the City of Manteca finds that the Final EIR is "adequate and complete", the City Council may certify the Final EIR in accordance with CEQA. The rule of adequacy generally holds that an EIR can be certified if:

1) The EIR shows a good faith effort at full disclosure of environmental information; and

2) The EIR provides sufficient analysis to allow decisions to be made regarding the proposed project in contemplation of environmental considerations.

Upon review and consideration of the Final EIR, the City Council may take action to approve, revise, or reject the project. A decision to approve the proposed project, for which this EIR identifies significant environmental effects, must be accompanied by written findings in accordance with State CEQA Guidelines Sections 15091 and 15093. A Mitigation Monitoring Program, as described below, would also be adopted in accordance with Public Resources Code Section 21081.6(a) and CEQA Guidelines Section 15097 for mitigation measures that have been incorporated into or imposed upon the project to reduce or avoid significant effects on the environment. This Mitigation Monitoring Program will be designed to ensure that these measures are carried out during project implementation, in a manner that is consistent with the EIR.

1.4 ORGANIZATION OF THE FINAL EIR

This Final EIR has been prepared consistent with Section 15132 of the State CEQA Guidelines, which identifies the content requirements for Final EIRs. This Final EIR is organized in the following manner:

CHAPTER 1.0 – INTRODUCTION

Chapter 1.0 briefly describes the purpose of the environmental evaluation, identifies the lead, agency, summarizes the process associated with preparation and certification of an EIR, and identifies the content requirements and organization of the Final EIR.

CHAPTER 2.0 – COMMENTS ON THE DRAFT EIR AND RESPONSES

Chapter 2.0 provides a list of commentors, copies of written comments made on the Draft EIR (coded for reference), and responses to those written comments.

CHAPTER 3.0 - ERRATA

Chapter 3.0 consists of minor revisions to the Draft EIR in response to comments on the Draft EIR, as well as minor staff edits. The revisions to the Draft EIR do not change the intent or content of the analysis or mitigation.

CHAPTER 4.0 – FINAL MMRP

Chapter 4.0 consists of a Mitigation Monitoring and Reporting Program (MMRP). The MMRP is presented in a tabular format that presents the impacts, mitigation measures, and responsibility, timing, and verification of monitoring.

CHAPTER 5.0 – REPORT PREPARERS

Chapter 5.0 lists all authors and agencies that assisted in the preparation of the EIR, by name, title, and company or agency affiliation.

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2.1 INTRODUCTION

The City of Manteca received five (5) comment letters regarding the Draft EIR. Acting as lead agency, the City of Manteca has prepared a response to the Draft EIR comments. Responses to comments received during the comment period do not involve any new significant impacts or "significant new information" that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5.

2.2 LIST OF COMMENTORS

Table 2-1 lists the comments on the Draft EIR that were submitted to the City of Manteca. The assigned comment letter number, letter date, letter author, and affiliation, if presented in the comment letter or if representing a public agency, are also listed.

TABLE 2-1 LIST OF COMMENTORS

RESPONSE LETTER/ NUMBER	INDIVIDUAL OR SIGNATORY	AFFILIATION	DATE
A	Rodney Estrada	San Joaquin County Environmental Health Department	01-05-11
B	Scott Morgan	Governor's Office of Planning and Research	01-21-11
C	David Warner Arnaud Marjollet	San Joaquin Valley Unified Air Pollution Control District	01-24-11
D	Tom Dumas	California Department of Transportation	01-25-11
E	Louie Tallerico	Citizen - City of Manteca	01-26-11

2.3 COMMENTS AND RESPONSES

REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

CEQA Guidelines Section 15088 requires that lead agencies evaluate and respond to all comments on the Draft EIR that regard an environmental issue. The written response must address the significant environmental issue raised and provide a detailed response, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, the written response must be a good faith and reasoned analysis. However, lead agencies need only to respond to significant environmental issues associated with the project and do not need to provide all the information requested by the commentor, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Section 15204).

CEQA Guidelines Section 15204 recommends that commentors provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible environmental impacts of the project and ways to avoid or mitigate the significant effects of the project, and that

commentors provide evidence supporting their comments. Pursuant to CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

CEQA Guidelines Section 15088 also recommends that revisions to the Draft EIR be noted as a revision in the Draft EIR or as a separate section of the Final EIR. Chapter 3.0 of this Final EIR identifies all revisions to the Draft EIR.

RESPONSES TO COMMENT LETTERS

Written comments on the Draft EIR are reproduced on the following pages, along with responses to those comments. To assist in referencing comments and responses, the following coding system is used:

- Each letter is lettered (i.e., Letter A) and each comment within each letter is numbered (i.e., comment A-1, comment A-2).

Where changes to the Draft EIR text result from the response to comments, those changes are included in the response and identified with revision marks (<u>underline</u> for new text, ~~strike out~~ for deleted text).

San Joaquin County
Environmental Health Department
600 East Main Street
Stockton, California 95202-3029

Website: www.sjgov.org/ehd
Phone: (209) 468-3420
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DIRECTOR
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Robert McClellon, REHS
Jeff Carruesco, REHS, RDI
Kasey Foley, REHS

January 5, 2011

Mark McAvoy, Senior Civil Engineer
Public Works Department
Engineering Division
1001 West Center Street
Manteca, California 95337

Subject: Manteca Circulation Element Update

The San Joaquin County Environmental Health Department (EHD) has no comments in regards to this application. A-1

If you have any questions, please call Rodney Estrada, Lead Senior Registered Environmental Health Specialist, at (209) 468-0331.

Rodney Estrada,
Lead Senior REHS

RE:tl

Response to Letter A Rodney Estrada, San Joaquin County Environmental Health Department

Response A-1: The commentor noted that the San Joaquin County Environmental Health Department has not comments on the Draft EIR for the Manteca Circulation Element Update. This comment is noted. No further analysis or supplemental information is warranted.

JERRY BROWN
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

January 21, 2011

Mark McAvoy
City of Manteca
1001 W. Center Street
Manteca, CA 95337

Subject: Manteca Circulation Element Update
SCH#: 2010042055

Dear Mark McAvoy:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on January 20, 2011, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. B-1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH#	**2010042055**
Project Title	Manteca Circulation Element Update
Lead Agency	Manteca, City of
Type	EIR Draft EIR
Description	The proposed project is the adoption and implementation of the City of Manteca Circulation Element Update. The proposed project embodies goals, objectives, policies, and implementation measures covering seven transportation topics: Level of Service Standards, Major Street Master Plan, Parking, Bicycle and Pedestrian Systems, Public Transit, Goods Movement, and Transportation Demand Management.

Lead Agency Contact

Name	Mark McAvoy		
Agency	City of Manteca		
Phone	209-456-8421	*Fax*	
email			
Address	1001 W. Center Street		
City	Manteca	*State* CA	*Zip* 95337

Project Location

County	San Joaquin			
City	Manteca			
Region				
Lat / Long				
Cross Streets	City-wide			
Parcel No.				
Township		*Range*	*Section*	*Base*

Proximity to:

Highways	
Airports	
Railways	
Waterways	
Schools	
Land Use	Various Land Uses (Residential, commercial, industrial, agricultural, open space, etc.) - City Wide

Project Issues	Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects; Other Issues
Reviewing Agencies	Resources Agency; Department of Conservation; Department of Fish and Game, Region 2; Department of Parks and Recreation; Central Valley Flood Protection Board; Department of Water Resources; Office of Emergency Management Agency, California; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 10; Air Resources Board, Transportation Projects; Regional Water Quality Control Bd., Region 5 (Sacramento); Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Date Received 12/07/2010 *Start of Review* 12/07/2010 *End of Review* 01/20/2011

Note: Blanks in data fields result from insufficient information provided by lead agency.

Response to Letter B: Scott Morgan, Governor's Office of Planning and Research

Response B-1: The commentor noted that the State Clearinghouse submitted the Draft EIR to select state agencies for public review, public review ended on January 20, 2011, and no state agencies provided comment by that date. The commentor further acknowledges that the City of Manteca has complied with the public review requirements for draft environmental documents pursuant to the California Environmental Quality Act. This comment is noted. No further analysis or supplemental information is warranted.

January 24, 2011

Mark McAvoy, P.E.
City of Manteca
Planning Department
1001 West Center Street
Manteca, CA 95337

Project: Manteca Circulation Element Update
District CEQA Reference No: 20100228

Dear Mr. McAvoy:

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the Draft Environmental Impact Report (DEIR) for the project referenced above. The District offers the following comments:

1. The District will act as a Trustee Agency and, in some circumstances may act as a Responsible Agency, for projects within the scope of the DEIR. Individual projects may be subject to District rules and regulations, including: Regulation VIII (Fugitive PM10 Prohibitions), Rule 4102 (Nuisance), Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations), Rule 4002 (National Emission Standards for Hazardous Air Pollutants), and Rule 9510 (Indirect Source Review). C-1

   The list of rules identified above is neither exhaustive nor exclusive. Prior to the start of construction activities, project proponents are strongly encourage to contact the District's Small Business Assistance (SBA) Office to identify other District rules or regulations that apply to their project and to obtain information about District permit requirements. The District's SBA staff can be reached at (209) 557-6446. Current District rules can be found online at: www.valleyai.org/rules/1ruleslist.htm.

2. The DEIR concludes that short-term (construction) air impacts will have a potentially significant impact on air quality but with mitigation these impacts would be reduced to a less than significant impact. However, the list of mitigation measures required of all construction projects will only reduce fugitive dust impacts and will not reduce construction exhaust emissions. While dust suppression is a key element to C-2

achieving attainment of federal PM2.5 standards and maintaining the federal PM10 attainment status, fugitive PM10 emissions are not the only construction emissions of concern. The District offers the following recommendations for including strategies to reduce construction related PM10 exhaust and NOx emissions:

a. The District recommends the goal be expanded to include the reduction of construction exhaust emissions of NOx and PM10.

b. Feasible mitigation of construction exhaust emission includes use of construction equipment powered by engines meeting, at a minimum, Tier II emission standards, as set forth in §2423 of Title 13 of the California Code of Regulations, and Part 89 of Title 40 Code of Federal Regulations. The District recommends incorporating, as a condition of project approval, a requirement that off-road construction equipment used on site achieve fleet average emissions equal to or less than the Tier II emissions standard of 4.8 g/hp-hr NOx. This can be achieved through any combination of uncontrolled engines and engines complying with Tier II and above engine standards.

   Said mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments (CEQA Guidelines §15126.4, subd.(a)(2)).

c. For projects exceeding the applicability thresholds identified in District Rule 9510 (Indirect Source Review), the District recommends that demonstration of compliance with District Rule 9510, before issuance of the first building permit for each project phase including payment of all applicable fees, be made a condition of project approval. Information about how to comply with District Rule 9510 can be found on the District's website at: http://www.valleyair.org/ ISR/ISRHome.htm.

d. The District recommends inclusion of a policy to reduce construction exhaust emissions, such as contracting with construction firms that can demonstrate that construction fleets can meet the emissions reduction requirements set by District Rule 9510 (20% reduction of NOx emissions and 45% reduction of PM10 emissions).

C-2 cont'd

3. The District encourages the coordination of NOx and PM2.5 emissions with the San Joaquin Council of Governments to make sure a county conformity budget exceedance does not occur.

C-3

4. Mitigation Measure 3.2-1 states that a dust control plan is to be submitted to the District at least 48 hours prior to any earthmoving or construction activities. In suggesting this 48-hour timeframe, please consider that a dust control plan, and the Air Impact Assessment application for District Rule 9510, if applicable, are to be approved by the District prior to the start of the first activity generating emissions (including but not limited to demolition, grading, etc.) whose review period will take longer than 48 hours. The District recommends adjusting this timeframe accordingly. A dust control plan is to be submitted to the District at least 30 days prior to soil disturbance. An Air Impact Assessment application is to be submitted no

C-4

later than applying for a final discretionary approval with the public agency. Further information can be found at the links provided below:

- http://www.valleyair.org/busind/comply/PM10/forms/Reg%20VIII%20CAB.pdf
- http://www.valleyair.org/ISR/ISRHome.htm

C-4 cont'd

5. The list of goals within the DEIR includes several transportation topcis. The District encourages local vehicle owners to take advantage of District grant programs for trucks and cars (Proposition 1B and PASS). Further details are available at http://www.valleyair.org/Grant_Programs/GrantPrograms.htm

C-5

6. Mitigation measure 3.2-3 states that the City of Manteca shall assess the site for the presence of asbestos including asbestos from structures such as a road base, bridges and other structures prior to construction of circulation element projects. The District has regulations which require compliance with the asbestos demolition and renovation requirements developed by the Environmental Protection Agency. If "other" structures involves the renovation or demolition of a regulated facility, please contact the District for compliance requirements.

C-6

7. The DEIR states that the impact is less than significant for creating objectionable odors affecting a substantial number of people. Specific consideration should be given when approving projects that could expose receptors to nuisance odors. Facilities are not exempt from District Rule 4102 (Nuisance) nor does it preclude residents from filing nuisance odor complaints to the District. Therefore, the District recommends that when evaluating projects that would locate new receptors near existing sources the City determine the potential for the existing source to generate odors and receive nuisance complaints. A facility would be considered to have a potentially significant impact if the facility has received more than one confirmed complaint per year averaged over a three year period or three unconfirmed complaints per year averaged over a three year period. For facilities where there is currently no development in the vicinity, impacts are determined based on the distance and frequency at which odor complaints have occurred for similar projects.

C-7

8. The DEIR addresses odor and TACS. Accurate quantification of health risks and operational emissions requires detailed site specific information, e.g. type of emission source, proximity of the source to sensitive receptors, and trip generation information. The required level of detail is typically not available until project specific approvals are being granted. Thus, the District recommends that potential health risks be further reviewed when approving future projects, including those that would be exempt from CEQA requirements. Specific consideration should be given when approving projects that could expose sensitive receptors to toxic air contaminants (TACs). If the analysis indicates that TACs are a concern, the District recommends that a Health Risk Assessment (HRA) be performed. If an HRA is to be performed, it is recommended that the project proponent contact the District to review the proposed modeling approach.

C-8

   a. The District recommends including policies that establish buffer zones to separate potential sources of TACs from sensitive land uses. The District

recommends using, at a minimum, the distances indentified in ARB's *Air Quality and Land Use Handbook: A Community Health Perspective*. The document includes a table with recommended buffer distances associated with various types of common sources. The ARB handbook can found on the ARB's website at: http://www.arb.ca.gov/ch/landuse.htm.

b. In addition to ARB's handbook, various tools exist to aid the City in performing a screening level analysis for emissions from new sources, such as prioritization charts, SCREEN3, and various spreadsheets available from the District's website, to determine if a health risk assessment (HRA) would be required. More information on TACs, prioritizations and HRAs can be obtained by:
   - E-mailing inquiries to the District's Technical Services Division at: hramodeler@valleyair.org; or by
   - Visiting the District's website at: http://www.valleyair.org/busind/pto/Tox_Resources/AirQualityMonitoring.htm.

C-8 cont'd

If you have any questions or require further information, please call Patia Siong at (559) 230-5930.

