

ENVIRONMENTAL CHECKLIST

FOR THE

MANTECA GATEWAY SOLAR AND RV/BOAT STORAGE PROJECT

CEQA Guidelines Section 15183 - Streamlined Environmental Review

SEPTEMBER 2025

Prepared for:

City of Manteca – City Hall
1001 West Center Street
Manteca, CA 95337
(209) 456-8000

Prepared by:

De Novo Planning Group
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D e N o v o P l a n n i n g G r o u p

A Land Use Planning, Design, and Environmental Firm

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ENVIRONMENTAL CHECKLIST

PROJECT TITLE

Manteca Gateway Solar RV & Boat Storage Project

LEAD AGENCY NAME AND ADDRESS

City of Manteca
1001 West Center Street
Manteca, CA 95337
(209) 456-8000

CONTACT PERSON

Baja Construction
Mark Dirato
223 Foster Street
Martinez, CA 94553

INTRODUCTION

The following pages provide an analysis of the proposed Manteca Gateway Solar RV & Boat Storage Project (proposed Project) with respect to the Project's consistency with the City of Manteca General Plan, the analysis contained in the General Plan Environmental Impact Report (EIR), and any site-specific environmental impacts or cumulative impacts that may result from Project implementation.

As explained in the following pages, the proposed Project is consistent with the City's General Plan, for which an EIR was prepared and certified, and there are no site-specific or cumulative impacts associated with the proposed Project that have not been fully addressed in a previous environmental document, or that cannot be mitigated to a less than significant level through the application of uniformly applied development policies and/or standards. The findings presented below demonstrate that no additional environmental analysis is required under the California Environmental Quality Act (CEQA) prior to approval of the proposed Project.

PROJECT OVERVIEW

PROJECT LOCATION AND EXISTING SURROUNDING USES

The Project site is 13.94+/- acres on the north side of East Bronzan Road in the City of Manteca. The Project site is located at 2371 Bronzan Road. (Figure 1 Project Location, and Figure 2 Site Plan).

The Project site consists of Assessor's Parcel Number: APN: 241-410-031. Adjacent uses are as follows:

- North – Vacant/Retention Pond/SR 120
- East – Vacant/Single Family Residence
- South – Vacant/Single Family Residences
- West – Single Family Residences

EXISTING SITE USES

The Project site is currently predominately vacant with the exception of a manufactured home, a steel garage, multiple shipping containers, various sheds, abandoned cars and various other debris from the years 1993-2021. From 2021-present the Project site appears to be vacant. (Figure 3 Aerial Photo).

GENERAL PLAN DESIGNATION

The Manteca General Plan designates the Project site as Commercial (C). (Figure 4 Existing General Plan Land Use). The Manteca General Plan defines this use as follows:

This designation provides for neighborhood, community, and regional-serving retail and service uses; offices; restaurants; service stations; highway-oriented and visitor commercial and lodging; auto-serving and heavy commercial uses; wholesale; warehousing; public and quasi-public uses; commercial recreation and public gathering facilities, such as amphitheaters or public gardens; and similar and compatible uses. Uses that are incompatible with residential uses due to noise, vibration, or other characteristics are not permitted in locations that may impact existing or future residential development. This designation allows for a non-residential Floor-Area-Ratio (FAR) up to 0.6 FAR and 50% site coverage.

ZONING DESIGNATION

The Project site is currently zoned General Commercial (CG) by the City of Manteca Zoning Map. The Manteca Zoning Code describes this zone as follows:

This category provides for wholesale, warehousing, and heavy commercial uses, highway-oriented commercial retail, public and quasi-public uses, and similar and compatible uses. The designation is also intended to accommodate visitor lodging, commercial recreation and public gathering facilities, such as amphitheaters, or public gardens. It also allows most neighborhood and mixed commercial uses.

PROJECT CHARACTERISTICS

The proposed Project consists of the construction of a 13.78-acre covered recreational vehicle (RV) and boat storage facility. The proposed Project would include development of 12 canopies, each covered with solar panels to produce an estimated 3000 kW of electricity for the power grid. The Project site will also include a two-story 2,400 square foot (SF) office building fronting Bronzan Road.

Utilities will be located within public utility easements and shall be maintained by governing agencies. Public utilities will be constructed with the proposed Project, including the extension of water, sewer, storm, and dry utilities.

REQUESTED ENTITLEMENTS AND OTHER APPROVALS

The City of Manteca is the Lead Agency for the proposed Project, pursuant to the State Guidelines for Implementation of CEQA (Guidelines Section 15050).

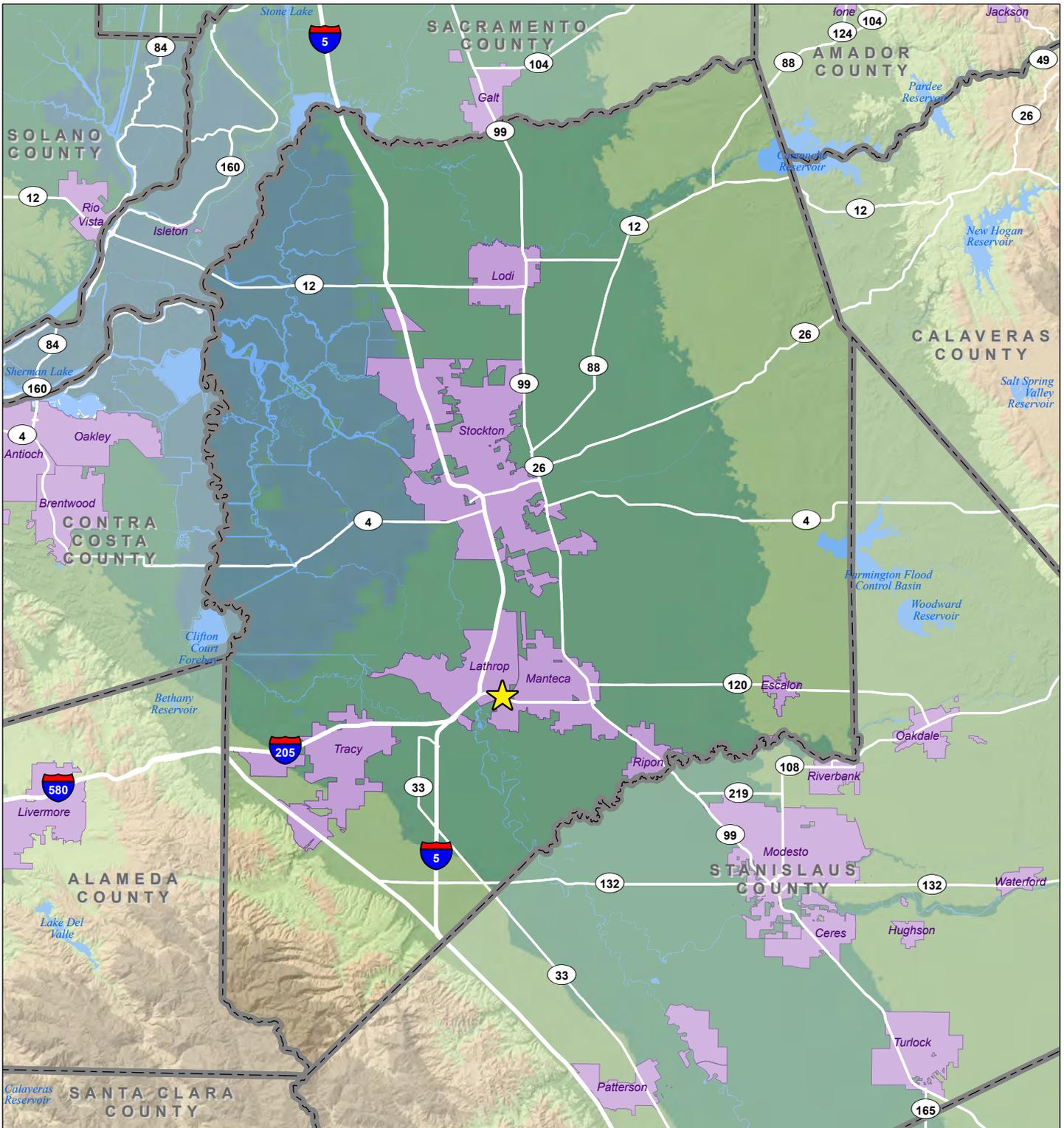
This document will be used by the City of Manteca to take the following actions:

- Adoption of the CEQA Exemption (Guidelines Section 15183).
- Development Review.
- Approval of the Conditional Use Permit (CUP).