Sincerely,

David Warner
Director of Permit Services

Arnaud Marjollet
Permit Services Manager

DW:ps

Cc: File

Response to Letter C: David Warner, Director of Permit Services
Arnaud Marjollet, Permit Services Manager
San Joaquin Valley Air Pollution Control District

Response C-1: The commentor notes that the District will act as a Trustee or Responsible Agency for projects within the scope of the DEIR and individual projects may be subject to District rules and regulations, including: Regulation VIII (Fugitive PM10 Prohibitions), Rule 4102 (Nuisance), Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations), Rule 4002 (National Emission Standards for Hazardous Air Pollutants), and Rule 9510 (Indirect Source Review). The commentor also states that prior to the start of construction activities, project proponents are strongly encourage to contact the District's Small Business Assistance (SBA) Office to identify other District rules or regulations that apply to their project and to obtain information about District permit requirements. The District's SBA staff can be reached at (209) 557-6446. Current District rules can be found online at: www.valleyai.org/rules/1ruleslist.htm.

This comment is noted. The City acknowledges the Districts rules and regulations. It is the City's practice to coordinate with the District during the CEQA process for individual projects, or if a project is exempt from CEQA, prior to the construction of individual projects.

Response C-2: The commentor notes that the list of mitigation measures identified in the DEIR that are required of all construction projects will only reduce fugitive dust impacts and will not reduce construction exhaust emissions. The commentor provided several recommendations for including strategies to reduce construction related PM10 exhaust and NOx emissions.

This comment is noted. Mitigation Measure 3.2-1 is modified as follows to address this comment.

MITIGATION MEASURES

Mitigation Measure 3.2-1: *The City of Manteca shall coordinate with the San Joaquin Valley Air Pollution Control District (SJVAPCD), as individual projects are designed, to determine the applicability of Rule 9510 (Indirect Source Review), and if necessary, prepare an Air Impact Assessment for the SJVAPCD to review. This rule will apply to any transportation or transit project where construction exhaust emissions equal or exceed two (2.0) tons of NOx or two (2.0) tons of PM10.*

In an effort to reduce construction exhaust emissions of NOx and PM10, the City should give preference to contractor bids that include construction fleets that can meet the emissions reduction requirements set by District Rule 9510 (20% reduction of NOx emissions and 45% reduction of PM10 emissions). The City should ensure that the selected contractor complies with the emission standards, as set forth in §2423 of Title 13 of the California Code of Regulations, and Part 89 of Title 40 Code of Federal Regulations.

The City of Manteca shall design Circulation Element projects to avoid significant amounts of haul material, such as excavated soil and construction debris -- construction sites should employ a balanced cut/fill ratio to the extent possible. The implementing agency shall prepare and submit a Dust Control Plan to the SJVAPCD at least ~~48 hours~~30 days prior to any earthmoving or construction activities. The implementing agency shall implement the following measures:

- *Maintain on-site truck loading zones.*
- *Configure on-site construction parking to minimize traffic interference and to ensure emergency vehicle access.*
- *Provide temporary traffic control during all phases of construction activities to improve traffic flow.*
- *Use best efforts to minimize truck idling to not more than two minutes during construction.*
- *Apply non-toxic soil stabilizers (according to manufacturers' specifications) to all inactive construction areas.*
- *During construction, replace ground cover in disturbed areas as quickly as possible.*
- *During construction, enclose, cover, water twice daily or apply non-toxic soil binders (according to manufacturers' specifications) to exposed piles with 5 percent or greater silt content and to all unpaved parking or staging areas or unpaved road surfaces.*
- *During the period of construction, install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.*
- *During the period of construction, assure that traffic speeds on all unpaved roads be reduced to 15 miles per hour or less.*
- *Pave all construction access roads at least 100 feet on to the site from permanent roadways.*
- *Cover all haul trucks.*

Response C-3: The commentor notes that the District encourages the coordination of NOx and PM2.5 emissions with the San Joaquin Council of Governments (SJCOG) to make sure a county conformity budget exceedance does not occur.

The City works closely with the SJCOG in the regional transportation planning efforts, including the RTP and CMP. This includes the development of a regional conformity analysis for the entirety of San Joaquin County, including the cities. The City of Manteca, in coordination with Caltrans and SJCOG, performs a project-level conformity analysis on individual projects as required by the federal funding requirements for federal transportation projects. The City of Manteca will continue to coordinate with SJCOG for regional and project-level conformity.

Response C-4: The commentor notes that Mitigation Measure 3.2-1 states that a dust control plan is to be submitted to the District at least 48 hours prior to any earthmoving or construction activities. In suggesting this 48-hour timeframe, please consider that a dust control plan, and the Air Impact Assessment application for District Rule 9510, if applicable, are to be approved by the District prior to the start of the first activity generating emissions (including but not limited to demolition, grading, etc.) whose review period will take longer than 48 hours. The District recommends adjusting this timeframe accordingly. A dust control plan is to be submitted to the District at least 30 days prior to soil disturbance. An Air Impact Assessment application is to be submitted no later than applying for a final discretionary approval with the public agency.

This comment is noted. Mitigation Measure 3.2-1 is modified as follows to address this comment.

MITIGATION MEASURES

Mitigation Measure 3.2-1: *The City of Manteca shall coordinate with the San Joaquin Valley Air Pollution Control District (SJVAPCD), as individual projects are designed, to determine the applicability of Rule 9510 (Indirect Source Review), and if necessary, prepare an Air Impact Assessment for the SJVAPCD to review. This rule will apply to any transportation or transit project where construction exhaust emissions equal or exceed two (2.0) tons of NOx or two (2.0) tons of PM10.*

In an effort to reduce construction exhaust emissions of NOx and PM10, the City should give preference to contractors bids that include construction fleets that can meet the emissions reduction requirements set by District Rule 9510 (20% reduction of NOx emissions and 45% reduction of PM10 emissions). The City should ensure that the selected contractor complies with the emission standards, as set forth in §2423 of Title 13 of the California Code of Regulations, and Part 89 of Title 40 Code of Federal Regulations.

The City of Manteca shall design Circulation Element projects to avoid significant amounts of haul material, such as excavated soil and construction debris -- construction sites should employ a balanced cut/fill ratio to the extent possible. The implementing agency shall prepare and submit a Dust Control Plan to the SJVAPCD at least ~~48 hours~~30 days prior to any earthmoving or construction activities. The implementing agency shall implement the following measures:

- *Maintain on-site truck loading zones.*
- *Configure on-site construction parking to minimize traffic interference and to ensure emergency vehicle access.*
- *Provide temporary traffic control during all phases of construction activities to improve traffic flow.*
- *Use best efforts to minimize truck idling to not more than two minutes during construction.*
- *Apply non-toxic soil stabilizers (according to manufacturers' specifications) to all inactive construction areas.*
- *During construction, replace ground cover in disturbed areas as quickly as possible.*
- *During construction, enclose, cover, water twice daily or apply non-toxic soil binders (according to manufacturers' specifications) to exposed piles with 5 percent or greater silt content and to all unpaved parking or staging areas or unpaved road surfaces.*
- *During the period of construction, install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.*
- *During the period of construction, assure that traffic speeds on all unpaved roads be reduced to 15 miles per hour or less.*
- *Pave all construction access roads at least 100 feet on to the site from permanent roadways.*
- *Cover all haul trucks.*

Response C-5: The commentor notes that the list of goals within the DEIR includes several transportation topics. The District encourages local vehicle owners to take advantage of District grant programs for trucks and cars (Proposition 1B and PASS). Further details are available at http://www.valleyair.org/Grant_Programs/GrantPrograms.htm

This comment is noted. This comment does not raise potential issues, inconsistencies, or errors in the DEIR and a specific response is not warranted.

Response C-6: The commentor notes that a mitigation measure requires the assessment of an individual site for the presence of asbestos, including in structures such as road base, bridges and other structures prior to construction. The commentor further notes that the District has regulations which require compliance with the asbestos demolition and renovation requirements developed by the Environmental Protection Agency and the District should be contacted for compliance requirements prior to the renovation or demolition of a regulated facility.

The City concurs with the commentor. The City of Manteca will review individual projects as they are designed to determine the presence of asbestos in structures. It is the City's normal practice to require a Phase I ESA (and Phase II ESA if required) as a technical study in the project-level CEQA document prior to project approval of any demolition or renovation projects. If asbestos is determined to be present the City will coordinate with the District to ensure compliance with all rules and regulations.

Response C-7: The commentor notes that specific consideration should be given when approving projects that could expose receptors to nuisance odors. The commentor further notes that when evaluating projects, the City should determine the potential for the existing sources to generate odors and receive nuisance complaints. The commentor indicates that a facility would be considered to have a potentially significant impact if the facility has received more than one confirmed complaint per year averaged over a three year period or three unconfirmed complaints per year averaged over a three year period. For facilities where there is currently no development in the vicinity, impacts are determined based on the distance and frequency at which odor complaints have occurred for similar projects.

This comment is noted. Each individual improvement will be reviewed for the potential to generate odors and receive nuisance complaints.

Response C-8: The commentor notes that accurate quantification of health risks and operational emissions requires detailed site specific information, e.g. type of emission source, proximity of the source to sensitive receptors, and trip generation information, which is typically not available until project specific approvals are being granted. Thus, the District recommends that potential health risks be further reviewed when approving future projects, including those that would be exempt from CEQA requirements. Specific consideration should be given when approving projects that could expose sensitive receptors to toxic air contaminants (TACs). If the analysis indicates that TACs are a concern, the District recommends that a Health Risk Assessment (HRA) be performed. If an HRA is to be performed, it is recommended that the project proponent contact the District to review the proposed modeling approach.

This comment is noted. The City of Manteca will review individual projects as they are designed to determine the potential to expose sensitive receptors to TACs. The review will

include the appropriate screening models. When the potential is determined to be present, it is the City's practice to require an HRA as a technical study in the project-level CEQA document prior to project approval.

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

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Flex your power!
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January 25, 2011

10-MER-Various
Manteca Circulation Element Update
SCH #2010042055

Mark McAvoy
City of Manteca, Public Works Dept
Engineering Division
1001 West Center Street
Manteca, CA 95337

Dear Mr. McAvoy,

The California Department of Transportation (Department) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the **Manteca Circulation Element Update** (MCEU). The project is the adoption and implementation of the MCEU, which embodies goals, objectives, policies, and implementation measures covering seven transportation topics: Level of Service Standards, Major Street Master Plan, Parking, Bicycle and Pedestrian Systems, Public Transit, Goods Movement, and Transportation Demand Management.

Upon review of the project, the Department has the following comments:

Traffic Operations

1. The Transportation and Circulation section of the DEIR is missing a Surface Transportation Assistance Act (STAA) Truck section that is utilizing freeway segments and interchanges intersections within the State Right-of-Way (ROW). Please ensure that all ramps intersections as well as other intersections within the State ROW are able to accommodate STAA trucks for all turn movements. Therefore, please address information on any interchanges that are currently not STAA Terminal Access and provide truck turn template for STAA trucks for all turn movements. D-1

Travel Forecasting

1. Based on Table 3.8-1(*Signalized Intersection Level of Service Criteria*) of the DEIR, the Level of Service (LOS) shown in the following tables are not accurate: D-2
   a) Table 3.8-5: lines 7 and 22
   b) Table 3.8-9: lines 4 and 16
   c) Table 5.0-12: line 16

   Please make the necessary corrections to the above tables.

"Caltrans Improves mobility across California"

2. Based on Table 3.8-3(*Manteca Roadway Segment LOS Thresholds*) of the DEIR, the LOS shown in the following tables are not accurate:
   a) Table 3.8-10: lines 1 and 5
   b) Table 5.0-9: line 9

   Please make the necessary corrections to the above tables. D-3

3. Based on Table 3.8-4 (*CMP Facility Peak Hour LOS Thresholds*) of the DEIR, the LOS shown in the following tables are not accurate:
   a) Table 3.8-12: lines 17 through 25, 27, 28, 29, 33, 38, 39, 43
   b) Table 5.0-11: line 17

   Please make the necessary corrections to the above tables. D-4

4. Please provide the LOS thresholds used to support the LOS for *Outside of City Roadway Segment* shown in Table 3.8-7, Table 3.8-11, Table 5.0-4, Table 5.0-9, and Table 5.0-14. D-5

5. Table 3.8-2 (*Manteca Freeway Segment LOS Thresholds*) shows the LOS thresholds for four to ten lanes. A segment on I-5 from SR-120 to I-205 is shown as 12 lanes in Table 3.8-12, Table 5.0-5, Table 5.0-10, and Table 5.0-15. Please provide the LOS thresholds used for twelve lanes to support the LOS shown in these tables. D-6

6. Table 5.0-11 (*CMP Segment Forecasts and LOS – No Project (Unconstrained)*) is based on the LOS thresholds shown in Table 3.8-4 (*CMP Facility Peak Hour LOS Thresholds*). Table 3.8-4 shows the LOS thresholds for two to six lanes for *Major City/County Roadway Segments*. However, Table 5.0-11 lists a roadway segment on McKinley Avenue Expressway from SR-120 to Woodward Avenue with eight lanes. Please provide the LOS thresholds used for eight lanes to support the LOS threshold shown for this roadway segment. D-7

7. The proposed MCEU, in addition to the Terra Ranch, Manteca Trails, and Machado Estates projects will impact I-5, SR-99, and SR-120. However, no mitigation measures were proposed to avoid or reduce the impacts. The proposed installation of traffic signals at some ramp junctions is not adequate. Based on the traffic information in the DEIR, mitigation measure should include the placement of ramp meters at the following interchanges:
   a) SR-120/Main Street
   b) SR-120/Airport Way
   c) SR-120/Union Road
   d) SR-99/Austin Road
   e) SR-99/SR-120
   f) SR-99/Lathrop Road
   g) I-5/Louise Avenue
   h) I-5/Lathrop Road

   D-8

8. Since upgrade to the SR-120/Airport Way and SR-120/Yosemite Ave interchanges is not included in Tier 1 of the 2011 Regional Transportation Plan (RTP), no improvements are expected soon for these interchanges. The proposed MCEU, Terra Ranch Subdivision, Manteca Trails, and Machado Estates projects will increase congestion and worsen the operation of these interchanges. All interchanges on I-5, SR-99, and SR-120 should be improved first or simultaneously with this proposed project. D-9

9. No mitigation measures were shown in the DEIR to add additional lanes to SR-99 and I-5 mainlines to avoid or reduce the congestion. D-10

10. In order to avoid or reduce congestive street parking in the downtown area, the MCEU may consider improvement to the parking system by building parking structures and implementing a Complete Streets policy to encourage the use of public transit, walking, and bicycling. D-11

Systems & Advanced Planning

1. The segment of SR-120 from I-5 to SR-99 is currently a four-lane freeway, with a 2025 concept facility of eight lanes and a suggested High Occupancy Vehicle (HOV) lane. The segment of SR-120 from SR-99 to Austin Road (Eastern Manteca) is currently a two-lane conventional highway with 2025 concept facility of a six-lane conventional highway. SR-99 from Ripon to Arch Road is a four-lane freeway with a 2025 concept facility of eight lanes with a HOV lane. Both highways are on the interregional road system, and within urban areas, the minimally acceptable concept LOS required is D. SR-99 is a National Network Route, and SR-120 is a Terminal Access Route for STAA. For purposes of goods movement, STAA established the federal standard for truck size (65 feet), with the associated design requirements for roads to accommodate such freight. D-12

2. Current programmed State Highway System projects within the City of Manteca's sphere of influence include:
   a) Reconstruct SR-99/SR-120 E. interchange (10-3A090) – ***Project completed in 2008***
   b) Widen SR-99 to six lanes from Austin Road interchange to Arch Road interchange (10-0E610) – ***Design Phase*** D-13
   c) Upgrade SR-120/Union Road interchange (10-0P200) – ***Environmental Phase***
   d) Improve STAA truck turning radius on SR-120 at the Vasconcellos Road intersection (10-0Q640) – ***Design Phase***
   e) Widen SR-120 east of SR-99 to Austin Road to five lanes (10-0E010) – ***Project completed in 2008***
   f) Tree planting on SR-99 from Austin Road to Yosemite Avenue (10-0U370) – ***Construction Phase***

3. The above projects were compared to the projects listed in Tier I and Tier II of the 2011 RTP specific to the City of Manteca, and two inconsistencies were noted:

   a) Tier I of the 2011 RTP listed a project on SR-120 at McKinley Avenue (MPO ID SJ07-2009), which would reconstruct/improve the interchange, including necessary auxiliary lanes. According to our records, this project (10-0I1890) was shelved at the request of City of Manteca in July 2008. As a Tier I project, it should be programmed and would be expected to become active in the near future. The RTP also listed three expressway projects for the new McKinley Avenue in Tier I, from the SR-120/McKinley Ave interchange connecting to SR-99. However, per the RTP, these projects are not shown as being programmed in the FTIP. D-14

b) The proposed SR-99/McKinley Ave interchange shown in Figure 4.2 (*Manteca Major Street Master Plan*) of the MCEU does not appear in the 2011 RTP.