The following agencies may be required to issue permits or approve certain aspects of the proposed Project:

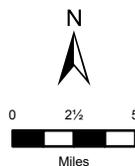
- Central Valley Regional Water Quality Control Board (CVRWQCB) - Storm Water Pollution Prevention Plan (SWPPP) approval prior to construction activities.
- San Joaquin Valley Air Pollution Control District (SJVAPCD) - Approval of construction-related air quality permits.
- San Joaquin Council of Governments (SJCOG) - Review of Project application to determine consistency with the San Joaquin County Multi-Species Habitat, Conservation, and Open Space Plan (SJMSCP).
- Caltrans

Figure Insert 1 – Regional Location



LEGEND

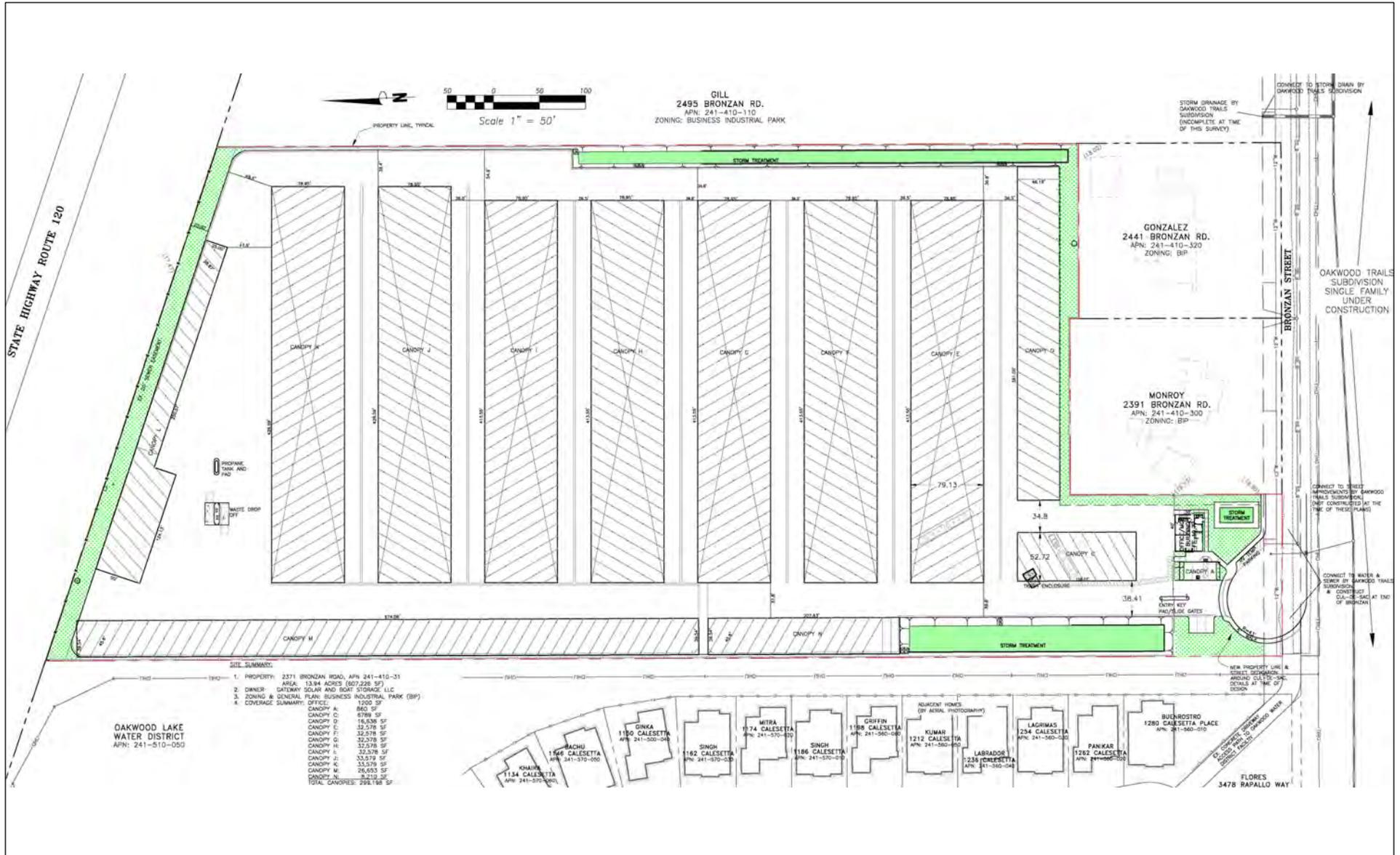
-  Project Location
-  Incorporated Area
-  California Counties



GATEWAY SOLAR AND RV-BOAT STORAGE

Figure 1. Regional Location Map

Sources: California State Geoportal; San Joaquin County GIS. Map date: June 8, 2025



GATEWAY SOLAR AND RV-BOAT STORAGE

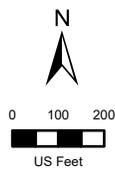
Figure 2. Site Plan

Sources: Cullen-Sherry & Associates, Inc. Map date: June 8, 2025.



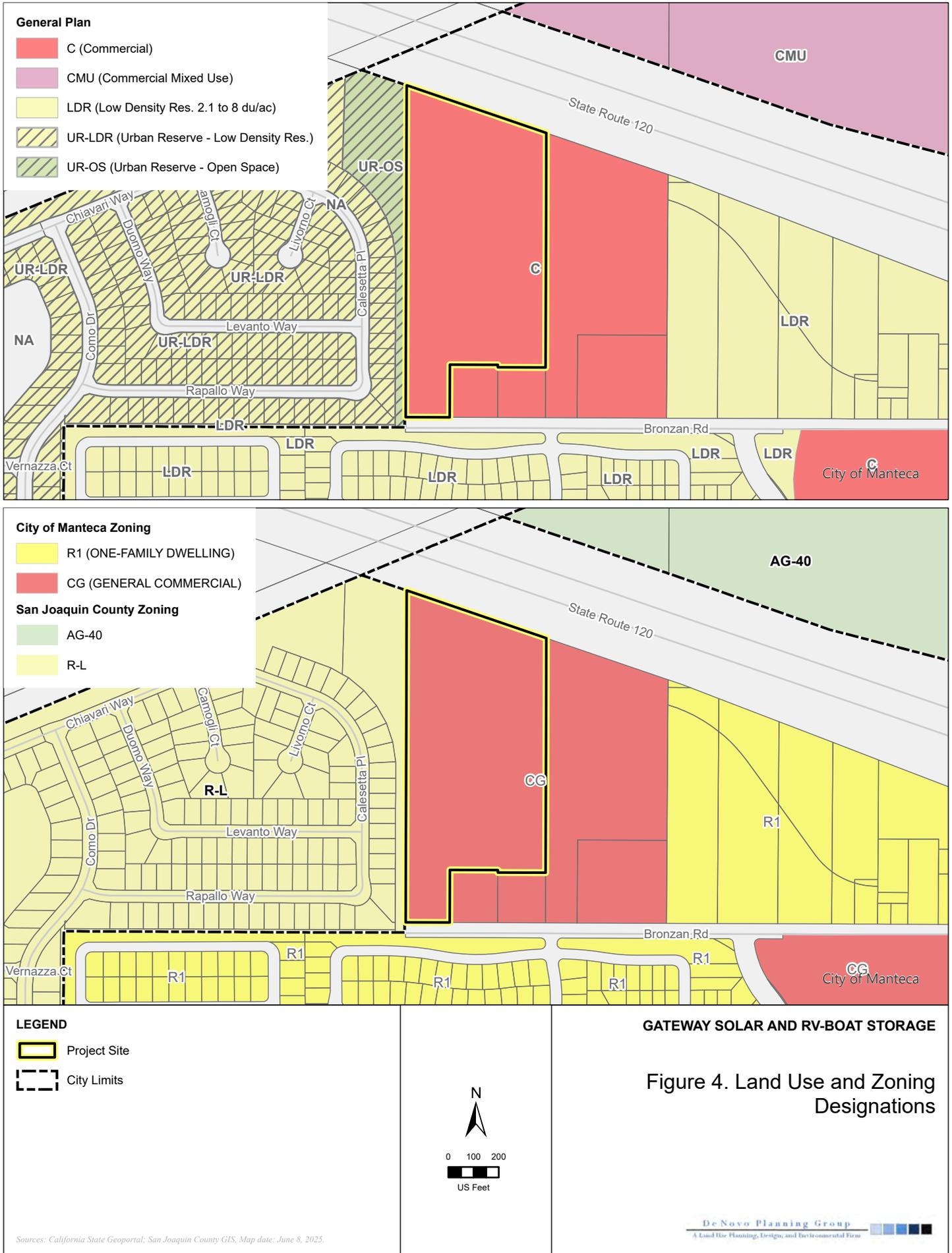
LEGEND

-  Project Site
-  Manteca City Limits



GATEWAY SOLAR AND RV-BOAT STORAGE

Figure 3. Aerial View



PREVIOUS ENVIRONMENTAL ANALYSES OF THE PROPOSED PROJECT

Previous environmental analysis has been prepared and certified which is applicable to the proposed Project.

The proposed Project is consistent with the Manteca General Plan, for which an EIR was certified on June 19, 2023 (SCH#2020019010). The certified General Plan EIR assumed full development and buildout of the Project site with uses that are proposed under the current application. The cumulative impacts associated with buildout of the Manteca General Plan, including the Project site, were fully addressed in the General Plan EIR.

CEQA GUIDELINES SECTION 15183 EXEMPTIONS

CEQA Guidelines Section 15183 allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified. As noted above, the proposed Project is consistent with the land use designation and densities established by the Manteca General Plan, for which an EIR was certified. The provisions contained in Section 15183 of the CEQA Guidelines are presented below.

15183. Projects Consistent with a Community Plan or Zoning

(a) CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.

(b) In approving a project meeting the requirements of this section, a public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:

- (1) Are peculiar to the project or the parcel on which the project would be located,*
- (2) Were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent,*
- (3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action,*
or
- (4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.*

(c) If an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, as contemplated by subdivision (e) below, then an additional EIR need not be prepared for the project solely on the basis of that impact.

(d) This section shall apply only to projects which meet the following conditions:

(1) The project is consistent with:

- (A) A community plan adopted as part of a general plan,*
- (B) A zoning action which zoned or designated the parcel on which the project would be located to accommodate a particular density of development, or*
- (C) A general plan of a local agency, and*

(2) An EIR was certified by the lead agency for the zoning action, the community plan, or the general plan.

(e) This section shall limit the analysis of only those significant environmental effects for which:

- (1) Each public agency with authority to mitigate any of the significant effects on the environment identified in the planning or zoning action undertakes or requires others to undertake mitigation measures specified in the EIR which the lead agency found to be feasible, and*
- (2) The lead agency makes a finding at a public hearing as to whether the feasible mitigation measures will be undertaken.*

(f) An effect of a project on the environment shall not be considered peculiar to the project or the parcel for the purposes of this section if uniformly applied development policies or standards have been previously adopted by the City or county with a finding that the development policies or standards will substantially mitigate that environmental effect when applied to future projects, unless substantial new information shows that the policies or standards will not substantially mitigate the environmental effect. The finding shall be based on substantial evidence which need not include an EIR. Such development policies or standards need not apply throughout the entire City or county, but can apply only within the zoning district in which the project is located, or within the area subject to the community plan on which the lead agency is relying. Moreover, such policies or standards need not be part of the general plan or any community plan, but can be found within another pertinent planning document such as a zoning ordinance. Where a City or county, in previously adopting uniformly applied development policies or standards for imposition on future projects, failed to make a finding as to whether such policies or standards would substantially mitigate the effects of future projects, the decision-making body of the City or county, prior to approving such a future project pursuant to this section, may hold a public hearing for the purpose of considering whether, as applied to the project, such standards or policies would substantially mitigate the effects of the project. Such a public hearing need only be held if the City or county decides to apply the standards or policies as permitted in this section.

(g) Examples of uniformly applied development policies or standards include, but are not limited to:

- (1) Parking ordinances.*
- (2) Public access requirements.*
- (3) Grading ordinances.*

- (4) Hillside development ordinances.*
- (5) Flood plain ordinances.*
- (6) Habitat protection or conservation ordinances.*
- (7) View protection ordinances.*
- (8) Requirements for reducing greenhouse gas emissions, as set forth in adopted land use plans, policies, or regulations.*

(h) An environmental effect shall not be considered peculiar to the project or parcel solely because no uniformly applied development policy or standard is applicable to it.

(i) Where the prior EIR relied upon by the lead agency was prepared for a general plan or community plan that meets the requirements of this section, any rezoning action consistent with the general plan or community plan shall be treated as a project subject to this section.

(1) "Community plan" is defined as a part of the general plan of a City or county which applies to a defined geographic portion of the total area included in the general plan, includes or references each of the mandatory elements specified in Section 65302 of the Government Code, and contains specific development policies and implementation measures which will apply those policies to each involved parcel.

(2) For purposes of this section, "consistent" means that the density of the proposed Project is the same or less than the standard expressed for the involved parcel in the general plan, community plan or zoning action for which an EIR has been certified, and that the project complies with the density-related standards contained in that plan or zoning. Where the zoning ordinance refers to the general plan or community plan for its density standard, the project shall be consistent with the applicable plan.

(j) This section does not affect any requirement to analyze potentially significant offsite or cumulative impacts if those impacts were not adequately discussed in the prior EIR. If a significant offsite or cumulative impact was adequately discussed in the prior EIR, then this section may be used as a basis for excluding further analysis of that offsite or cumulative impact.

PROJECT-SPECIFIC ENVIRONMENTAL REVIEW

The attached Environmental Checklist includes a discussion and analysis of any peculiar or site-specific environmental impacts associated with construction and operation of the proposed Project. The Environmental Checklist identifies the applicable City of Manteca development standards and policies that would apply to the proposed Project during both the construction and operational phases, and explains how the application of these uniformly applied standards and policies would ensure that no peculiar or site-specific environmental impacts would occur.

CONCLUSION

As described above, the proposed Project is consistent with the Manteca General Plan (*and subsequent Manteca General Plan Amendment, 2024*), for which an EIR was certified on June 19, 2023 (SCH#2020019010). Cumulative impacts associated with development and buildout of the Project site, as proposed, were fully addressed in the Manteca General Plan EIR (SCH# 2020019010). Since the proposed Project is consistent with the land use designation and development intensity assumed under the General Plan and analyzed in the General Plan EIR, implementation of the proposed Project would not result in any new cumulative environmental impacts beyond those addressed in the General Plan EIR.

The analysis in the attached CEQA Environmental Checklist demonstrates that there are no site-specific or peculiar impacts associated with the Project, and identifies uniformly applied standards and policies that would be applied to the Project. The Project Requirements identified in the attached environmental analysis include requirements that must be implemented by the proposed Project to ensure that any site-specific impacts or construction-related impacts are reduced to a less than significant level. All Project Requirements identified in the attached Environmental Checklist shall be made a condition of Project approval and shall be implemented within the timeframes identified.

ENVIRONMENTAL CHECKLIST

I. AESTHETICS

	<i>Significant Impact Peculiar to the Project or the Project Site</i>	<i>Significant Impact due to New Information</i>	<i>Impact Adequately Addressed in the General Plan EIR</i>	<i>Impact not Previously Addressed in General Plan EIR</i>
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with the applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

Project Impacts:

The development of the proposed RV and boat storage and office facilities would change the existing visual nature / character of the Project site from a vacant field to an urban development. The Project site is not designated as a scenic vista or scenic highway. The development of the Project site would create new sources of light and glare that is typical of commercial development. The proposed Project is allowed under the existing General Plan land use designation. There is nothing peculiar about the site that presents impacts greater than was anticipated under the General Plan. For instance, the Project site is not topographically elevated from the surrounding lands and is not highly visible from areas beyond the immediate vicinity of the Project site. There are no prominent features on the Project site, such as rock outcroppings, or other visually distinctive features that contribute to the scenic quality of the Project site. As discussed below, impacts to scenic vistas or viewsheds would not be anticipated.

Prior Environmental Analysis:

Implementation of the proposed Project would introduce new RV and boat storage uses to the Project site, which is consistent with the existing commercial land uses anticipated for the Project site by the Manteca General Plan and analyzed in Chapter 3.1 of the Manteca General Plan EIR (City of Manteca General Plan Draft EIR, pages 3.1-8 through 3.1-18). As such, the proposed Project is consistent with the adopted vision and use identified within the General Plan, and would not result in any new or increased impacts beyond those that were already addressed in

the General Plan EIR. The General Plan EIR determined that visual and aesthetic impacts were less than significant. These impacts were adequately addressed in Chapter 3.1 of the General Plan EIR. The proposed Project would not result in a new or substantially more severe impact than what was previously analyzed. The General Plan did not identify any mitigation measures, but did include policies that would serve to minimize potential impacts to visual character of the City. The following are General Plan policies presented in the General Plan EIR relative to this environmental topic:

Policies: Community Design Element

- CD-2.1. Promote architectural design that exhibits timeless character and is constructed with high quality materials.
- CD-2.2. Utilize architectural design features (e.g., windows, columns, offset roof planes, etc.) to vertically and horizontally articulate elevations for all sides of buildings.
- CD-2.3. Provide purposeful variations in color, texture, materials, articulation, and architectural treatments that coincide with the associated architectural style. Avoid long expanses of blank, monotonous walls or fences through the use of vertical and horizontal façade or fence articulation achieved through stamping, colors, materials, modulation, and landscaping.
- CD-2.4. For projects that include multiple buildings, encourage differing, but complementary architectural styles that incorporate representative characteristics of a given area.
- CD-2.5. Employ design strategies and building materials that evoke a sense of quality and permanence.
- CD-2.6. Orient building entrance toward the street and provide parking in the rear, when possible.
- CD-2.9. Ensure that new development and redevelopment reinforces desirable elements of its neighborhood, district, or center, including architectural style, scale, and setback patterns.
- CD-2.10. Encourage context-sensitive transitions in architectural scale and character between new and existing residential development.
- CD-2.11. Provide special building-form elements, such as towers and archways, and other building massing elements to help distinguish activity nodes and establish landmarks within the community.
- CD-2.12. For infill development, incorporate context sensitive design elements that maintain compatibility and raise the quality of the area's architectural character.
- CD-2.15. Where practical, and in compliance with ADA standards, separate common areas that provide seating from the primary walkways by informal barriers, such as planters, bollards, fountains, low fences, and/or changes in elevation.
- CD-2.16. Design retention/detention basins to be visually attractive and well-integrated with any associated project and with adjacent land uses.
- CD-2.17. Require that lighting and fixtures be integrated with the design and layout of a project and that they provide a desirable level of security and illumination.

- CD-4.1. Strengthen the positive qualities of the City's neighborhoods, districts, and centers.
- CD-4.2. Support the development and preservation of unique neighborhoods, districts, and centers that exhibit a special sense of place and quality of design.
- CD-4.3. Strengthen the identity of individual neighborhoods, districts, and centers through the use of entry monuments, flags, street signs, themed streets, natural features, landscaping, and lighting.
- CD-4.6. Design neighborhoods, districts, and centers to provide access to adjacent open spaces.
- CD-4.7. Design neighborhoods in new growth areas to incorporate the following characteristics:
 - The edges of the neighborhood shall be identifiable by use of landscaped areas along major streets or natural features, such as permanent open space. Primary arterial streets may be used to define the boundaries of neighborhoods. The street system shall be designed to discourage high volume and high speed traffic through the neighborhood.
 - Neighborhoods shall be not more than one mile in length or width.
 - Each neighborhood shall include a distinct center, such as an elementary school, neighborhood park(s), and/or a mixed-use commercial area within a reasonable walking distance of the homes, approximately one-half mile.
 - Each neighborhood shall include an extensive pedestrian and bikeway system comprised of sidewalks and bike lanes along streets and dedicated trails.
- CD-8.1. To the extent possible, require new development to retain or incorporate visual reminders of the agricultural heritage of the community.
- CD-8.2. Utilize wood, wrought-iron, or other types of open fencing instead of block walls in rural areas as needed.
- CD-8.3. Allow for the elimination of vertical curbs, paved gutters, and sidewalks in rural areas if adequate drainage conditions are provided.
- CD-8.4. For lighting in rural areas of the community, provide:
 - Minimal levels of street, parking, building, site and public area lighting to meet safety standards and provide direction.
 - Directional shielding for all exterior lighting to minimize the annoyance of direct or indirect glare.
 - Automatic shutoff or motion sensors for lighting features in newly developed areas.

Implementation: Community Design Element

- CD-2a. Adopt and maintain, in consistency with the General Plan, the City's Zoning regulations, and current best practice design solutions, Citywide Design Guidelines for the architectural review of discretionary projects.
- CD-2b. Require development projects to incorporate Crime Prevention through Environmental Design (CPTED) techniques and defensible space design concepts.

- CD-8a. Require projects developing on the fringe of the City or adjacent to agricultural or rural residential uses to be compatible with the character of the area, including implementing the City's light and glare standards, use of appropriate materials and design, and siting of more intense uses away from rural and agricultural uses, where feasible.