4. The MCEU overview is intended to surpass the twenty-year planning horizon stipulated with the General Plan Updates. As stated in Section 4.4, the MCEU "*…is intended to be compatible with the 2007 San Joaquin County RTP.*" At present, a Final Draft 2011 RTP has been prepared by San Joaquin County Council of Governments, which would supersede the 2007 RTP. The MCEU should be revised and updated to reflect the 2011 RTP. D-15

5. Figure 4.3 of the MCEU depicts planned future modifications to selected local roads' lane widths. Proposed along all existing and possibly future interchanges on SR-120 is an increase to six lanes. With an increase in the number of lanes comes consideration of how these additional lanes would operate with the concept facility of eight lanes and whether these additional access lanes will require inclusion of auxiliary lanes in addition to the mainline. This could considerably add to the future ROW footprint, and could affect Atherton Drive, which is currently a frontage road proposed for widening to four lanes. D-16

6. Section 4.14 (*Goods Movement*) of the MCEU has an implementation measure that states: "*These truck routes are designed to facilitate the movements of goods from the regional transportation systems to the goods movement industries in the City. These roads shall be designed to accommodate STAA trucks through adequate corner radii, appropriate lane widths, and other design features.*" Figure 4.4, *Truck Routes* map, should be understood by this passage as representing current and future STAA routes in Manteca. It appears that the central business district shown in Figure 4.1 will not be served by any inner city truck routes. Yosemite Ave is a STAA route from SR-99 west to the Spreckels Business Park, and then proceeds southward on Spreckels Avenue to Moffat Boulevard, and proceeds west to Main Street via Industrial Park Drive. Furthermore, the STAA segment on Industrial Park Drive is indicated in both Figure 4.3 and Figure 4.4, but not in Figure 4.2. D-17

7. Of particular interest to Goods Movement facilitation, the proposed expansion of the intermodal freight facility and the development of the Center Point warehousing facility near the Airport Way/Roth Road intersection would best serve State Transportation Planning interest if Airport Way is designated as a STAA route southward towards SR-120 in order to alleviate some of the Bay Area freight origin/destination from having to travel via I-5 to Roth Road. It should be noted that expansion of freight facilities at this particular area would increase the volume of truck traffic upon I-205 merging on I-5 to avoid the SR-120 off- ramp, as well as the return truck traffic merging from I-5 into the SR-120 access traffic to enter I-205. Figure 4.4 shows Airport Way as an existing STAA route within Manteca, yet no signage is currently posted. Terminal Access should be applied for this route. D-18

8. The MCEU appears to provide conflicting information on local rail opportunities.

   a) Page 4-3 states: "*The railroad is an inherent safety concern because of the existing at-grade street crossings and the potential for vehicle, bicycle, or pedestrian versus train collisions.*" However, page 4-5 mentions the construction of the Tidewater Bikeway, which appears to be the result of relinquishment of the Tidewater Railroad ROW. Please clarify. D-19

b) Page 4-6, *Goal C-7*, states: "*Accommodate truck and freight movements by developing city-wide truck routes and encouraging the development of freight and warehousing centers near existing rail lines and spurs.*" Would these existing rail lines and spurs in the City of Manteca originate from the Tidewater Railroad that has been converted to a bike path (Tidewater Bikeway) paralleling Moffat Blvd going farther northwest, or would these rail lines and spurs be in association with the Union Pacific line that includes the Intermodal facility near the Roth Road/Airport Way intersection in Lathrop, or both? Please clarify. D-19 Cont'd

A map showing the distribution of these facilities would be helpful, as integration of a local spur line with the intermodal facility could alleviate some need for truck route improvements, yet may present some at-grade conflicts with traffic.

If you have any questions, please contact Sinarath Pheng at (209) 942-6092 (e-mail: Sinarath_Pheng@dot.ca.gov) or myself at (209) 941-1921.

Sincerely,

for TOM DUMAS, CHIEF
OFFICE OF METROPOLITAN PLANNING

Response to Letter D: Tom Dumas, Chief, Office of Metropolitan Planning, Department of Transportation

Response D-1: The commentor notes that the DEIR is missing a STAA Truck section and requests that truck turn templates be provided for all interchange turn movements.

This DEIR evaluates the City's proposed General Plan update, which is a long-range planning document. While truck volumes were considered when evaluating traffic operations impacts, details like truck turning templates were not considered as part of this analysis. As specific projects develop and new state highway projects are pursued between Caltrans and the City of Manteca, adequate truck accommodations (including corner radii) will be made for Truck Routes within the City. No other action is required to address this comment.

Response D-2: The commentor notes that several tables in Chapter 3 and 5 are inaccurate.

The tables referenced in the comment letter were reviewed for accuracy and no issues were found. The tables referenced by the commentor had intersection delay values rounded to the nearest second to aid in readability. The commentor's concern referred to the rounded values and noted potential inconsistencies with the HCM LOS thresholds. A review of the appendix data, which includes delay levels reported to the tenth of a second, indicates that the LOS values reported in the DEIR tables are correct. No further action is required.

Response D-3: The commentor notes that two tables in Chapter 3 and 5 are inaccurate.

Table 3.8-3 line 1 was reviewed and found to have an error. The No Project (constrained) LOS should be "C" rather than "D." This correction is reflected in the errata document, and does not alter the study conclusions. No error was found on line 5 of Table 3.8-10; the traffic volume is at the threshold of LOS C/D conditions and is accurately reported as operating at LOS C. Table 5.0-9 line 9 was also found to have an error. The No Project (unconstrained) LOS should be "C" rather than "A." This correction is reflected in the errata document, and does not alter the study conclusions.

Response D-4: The commentor identifies errors in Table 3.8-12 and 5.0-11.

The lines referenced as being in error in Table 3.8-12 do not exist. Therefore, it is assumed that the commentor was referring to Table 3.8-13. Regarding the errors in the lines mentioned by the commentor, the table format appears to be causing confusion. The "Number of Lanes" column is ambiguous. This column refers to the No Project (Constrained) scenario; the Circulation Element Update scenario includes roadway widening not shown in the table, which is likely causing confusion. The errata document presents a revised table showing the number of lanes under the Circulation Element

Update scenario. No errors were present in the original LOS data. A similar correction was made to Table 5.0-11. In addition, a slight error was found in Table 5.0-11 line 17. The table should read 3,300 rather than 3,050. This correction is reflected in the errata document, and does not alter the study conclusions.

Response D-5: The commentor requests that the LOS thresholds for the "Outside of City Roadway Segments" be defined.

The roadway segment LOS thresholds for the roadway facilities outside the City of Manteca are the same as those presented in Table 3.8-3 on page 3.8-8 of the Draft EIR. See below. No additions or corrections are necessary.

TABLE 3.8-3 MANTECA ROADWAY SEGMENT LEVEL OF SERVICE THRESHOLDS

NUMBER OF LANES	*LOS A*	*LOS B*	*LOS C*	*LOS D*	*LOS E*
2	8,400	9,300	11,800	14,700	17,300
4	18,600	20,600	26,000	32,500	38,200
6	28,800	32,000	40,300	50,400	59,300
8	38,100	42,300	53,300	66,600	78,400

SOURCE: HIGHWAY CAPACITY MANUAL, TRANSPORTATION RESEARCH BOARD, 2000.

Response D-6 : The commentor requests that the LOS threshold for 12 lane freeways be provided.

The 12 lane freeway LOS threshold is provided in the table below and is based on an extrapolation of the LOS thresholds for freeway segments with fewer lanes. This addition is reflected in the errata document, and does not alter the study conclusions.

TABLE 3.8-2 MANTECA FREEWAY SEGMENT LEVEL OF SERVICE THRESHOLDS

NUMBER OF LANES	*LOS A*	*LOS B*	*LOS C*	*LOS D*	*LOS E*
4	27,600	45,200	63,600	77,400	86,400
6	41,400	67,800	95,400	116,100	129,600
8	55,200	90,400	127,200	154,800	172,800
10	69,000	113,000	159,000	193,500	216,000
12	82,800	135,600	190,800	232,200	259,200

SOURCE: HIGHWAY CAPACITY MANUAL, TRANSPORTATION RESEARCH BOARD, 2000.

Response D-7: The commentor requests that the SJCOG CMP LOS threshold for 8 lane roadway segments be provided.

The 8 lane SJCOG CMP LOS threshold for major City/County roadway segments is provided in the table 3.8-4 on page 3.8-9 of the Draft EIR. See below. This table is based on an extrapolation of the LOS thresholds for roadway segments with fewer lanes. No additions or corrections are necessary.

TABLE 3.8-4 CMP FACILITY PEAK HOUR LEVEL OF SERVICE THRESHOLDS

NUMBER OF LANES	*LOS A*	*LOS B*	*LOS C*	*LOS D*	*LOS E*
Major City/County Roadway Segments					
2	-	-	870	1,390	1,480
4	-	-	2,030	2,950	3,120

6	-	-	3,170	4,450	4,690
8	-	-	4,290	5,890	6,190
Freeway Segments					
4	2,050	3,350	4,840	6,250	7,110
6	3,240	5,250	7,600	9,840	11,180
8	4,420	7,160	10,360	13,420	15,240
10	5,600	9,070	13,130	16,980	19,310
12	6,780	10,980	15,890	20,560	23,360

SOURCE: FLORIDA DEPARTMENT OF TRANSPORTATION (FDOT) QUALITY/LEVEL OF SERVICE HANDBOOK (2002).

Response D-8: The commentor notes that the proposed Circulation Element Update would impact I-5, SR 99, and SR 120 and that the proposed traffic signal/interchange improvements assumed under the Circulation Element update are not adequate. The commentor notes that mitigation should include ramp meters at eight interchanges in Manteca and Lathrop.

Details such as the addition of ramp meters at specific locations requires analysis at a level that is beyond the consideration of this DEIR. The City of Manteca has supported the installation of ramp meters as a part of recent interchange planning projects, including the SR 120/Union Road and SR 99/Lathrop Road interchanges. Moreover, the City supports regional projects through its participation in the Measure K transportation sales tax and the SJCOG Regional Traffic Impact Fee program. These two programs provide a considerable level of funding for the majority of the interchanges listed by the commentor. While details like ramp meters are not typically included at this stage of planning, the City supports their installation and will work with Caltrans to include them, if warranted, on the design of City funded projects.

Response D-9: The commentor notes that the proposed improvements to the SR 120/Airport Way interchange (which is assumed in the Circulation Element Update) and SR 120/Yosemite Avenue interchange (which is not assumed in the Circulation Element Update), are not included in the 2011 SJCOG RTP Tier I project list. The commentor also notes that the proposed Circulation Element update, Terra Ranch Subdivision, Manteca Trails, and Machado Estates projects will contribute to congestion and worsen operations at the two interchanges. The commentor also notes that "all interchanges on I-5, SR 99, and SR 120 should be improved first or simultaneously with this project."

The comment related to the 2011 SJCOG Tier I RTP list is noted, but this comment does not impact the findings of the DEIR. The SR 120/Airport Way interchange is considered to be reasonably foreseeable under the time span of the DEIR analysis. Specific development projects (e.g., Machado Estates, Lowes Retail, etc.) have identified fair share funding contributions toward this interchange and the proposed Public Facilities Fee (PFF), which is recommended to be adopted by the City Council in the Circulation Element, contains several projects related to the implementation of this interchange improvement.

Considering these factors, the DEIR analysis assumed that the SR 120/Airport Way interchange was constructed under the Cumulative Conditions analysis horizon.

The comment related to the timing of improvements is noted, but CEQA does not require that mitigation phasing or concurrency be described as part of the EIR. Rather, CEQA says that "mitigations must be implemented within a reasonable period of time." Note, however, that the City of Manteca has a long track record of providing planning and capital support for Caltrans projects, which reduces city-related traffic congestion before it becomes a major concern. Recent examples include the financial support for the SR 120/Union Road interchange, the SR 99/Lathrop Road interchange, and signalization improvements at SR 120/Airport Way and SR 120/Main Street interchanges.

Response D-10: The commentor notes that no mitigation measures were shown in the DEIR to add lanes to SR 99 and I-5 to reduce or avoid congestion.

The DEIR identified impacts on I-5 between Louise Avenue and SR 120 and on SR 99 between Yosemite Avenue and SR 120. Note that the DEIR analysis assumed that major widening projects were completed on both I-5 and SR 99:

- I-5 Widening – freeway improved to include three lanes plus an HOV lane in each direction from SR 120 to French Camp Road. (Sources: *SJCOG RTIF, Measure K Renewal Program;* project description based on I-*205/I-5 Corridor System Management Plan*, San Joaquin County Final Report, 2010.) It is further noted that the SJCOG 2011 RTP includes the addition of HOV lanes on this freeway segment.

- SR 99 Widening – freeway widened from four to six lanes from SR 120 to Arch Road. This includes reconstruction of the SR 99/Lathrop Road interchange. (Source: *Measure K Renewal project with programmed Prop 1B funding*). Based on the SJCOG RTP and other relevant documents, additional widening beyond this (and south of SR 120) is not planned.

While additional lanes could potentially reduce congestion on these segments, additional widening is not planned. The City of Manteca does not have jurisdiction over state facilities to recommend unplanned widening projects as a mitigation measure; there is no guarantee that Caltrans or other agencies will approve or support any currently unplanned projects.

While the DEIR did not recommend unplanned/unsupported widening projects, the City of Manteca does support ongoing regional congestion relief projects through its participation in Measure K and the SJCOG Regional Traffic Impact Fee programs.