Mitigation Measures from Uniformly Applied Development Policies and Standards:

All applicable mitigation measures from the General Plan EIR, including the mitigation measures for aesthetic/visual impacts incorporated as goals and policies in the General Plan, will be applied to the proposed Project. These serve as uniformly applied development policies and standards and/or as conditions of approval for this Project to ensure consistency with the General Plan and compliance with City rules and regulations.

Responses to Checklist Questions

Response a): Less than Significant. As discussed in Chapter 3.1 of the General Plan EIR, the existing General Plan does not designate official scenic vistas. The proposed Project is not located along or near a scenic vista. The Project uses are consistent with the General Plan land use designations, and compatible with the surrounding land use designations. The proposed Project would not result in new or more severe impacts than what was previously disclosed in the General Plan EIR. No additional analysis is required. Therefore, this impact is considered **less than significant**.

Response b): Less than Significant. As discussed in Chapter 3.1 of the General Plan EIR, no adopted State scenic highways are in Manteca. Only one highway section in San Joaquin County is listed as a Designated Scenic Highway by the Caltrans Scenic Highway Mapping System; the segment of Interstate 580 (I-580) from Interstate 5 to Interstate 205. This route traverses the edge of the Coast Range to the west and Central Valley to the east. The City of Manteca, including the Project site, is not visible from this roadway segment. The General Plan EIR determined that implementation of the General Plan would have a less than significant impact relative to this topic. The proposed Project would not result in new or more severe impacts than what was previously disclosed in the General Plan EIR. No additional analysis is required. Therefore, this impact is considered **less than significant**.

Response c): Less than Significant. CEQA Guidelines Section 15387 defines an urbanized area as a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile. The Project site is located along the boundary of the City of Manteca, which is defined as an urbanized area. The proposed commercial use is in an area that the General Plan envisions to be developed with commercial uses. Additionally, the surrounding area to the west and south currently contains residential uses; commercial uses, like those proposed, could be developed to the east of the site in the future. The proposed uses are scaled to be visually compatible with the existing and future surrounding land uses. The proposed Project site is currently zoned for CG uses that are consistent with the C General Plan land use designation.

The General Plan EIR determined that implementation of the General Plan would have a less than significant impact relative to this topic. The proposed Project would not result in new or more severe impacts than what was previously disclosed in the General Plan EIR. No additional analysis is required. The implementation of City standards and requirements would reduce any impacts related to visual quality or character to a **less than significant** level.

Response d): Less than Significant. During the day, sunlight reflecting from structures and vehicles is a primary source of glare, while nighttime light and glare can be divided into both stationary and mobile sources. Some types of stationary sources of nighttime light include structure illumination, interior lighting, decorative landscape lighting, and street lights. The principal mobile source of nighttime light and glare is vehicle headlamp illumination.

The General Plan EIR (page 3.1-5) notes that there is ambient lighting that comes from existing development, including roadways. The developed and inhabited land uses in the City of Manteca are the main source of daytime and nighttime light and glare. They are typified by single and multi-family residences, commercial structures, industrial areas, and streetlights. These areas and their associated human activities (inclusive of vehicular traffic) characterize the existing light and glare environment present during daytime and nighttime hours in the developed portions of the city. Because the Project site is adjacent to developed portions of the City of Manteca, ambient light in this area is more pronounced than in areas farther away from the developed areas.

The surrounding area has existing sources of light and glare created by streetlights, car headlights, and interior and exterior lighting from buildings, including adjacent residential and highway uses. The proposed Project would create these same sources of light and glare. Chapter 3.1 of the General Plan EIR notes that exterior lighting is allowed under the General Plan but is required to comply with City standards for outdoor lighting (Municipal Code Chapter 17.50). These standards require exterior lighting to be energy efficient, stationary, shielded and directed away from adjoining properties and public rights-of-way. The lighting plan for the proposed uses was submitted as part of the site plan application and will require a final approval by the City.

The General Plan EIR determined that implementation of the General Plan would have a less than significant impact relative to this topic. The proposed Project would not result in new or substantially more severe impacts than what was previously disclosed in the General Plan EIR. No additional analysis is required. The implementation of City standards and requirements would reduce any impacts related to light and glare to a **less than significant** level.

II. AGRICULTURE AND FOREST RESOURCES

	<i>Significant Impact Peculiar to the Project or the Project Site</i>	<i>Significant Impact due to New Information</i>	<i>Impact Adequately Addressed in the General Plan EIR</i>	<i>Impact not Previously Addressed in General Plan EIR</i>
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?			X	
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?			X	
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1222(g)) or timberland (as defined in Public Resources Code section 4526)?			X	
d) Result in the loss of forest land or conversion of forest land to non-forest use?			X	
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?			X	

Project Impacts:

The development of a commercial RV and boat storage and office facilities would change the existing character of the Project site from a predominately vacant field to commercial development. The Project site contains areas designated as Rural Residential Land and Vacant or Disturbed Land, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency (California Department of Conservation, 2025). The proposed Project would therefore not result in the conversion of important farmland to a non-agricultural use. The Project site is not under a Williamson Act contract. The proposed Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract.

Prior Environmental Analysis:

Implementation of the proposed Project would introduce new RV and boat storage uses to the Project site, and would be consistent with the surrounding uses anticipated for the Project site by the Manteca General Plan and analyzed in Chapter 3.2 of the General Plan EIR (City of Manteca General Plan Draft EIR, pages 3.2-10 through 3.2-17). As such, the proposed Project is consistent with the adopted vision and uses identified within the General Plan and would not result in any new or increased impacts beyond those that were evaluated in the General Plan EIR. Although the General Plan contains a strategy to protect agricultural lands beyond the city edges from conversion to non-agricultural use, the General Plan EIR identified the conversion of farmlands of concern under CEQA to non-agricultural uses as a significant impact. The General Plan EIR notes that because these parcels are located near existing urbanized areas, they may not be viable

for agricultural operations due to conflicts with nearby urbanized areas. As discussed under Impact 3.2-1 of the General Plan EIR, no additional mitigation is available, resulting in a significant and unavoidable impact. The City of Manteca adopted a Statement of Overriding Considerations stating that the EIR for the General Plan concludes that General Plan impacts on agricultural land conversion are significant and that feasible mitigation measures are not available that would conclusively reduce these impacts to a less than significant level. The following are General Plan policies presented in the General Plan EIR relative to this environmental topic:

Policies: Resource Conservation Element

- RC-8.1. Support the continuation of agricultural uses on lands designated for urban use, until urban development is imminent.
- RC-8.2. Provide an orderly and phased development pattern, encouraging the development of vacant lands within City boundaries prior to conversion of agricultural lands, so that farmland is not subjected to premature development pressure.
- RC-8.3. Encourage permanent agricultural lands surrounding the Planning Area to serve as community separators and continue the agricultural heritage of Manteca.
- RC-8.4. Support and encourage the preservation of designated Agriculture lands, without placing an undue burden on agricultural landowners.
- RC-8.5. Minimize conflicts between agricultural and urban land uses.
- RC-8.6. Ensure that urban development near existing agricultural lands will not unnecessarily constrain agricultural practices or adversely affect the economic viability of nearby agricultural operations.
- RC-8.7. Prohibit the fragmentation of agricultural parcels into small rural residential parcels except in areas designated for urban development in the Land Use Diagram.
- RC-8.9. Work with the Local Agency Formation Commission (LAFCO) on issues of mutual concern including the conservation of agricultural land through consistent use of LAFCO policies, particularly those related to conversion of agricultural lands and establishment of adequate buffers between agricultural and non-agricultural uses, and the designation of a reasonable and logical Sphere of Influence boundary for the City.
- RC-8.10. Prohibit re-designation of Agricultural lands to other land use designations unless all of the following findings can be made:
 - There is a public need or net community benefit derived from the conversion of the land that outweighs the need to protect the land for long-term agricultural use.
 - There are no feasible alternative locations for the proposed project that are either designated for non-agricultural land uses or are less productive agricultural lands.
 - The use would not have a significant adverse effect on existing or potential agricultural activities on surrounding lands designated Agriculture.
- RC- P-8.11. Require the development projects to reduce impacts on agricultural lands through the use of buffers, such as greenbelts, drainage features, parks, or other improved

- and maintained features, in order to separate residential and other sensitive land uses, such as schools and hospitals, from agricultural operations and from lands designated Agriculture.
- RC-8.12. Work with agricultural landowners to improve practices that have resulted in adverse impacts to adjacent properties. Such practices include site drainage and flood control measures.
 - RC-8.15. Do not extend water and sewer lines to noncontiguous urban development that would adversely affect agricultural operations.

Implementation: Resource Conservation Element

- RC-8a. Continue to implement Chapter 8.24 (Right to Farm) of the Municipal Code in order to protect farming uses from encroaching urban uses and to notify potential homebuyers of nearby agricultural operations.
- RC-8b. Consider impacts to agricultural lands and agricultural productivity when reviewing new development projects, amendments to the General Plan, and rezoning applications.
- RC-8c. Amend Title 17 (Zoning) of the Municipal Code to include specific agricultural buffer requirements for residential and sensitive land uses (i.e., schools, day care facilities, and medical facilities) that are proposed near existing agricultural lands in order to protect the associated agricultural operations from encroachment by incompatible uses. Buffers shall generally be defined as a physical separation, depending on the land use, and may consist of topographic features, roadways, bike/pedestrian paths, greenbelts, water courses, or similar features. The buffer shall occur on the parcel for which a permit is sought and shall favor protection of the maximum amount of agricultural land.
- RC-8e. 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.
 - Require a buffer, which may include a roadway and landscaped buffer, open space, fencing, transition area, or low intensity uses, between urban uses and lands designated Agriculture on the Tentative Map.

These impacts were adequately addressed in Chapter 3.2 of the General Plan EIR. The proposed Project would not result in a new or substantially more severe impact than what was previously analyzed in the General Plan EIR. The General Plan did not identify any mitigation measures, but did include policies that would serve to minimize potential impacts to agricultural resources of the City.

Responses to Checklist Questions

Response a): Less than Significant. The General Plan EIR found that buildout of the General Plan would have a significant and unavoidable impact on the conversion of Important Farmland. However, the proposed Project is subject to the requirements of the Agricultural Conservation and Mitigation Program which will involve a contribution of conservation easement-protected land or payment of in-lieu fees to the Mitigation Program as compensation for the agricultural land conversion impacts of the Project. The Project site contains areas designated as Rural Residential Land and Vacant or Disturbed Land. Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would not be converted by the Project. The proposed Project would not result in new or substantially more severe impacts than what was previously disclosed in the General Plan EIR. No additional analysis is required. As such, the impact was adequately addressed in the General Plan EIR and implementation of the proposed Project would have **less than significant** impact related to this environmental topic.

Response b): Less than Significant. The Project site is zoned for CG uses by the City of Manteca Zoning Map and is designated C by the City's General Plan. The General Plan EIR noted that because these parcels are located near existing urbanized areas, they may not be viable for agricultural operations due to conflicts with nearby urbanized areas. As discussed under Impact 3.2-2 of the General Plan EIR, no additional mitigation is available, and the General Plan EIR concluded that the impact relative to this topic resulted in a significant and unavoidable impact. There is no land zoned for agricultural uses adjacent to the site. The proposed Project would not result in new or more severe impacts than what was previously disclosed in the General Plan EIR. No additional analysis is required. As such, implementation of the proposed Project would have **less than significant** impact related to this environmental topic.

Responses c) and d): No Impact. The Project site is not forest land (as defined in Public Resources Code section 1222(g)) or timberland (as defined in Public Resources Code section 4526). The proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland. The proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use. There are no forest resources on the Project site or in the immediate vicinity of the Project site. Therefore, there is **no impact**.

Response e): Less than Significant. The General Plan EIR noted that the General Plan land use map was generally developed to arrange new designations to place compatible uses adjacent to existing uses. Nevertheless, the General Plan would allow development that could result in potentially incompatible urban uses next to farms or ranches, creating circumstances that impair the productivity and profitability of agricultural operation, and could eventually lead farmers to take their land out of production. As described in the discussion for Threshold AG-1 of the General Plan EIR, the General Plan includes policies and actions that aim to protect agricultural lands outside of the city from conversion to non-agricultural use, including from incompatible uses. Furthermore, as discussed in Chapter 8.24 of the General Plan EIR, the Manteca Municipal Code contains a "Right-to-Farm Ordinance," under which the City notifies property buyers to accept inconveniences or discomforts resulting from nearby agricultural activities, thereby protecting agricultural operations from nuisance complaints. With implementation of the General Plan

policies and actions, as well as the City's Right-to-Farm Ordinance, the General Plan EIR concluded that the impact relative to this topic would be less than significant. The proposed Project would not result in new or more severe impacts than what was previously disclosed in the General Plan EIR. No additional analysis is required. As such, implementation of the proposed Project would have **less than significant** impact related to this environmental topic.

III. AIR QUALITY

	<i>Significant Impact Peculiar to the Project or the Project Site</i>	<i>Significant Impact due to New Information</i>	<i>Impact Adequately Addressed in the General Plan EIR</i>	<i>Impact not Previously Addressed in General Plan EIR</i>
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

Project Impacts:

The Project site is located within the boundaries of the San Joaquin Valley Air Pollution Control District (SJVAPCD). This agency is responsible for monitoring air pollution levels and ensuring compliance with federal and state air quality regulations within the San Joaquin Valley Air Basin (SJVAB) and has jurisdiction over most air quality matters within its borders.

The proposed Project is allowed under the existing General Plan land use designation and is consistent with the growth assumptions of applicable air quality plans. There is nothing peculiar about the site that presents impacts greater than was anticipated under the General Plan. As discussed below, compliance with the mitigation measures incorporated into the General Plan goals and policies and applicable City Code and compliance with applicable Federal, State, and local laws and regulations would reduce impacts related to air quality to a less than significant level.

Prior Environmental Analysis:

The General Plan EIR analyzed the anticipated impacts of air quality associated with the future urban development that was contemplated by the General Plan. The General Plan concluded that development anticipated by the General Plan could result in new sources of criteria air pollutant emissions and/or TACs near existing or planned sensitive receptors. However, with application of State and SJVAPCD rules and regulations, implementation of the General Plan policies and actions would reduce construction and operation-related criteria air pollutants. Additionally, review of development projects by SJVAPCD for permitted sources of air toxics (e.g., industrial facilities, dry cleaners, and gasoline dispensing facilities) in addition to General Plan policies and actions would ensure that health risks are minimized. The following are General Plan policies presented in the General Plan EIR relative to this environmental topic:

Policies: Land Use Element

- LU-3.9: Locate residences away from areas of excessive noise, smoke, dust, odor, and lighting, and ensure that adequate provisions, including buffers or transitional uses, such as less intensive renewable energy production, light industrial, office, or commercial uses, separate the proposed residential uses from more intensive uses, including industrial, agricultural, or agricultural industrial uses and designated truck routes, to ensure the health and well-being of existing and future residents.
- LU-6.9: Require mixed-use development to provide strong connections with the surrounding development and neighborhoods through the provision of pedestrian and bicycle facilities and, where feasible, site consolidation.
- LU-9.1: Require future planning decisions, development, and infrastructure and public projects to consider the effects of planning decisions on the overall health and well-being of the community and its residents, with specific consideration provided regarding addressing impacts to disadvantaged populations and communities and ensuring disadvantaged communities have equitable access to services and amenities.
- LU-9.2: As part of land use decisions, ensure that environmental justice issues related to potential adverse health impacts associated with land use decisions, including methods to reduce exposure to hazardous materials, industrial activity, vehicle exhaust, other sources of pollution, and excessive noise on residents regardless of age, culture, gender, race, socioeconomic status, or geographic location, are considered and addressed.

Implementation: Land Use Element

- LU-1b: Regularly review and revise, as necessary, the Zoning Code to accomplish the following purposes:
 - Ensure consistency with the General Plan in terms of zoning districts and development standards;
 - Provide for a Downtown zone that permits the vibrant mixing of residential, commercial, office, business-professional, and institutional uses within the Central Business District;
 - Ensure adequate buffers and transitions are required between intensive uses, such as industrial and agricultural industrial, and sensitive receptors, including residential uses and schools; and
 - Provide for an Agricultural Industrial zone that accommodates the processing of crops and livestock.
 - Ensure that land use requirements meet actual demand and needs over time as technology, social expectations, and business practices change.
- LU-6a: Consider implementing incentives to support developers who construct vertical mixed-use projects and/or who build housing above non-residential ground-floor uses within Downtown.
- LU-9a: Review all development proposals, planning projects, and infrastructure projects to ensure that potential adverse impacts to disadvantaged communities, such as exposure to pollutants, including toxic air contaminants, and unacceptable levels of noise and vibration are reduced to the extent feasible and that measures to improve quality of life,

such as connections to bicycle and pedestrian paths, community services, schools, and recreation facilities, access to healthy foods, and improvement of air quality are included in the project. The review shall address both the construction and operation phases of the project.

- LU-9c: Encourage and support local transit service providers to increase and expand services for people who are transit-dependent, including seniors, persons with mobility disabilities, and persons without regular access to automobiles by improving connections to regional medical facilities, senior centers, and other support systems that serve residents and businesses.

Policies: Resource Conservation Element

- RC-4.1: Prepare for and respond to the expected impacts of climate change.
- RC-4.2: Assess and monitor the effects of climate change and the associated levels of risk in order to adapt to changing climate conditions and be resilient to negative changes and impacts associated with climate change.
- RC-5.1: Ensure that land use and circulation improvements are coordinated to reduce the number and length of vehicle trips.
- RC-5.2: Encourage private development to explore and apply non-traditional energy sources such as co-generation, wind, and solar to reduce dependence on traditional energy sources.
- RC-5.3: Require all new public and privately constructed buildings to meet and comply with construction and design standards that promote energy conservation, including the most current “green” development standards in the California Green Building Standards Code.
- RC-5.4: Support innovative and green building best practices including, but not limited to, LEED certification for all new development, and encourage public and private projects to exceed the most current “green” development standards in the California Green Building Standards Code.
- RC-5.5: Encourage the conservation of public utilities.
- RC-5.6: Encourage the conservation of petroleum products.
- RC-6.1: Coordinate with the San Joaquin Valley Air Pollution Control District (Air District), San Joaquin Council of Governments, and the California Air Resources Board (State Air Board), and other agencies to develop and implement regional and county plans, programs, and mitigation measures that address cross-jurisdictional and regional air quality impacts, including land use, transportation, and climate change impacts, and incorporate the relevant provisions of those plans into City planning and project review procedures. Also cooperate with the Air District, SJCOG, and State Air Board in:
 - Enforcing the provisions of the California and Federal Clean Air Acts, state and regional policies, and established standards for air quality.
 - Identifying baseline air pollutant and greenhouse gas emissions.
 - Encouraging economy clean fuel for city vehicle fleets, when feasible.
 - Developing consistent procedures for evaluating and mitigating project-specific and cumulative air quality impacts of projects.

- RC-6.2: Minimize exposure of the public to toxic or harmful air emissions and odors through requiring an adequate buffer or distance between residential and other sensitive land uses and land uses that typically generate air pollutants, toxic air contaminants, or obnoxious fumes or odors, including but not limited to industrial, manufacturing, and processing facilities, highways, and rail lines.
- RC-6.3: Ensure that new construction is managed to minimize fugitive dust and construction vehicle emissions.
- RC-6.4: Require appliances and equipment, including wood-burning devices, in development projects to meet current standards for controlling air pollution, including particulate matter and toxic air contaminants.
- RC-6.5: Require and/or cooperate with the Air District to ensure that burning of any combustible material within the City is consistent with Air District regulations to minimize particulate air pollution.