Response D-11: The commentor recommends that the Circulation Element consider improvements to the parking system in downtown Manteca and the adoption of a Complete Streets policy to encourage travel by alternative modes.

These comments refer to the Circulation Element and do not require any action related to the DEIR. However, it should be noted that the Circulation Element Update includes numerous goals, policies, and implementation measures that address complete streets throughout the Circulation Systems, as well as parking in the Downtown area. See Page 2.0-6 through 2.0-19 of the Draft EIR for a list of the goals, policies, and implementation measures.

Specifically, the Circulation Element includes an implementation action for the City to consider a Parking Management Plan in the downtown area that will ensure that parking facilities are provided in a coordinated manner and will encourage patrons to park once downtown and walk to other locations. In addition, the LOS threshold in the downtown area was set at a level to encourage the use of alternative modes of travel and to eliminate the need to widen roads and degrade the quality of the pedestrian environment in the area. The updated circulation element also incorporates Complete Streets policies to balance travel for all modes, consistent with Assembly Bill 1358.

Response D-12: The commentor describes the concept facility specifications of several State highways in the analysis area, the LOS thresholds for State facilities in the analysis area, and STAA truck design requirements for SR 99.

This comment does not raise potential issues, inconsistencies, or errors in the DEIR and a specific response is not warranted. However, it should be noted that Caltrans concept facilities describe a roadway condition that would be required to meet the agency's concept LOS, but often the concept design is not implemented because of financial, environmental, air quality, or right of way constraints. Concept facilities are not considered reasonably foreseeable plans for future State highway projects. A case in point is SR 120 between I-5 and SR 99. The RTP and various fee programs are contemplating the widening of this facility to a six-lane freeway, whereas the commentor notes that the ultimate facility is an eight-lane freeway with HOV lanes.

Response D-13: The commentor describes several programmed state highway projects in the study area.

The comments are noted; all relevant programmed projects were included in the DEIR Cumulative Conditions analysis. This comment does not raise potential issues, inconsistencies, or errors in the DEIR and a specific response is not warranted.

Response D-14: The commentor describes the status of several projects in the SJCOG RTP.

According to the 2011 SJCOG RTP, the SR 120/McKinley Avenue interchange is a Tier I project, which is expected to open to traffic in 2020. While the City did put this project on hold in 2008, this delay was caused primarily by the lack of development interest in the area (which partially drives the need for the new interchange), and is not related to lack of interest by the City. The City of Manteca is currently serving as the lead agency to initiate development of the interchange Project Approval and Environmental Document (PA&ED) and Design in order to facilitate its environmental clearance, design, and construction. The City of Manteca has proposed to include the McKinley Expressway project in its PFF program. One of the implementation actions included in the Circulation Element is for the City of Manteca to adopt the PFF program to support this facility and all others described in the Circulation Element. Also in response to the comment, the SR 99/McKinley Avenue interchange described in the Circulation Element is equivalent to the SR 99/Austin Road interchange (MPO ID SJ11-2023), which is listed as a Tier II project in the 2011 SJCOG RTP. The City of Manteca will be serving as the lead agency to initiate development of the interchange Project Study Report, which will finalize the location of this interchange, estimate its cost, and evaluate potential configurations and environmental impacts.

Response D-15: The commentor notes that the Circulation Element should be updated to reflect the 2011 RTP.

This comment relates to policies in the Circulation Element, and not the DEIR. This comment does not raise potential issues, inconsistencies, or errors in the DEIR and a specific response is not warranted. However, it is acknowledged that the City will update the Circulation Element to reference the currently adopted RTP (versus 2007 RTP).

Response D-16: The commentor raises questions about how the planned modifications could conflict with the eight-lane concept facility along SR 120.

It should be noted that the Circulation Element is a long-range planning document and does not consider detailed design issues such as overpass spans and interchange designs. As specific projects move forward, such as the SR 120 interchange improvement project, the City of Manteca will work closely with Caltrans to ensure that the designs of the interchange meet the requirements of Caltrans. The City of Manteca has successfully worked with Caltrans on the Project Study Reports for the SR 120/McKinley Avenue and SR 120/Union Road interchanges.

Response D-17: The commentor refers to the STAA truck routes shown in the Circulation Element.

This comment refers to the Circulation Element, not the DEIR; no action on the DEIR needs to be taken relative to this comment. Figure 4.4 presented in the draft Circulation Element,

and reviewed by Caltrans, will not be included in the final Circulation Element to be approved by the City Council. The truck routes will be a document maintained outside of the Circulation Element and administered by the Public Works Department. Separating the truck routes from the Circulation Element will allow the City to update these routes without the need for a General Plan amendment. Figures 4.3 and 4.2 are unrelated to the truck routes and these figures do not need to be modified.

Response D-18: The commentor refers to goods movement in the context of the proposed CenterPoint Intermodal facility and STAA truck routes on Airport Way.

As described above, Figure 4.4 in the draft Circulation Element will be removed prior to adoption by the City Council. However, as shown in the referenced figure, the City of Manteca supports the designation of a truck route along Airport Way between French Camp Road and the future McKinley Expressway to facilitate goods movement in the western portion of the City. The City will evaluate the option to install Terminal Access truck route signage along this route. Truck route planning efforts will be performed by the Public Works Department separate from the Circulation Element Update.

Response D-19: This comment raises a question about the interaction between the existing UPRR facilities and the proposed Tidewater Bikeway extension.

It should be noted that the proposed Tidewater Bikeway extension will be similar to the existing Bikeway along the active UPRR tracks between Center Street and Industrial Park Drive. No relinquishment of the UPRR tracks is anticipated or required for the extension of the Tidewater Bikeway.

The commentor also raises a question about the location of potential future industrial developments that could take advantage of rail shipment through new or existing rail spurs. In response, the exact location of future rail-served industrial developments is beyond the scope of the Circulation Element update. However, based on the existing zoning and future land use designations in the General Plan, no industrial development is anticipated to occur along the abandoned railroad portions of the Tidewater Bikeway. As the Tidewater Bikeway is extended further south (potentially along the Moffat Boulevard corridor), the design of the facility will consider the crossing of existing and potential future rail spurs and design accommodations will be made to minimize the likelihood of bicycle/rail conflicts.

From: Louie Tallerico [mailto:ltalle@clearwire.net]
Sent: Wednesday, January 26, 2011 6:21 PM
To: Rick Riella; McAvoy, Mark; Bill Barnhart
Subject: North Manteca

Mark,

I got your email off the web. Appreciated meeting you at the meeting. Sorry that there was some confusion over the maps. I attached a brief letter that I had previously sent out with some comments about North Manteca and the traffic flow and other issues. As was stressed last night, we feel that it is extremely important to minimize the impact of truck traffic from the proposed industrial development. We are also very interest is seeing a designated truck route with the appropriate design requirements. If we do it right, we will minimize the degradation of "Quality of Life" for the residential developments in North Manteca. I believe that the document you are preparing is an excellent opportunity for us to develop a good vision for the future road system in North Manteca. Your hard work on this project is much appreciated. I included Bill Barnhart and Rick Riella on the distribution. I am looking forward to seeing the final versions of the maps for the area. It would be good if we can review them before there is a public meeting. E-1

Thanks for Your Time
Louie Tallerico

1

Draft C

To: Distribution **12/3/2010**

From: Louie Tallerico
PO Box 721
Manteca, CA 95336

Re: Union Pacific Lathrop Modernization Project

I am in favor of the Union Pacific Lathrop Modernization Project and the CenterPoint Properties Project. The purpose of this memorandum is to discuss some of the key issues that have been addressed by concerned citizens at numerous meetings. The major issues appear to be:

Traffic on roads adjacent to the facility
Use of Lathrop Road to I-5 and H99
Use of Airport Way
Congestion on Roth Road caused by stopped trains

Noise that could impact residential areas
Train switching
Loading and unloading trucks
Movement of trucks on site
Loading and unloading at Warehouses
Trucks jumping curbs at intersections

Light
Excessive light during the night that could impact residential areas

E-2

With the continued and projected growth in north Manteca, North Lathrop, and South Stockton, it is important to think about the near-term and long-range solutions that will help address the issues. People may complain about noise and light, but one of the major annoyances is being stopped for extended periods of time waiting for the train to move! Historically, this has been a major problem on Roth Road and Lathrop Road. The installation of the grade separation on Lathrop Road has resulted in a dramatic reduction in traffic being stopped along Lathrop Road. I believe there is universal agreement that a grade separation on Roth Road will have a similar result and should be implemented as soon as funds are available. The main issue is when should a grade separation be required and how will it be funded. It is my understanding that the Union Pacific Modernization Project is designing the facility to provide an opportunity for a grade separation even if it is not required as a result of the EIR. The EIR should look into this issue in great detail. They should consider the integrated impact of the CenterPoint Project, the Union Pacific Expansion, and projected future development in the area. It should be noted that

Draft C

the Burlington Northern Intermodal facility located to the east of H99 resulted in the installation of two grade separations to alleviate traffic concerns.

Another key issue is the truck traffic in the area. Here the major concerns are the routes the trucks will use to access H99, the routes to I5 (Most believe it will be via Roth Road), and the flow of trucks along Airport Way to the south of the facilities. Obviously, the flow to I5 looks good and will be excellent if a grade separation is implemented. The access to H99 is not as obvious. Trucks going north may use Roth Road, Airport Way, and French Camp Road or Arch Road. Trucks going south could use French Camp Road, but there will be a strong tendency to use Airport Way. This could result in additional traffic on Airport Way and Lathrop Road. Thus, there could be some issues even with the plans to widen Airport Way. There may be a longer-term approach that could provide an excellent solution to these concerns and provide better traffic flow in the area. During previous planning by San Joaquin County and the City of Stockton, there have been proposals to extend Roth Road to the east to connect with the intersection of French Camp Road and H99 and there were also proposals to improve the connection of Austin Road to this intersection. These concepts are presented in the latest Stockton General Plan. Caltrans has a new design for the French Camp Road/H99 interchange. It is currently funded with a projected construction start date of 2011. If an extension of Roth Road could be implemented, it would provide excellent access to H99 and the Union Pacific Intermodal and CenterPoint Facilities would then be well connected to I5, H99, the Airport, the Burlington Northern Intermodal Facility, etc.

E-2 cont'd

With the high level of truck traffic projected for the area it is important to give special consideration to the design of the following intersections:

Roth Road and Airport Way
Lovelace Road and Airport Way
Roth Road and the entrance to the facility
Lathrop Road and the entrance to the facility.

At this time, the intersections at Roth Road and Airport Way and Lathrop Road and Airport Way do not appear to be designed to handle the truck traffic. The biggest issues are congestion caused by trucks making turns with limited space and the noise caused by trucks being forced to "jump curbs" as they attempt to make turns. Going over the curbs has resulted in the generation of a fair amount of noise. Every effort should be made to design these intersections to safely handle the vehicle mix that is projected for the area. It may be a good investment to exceed some of the existing design standards.

Second to concerns related to traffic, are concerns related to noise. (I did receive some secondhand information that a noise study was conducted and it revealed that the major source of noise is currently the traffic on Lathrop Road and Airport Way.) The preliminary design information presented to date shows extensive use of

Draft C

berms, landscaping, buildings, and open space as noise buffers. These designs look very promising and should go a long ways towards minimizing the impacts. In addition, it is important to implement the latest technologies to minimize noise generation caused by locomotives, switchers, trucks, mobile cargo handling equipment, etc. Most people feel that it is imperative to ensure that the latest technologies are evaluated and, to the extent possible, implemented during the detailed design phase of the projects. It is also important to implement technologies that will minimize the lighting and glare from the facilities. These should include fixtures with the most modern and efficient hoods that precisely direct illumination downward to the work surface and away from surrounding properties, high-pressure sodium bulbs or similar technologies that reduce visual contrast, minimizing the number of lighting fixtures nearest the eastern property boundary to the extent allowed by safety, use of electronic timers to ensure that lights are automatically turned off when not required, etc.

In summary, I feel it will be possible to have have the CenterPoint and Union Pacific projects be a true asset to North Manteca and the county without having a negative impact on "Quality of Life Issues" for existing and future development in the area by striving to implement the near-term and longer range planning summarized in this document.

E-2 cont'd

Distribution:

Mo Hatef
Associate Planner
San Joaquin County CDD
1810 East Hazelton Avenue
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Rochelle Henson
Community Development Department
City of Manteca
1001 W. Center Street
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1325 Maple Valley St
Manteca, CA 95336

Response to Letter E: Louie Tallerico, Resident, City of Manteca

Response E-1: The commentor, representing concerned citizens, spoke at the public meeting for the Draft EIR. He reiterates his comments in an email and an attached letter. The commentor is specifically concerned with traffic flow and truck routes in North Manteca. The commentor indicates that it is extremely important to minimize the impact of truck traffic from a proposed industrial development in North Manteca, and that he and others are interested is seeing a designated truck route with the appropriate design requirements to facilitate truck traffic flows in this area. The commentor notes that there has been some confusion over the truck routes shown on some maps in the Circulation Element Update, and that would like to review the final truck routes on a map before there is a public meeting that considers there approval.

This comment is noted. The City acknowledges the confusion over the conceptual location of a truck route in North Manteca as shown on maps in the Circulation Element Update. It should be noted that the City of Manteca supports the designation of a truck route along Airport Way between French Camp Road and the future McKinley Expressway to facilitate goods movement in the western portion of the City. The exact location of a truck route has not been developed or evaluated to date, therefore, Figure 4.4 presented in the draft Circulation Element, will not be included in the final Circulation Element to be approved by the City Council. Instead, the City will develop a separate Truck Route and STAA Truck Route Map for adoption at a later date. This truck route planning effort will be administered by the Public Works Department, and will include input from the community. The Public Works Department will engage the commentor during the process of developing the truck route map for the City to ensure that concerns and input are received.

Response E-2: The commentor has attached a letter for a specific project located in the northern part of Manteca to support his comment provided in E-2 above. This comment is noted. The response provided above addresses his concern and will ensure that he is included in the development of a truck route in northern Manteca.

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Revisions made to the Draft EIR are identified below. None of the revisions identify new significant environmental impacts, nor does any of the revisions result in substantive changes to the Draft EIR. Mitigation measures have been revised and expanded. These mitigation measure revisions provide added benefits, but do not change the impact conclusions that were made in the Draft EIR.

3.1 REVISIONS TO THE DRAFT EIR

SECTION 3.2 AIR QUALITY

Page 3.2-21 of the Draft EIR is amended as follows:

MITIGATION MEASURES

Mitigation Measure 3.2-1: *The City of Manteca shall coordinate with the San Joaquin Valley Air Pollution Control District (SJVAPCD), as individual projects are designed, to determine the applicability of Rule 9510 (Indirect Source Review), and if necessary, prepare an Air Impact Assessment for the SJVAPCD to review. This rule will apply to any transportation or transit project where construction exhaust emissions equal or exceed two (2.0) tons of NOx or two (2.0) tons of PM10.*

In an effort to reduce construction exhaust emissions of NOx and PM10, the City should give preference to contractor's bids that include construction fleets that can meet the emissions reduction requirements set by District Rule 9510 (20% reduction of NOx emissions and 45% reduction of PM10 emissions). The City should ensure that the selected contractor complies with the emission standards, as set forth in §2423 of Title 13 of the California Code of Regulations, and Part 89 of Title 40 Code of Federal Regulations.