Implementation: Resource Conservation Element

- RC-4a: Continue to assess and monitor performance of greenhouse gas emissions reduction efforts, including progress toward meeting longer-term GHG emissions reduction goals for 2035 and 2050 by reporting on the City's progress annually, updating the Climate Action Plan and GHG inventory regularly to demonstrate consistency with State-adopted GHG reduction targets, including those targets established beyond 2020, and updating the GHG Strategy in the General Plan, as appropriate.
- RC-4b: When updating master plans for infrastructure, including water supply, flood control, and drainage, and critical facilities, review relevant climate change scenarios and ensure that the plans consider the potential effects of climate change and include measures to provide resilience.
- RC-4c: Incorporate the likelihood of climate change impacts into City emergency response planning and training.
- RC-5a: Implement development standards and best practices that promote energy conservation and the reduction in greenhouse gases, including:
 - Require new development to be energy-efficient through passive design concepts (e.g., techniques for heating and cooling, building siting orientation, street and lot layout, landscape placement, and protection of solar access;
 - Require construction standards which promote energy conservation including window placement, building eaves, and roof overhangs;
 - Require all projects to meet minimum State and local energy conservation standards;
 - Require best practices in selecting construction methods, building materials, project appliances and equipment, and project design;
 - Encourage and accommodate projects that incorporate alternative energy;
 - Encourage projects to incorporate enhanced energy conservation measures and other voluntary methods of reducing energy usage and greenhouse gas emissions; and
 - Require large energy users to implement an energy conservation plan as part of the project review and approval process, and develop a program to monitor compliance

- with and effectiveness of that plan.
- RC-5b: Continue to review development projects to ensure that all new public and private development complies with the California Code of Regulations, Title 24 standards as well as the energy efficiency standards established by the General Plan and the Municipal Code.
 - RC-5c: Develop a public education program to increase public participation in energy conservation.
 - RC-5d: Connect residents and businesses with programs that provide free or low-cost energy efficiency audits and retrofits to existing buildings.
 - RC-5e: Update the Municipal Code to incentivize the use of small-scale renewable energy facilities and, where appropriate, to remove impediments to such uses.
 - RC-5f: Cooperate with other agencies, jurisdictions, and organizations to expand energy conservation programs.
 - RC-5g: Explore alternative energy sources, including co-generation, active solar energy, and wind generation, and identify opportunities for alternative energy to be used in public and private projects.
 - RC-5h: Implement transportation measures, as outlined in the Circulation Element, which reduce the need for automobile use and petroleum products.
 - RC-6a: Work with the Air District to implement the Air Quality Management Plan (AQMP).
 - Cooperate with the Air District to develop consistent and accurate procedures for evaluating project-specific and cumulative air quality impacts.
 - Cooperate with the Air District and the State Air Board in their efforts to develop a local airshed model.
 - Cooperate with the Air District in its efforts to develop a cost/benefit analysis of possible control strategies (mitigation measures to minimize short and long-term stationary and area source emissions as part of the development review process, and monitoring measures to ensure that mitigation measures are implemented.
 - RC-6b: Review development, land use, transportation, and other projects that are subject to CEQA for potentially significant climate change and air quality impacts, including toxic and hazardous emissions and require that projects provide adequate, appropriate, and cost-effective mitigation measures reduce significant and potentially significant impacts. This includes, but is not limited to, the following:
 - Use of the Air District “Guide for Assessing and Mitigating Air Quality Impacts”, as may be amended or replaced from time to time, in identifying thresholds, evaluating potential project and cumulative impacts, and determining appropriate mitigation measures;
 - Contact the Air District for comment regarding potential impacts and mitigation measures as part of the evaluation of air quality effects of discretionary projects that are subject to CEQA;
 - Require projects to participate in regional air quality mitigation strategies, including Air District-required regulations, as well as recommended best

- management practices when applicable and appropriate ;
- Promote the use of new and replacement fuel storage tanks at refueling stations that are clean fuel compatible, if technically and economically feasible;
- The use of energy efficient lighting (including controls) and process systems beyond Title 24 requirements shall be encouraged where practicable (e.g., water heating, furnaces, boiler units, etc.);
- The use of energy efficient automated controls for air conditioning beyond Title 24 requirements shall be encouraged where practicable; and
- Promote solar access through building siting to maximize natural heating and cooling, and landscaping to aid passive cooling and to protect from winds;
- The developer of a sensitive air pollution receptor shall submit documentation that the project design includes appropriate buffering (e.g., setbacks, landscaping) to separate the use from highways, arterial streets, hazardous material locations and other sources of air pollution or odor;
- Identify sources of toxic air emissions and, if appropriate, require preparation of a health risk assessment in accordance with Air District-recommended procedures; and
- Circulate the environmental documents for projects with significant air quality impacts to the Air District for review and comment.
- RC-6c: Review area and stationary source projects that could have a significant air quality impact, either individually or cumulatively, to identify the significance of potential impacts and ensure that adequate air quality mitigation is incorporated into the project, including:
 - The use of best available and economically feasible control technology for stationary industrial sources;
 - All applicable particulate matter control requirements of Air District Regulation VIII;
 - The use of new and replacement fuel storage tanks at refueling stations that are clean fuel compatible, if technically and economically feasible;
 - Provision of adequate electric or natural gas outlets to encourage use of natural gas or electric barbecues and electric gardening equipment; and
 - Use of alternative energy sources.
- RC-6d: Maintain adequate data to analyze cumulative land use impacts on air quality and climate change. This includes tracking proposed, planned, and approved General Plan amendments, development, and land use decisions so that projects can be evaluated for cumulative air quality impacts, including impacts associated with transportation and land use decisions.
- RC-6e: Prior to entitlement of a project that may be an air pollution point source, such as a manufacturing and extracting facility, the developer shall provide documentation that the use is located and appropriately separated from residential areas and sensitive receptors (e.g., homes, schools, and hospitals).
- RC-6f: Construction activity plans shall include and/or provide for a dust management plan to prevent fugitive dust from leaving the property boundaries and causing a public

nuisance or a violation of an ambient air standard.

Project development applicants shall be responsible for ensuring that all adequate dust control measures are implemented in a timely manner during all phases of project development and construction.

Mitigation Measures from Uniformly Applied Development Policies and Standards:

All applicable mitigation measures from the General Plan EIR, including the mitigation measures for air quality impacts incorporated as goals and policies in the General Plan, will be applied to the proposed Project. These serve as uniformly applied development policies and standards and/or as conditions of approval for this Project to ensure consistency with the General Plan and compliance with City rules and regulations.

Responses to Checklist Questions

Responses a), b): Less than Significant. The proposed Project would be both a direct and indirect source of air pollution. Direct sources of pollution include area, energy, and water and waste sources, due to the service demands from development of the on-site buildings and associated infrastructure. Indirect sources of pollution would be due to the generation of trips of from vehicles traveling to and from the Project site.

CalEEMod™ (California Emissions Estimator Model (v.2022.1.1.29) was used to model operational emissions of the proposed Project. Table AIR-1 shows proposed Project emissions as provided by CalEEMod. Further detail and the modeling output is provided in Appendix A. The SJVAPCD provides a list of applicable air quality emissions thresholds.

Table AIR-1: Operational Project Generated Emissions (tons per year)

POLLUTANT	CO	NOX	ROG	SOX	PM ₁₀	PM _{2.5}
PROJECT OPERATIONS EMISSIONS	3	2	3	<1	1	<1
SJVAPCD THRESHOLD	100	10	10	27	15	15
EXCEEDS THRESHOLD?	No	No	No	No	No	No

SOURCES: CALEEMOD (v.2022.1.1.29)

The SJVAPCD has established their thresholds of significance by which the Project emissions are compared against to determine the level of significance. The SJVAPCD has established operations related emissions thresholds of significance as follows: 100 tons per year of carbon monoxide (CO), 10 tons per year of oxides of nitrogen (NO_x), 10 tons per year of reactive organic gases (ROG), 27 tons per year of sulfur oxides (SO_x), 15 tons per year particulate matter of 10 microns or less in size (PM₁₀), and 15 tons per year particulate matter of 2.5 microns or less in size (PM_{2.5}).

If the proposed Project’s emissions will exceed the SJVAPCD’s threshold of significance for operational-generated emissions, the proposed Project will have a significant impact on air quality and all feasible mitigation are required to be implemented to reduce emissions to the

extent feasible. As shown in Table AIR-1 above, operational emissions would not exceed any of the SJVAPCD operational thresholds of significance.

Separately, emissions from construction activities represent temporary impacts that are typically short in duration, depending on the size, phasing, and type of project. Air quality impacts can nevertheless be acute during construction periods. Construction-related activities would result in Project-generated emissions from demolition, site preparation, grading, paving, building construction, and architectural coatings. CalEEMod™ (v.2022.1.1.29) was used to estimate construction emissions for the proposed Project. Table AIR-2, below, provides the construction criteria pollutant emissions associated with implementation of the proposed Project. Further detail is provided in Appendix A.

Table AIR-2: Maximum Construction Project Generated Emissions (tons per year)

<i>POLLUTANT</i>	<i>CO</i>	<i>NOx</i>	<i>ROG</i>	<i>SOx</i>	<i>PM₁₀</i>	<i>PM_{2.5}</i>
Project Construction Emissions	3	2	1	<1	<1	<1
SJVAPCD Threshold	100	10	10	27	15	15
Exceeds Threshold?	No	No	No	No	No	No

SOURCES: CAL EEMOD (v.2022.1.1.29)

If the proposed Project’s emissions will exceed the SJVAPCD’s threshold of significance for construction-generated emissions, the proposed Project will have a significant impact on regional air quality and all feasible mitigation are required to be implemented to reduce emissions. As shown in Table AIR-2, Project maximum construction emissions would not exceed the SJVAPCD thresholds of significance.

Nevertheless, regardless of emission quantities, the SJVAPCD requires construction related control measures in accordance with their rules and regulations. Implementation of these control measures (provided in further detail below) would further reduce proposed Project construction related emissions to the extent possible.

The first step is to prepare a Dust Control Plan that meets all the applicable requirements of APCD Rule 8021. All construction activities are required to implement dust control measures, as required by APCD Rules 8011-8081, to limit Visible Dust Emissions to 20% opacity or less. Dust control measures include application of water or chemical dust suppressants to unpaved roads and graded areas, covering or stabilization of transported bulk materials, prevention of carryout or trackout of soil materials to public roads, limiting the area subject to soil disturbance, construction of wind barriers, access restrictions to inactive sites as required by the applicable rules. The following dust control practices are identified in Tables 6-2 and 6-3 of the GAMAQI (2002):

- a. *All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical*

- stabilizer/suppressant, or vegetative ground cover.*
- b. All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant.*
 - c. All land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities shall control fugitive dust emissions by application of water or by presoaking.*
 - d. When materials are transported off-site, all material shall be covered, effectively wetted to limit visible dust emissions, or at least six inches of freeboard space from the top of the container shall be maintained.*
 - e. All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at least once every 24 hours when operations are occurring. The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden.*
 - f. Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant.*
 - g. Limit traffic speeds on unpaved roads to 15 mph.*
 - h. Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent.*

The proposed Project would comply with pre-existing requisite federal, State, SJVAPCD, and other local regulations and requirements, as well as implement the control measures provided by the SJVAPCD for construction-related PM₁₀ emissions.

CONCLUSION

The proposed Project would result in air pollutant emissions that are below the SJVAPCD's CEQA significance thresholds for both the construction and operations phases of the Project. As such, the Project would result in less than significant impacts related to the Project's impact on regional air quality. In addition, the Project would comply with pre-existing requisite federal, State, SJVAPCD, and other local regulations and requirements, as well as implement the control measures provided by the SJVAPCD for construction-related PM₁₀ emissions. The Project's air quality emissions are also consistent with the impact findings for air quality disclosed in General Plan EIR. The proposed Project would not result in new or more severe impacts than what was previously disclosed in the General Plan EIR. No additional analysis is required. The implementation of City standards and requirements would reduce any impacts related to air quality to a **less than significant** level.

Response c): Less than Significant. The SJVAPCD has developed daily mass emissions screening criteria for ROG, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} to determine whether project emissions would result in a violation of an AAQS. Because the NAAQS and CAAQS are concentration-based standards, Project emissions were evaluated using the SJVAPCD mass emissions screening levels, which provides a preliminary assessment to determine whether a project would contribute to a violation of an AAQS. The screening is conducted by evaluating daily Project emissions against a

100 pound per day screening levels for each criteria air pollutant. The following table (Table AIR-3) provides the proposed Project’s construction emissions in pounds per day in comparison to these screening levels.

Table AIR-3: Project Construction Emissions (Pounds per Day)

POLLUTANT	CO	NOX	ROG	SOX	PM ₁₀	PM _{2.5}
Year 2026	29	29	2	<1	9	5
Year 2027	19	11	74	<1	2	1
Maximum Annual Emissions	29	29	74	<1	9	5
SJVAPCD Threshold (Pounds/day)	100	100	100	100	100	100
Exceeds Threshold?	No	No	No	No	No	No

SOURCES: CALFEEMOD (v.2022.1.1.29)

NOTE: EMISSIONS ONLY INCLUDE THOSE EMISSIONS THAT ARE CONSIDERED “ON-SITE”, PER SJVAPCD GUIDANCE.

If the proposed Project’s emissions exceed the SJVAPCD’s threshold of significance for construction-generated emissions, the proposed Project would have a significant impact on air quality. As shown in Table AIR-2, the proposed Project would not exceed the SJVAPCD thresholds of significance for construction criteria pollutants. As shown in Table AIR-3, the proposed Project would also not exceed the daily mass screening criteria thresholds during Project construction.

A toxic air contaminant (TAC) is defined as an air pollutant that may cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health. The TACs are usually present in minute quantities in the ambient air. However, their high toxicity or health risk may pose a threat to public health even at very low concentrations. In general, for those TACs that may cause cancer, there is no concentration that does not present some risk. This contrasts with the criteria pollutants for which acceptable levels of exposure can be determined and for which the state and federal governments have set ambient air quality standards.’

The Project is not a substantial source of toxic air pollutants TACs. The largest risk of TACs from the proposed Project is diesel particulate matter (DPM) from mobile emissions. However, the Project would not generate heavy-duty trucks during Project operation, which is the main cause of DPM emissions. Additionally, Project construction activities would occur over approximately two years or less; therefore, these emissions would be temporary, as well as relatively small-scale. Moreover, the Project is consistent with the existing General Plan land use associated with the Project site in the General Plan EIR. Since the proposed Project would not generate a significant risk of public exposure to TACs or a substantially greater impact than that evaluated in the General Plan EIR, the proposed Project would have a **less than significant** impact relative to exposure of sensitive receptors to toxic air contaminants.

Response d): Less than Significant. Operation of the proposed Project would not generate notable odors. The land uses included in the proposed Project are compatible with the

surrounding existing and proposed land uses. People in the immediate vicinity of construction activities may be subject to temporary odors typically associated with construction activities (diesel exhaust, hot asphalt, etc.). However, any odors generated by construction activities would be minor and would be short and temporary in duration.

Examples of facilities that are known producers of operational odors include: Wastewater Treatment Facilities, Chemical Manufacturing, Sanitary Landfill, Fiberglass Manufacturing, Transfer Station, Painting/Coating Operations (e.g. auto body shops), Composting Facility, Food Processing Facility, Petroleum Refinery, Feed Lot/Dairy, Asphalt Batch Plant, and Rendering Plant. The Project does not propose to develop land uses that have the potential for substantial generation of odors. The Project consists of RV and boat storage uses which do not generate substantial amounts of odors. Trash bins would not have substantial amounts of organic materials that would generate a public nuisance relative to odors. In addition, the SJVAPCD Rule 4102 prohibits "...air contaminants or other materials which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such person or the public or which cause or have a natural tendency to cause injury or damage to business or property." As such, the Project would not result in emissions which adversely affects a substantial number of people. This is a **less than significant** impact.

IV. BIOLOGICAL RESOURCES

	<i>Significant Impact Peculiar to the Project or the Project Site</i>	<i>Significant Impact due to New Information</i>	<i>Impact Adequately Addressed in the General Plan EIR</i>	<i>Impact not Previously Addressed in General Plan EIR</i>
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				X
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			X	
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?			X	

Project Impacts:

The proposed Project includes the development of a commercial RV and boat storage and office facilities and would modify habitats through conversion of an open vacant field to urban development. There is limited potential for impacts to special status animal or plant species to occur due to the lack of habitat. The Project site does not contain any oak trees, creeks, riparian areas, wetlands, or other sensitive habitat.

Prior Environmental Analysis

The General Plan EIR analyzed the anticipated impacts that would occur to the biological resources of the City of Manteca because of the future urban development that was contemplated by the General Plan. These impacts included development impacts to special-status species, species of concern, non-listed species, biological communities, and migratory wildlife corridors (City of Manteca General Plan Draft EIR, pages 3.4-32 through 3.4-48). Mitigation measures to

address these impacts are incorporated into the General Plan EIR and include General Plan policies that encourage the protection and conservation of biological resources and require compliance with rules and regulations protecting biological resources. The following are General Plan policies presented in the General Plan EIR relative to this environmental topic:

Policies: Resource Conservation Element

- RC-1.1: Where feasible, protect and enhance surface water resources in creeks, streams, channels, seasonal and permanent marshland, wetlands, sloughs, riparian habitat, and vernal pools through sound land use planning, community design, and site planning.
- RC-1.4: Encourage the rehabilitation of culverted or open existing channelized waterways to a more natural condition, as feasible, to remove concrete linings and allow for a connection between the stream channel and the natural water table. Avoid creating additional culverted or open channelized waterways, unless no other alternative is available to protect human health, safety, and welfare.
- RC-1.5: Where feasible, require development projects adjacent to creeks and streams to include opportunities for beneficial uses, such as flood control, ecological restoration, public access trails, and walkways.
- RC-1.6: Encourage the conservation of riparian habitat along local creeks and waterways in order to maintain water quality and provide suitable habitat for native fish and plant species.
- RC-1.8: Minimize pollution of water resources, including the San Joaquin River, other waterways, and the groundwater basin, from urban runoff, soil erosion, and sedimentation.
- RC-7.1: Consider General Plan land use designations that include agriculture, permanent open space, parks and similar uses, as well as waterways (i.e., San Joaquin River, Lower Lone Tree Creek, Middle Lone Tree Creek, Oakwood Lake, Walker Slough, and Walthall Slough), as contributing to the City's open space.
- RC-7.2: Conserve open space for conservation, recreation, and agricultural uses. Conversion of open space, as described under Policy RC-7.1, to developed residential, commercial, industrial, or other similar types of uses, shall be strongly discouraged. Undeveloped land that is designated for urban uses may be developed if needed to support economic development, improve the City's housing stock and range of housing types, and if the proposed development is consistent with the General Plan Land Use Map.
- RCP-8.1: Support the continuation of agricultural uses on lands designated for urban use, until urban development is imminent.
- RC-8.2: Provide an orderly and phased development pattern, encouraging the development of vacant lands within City boundaries prior to conversion of agricultural lands, so that farmland is not subjected to premature development pressure.
- RC-8.3: Encourage permanent agricultural lands surrounding the Planning Area to serve as community separators and continue the agricultural heritage of Manteca.
- RC-9.1: Protect sensitive habitats that include creek corridors, wetlands, vernal pools, riparian areas, wildlife and fish migration corridors, native plant nursery sites, waters of

the United States, sensitive natural communities, and other habitats designated by State and Federal agencies.