The City of Manteca shall design Circulation Element projects to avoid significant amounts of haul material, such as excavated soil and construction debris -- construction sites should employ a balanced cut/fill ratio to the extent possible. The implementing agency shall prepare and submit a Dust Control Plan to the SJVAPCD at least ~~48 hours~~30 days prior to any earthmoving or construction activities. The implementing agency shall implement the following measures:

- *Maintain on-site truck loading zones.*
- *Configure on-site construction parking to minimize traffic interference and to ensure emergency vehicle access.*
- *Provide temporary traffic control during all phases of construction activities to improve traffic flow.*
- *Use best efforts to minimize truck idling to not more than two minutes during construction.*
- *Apply non-toxic soil stabilizers (according to manufacturers' specifications) to all inactive construction areas.*
- *During construction, replace ground cover in disturbed areas as quickly as possible.*
- *During construction, enclose, cover, water twice daily or apply non-toxic soil binders (according to manufacturers' specifications) to exposed piles with 5 percent or greater silt content and to all unpaved parking or staging areas or unpaved road surfaces.*

- *During the period of construction, install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.*
- *During the period of construction, assure that traffic speeds on all unpaved roads be reduced to 15 miles per hour or less.*
- *Pave all construction access roads at least 100 feet on to the site from permanent roadways.*
- *Cover all haul trucks.*

SECTION 3.8 TRANSPORTATION AND CIRCULATION

Page 3.8-8 of the Draft EIR is amended as follows:

TABLE 3.8-2 MANTECA FREEWAY SEGMENT LEVEL OF SERVICE THRESHOLDS

NUMBER OF LANES	*LOS A*	*LOS B*	*LOS C*	*LOS D*	*LOS E*
4	27,600	45,200	63,600	77,400	86,400
6	41,400	67,800	95,400	116,100	129,600
8	55,200	90,400	127,200	154,800	172,800
10	69,000	113,000	159,000	193,500	216,000
12	82,800	135,600	190,800	232,200	259,200

SOURCE: HIGHWAY CAPACITY MANUAL, TRANSPORTATION RESEARCH BOARD, 2000.

Page 3.8-21 of the Draft EIR is amended as follows:

TABLE 3.8-10 CITY OF MANTECA ROADWAY SEGMENT ADT AND LEVEL OF SERVICE - CUMULATIVE CONDITIONS WITH CIRCULATION ELEMENT UPDATE

SEGMENT	*NUMBER OF LANES*	*NO PROJECT (CONSTRAINED)*		*CIRCULATION ELEMENT UPDATE*		*IMPACT?*	
		ADT	*LOS*	*ADT*	*LOS*	*2023 GP*	*PROP GP*
Lathrop Road: London Avenue to Airport Way	4	14,100	~~D~~C	26,200	D	X	
Union Road: Dell Webb to Lathrop Road	4	29,500	D	30,300	D	X	
Lathrop Road: Main Street to SR 99	4	22,900	C	31,800	D	X	
Main Street: Center Street to Yosemite Avenue[2]	2	16,900	E	18,000	F	X	
McKinley Avenue Expressway: SR 120 to Woodward Avenue	4	11,800	C	40,500	F	X	X
McKinley Avenue Expressway: Woodward Avenue to Airport Way	2	3,900	A	12,700	D	X	
McKinley Avenue Expressway: Airport Way to Union Road	2	--	--	12,900	D	X	
McKinley Avenue Expressway: Union Road to Main Street	2	--	--	15,000	E	X	X
McKinley Avenue Expressway: Atherton to Austin Road	4	25,700	C	27,100	D	X	
Atherton Drive: Woodward Avenue (west) to McKinley Avenue	4	--	--	27,500	D	X	
Main Street: Woodward Avenue to McKinley Avenue	2	13,500	D	14,500	D	X	

NOTES: 1 LANES ASSUMED UNDER CUMULATIVE CONDITIONS WITH CIRCULATION ELEMENT UPDATE SCENARIO. 2 ROADWAY SEGMENT IS CONSIDERED A PART OF DOWNTOWN MANTECA, WHICH IS NOT SUBJECT TO LOS REQUIREMENTS UNDER THE PROPOSED GENERAL PLAN.

SOURCE: FEHR & PEERS, 2010.

Page 3.8-24 of the Draft EIR is amended as follows:

TABLE 3.8-13 CMP SEGMENT FORECASTS AND LEVEL OF SERVICE - CUMULATIVE CONDITIONS WITH CIRCULATION ELEMENT UPDATE

ROADWAY	SEGMENT	NO PROJECT (CONSTRAINED)			CIRCULATION ELEMENT UPDATE			IMPACT ?
		NUMBER OF LANES	PM PEAK HOUR VOLUME	LOS	NUMBER OF LANES	PM PEAK HOUR VOLUME	LOS	
I-5	El Dorado St to Roth Road	8	10,600	D	8	10,850	D	
	Roth Road to Lathrop Road	8	11,060	D	8	11,390	D	
	Lathrop Road to Louise Ave	8	11,200	D	8	11,160	D	
	Louise Ave to SR 120	8	12,640	D	8	13,060	D	
	SR 120 to I-205	12	16,090	D	12	15,680	C	
SR 120	I-5 to Yosemite Ave	6	9,730	D	6	9,690	D	
	Yosemite Ave to Airport Way[1]	6	9,940	E	6	10,440	E	
	Airport Way to Union Road[1]	6	9,890	E	6	9,850	E	
	Union Road to Main Street[1]	6	9,550	D	6	9,220	D	
	Main Street to SR 99[1]	6	7,040	C	6	6,920	C	
SR 99	French Camp Road to Lathrop Road	6	9,550	D	6	9,760	D	
	Lathrop Road to Yosemite Ave	6	10,050	E	6	10,080	E	X
	Yosemite Ave to SR 120	6	11,580	F	6	11,660	F	X
	SR 120 to Austin Road	6	15,350	F	6	14,730	F	
	Austin Road to Jack Tone Road	6	15,420	F	6	14,600	F	
Airport Way	Roth Road to Daisywood Drive	4	1,450	C	4	1,960	C	
	Daisywood Drive to Lathrop Road	2	2,570	F	4	2,940	D	
	Lathrop Road to Northgate Drive	2	1,370	D	4	1,850	C	
	Northgate Drive to Louise Avenue	2	950	D	4	1,600	C	
	Louise Avenue to Crom Street	2	1,600	F	4	1,990	C	
	Crom Street to Yosemite Avenue	2	1,520	F	4	2,280	D	
	Yosemite Avenue to Wawona St	2	1,470	E	4	1,940	C	
	Wawona St to Daniels Street	2	1,720	F	4	1,990	C	
	Daniels Street to SR 120	2	1,770	F	4	2,200	D	
Lathrop Road	I-5 to McKinley Avenue	4	1,810	C	4	2,470	D	
	McKinley Avenue to ~~Airport Way~~City Limit	4	1,750	C	4	2,360	D	
	City Limit to Airport Way	2	1,750	F	4	2,360	D	
	Airport Way to London Avenue	2	1,400	E	4	2,610	D	
	London Avenue to Union Road	2	1,460	E	4	2,260	D	
	Union Road to Main Street	2	1,530	F	4	2,280	D	
	Main Street to SR 99	4	1,440	C	4	2,000	C	
Yosemite	Airport Way to Winters Drive	4	1,760	C	4	1,510	C	

Avenue	Winters Drive to Union Road	~~4~~4	2,340	D	4	1,990	C	
	Union Road to Walnut Avenue	~~2~~4	1,460	E	4	1,470	C	
	Walnut Avenue to Main Street	~~2~~2	1,080	D	2	1,080	D	
	Main Street to Powers Avenue	~~2~~2	1,540	F	2	1,460	E	
	Powers Avenue to Spreckels Avenue	~~4~~4	2,330	D	4	2,120	D	
	Spreckels Avenue to Northwoods Avenue	~~4~~4	1,690	C	4	2,030	C	
	Northwoods Avenue to SR 99	~~4~~6	2,080	D	6	2,000	C	
	SR 99 to Austin Road	~~4~~6	2,650	D	6	3,180	D	
	Austin Road to Jack Tone Road	~~4~~2	1,140	D	2	1,490	F	X
Jack Tone Road	SR 99 to Ripon Road	~~4~~4	1,060	C	4	1,300	C	
Ripon Road	Main Street to Jack Tone Road	~~2~~2	820	C	2	430	C	
McKinley Avenue Expressway	SR 120 to Woodward Avenue	~~2~~4	1,130	D	4	3,890	F	X
	Woodward Avenue to Airport Way	~~2~~2	350	C	2	1,140	D	
	Airport Way to Union Road	~~-~~2	-	-	2	1,150	D	
	Union Road to Main Street	~~-~~2	-	-	2	1,340	D	
	Main Street to Atherton Drive	~~4~~4	1,270	C	4	2,200	D	
	Atherton Drive to Austin Road	~~4~~4	2,300	D	4	2,420	D	
	Austin Road to SR 99	~~6~~6	3,280	D	6	3,540	D	

NOTE: I THESE FREEWAY SEGMENTS HAVE A LOS F STANDARD.

SOURCE: FEHR & PEERS, 2010.

SECTION 5.0 ALTERNATIVES

Page 5.0-19 of the Draft EIR is amended as follows:

TABLE 5.0-9 OUTSIDE OF CITY ROADWAY SEGMENT ADT AND LOS - NO PROJECT (UNCONSTRAINED)

SEGMENT	*NUMBER OF LANES*	*NO PROJECT (UNCONSTRAINED)*		*IMPACT?*
		ADT	*LOS*	
Roth Road: I-5 to UPRR Tracks	2	18,800	F	
Lathrop Road: I-5 to McKinley Avenue	4	25,800	C	
Lathrop Road: McKinley Avenue to Manteca/Lathrop City Limit	4	24,700	C	
Louise Avenue: I-5 to McKinley Avenue	4	25,900	C	
Louise Avenue: McKinley Avenue to Manteca/Lathrop City Limit	4	16,400	A	
Yosemite Avenue: SR 120 to McKinley Avenue	2	21,000	F	
Yosemite Avenue: McKinley Avenue to Manteca/Lathrop City Limit	2	16,100	E	
Yosemite Avenue: Austin Road to Jack Tone Road	2	20,900	F	X
Airport Way: Daisywood Drive to Roth Road	4	24,300	C~~A~~	
Union Road: Woodward Avenue to Fig Avenue	2	6,100	A	
Austin Road: McKinley Avenue to Ripon Road	2	5,800	A	
Jack Tone Road: SR 99 to Ripon Road	4	13,600	A	
Ripon Road: Main Street to Austin Road	2	3,300	A	
Ripon Road: Austin Road to Jack Tone Road	2	5,100	A	

SOURCE: FEHR & PEERS, 2010.

Page 5.0-20 of the Draft EIR is amended as follows:

TABLE 5.0-11 CMP SEGMENT FORECASTS AND LEVEL OF SERVICE - NO PROJECT (UNCONSTRAINED)

ROADWAY	SEGMENT	NUMBER OF LANES	NO PROJECT (UNCONSTRAINED)		IMPACT?
			PEAK HOUR VOLUME	LOS	
I-5	El Dorado St to Roth Road	8	10,660	D	
	Roth Road to Lathrop Road	8	11,410	D	
	Lathrop Road to Louise Ave	8	11,190	D	
	Louise Ave to SR 120	8	13,350	D	
	SR 120 to I-205	12	16,490	D	
SR 120	I-5 to Yosemite Ave	6	10,200	E	X
	Yosemite Ave to Airport Way[1]	6	11,110	E	
	Airport Way to Union Road[1]	6	9,920	E	
	Union Road to Main Street[1]	6	9,440	D	
	Main Street to SR 99[1]	6	7,020	C	
SR 99	French Camp Road to Lathrop Road	6	9,580	D	
	Lathrop Road to Yosemite Ave	6	9,900	E	
	Yosemite Ave to SR 120	6	11,570	F	
	SR 120 to Austin Road	6	14,710	F	
	Austin Road to Jack Tone Road	6	14,580	F	
Airport Way	Roth Road to Daisywood Drive	6	2,070	C	
	Daisywood Drive to Lathrop Road	6	~~3,050~~3,300	D	
	Lathrop Road to Northgate Drive	6	2,120	C	
	Northgate Drive to Louise Avenue	6	1,780	C	
	Louise Avenue to Crom Street	6	2,150	C	
	Crom Street to Yosemite Avenue	6	2,430	C	
	Yosemite Avenue to Wawona St	6	2,120	C	
	Wawona St to Daniels Street	6	2,050	C	
	Daniels Street to SR 120	6	2,400	C	
Lathrop Road	I-5 to McKinley Avenue	4	2,520	D	
	McKinley Avenue to Airport Way	4	2,390	D	
	Airport Way to London Avenue	4	2,550	D	
	London Avenue to Union Road	4	2,310	D	
	Union Road to Main Street	4	2,300	D	
	Main Street to SR 99	4	2,000	C	
Yosemite Avenue	Airport Way to Winters Drive	6	1,550	C	
	Winters Drive to Union Road	6	2,120	C	
	Union Road to Walnut Avenue	4	1,520	C	
	Walnut Avenue to Main Street	2	1,210	D	
	Main Street to Powers Avenue	4	1,860	C	
	Powers Avenue to Spreckels Avenue	4	2,210	D	
	Spreckels Avenue to Northwoods Avenue	6	2,110	C	
	Northwoods Avenue to SR 99	6	2,020	C	
	SR 99 to Austin Road	6	3,300	D	
	Austin Road to Jack Tone Road	2	1,510	E	X
Jack Tone Rd.	SR 99 to Ripon Road	4	1,330	C	
Ripon Road	Main Street to Jack Tone Road	2	430	C	
McKinley Avenue Expressway	SR 120 to Woodward Avenue	8	4,500	D	
	Woodward Avenue to Airport Way	4	1,830	C	
	Airport Way to Union Road	4	1,690	C	
	Union Road to Main Street	4	1,900	C	
	Main Street to Atherton Drive	4	2,390	D	
	Atherton Drive to Austin Road	4	2,440	D	
	Austin Road to SR 99	6	3,510	D	

NOTE: [1] THESE FREEWAY SEGMENTS HAVE A LOS F STANDARD.

SOURCE: FEHR & PEERS, 2010.

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This document is the Final Mitigation Monitoring and Reporting Program (FMMRP) for the City of Manteca Circulation Element Update. This FMMRP has been prepared pursuant to Section 21081.6 of the California Public Resources Code, which requires public agencies to "adopt a reporting and monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." A FMMRP is required for the proposed project because the EIR has identified significant adverse impacts, and measures have been identified to mitigate those impacts.

The numbering of the individual mitigation measures follows the numbering sequence as found in the Draft EIR. All revisions to mitigation measures that were necessary as a result of responding to public comments and incorporating staff-initiated revisions have been incorporated into this FMMRP.

4.1 MITIGATION MONITORING AND REPORTING PROGRAM

The FMMRP, as outlined in the following table, describes mitigation timing, monitoring responsibilities, and compliance verification responsibility for all mitigation measures identified in this Final EIR. Agencies considering approval of subsequent activities under the City of Manteca Circulation Element Update would utilize this EIR as the basis in determining potential environmental effects and the appropriate level of environmental review of a subsequent activity.

The FMMRP is presented in tabular form on the following pages. The components of the FMMRP are described briefly below:

- **Mitigation Measures**: The mitigation measures are taken from the Draft EIR and Initial Study, in the same order that they appear in the Draft EIR and Initial Study.
- **Mitigation Timing**: Identifies at which stage of the project mitigation must be completed.
- **Monitoring Responsibility**: Identifies the agency that is responsible for mitigation monitoring.
- **Compliance Verification**: This is a space that is available for the monitor to date and initial when the monitoring took place.

TABLE 4.0-1: MITIGATION MONITORING AND REPORTING PROGRAM

RESOURCE	*MITIGATION MEASURE*	*MONITORING RESPONSIBILITY*	*TIMING*	*VERIFICATION (DATE/INITIALS)*
AESTHETICS				
Impact 4.5.1: Potential to have a substantial adverse effect on a scenic vista, substantially damage scenic resources within a state scenic highway, or substantially degrade the existing visual character or quality of the site and its surroundings.	***Adopted General Plan Policies*** • *RC-P-17 New development shall maximize the potential for open space and visual experiences.* • *CD-P-49 In order to establish a visual character that retains the agricultural heritage, the city will permit the use of orchard trees (or similar non-fruiting species) in landscape corridors along major streets adjacent to residential neighborhoods, in-lieu of formalized landscape. In such landscapes, the groundcover may be limited to bare earth and weed control and/or groundcovers compatible with the orchard characteristics.* • *CD-I-14: Establish design guidelines for non-residential uses within 200 feet of SR 99 and SR 120. The guidelines should address the following concept. The landscape along SR 120 and SR 99 will reflect the natural character of the region in the selection of trees and groundcover.*	City of Manteca	Prior to Design Approval	
Impact 4.5.2: Potential to create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	***Adopted General Plan Policies*** <u>Policies</u> • *CD-P-44: Provide minimal levels of street, parking, building, site, and public area lighting to meet safety standards and provide direction.* • *CD-P-45 Provide directional shielding for all exterior lighting to minimize the annoyance of direct or indirect glare.*	City of Manteca	Prior to Design Approval	
AGRICULTURAL RESOURCES				
Impact 3.1-1: Conversion of Farmlands, including Prime Farmland, Unique Farmland, and Farmland of Statewide Importance	***Adopted General Plan Policies and Implementation Measures*** <u>Policies</u> • *LU-P-41: The City shall encourage the continuation of agricultural uses on lands within the Primary and Secondary Urban Services Boundary lines pending their development as urban uses consistent with the General Plan.*	City of Manteca	Prior to Design Approval	

	• *LU-P-42: The City will encourage the continuation of small, specialty agricultural operations and demonstration or educational agricultural operations that are compatible with the adjacent urban uses.* • *CD-P-48: Allow pockets of agricultural activity to remain within the urban areas of the city where such uses are compatible with the surrounding urban use.* • *CD-P-49: Allow use of small under-utilized parcels or undeveloped portions of parcels for temporary, seasonal agricultural activity, such as truck farms, strawberries, and small orchards.* • *RC-P-19: The City shall support the continuation of agricultural uses on lands designated for urban use, until urban development is imminent.* • *RC-P-20: The City shall provide an orderly and phased development pattern so that farmland is not subjected to premature development pressure.* • *RC-P-21: In approving urban development near existing agricultural lands, the City shall take actions so that such development will not unnecessarily constrain agricultural practices or adversely affect the viability of nearby agricultural operations.* • *RC-P-22: Nonagricultural uses in areas designated for agriculture should be redirected to urban areas.* • *RC-P-23: Protect designated agricultural lands, without placing an undue burden on agricultural landowners.* • *RC-P-24: Provide buffers at the interface of urban development and farmland; in order to minimize conflicts between these uses.* • *RC-P-25: The City shall ensure, in approving urban development near existing agricultural lands, that such development will not unnecessarily constrain agricultural practices or adversely affect the economic viability of nearby agricultural operations.* • *RC-P-26: The City shall restrict the fragmentation of agricultural land parcels into small rural residential parcels except in areas designated for estate type development in the General Plan Land Use Diagram.* • *RC-P-28: The City shall not extend water and sewer lines to premature urban development that would adversely affect*			

	agricultural operations. • *RC-P-29: The City shall encourage Manteca Unified School District and the Delta Community College District to maintain the school farm facilities and associated education programs in the City.* • *RC-P-30: The City of Manteca will participate in a county-wide program to mitigate the conversion of Prime Farmland and Farmlands of Statewide Importance to urban uses.* *Implementation Measures* • *LU-I-1. The City shall maintain a growth management system that provides a mechanism for the annual allocation of the amount of residential, commercial, and industrial development that may occur. The growth management system shall have the following objectives:* o *Maintain, and where necessary enhance, the community's current public services and facilities;* o *Protect against the construction of development projects which will require sewage treatment capacity in excess of that determined available by the City Council;* o *Preserve and protect the environment;* o *Preserve and protect the quality of life and character of the community.* o *Provide for the orderly and adequate expansion of the City's housing stock in order to advance housing opportunities and to accommodate a reasonable share of expected regional growth.* o *Provide for the adequate and orderly expansion of the City's commercial and employment development base in balance with the city's housing stock;* o *Provide for a balance between multi-family and single family residential development;* o *Conserve viable agricultural and open space lands; and* o *Encourage and facilitate development proposals that accomplish the goals, policies, and programs of the General Plan through development innovations that cannot be accomplished by conventional zoning.* • *RC-I-30. Apply the following conditions of approval where urban development occurs next to farmland.*			

	○ *Require notifications in urban property deeds that agricultural operations are in the vicinity, in keeping with the City's right-to farm ordinance.* ○ *Require adequate and secure fencing at the interface of urban and agricultural use.* ○ *Require phasing of new residential subdivisions; so as to include an interim buffer between residential and agricultural use.* • *RC-I-31. Work with San Joaquin County on the following issues:* ○ *Pesticide application and types of agricultural operations adjacent to urban uses.* *Support the continuation of County agricultural zoning in areas designated for agricultural land use in the Area Plan.*			
Impact 3.1-2: Conflict with Existing Agricultural Zoning or Williamson Act Contracts	***Adopted General Plan Policies and Implementation Measures*** <u>*Policies*</u> • *RC-P-27: The City shall discourage the cancellation of Williamson Act contracts outside the Primary Urban Service Boundary line.* <u>*Implementation Measures*</u> • *LU-I-1. The City shall maintain a growth management system that provides a mechanism for the annual allocation of the amount of residential, commercial, and industrial development that may occur. The growth management system shall have the following objectives:* ○ *Maintain, and where necessary enhance, the community's current public services and facilities;* ○ *Protect against the construction of development projects which will require sewage treatment capacity in excess of that determined available by the City Council;* ○ *Preserve and protect the environment;* ○ *Preserve and protect the quality of life and character of the community.* ○ *Provide for the orderly and adequate expansion of the City's housing stock in order to advance housing opportunities and to accommodate a reasonable share of expected regional growth.* ○ *Provide for the adequate and orderly expansion of the City's commercial and employment development base in balance with*	City of Manteca	Prior to Design Approval	

	the city's housing stock; o *Provide for a balance between multi-family and single family residential development;* o *Conserve viable agricultural and open space lands; and* o *Encourage and facilitate development proposals that accomplish the goals, policies, and programs of the General Plan through development innovations that cannot be accomplished by conventional zoning.* • *RC-I-30. Apply the following conditions of approval where urban development occurs next to farmland.* o *Require notifications in urban property deeds that agricultural operations are in the vicinity, in keeping with the City's right-to farm ordinance.* o *Require adequate and secure fencing at the interface of urban and agricultural use.* o *Require phasing of new residential subdivisions; so as to include an interim buffer between residential and agricultural use.* • *RC-I-31. Work with San Joaquin County on the following issues:* o *Pesticide application and types of agricultural operations adjacent to urban uses.* *Support the continuation of County agricultural zoning in areas designated for agricultural land use in the Area Plan.*			
AIR QUALITY				
Impact 3.2-2: Short-term - Conflict with, or Obstruct, the Applicable Air Quality Plan, Cause a Violation of Air Quality Standards, Contribute Substantially to an Existing Air Quality Violation, or Result in a Cumulatively Considerable Net Increase of a Criteria Pollutant in a Non-Attainment Area	***Mitigation Measure 3.2-1:*** *The City of Manteca shall coordinate with the San Joaquin Valley Air Pollution Control District (SJVAPCD), as individual projects are designed, to determine the applicability of Rule 9510 (Indirect Source Review), and if necessary, prepare an Air Impact Assessment for the SJVAPCD to review. This rule will apply to any transportation or transit project where construction exhaust emissions equal or exceed two (2.0) tons of NOx or two (2.0) tons of PM10.* *In an effort to reduce construction exhaust emissions of NOx and PM10, the City should give preference to contractors bids that include construction fleets that can meet the emissions reduction requirements set by District Rule 9510 (20% reduction of NOx emissions and 45% reduction of PM10 emissions). The City should ensure that the selected contractor complies*	City of Manteca	Prior to Design Approval	

	with the emission standards, as set forth in §2423 of Title 13 of the California Code of Regulations, and Part 89 of Title 40 Code of Federal Regulations. *The City of Manteca shall design Circulation Element projects to avoid significant amounts of haul material, such as excavated soil and construction debris -- construction sites should employ a balanced cut/fill ratio to the extent possible. The implementing agency shall prepare and submit a Dust Control Plan to the SJVAPCD at least 30 days prior to any earthmoving or construction activities. The implementing agency shall implement the following measures:* • *Maintain on-site truck loading zones.* • *Configure on-site construction parking to minimize traffic interference and to ensure emergency vehicle access.* • *Provide temporary traffic control during all phases of construction activities to improve traffic flow.* • *Use best efforts to minimize truck idling to not more than two minutes during construction.* • *Apply non-toxic soil stabilizers (according to manufacturers' specifications) to all inactive construction areas.* • *During construction, replace ground cover in disturbed areas as quickly as possible.* • *During construction, enclose, cover, water twice daily or apply non-toxic soil binders (according to manufacturers' specifications) to exposed piles with 5 percent or greater silt content and to all unpaved parking or staging areas or unpaved road surfaces.* • *During the period of construction, install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.* • *During the period of construction, assure that traffic speeds on all unpaved roads be reduced to 15 miles per hour or less.* • *Pave all construction access roads at least 100 feet on to the site from permanent roadways.* • *Cover all haul trucks.*			
pact 3.2-3: Occasional Localized Carbon Monoxide Concentrations	***Mitigation Measure 3.2-2:*** *The City of Manteca shall screen individual projects at the time of design for localized CO hotspot concentrations and if*	City of	Prior to Design	

from Traffic Conditions at Some Individual Locations	*necessary incorporate project-specific measures into the project design to reduce or alleviate CO hotspot concentrations.*	Manteca	Approval	
Impact 3.2-6: Potential to release asbestos from earth movement or structural asbestos from demolition/renovation of existing structures	***Mitigation Measure 3.2-3:*** *Prior to construction of Circulation Element projects, the City of Manteca shall assess the site for the presence of asbestos including asbestos from structures such as road base, bridges, and other structures. In the event that asbestos is present, the City of Manteca shall comply with applicable state and local regulations regarding asbestos, including CARB's asbestos airborne toxic control measure (ATCM) (Title 17, CCR § 93105 and 93106), to ensure that exposure to construction workers and the public is reduced to an acceptable level. This may include the preparation of an Asbestos Hazard Dust Mitigation Plan to be implemented during construction activities.*	City of Manteca	Prior to Design Approval	
BIOLOGICAL RESOURCES				
Impact 3.3-1: Direct or Indirect Effects on Candidate, Sensitive, or Special-Status Species including their Habitat or Movement Corridors	***Mitigation Measure 3.3-1:*** *Prior to final design approval of individual projects, the City of Manteca shall coordinate with the SJMSCP administrator (SJCOG, Inc.) to verify whether construction within the study area would require a permit. The permit process will require a field reconnaissance of the project study area by an SJCOG approved biologist in an effort to identify any biological constraints, including HCP covered species or habitat. If the biologist identifies HCP covered species or habitat within the limits of the project study area the City of Manteca shall implement all minimization measures and pay the appropriate mitigation fees or provide land in lieu of fees as established by the SJCOG, Inc. If the biologist identifies species or habitat within the project study area that are not covered by the HCP, the City of Manteca shall coordinate with the appropriate regulatory agency (USFWS, NMFS, or CDFG) to obtain the appropriate permits prior to any disturbance to the species or their habitat.* ***Adopted General Plan Policies and Implementation Measures*** *Policies* • *RC-P-32 Protect special status species and other species that are sensitive to human activities.* *Implementation Measures* • *RC-I-32 Continue to support and comply with the requirements of the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP) when reviewing proposed public and private*	City of Manteca	Prior to Design Approval	

	land use changes. *RC-I-34 Project proponents who opt not to participate in the SJMSCP shall satisfy applicable U.S. Endangered Species Act (ESA), California Endangered Species Act (CESA), National Environmental Policy Act (NEPA), California Environmental Quality Act (CEQA), and other applicable local, state, and federal laws and regulation provisions through consultations with the Permitting Agencies and local planning agencies.*			
Impact 3.3-2: Adverse Effects on Riparian Habitat or Other Sensitive Natural Community Identified in Local or Regional Plans, Policies, Regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service, or on Federally Protected Wetlands as Defined by Section 404 of the Clean Water Act through Direct Removal, Filling, Hydrological Interruption, or Other Means	***Mitigation Measure 3.3.2.*** *Prior to approval of individual projects, the City of Manteca shall retain a qualified biologist to perform an assessment of the project area to identify wetlands, riparian, and other sensitive aquatic environments. If wetlands are present the qualified biologist shall perform a wetland delineation following the 1987 Army Corps of Engineers Wetlands Delineation Manual. The wetland delineation shall be submitted to the ACOE for verification.* ***Mitigation Measure 3.3.3.*** *If wetlands, riparian, or other sensitive aquatic environments are found within the project area for a individual project, the City of Manteca shall design or modify the project to avoid direct and indirect impacts on these habitats, if feasible. Additionally, the City of Manteca shall minimize the loss of riparian vegetation by trimming rather than removal where feasible.* *Prior to construction, the City of Manteca shall install orange construction barrier fencing to identify environmentally sensitive areas around the wetland (20' from edge), riparian area (100' from edge), and other aquatic habitats (250' from edge of vernal pool). The location of the fencing shall be marked in the field with stakes and flagging and shown on the construction drawings. The fencing will be installed before construction activities are initiated and will be maintained throughout the construction period. The following paragraph will be included in the construction specifications:* *The Contractor's attention is directed to the areas designated as "environmentally sensitive areas." These areas are protected, and no entry by the Contractor for any purpose will be allowed unless specifically authorized in writing by the City of Manteca. The Contractor will take measures to ensure that Contractor's forces do not enter or disturb these areas, including giving written notice to employees and subcontractors.* *Temporary fences around the environmentally sensitive areas will be installed as the first order of work. Temporary fences will be furnished, constructed, maintained, and removed as shown on the plans, as specified*	City of Manteca	Prior to Design Approval	

	in the special provisions, and as directed by the project engineer. The fencing will be commercial-quality woven polypropylene, orange in color, and at least 4 feet high (Tensor Polygrid or equivalent). The fencing will be tightly strung on posts with a maximum 10-foot spacing. *Immediately upon completion of construction activities the contractor shall stabilize exposed soil/slopes. On highly erodible soils/slopes, use a nonvegetative material that binds the soil initially and breaks down within a few years. If more aggressive erosion control treatments are needed, geotextile mats, excelsior blankets, or other soil stabilization products will be used. All stabilization efforts should include habitat restoration efforts.* ***Mitigation Measure 3.3.4:** If wetlands or riparian habitat are disturbed as part of the individual projects, the City of Manteca shall compensate for the disturbance to ensure no net loss of habitat functions and values. Compensation ratios shall be based on site-specific information and determined through coordination with state, federal, and local agencies as part of the permitting process for the project. The compensation shall be at a minimum ratio of 3 acres restored, created, and/or preserved for every 1 acre disturbed. Compensation may comprise onsite restoration/creation, off-site restoration, preservation, or mitigation credits (or a combination of these elements). The City of Manteca shall develop and implement a restoration and monitoring plan that describes how the habitat shall be created and monitored over a minimum period of time.* ***Adopted General Plan Policies and Implementation Measures*** *Policies* • *BR-P-30 Condition new development in the vicinity of the San Joaquin River and Walthall Slough to promote and protect riparian habitat, wetlands, and other native vegetation and wildlife community.* • *BR-P-34 Consider the development of new drainage channels planted with native vegetation, which would provide habitat as well as drainage.* *Implementation Measures* • *RC-I-32 Continue to support and comply with the requirements of the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP) when reviewing proposed public and private land use changes.* • *RC-I-33 For project proponents who opt against participation in the SJMSCP, require site-specific research, and ground surveys for proposed development projects. This research must include a detailed*			

	inventory of all biological resources onsite, and appropriate mitigation measures for avoiding or reducing impact to these biological resources. This requirement may be waived if determined by the City that the proposed project area is already sufficiently surveyed. • *RC-I-34 Project proponents who opt not to participate in the SJMSCP shall satisfy applicable U.S. Endangered Species Act (ESA), California Endangered Species Act (CESA), National Environmental Policy Act (NEPA), California Environmental Quality Act (CEQA), and other applicable local, state, and federal laws and regulation provisions through consultations with the Permitting Agencies and local planning agencies.* • *BR-I-36 Limit the access of pedestrians and cyclists to wetland areas so that access is compatible with long-term protection of these natural resources.* *BR-I-38 Until such time that a Clean Water Act regional general permit or its equivalent is issued for coverage under the SJMSCP, acquisition of a Section 404 permit by project proponents will continue to occur as required by existing regulations. Project proponents shall comply with all requirements for protecting federally protected wetlands.*			
Impact 3.3-3: Interference with the Movement of 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	***Mitigation Measure 3.3-5:*** *Prior to design approval of individual projects that contain movement habitat, the City of Manteca shall incorporate economically viable design measures, as applicable and necessary, to allow wildlife or fish to move through the transportation corridor, both during construction activities and post construction. Such measures may include appropriately spaced breaks in a center barrier, or other measures that are designed to allow wildlife to move through the transportation corridor. If the project cannot be designed with these design measures (i.e. due to traffic safety, etc.) the City of Manteca shall coordinate with the appropriate regulatory agency (i.e. USFWS, NMFS, CDFG) to obtain regulatory permits and implement alternative project-specific mitigation prior to any construction activities.* ***Adopted General Plan Policies and Implementation Measures*** <u>*Policies*</u> • *RC-P-31. Minimize impact of new development on native vegetation and wildlife.* • *RC-P-32. Condition new development in the vicinity of the San Joaquin River and Walthall Slough to protect riparian habitat,*	City of Manteca	Prior to Design Approval	

	wetlands, and other native vegetation and wildlife communities and habitats. • *RC-P-34. Protect special status species and other species that are sensitive to human activities.* • *RC-P-35. Allow contiguous habitat areas.* • *RC-P-36. Consider the development of new drainage channels planted with native vegetation, which would provide habitat as well as drainage.* *Implementation Measures* • *RC-I-32. Continue to support and comply with the requirements of the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP) when reviewing proposed public and private land use changes.* • *RC-I-33. Project proponents who opt not to participate in the SJMSCP shall:* o *Satisfy applicable U.S. Endangered Species Act (ESA), California Endangered Species Act (CESA), National Environmental Policy Act (NEPA), California Environmental Quality Act (CEQA), and other applicable local, state, and federal laws and regulation provisions through consultations with the Permitting Agencies and local planning agencies.* *Provide site-specific research and ground surveys for proposed development projects. This research must include a detailed inventory of all biological resources onsite, and appropriate mitigation measures for avoiding or reducing impact to these biological resources. This requirement may be waived if determined by the City that the proposed project area is already sufficiently surveyed.*			
Impact 3.3-4: Potential Introduction or Spread of Noxious Weeds Associated with the Transportation Projects	***Mitigation Measure 3.3.6:*** *Prior to approval of transportation projects, the City of Manteca shall retain a qualified botanist determine whether noxious weeds are an issue for the project. If the botanist determines that noxious weeds are an issue, the City of Manteca shall review the noxious weed list from the County Agricultural Commission, California Department of Food and Agriculture, and the California Exotic Pest Plant Council to identify target weed species for a field survey. Noxious weed infestations shall be mapped and documented. The City of Manteca shall incorporate the following measures into project plans and specifications:* • *Certified, weed-free, imported erosion-control materials (or rice*	City of Manteca	Prior to Design Approval	

	straw in upland areas) will be used. • *The project sponsor will coordinate with the county agricultural commissioner and land management agencies to ensure that the appropriate BMPs are implemented.* • *Construction supervisors and managers will be educated about noxious weed identification and the importance of controlling and preventing their spread.* • *Equipment will be cleaned at designated wash stations after leaving noxious weed infestation areas.*			
CULTURAL RESOURCES				
Impact 3.4-1: Damage to or the Destruction of Archaeological Resources	***Adopted General Plan Policies and Implementation Measures*** <u>*Policies*</u> • *RC-P-37. The City shall not knowingly approve any public or private project that may adversely affect an archaeological site without consulting the California Archaeological Inventory at Stanislaus State University, conducting a site evaluation as may be indicated, and attempting to mitigate any adverse impacts according to the recommendation of a qualified archaeologist. City implementation of this policy shall be guided by the California Environmental Quality Act (CEQA) and the National Historic Preservation Act (NHPA).* • *RC-P-38. The City shall require that the proponent of any development proposal in an area with potential archaeological resources, and specifically near the San Joaquin River and Walthall Slough, and on the east side of State Highway 99 at the Louise Avenue crossing, shall consult with the California Archaeological Inventory, Stanislaus State University to determine the potential for discovery of cultural resources, conduct a site evaluation as may be indicated, and mitigate any adverse impacts according to the recommendation of a qualified archaeologist. The survey and mitigation shall be developer funded.* <u>*Implementation Measures*</u> • *RC-I-38. Require a records search for any proposed development project, to determine whether the site contains known archaeological, historic, or cultural resources and/or to determine the potential for discovery of additional cultural resources. This requirement may be waived if determined by the City that the*	City of Manteca	Prior to Design Approval	

	proposed project area is already sufficiently surveyed. • *RC-I-39. Require that sponsors of proposed development projects on sites where probable cause for discovery of archaeological resources (as indicated by records search and where resources have been discovered in the vicinity of the project) retain a consulting archaeologist to survey the project site. If unique resources, as defined by California State law, are found, a qualified archaeologist or historian shall be called to evaluate the find and to recommend proper action. Require a monitoring plan for the project to ensure that mitigation measures are implemented.* • *RC-I-40. When feasible, incorporate significant archaeological sites into open space areas.*			
Impact 3.4-2: Inadvertent Discovery of Human Remains	***Adopted General Plan Implementation Measure*** <u>*Implementation Measure*</u> • *RC-I-46. If human remains are discovered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to their origin and disposition pursuant to Public Resource code Section 5097.98. If the Coroner determines that no investigation of the cause of death is required, and if the remains are of Native American origin, the Coroner will notify the Native American Heritage Commission, which in turn will inform a most likely descendent. The descendent will then recommend to the landowner appropriate disposition of the remains and any grave goods.*	City of Manteca	During construction	
Impact 3.4-4: Damage to or the Destruction of Historical Resources	***Adopted General Plan Implementation Measure*** <u>*Policies*</u> • *RC-P-39. The City shall set as a priority the protection and enhancement of Manteca's historically and architecturally significant buildings.* • *RC-P-40. The City shall work with property owners seeking registration of historical structures as Historic Landmarks or listing on the Register of Historic Sites.* • *RC-P-41. The City shall prepare and adopt a Historical Preservation Ordinance.* • *RC-P-42. The City and Redevelopment Agency shall support the efforts of property owners to preserve and renovate historic and*	City of Manteca	Prior to Design Approval	

	architecturally significant structures. Where such buildings cannot be preserved intact, the City shall seek to preserve the building facades. *Implementation Measures* • *RC-I-38. Require a records search for any proposed development project, to determine whether the site contains known archaeological, historic, or cultural resources and/or to determine the potential for discovery of additional cultural resources. This requirement may be waived if determined by the City that the proposed project area is already sufficiently surveyed.* • *RC-I-39. Require that sponsors of proposed development projects on sites where probable cause for discovery of archaeological resources (as indicated by records search and where resources have been discovered in the vicinity of the project) retain a consulting archaeologist to survey the project site. If unique resources, as defined by California State law, are found, a qualified archaeologist or historian shall be called to evaluate the find and to recommend proper action. Require a monitoring plan for the project to ensure that mitigation measures are implemented.* • *RC-I-41. The City should continue its inventory of all historic sites throughout the City. The inventory should contain a narrative of the significant facts regarding the historic events or persons associated with the site, and pictures of the site.* • *RC-I-42. The City shall continue to support the local historical society in their efforts to* archive historic information, including photographs, publications, oral histories and other materials, and to make the information available to the public for viewing and research. • *RC-I-43. All City permits for reconstruction or modification of existing buildings will require submittal of a photograph of the existing structure or site. The intent is to create a record of the buildings in the City over time. A photograph will also be required for vacant sites that will be modified with new construction of new buildings or other above ground improvements.* • *RC-I-44. Encourage the placement of monuments or plaques that recognize and celebrate historic sites, structures, and events.* • *RC-I-45. The City shall adopt and implement a historic building code, as authorized by state law.*			

GEOLOGY AND SOILS				
Impact 4.5.3: Potential to expose people or structures to substantial adverse effects, including the risk of loss, injury, or death involving rupture of a fault, strong seismic ground shaking, liquefaction, landslides, lateral spreading, or subsidence.	***Adopted General Plan Policies*** • *S-P-1 The City shall require preparation of geological reports and/or geological engineering reports for proposed new development located in areas of suspected significant geological hazards, including potential subsidence (collapsible surface soils) due to groundwater extraction.* • *S-P-2 The City shall require new development to mitigate the potential impacts of geologic hazards through Building Plan review.* • *S-P-3 The City shall require new development to mitigate the potential impacts of seismic induced settlement of uncompacted fill and liquefaction (water-saturated soil) due to the presence of a high water table.* • *S-P-5 The City shall ensure that all public facilities, such as buildings, water tanks, and reservoirs, are structurally sound and able to withstand seismic shaking and the effects of seismically induced ground failure.* • *SG-I-1 All new development shall comply with the current Uniform Building Code (UBC) requirements for Seismic Zone 3, which stipulates building structural material and reinforcement.* • *SG-I-2 All new development shall comply with California Health and Safety Code Section 19100 et seq. (Earthquake Protection Law), which requires that buildings be designed to resist stresses produced by natural forces caused earthquakes and wind.*	City of Manteca	Prior to Design Approval/during construction	
Impact 4.5.4: Potential to result in substantial soil erosion or the loss of topsoil.	***Adopted General Plan Policies*** • *RC-I-16 All new development shall comply with the Uniform Building Code (UBC) requirements for specific site development and construction standards for specific soils types.* • *RC-I-17 All new development shall comply with the Uniform Building Code (UBC), Chapter 70, regulating grading activities including drainage and erosion control.* • *RC-I-18 Require site-specific land management and development practices for proposed development projects, including appropriate mitigation measures for avoiding or reducing erosion.*	City of Manteca	Prior to Design Approval/during construction	

	Mitigation Measure 5.2-1: *In addition to applicable adopted General Plan policies, the impact of a soil erosion from projects that are implemented under the Circulation Element and the Public Facilities Implementation Program can be minimized by implementing the following measures:* • *Comply with NPDES General Construction Permit requirements. To reduce or eliminate construction-related water quality effects, the City or its agents will ensure that transportation improvement projects comply with the requirements of the NPDES General Construction Permit. The City will obtain coverage under the General Construction Permit before the onset of any construction activities, where the disturbed area is 1 acre or greater in size.* • *A SWPPP will be developed by a qualified engineer or erosion control specialist in accordance with the NPDES General Construction Permit requirements. The SWPPP will be implemented prior to the issuance of any grading permit before construction. The SWPPP will be kept on site during construction activity and will be made available upon request to representatives of the RWQCB.* • *Compliance and coverage under the NPDES General Construction Permit will require controls of pollutant discharges that utilize BMPs and technology to reduce erosion and sediments to meet water quality standards. BMPs may consist of a wide variety of measures taken to reduce pollutants in stormwater runoff from the construction site. Measures may include, temporary erosion control measures (such as silt fences, staked straw bales/wattles, silt/sediment basins and traps, check dams, geofabric, sandbag dikes, and temporary revegetation or other ground cover) will be employed to control erosion from disturbed areas.* • *Final selection of BMPs will be subject to approval by the City. The City will verify that an NOI has been filed with the SWRCB, and a SWPPP has been developed before allowing construction to begin.*			
Impact 4.5.5: Creation of risks to life or property from being located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code.	***Adopted General Plan Policies:*** *The impact of expansive soils can be minimized by incorporating design features and operating requirements into projects that are implemented under the Circulation Element and the Public Facilities Implementation Program. Each project shall be consistent with the following General Plan Policies:* • *S-P-1 The City shall require preparation of geological reports and/or geological engineering reports for proposed new*	City of Manteca	Prior to Design Approval	

	development located in areas of suspected significant geological hazards, including potential subsidence (collapsible surface soils) due to groundwater extraction. • *S-P-2 The City shall require new development to mitigate the potential impacts of geologic hazards through Building Plan review.* • *RC-I-16 Comply with the Uniform Building Code (UBC) requirements for specific site development and construction standards for specific soil types.*			
HAZARDS AND HAZARDOUS MATERIALS				
Impact 4.5.8: Create a significant hazard to the public or the environment involving the release or emissions of hazardous materials into the environment, or within one-quarter mile of an existing or proposed school.	***Adopted General Plan Policies:*** *The impact from emitting or handling hazardous materials near schools can be minimized by proper handling of such materials. Each project implemented under the Circulation Element and the Public Facilities Implementation Program shall be consistent with the following General Plan Policies:* • *SP-P-16 City approvals of all new development shall consider the potential for the production, use, storage, and transport of hazardous materials and provide for reasonable controls on such hazardous materials.* ***Mitigation Measure 5.2-2:*** *In addition to previous adopted General Plan policies, the impact from release of hazardous materials from projects that are implemented under the Circulation Element and the Public Facilities Implementation Program can be minimized by implementing the following measures:* • *Implement site-specific analysis for hazardous materials, remediation, and clean-up. The City shall investigate potential for improvement projects to be located at or near areas that are reasonably expected to contain hazardous materials, DTSC sites, areas containing ADL, or at any structure that may contain asbestos. If a project site is found to be contaminated, clean up measures in accordance with the appropriate regulatory agency procedures will be implemented. Additionally, appropriate remediation measures will be employed to ensure worker safety during construction.*	City of Manteca	Prior to Design Approval	

Impact 4.5.10: Potential to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	***Mitigation Measure 5.2-3:*** *Prepare and implement a transportation management plan if it is determined that a project could hinder emergency access. The City shall assess the necessity of a Transportation Management Plan (TMP) on a project-by-project basis. If the project will result in road closures, traffic detours, or congestion on main thoroughfares or roads that provide primary access to populated areas, a TMP will be prepared prior to the initiation of project construction. The TMP will be provided to all emergency service providers in the metropolitan area and will notify them of anticipated dates and hours of construction, as well as any anticipated limits on access. Notice will be provided at least 5 days before construction begins.*	City of Manteca	Prior to Design Approval	
GREENHOUSE GASES AND CLIMATE CHANGE				
Impact 3.5.1: CO2 Emission Effects on Climate Change and Global Warming	***Mitigation Measure 3.5-1:*** *Coordinate with the SJCOG as they develop a Sustainable Communities Strategy (SCS) in compliance with SB 375. This will involve county-wide land use scenarios that reflect different population distributions and land use (mix and density), and multimodal transportation strategies, utilizing the SJCOG regional travel demand model in coordination with a rapid fire tool similar to I-Places. Land use scenarios for Manteca should demonstrate potential reductions in vehicle miles traveled (VMT) and total vehicle miles; GHG, conventional and toxic air pollutant emissions; long distance commute trips; and other such factors consistent with state and federal law.* ***Mitigation Measure 3.5-2:*** *Coordinate with the San Joaquin Council of Governments as they develop and implement a Congestion Management Plan to provide a consistent and coordinated approach for responding to congestion through the investment in roadway capacity increasing measures once all reasonable non-capacity measures have been employed.* ***Mitigation Measure 3.5-3:*** *Participate in the SJCOG Smart Growth Incentive Program. The Measure K Renewal Smart Growth Incentive Program funds are available for infrastructure improvements and planning grants that will assist local agencies in better integrating transportation and land use, such as street calming, walkable community projects, transit amenities and alternative modes of transportation. These funds promote infill development in walkable areas thereby increasing living and transportation choices while reducing reliance on automobiles, and to reward jurisdictions that approve new housing and mixed-use development in urban locations near transit hubs (station, transit center,*	City of Manteca	Ongoing	

	bus stops serving two or more routes). ***Mitigation Measure 3.5-4:*** *Insure that planning efforts include the following:* • *Support development patterns that are amenable to transit, bicycle and pedestrian facilities* • *Continue to encourage use of transit* • *Incorporate bicycle facilities into transportation projects* • *Implement Complete Streets design concepts* • *Seek funding for bicycle projects and maintenance from local, state and federal sources* • *Assist and encourage employers to promote the use of bicycle facilities and safety* ***Mitigation Measure 3.5-5:*** *Seek funding for the development of a Climate Action Plan (CAP) and insure that Manteca's planning efforts address climate change and greenhouse gas emissions. Once funded, the CAP should include the following components* • *Baseline inventory of GHG emissions from municipal sources.* • *A target reduction goal consistent with AB 32.* • *Policies and measures to reduce GHG emissions.* • *Quantification of the effectiveness of the proposed policies and measures.* • *A monitoring program to track the effectiveness and implementation of the CAP.*			
Impact 3.5.2: Energy Consumption Effects on Climate Change and Global Warming	***Mitigation Measure 3.5-6:*** *Consistent with Appendix F of the CEQA Guidelines, the City of Manteca should:* • *Promote measures to reduce wasteful, inefficient and unnecessary consumption of energy during construction, operation, maintenance and/or removal of projects. As the individual projects are designed there should be an explanation as to why certain measures were incorporated in the project and why other measures were dismissed.* • *Site, orient, and design projects to minimize energy consumption, increase water conservation and reduce solid-waste.* • *Promote efforts to reduce peak energy demand in the design and operation of projects.* • *Promote the use of alternate fuels (particularly renewable ones) or energy systems for projects.*	City of Manteca	Ongoing	

	• *Promote efforts to recycle materials used in the construction (including demolition phase) of projects.*			
HYDROLOGY AND WATER QUALITY				
Impact 4.5.12: Potential to violate any water quality standards or waste discharge requirements or 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.	***Adopted General Plan Policies*** • *RC-I-1 Continue to implement standards for water conserving landscape practices, including the use of drought tolerant plants, for both public and private projects.* • *RC-I-22 Maintain a buffer area between waterways and urban development to protect water quality and riparian areas.* • *RC-I-23 Utilize cost-effective urban runoff controls, including Best Management Practices (BMPs), to limit urban pollutants from entering the water courses.* • *RC-I-24 Comply with the Regional Water Control Board's regulations and standards to maintain and improve groundwater and surface water quality in Manteca* • *RC-P-11 Minimize pollution of waterways and other surface water bodies from urban runoff.* • *RC-P-12 Protect the quality of Manteca's groundwater.* ***Mitigation Measure 5.2-4:*** *In addition to previous mitigation measures, the impact on water quality from each project implemented under the Circulation Element and the Public Facilities Implementation Program can be minimized by implementing the following measures:* • *Comply with NPDES General Construction Permit requirements. Develop a SWPPP in accordance with the NPDES General Construction Permit requirements. Keep the SWPPP on site during construction activity and available upon request by the RWQCB. Compliance and coverage under the NPDES General Construction Permit will require controls of pollutant discharges that utilize BMPs and technology to reduce erosion and sediments to meet water quality standards.* • *Develop and implement a spill prevention and control program to minimize the potential for, and effects from, spills of hazardous, toxic, or petroleum substances during all construction activities.* • *Obtain an NPDES permit and Waste Discharge Requirement from the Central Valley RWQCB before discharging any dewatered effluent to surface water.*	City of Manteca	Prior to Design Approval/during construction	

	• *Implement measures to maintain water quality after construction. General site design control measures incorporated into the project design can include: conserving natural areas; protecting slopes and channels; minimizing impervious areas; storm drain identification, and appropriate messaging and signing; and minimizing effective imperviousness through the use of turf buffers and/or grass-lined channels, if feasible.*			
Impact 4.5.13: Potential to substantially alter the existing drainage of the area in a manner which would result in substantial erosion, siltation, or flooding on- or off-site, or otherwise substantially degrade water quality.	***Adopted General Plan Policies*** • *S-I-6 Discourage large continuous paved areas unless provided with engineered drainage facilities.* ***Mitigation Measure 5.2-5:*** *In addition to previous mitigation measures, the impact on drainage from each project implemented under the Circulation Element and the Public Facilities Implementation Program can be minimized by implementing the following measures:* • *Conduct project-level drainage studies. This study should include: 1)runoff calculations (pre-development and post-development); 2) an assessment of existing drainage facilities and necessary upgrades/repairs; and 3) a maintenance program.* • *Avoid project designs that require continual de-watering activities for the life of the projects.*	City of Manteca	Prior to Design Approval	
LAND USE AND PLANNING				
Impact 3.6-1: Physical Division of an Established Community	***Mitigation Measure 3.6.1:*** *Prior to approval of individual projects, the City of Manteca shall review the proposed design to ensure that the project will not physically divide the community. The consultation should include a more detailed project-level analysis of land uses adjacent to proposed improvements to identify specific impacts. The analysis should consider new road widths and specific project locations in relation to existing roads. If it is determined that a project could physically divide a community, the City of Manteca shall redesign the project to avoid the impact, if feasible. The measures could include realignment of the improvements to avoid the affected community. Where avoidance is not feasible, the City of Manteca shall incorporate minimization measures to reduce the impact. The measures could include: alignment modifications, right-of-way reductions, provisions for bicycle, pedestrian, and vehicle facilities, and enhanced*	City of Manteca	Prior to Design Approval	

	landscaping and architecture.			
Impact 3.6-2: Conflicts with Applicable Land Use Plan, Policy, or Regulation Adopted to Avoid or Mitigate an Environmental Effect	***Mitigation Measure 3.6-2:*** *The City of Manteca shall have continued coordination with SJCOG during the development and implementation of the Regional Congestion Management Plan (CMP) to provide a consistent and coordinated approach for responding to congestion on CMP monitored roadways in Manteca through the investment in roadway capacity increasing measures once all reasonable non-capacity measures have been employed. The coordination efforts should include:* • *Adherence to the SJCOG's level of service standard for all regional CMP roadway facilities, or in the case of "planned" level of service deficiencies approved by the City of Manteca, provide SJCOG with a Deficiency Plan to address the deficiency.* • *Adherence to the SJCOG's standards for the frequency and routing of public transit.* • *Adherence to the SJCOG programs and policies that are designed to reduce automobile trip generation from newly developed residential and employment centers.* • *Adherence to the SJCOG programs and policies that are designed to reduce automobile trip generation from newly developed residential and employment centers.* • *Adherence to the SJCOG's trip reduction and travel demand programs that promotes alternative transportation modes.* • *Provide SJCOG with the opportunity to review all development proposals so that they can comment on their regional impact and appropriate mitigation to address impacts to the regional transportation system.* ***Mitigation Measure 3.6-3:*** *The City of Manteca shall coordinate with SJCOG during the development of the Sustainable Communities Strategy (SCS) for San Joaquin County in compliance with SB 375. This effort will require coordination of Manteca's land use and transportation planning efforts to ensure that SJCOG's regional planning efforts complement each other. This will involve SJCOG's development of a countywide land use scenarios that reflects different population distributions and land use (mix and density), and multimodal transportation strategies, utilizing the SJCOG regional travel demand model in coordination with a rapid fire tool similar to I-Places. Scenarios will be developed to identify the alternatives that demonstrate potential reductions in vehicle miles traveled (VMT) and total vehicle miles; GHG, conventional and toxic air pollutant emissions; long distance commute trips; and other such factors that are consistent with*	City of Manteca	Ongoing	

	state and federal law. Upon completion of the SCS, the City of Manteca shall present the land use and transportation development scenario to the Manteca City Council for consideration.			
Impact 3.6-4: Induce Substantial Population Growth in an Area	***Mitigation Measure 3.6-4:*** *The City of Manteca shall coordinate with SJCOG to secure funds for transportation projects through the Measure K Smart Growth Incentive Program. The program seeks the following:* • *A minimum of $65 million in state and federal transportation funding or Measure K funding will be made available for smart growth incentives to local jurisdictions in San Joaquin County. These funds will be made available for infrastructure improvements and planning grants that will assist local agencies in better integrating transportation and land use, such as street calming, walkable community projects, transit amenities and alternative modes of transportation. These funds will be available to enhance infill development, neighborhood revitalization and downtown improvements.* • *The program promotes infill development in walkable areas thereby increasing living and transportation choices while reducing reliance on automobiles, and to reward jurisdictions that approve new housing and mixed-use development in urban locations near transit hubs. Projects to serve cities currently not served by high-frequency transit service that are creating conditions that would allow for increased transit service, encourage livable communities, support mixed use development, and/or support infill and redevelopment of downtown areas are eligible. In high frequency transit areas eligible projects must be within walking distance of transit hubs (station, transit center, bus stops serving two or more routes). Investments in transit hubs themselves are eligible.* *This program aims to capitalize on public investments in transportation infrastructure, help rebuild and revitalize town centers and main streets, promote infill development, create more walkable communities, encourage transit use, and address regional housing needs. When allocating dollars for housing projects a minimum overall density of 10 units per acre with bonus points for higher densities and affordable housing will be used. Mixed use developments must have an average of 12 units per acre and be at least 50% housing.*	City of Manteca	Ongoing	
NOISE				

Impact 3.7-1: Grading and Construction Activities Would Intermittently and Temporarily Generate Noise Levels Above Ambient Background Levels	***Mitigation Measure 3.7-1:*** *Subsequent projects under the Circulation Element shall be designed and implemented to reduce adverse construction noise and vibration impacts to sensitive receptors, as feasible. Measures to reduce noise and vibration effects may include, but are not limited to:* • *Construction of temporary sound barriers to shield noise-sensitive land uses.* • *Location of noise-generating stationary equipment (e.g., power generators, compressors, etc.) at the furthest practical distance from nearby noise-sensitive land uses.* • *Phase demolition, earth-moving and ground-impacting operations so as not to occur in the same time period.* • *Use of equipment noise-reduction devices (e.g., mufflers, intake silencers, and engine shrouds) in accordance with manufacturers' recommendations.* • *Substituting noise/vibration-generating equipment with equipment or procedures that would generate lower levels of noise/vibration. For instance, in comparison to impact piles, drilled piles or the use of a sonic or vibratory pile driver are preferred alternatives where geological conditions would permit their use.* • *Limit noise-generating construction activities, excluding those that would result in a safety concern to workers or the public, to the hours of 7 a.m. to 8 p.m., as outlined in Section 9.52.040.K of the City of Manteca Municipal Code.* • *Other specific measures as they are deemed appropriate by the implementing agency to maintain consistency with adopted policies and regulations regarding noise and groundborne vibration levels.*	City of Manteca	Prior to Design Approval/during construction	
TRANSPORTATION AND CIRCULATION				
Impact 3.8-2: Increase in traffic volumes would increase delay and/or volume-to-capacity ratios at traffic facilities creating unacceptable operations	***Mitigation Measure 3.8.1:*** *The City of Manteca shall either update the PFF to include additional lanes/wider segments at facilities that are operating at unacceptable levels, or adopt an alternative LOS standard for that particular roadway/intersection.* ***Mitigation Measure 3.8.2:*** *The City of Manteca shall coordinate transportation planning efforts with neighboring jurisdictions to ensure that LOS is maintained at acceptable levels.*	City of Manteca	On-going	
Impact 3.8-4: Implementation proposed project could increase	***Mitigation Measure 3.8.3:*** *The City of Manteca shall coordinate with the City of Ripon and Caltrans to either: 1) develop a design that would*	City of Manteca	On-going	

traffic volumes in locations that would adversely affect bicycle and pedestrian travel or lead to increased bicycle or pedestrian demand in areas where adequate non-motorized facilities do not exist	*accommodate the McKinley Avenue Expressway and the Olive Expressway with collector-distributor ramps, braded ramps, or other geometric considerations, or 2) try to develop an interchange design and location along SR 99 that would accommodate the needs of the both Cities, while meeting the spacing requirements of Caltrans.*			

CITY OF MANTECA

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