- RC-9.2: Preserve and enhance those biological communities that contribute to Manteca and the region's biodiversity, including but not limited to, wetlands, riparian areas, aquatic habitat, and agricultural lands
- RC-9.3: Focus conservation efforts on high priority conservation areas that contain suitable habitat for endangered, threatened, migratory, or special-status species and that can be managed with minimal interference with nearby urban land uses.
- RC-9.4: Conserve existing native vegetation, where possible, and integrate regionally native plant species into development and infrastructure projects where appropriate.
- RC-9.5: Condition new development in the vicinity of the San Joaquin River and Walthall Slough to protect riparian habitat, wetlands, and other native vegetation and wildlife communities and habitats.
- RC-9.7: Protect special status species and other species that are sensitive to human activities.
- RC-9.9: Encourage the planting of native vegetation on new drainage channels.
- RC-9.8: Encourage contiguous habitat areas.
- RC-9.10: Continue to support and implement the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (County Habitat Plan).
- RC-11.1: Support the long-term viability and success of the natural Delta ecosystems and the continuation of Delta heritage.
- RC-11.2: Support efforts to ensure the protection, viability, and restoration of the Delta ecosystem in perpetuity, including implementing local conservation efforts that improve adequate water supply and quality.
- RC-11.4: Promote protection of areas for habitat restoration, including remnants of riparian and aquatic habitat, particularly in the Delta.
- RC-11.5: Encourage compatibility between agricultural practices and wildlife habitat.
- RC-11.6: Preserve and protect the water availability and quality of the Delta for designated beneficial uses and habitat protection.
- RC-11.7: Encourage and promote the expansion of floodplains and riparian habitats in levee projects.
- RC-12.1: Ensure the long-term viability, success of the natural Delta ecosystems, and continuation of Delta heritage.
- RC-12.2: Support efforts for the protection and restoration of the Delta ecosystem in perpetuity, including implementing local conservation efforts that improve adequate water supply and quality.
- RC-12.4: Support regional efforts to address issues related to urban development, habitat conservation and agricultural protection through participating in the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP).
- RC-12.5: Promote protection of remnants of riparian and aquatic habitat.
- RC-12.7: Preserve and protect the water availability and quality of the Delta for both designated beneficial uses, and habitat protections.

- RC-12.8: Protect opportunities for habitat restoration.
- RC-12.9: Encourage and promote the expansion of floodplains and riparian habitats in levee projects.

The General Plan policies described above, combined with the Manteca Municipal Code requirements, would protect biological resources in the Project area. As such, the proposed Project is consistent with the General Plan's adopted vision and land uses designated on the Project site, and would not result in any new or substantially increased impacts beyond those that were already addressed in the General Plan EIR. The General Plan EIR determined that impacts to these environmental topics were less than significant. These impacts were adequately addressed in Chapter 3.4 of the General Plan EIR. The proposed Project would not result in a new or substantially more severe impact than what was previously analyzed. The General Plan EIR did not identify any mitigation measures, but the General Plan included policies that would serve to minimize potential impacts to biological resources.

Mitigation Measures from Uniformly Applied Development Policies and Standards:

All applicable mitigation measures from the General Plan EIR, including the mitigation measures for biological resources impacts incorporated as goals and policies in the General Plan, will be applied to the proposed Project. These serve as uniformly applied development policies and standards and/or as conditions of approval for this Project to ensure consistency with the General Plan and compliance with City rules and regulations.

Responses to Checklist Questions

Response a): Less than Significant. The Project site is primarily a leveled vacant field that is biologically unremarkable. Due to a lack of suitable habitat, it is unlikely that special-status plants occur on the Project site. No special-status wildlife species are expected to occur on the Project site on more than a very occasional or transitory basis. The site is not in designated critical habitat of any federally listed species. Habitats on the Project site are highly disturbed from intensive farming for decades and periodic disking and tilling of portions of the site for several years. Ruderal grassland vegetation on the Project site is primarily constrained to the outer edges of the vegetable fields on the Project site, surrounding the site.

Special-status plants generally occur in relatively undisturbed areas in vegetation communities such as vernal pools, marshes and swamps, seasonal wetlands, riparian scrub, and areas with unusual soils. All special-status plants in area occur in habitat types that do not occur on the Project site. The site contains ruderal grassland species that is routinely disked and the site has been historically farmed for decades and is not suitable for special-status plants. No special-status plants or potentially suitable habitat for special-status plants are observed on the Project site. Due to lack of suitable habitat, it is unlikely that special status plants occur in the Project site. Human settlement has involved a high frequency of ground disturbance associated with the historical farming activities in the region, including the Project site. Therefore, the Project site does not contain suitable habitat for special-status plant species. Implementation of the proposed Project would have a **less than significant** impact on these species.

Special-status wildlife species recorded in Project area include burrowing owl, Swainson's hawk, tricolored blackbird (*Agelaius tricolor*), white-tailed kite (*Elanus leucurus*), least Bell's vireo (*Vireo bellii pusillus*), California tiger salamander (*Ambystoma californiense*), giant garter snake (*Thamnophis gigas*), western spadefoot (*Spea hammondi*), delta smelt (*Hypomesus transpacificus*), longfin smelt (*Spirinchus thaleichthys*), Central Valley steelhead (*Oncorhynchus mykiss*), brush rabbit (*Sylvilagus bachmani riparius*), California red-legged frog (*Rana aurora draytonii*), valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*), vernal pool fairy shrimp (*Branchinecta lynchi*), and vernal pool tadpole shrimp (*Lepidurus packardi*). While the Project site may have provided habitat for several of the special-status wildlife species at some time in the past, intensive farming and development have substantially modified natural habitats in the greater Project vicinity, including those in the Project site. Swainson's hawk, burrowing owl, and white-tailed kite are the only species identified that has much potential to occur on the Project site on more than a transitory or very occasional basis.

Special-status birds that occur within the region include: tricolored blackbird, Swainson's hawk, northern harrier, and bald eagle, which are associated with streams, rivers, lakes, wetlands, marshes, and other wet environments; loggerhead shrike, and burrowing owl, which lives in open areas, usually grasslands, with scattered trees and brush; and raptors that are present in varying habitats throughout the region.

The proposed Project would be required to comply with the City's General Plan and adopted Federal, State, and local regulations for the protection of special-status plants and animals, including habitat. The City of Manteca General Plan includes numerous policies and actions intended to protect special-status plants and animals, including habitat, from adverse effects associated with future development and improvement projects. Additionally, the Project would be subject to the mitigation requirements set forth by the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (HCP/SJMSCP). Implementation of the General Plan policies and actions, as well as Federal and State regulations, would ensure that the Project results in a **less than significant** impact to these species.

Swainson's Hawk. The Swainson's hawk is threatened in California and is protected by the California Department of Fish and Wildlife (CDFW) and the Migratory Bird Treaty Act (MBTA). Additionally, Swainson's hawk foraging habitat is protected by the CDFG. Swainson's hawks forage in open grasslands and agricultural fields and commonly nest in solitary trees and riparian areas near foraging habitat. The agricultural land on the Project site provides foraging habitat for Swainson's hawk. There are also several potential nest trees within the Project site, and annual cropland and grasslands in the region provide suitable foraging habitat for this species. Incidental take minimization measures are required for this species since there is suitable nesting and foraging habitat on or near the Project site. The proposed Project will participate in the HCP/SJMSCP (SJCOG, 2000). The HCP involves payment of fees and compliance with standard Incidental Take Minimization Measures (ITMMs) that will be issued for the Project. Pursuant to the HCP, if construction is scheduled to commence during the nesting season (i.e., between February 15 through August 31), and Swainson's hawks are nesting in or near the Project site, a construction setback of twice the diameter of the drip-line of the nest tree (as measured from

under the nest) would be required until nesting is complete. The implementation of Project Requirement BIO-1 would ensure that Swainson's hawks are not impacted during construction activities. The implementation of Project Requirement BIO-1 would ensure that the Project implements the requirements specified in the General Plan to protect biological resources.

Burrowing Owls. The Migratory Bird Treaty Act and Fish and Game Code of California protects burrowing owls year-round, as well as their nests during the nesting season (February 1 through August 31). Burrowing owls are a year-long resident in a variety of grasslands as well as scrub lands that have a low density of trees and shrubs with low growing vegetation; burrowing owls that nest in the Central Valley may winter elsewhere. The primary habitat requirement of the burrowing owl is small mammal burrows for nesting. The owl usually nests in abandoned ground squirrel burrows, although they have been known to dig their own burrows in softer soils. In urban areas, burrowing owls often utilize artificial burrows including pipes, culverts, and piles of concrete pieces. This semi-colonial owl breeds from March through August, and is most active while hunting during dawn and dusk. The intensity of development and commercial and residential operations within and surrounding the Project site reduces the likelihood of burrowing owls using the Project site for nesting. If burrow habitat becomes available in the future, this species may utilize habitats in the Project site for nesting. Pursuant to the HCP/SJMSCP, if construction is scheduled to commence outside the nesting season (i.e., if construction starts between September 1 and January 31) and burrowing owls are present on-site, they can be passively relocated. If construction commences during the nesting season and burrowing owls are present on-site, a 250-foot construction setback from the natal burrow would be required until nesting is complete. The implementation of Project Requirement BIO-2 would ensure that burrowing owls are not impacted during construction activities. The implementation of Project Requirement BIO-2 would ensure that the Project implements the requirements specified in the General Plan to protect biological resources.

White-Tailed Kite. White-tailed kite is a State of California Species of Concern, but is not a listed species at the state or federal level. The Migratory Bird Treaty Act and Fish and Game Code protect white-tailed kite year-round, as well as their nests during nesting season; nesting for this species peaks from May to August. White-tailed kites can be found in a variety of habitats across California including grasslands, open woodlands, riparian areas, marshes, and cultivated fields. Populations of white-tailed kites are concentrated in the Central Valley, but their range spans west of the Sierra Nevada's to the California coastline. White-tailed kite may nest in trees in or near the Project site and may forage in the onsite fields and grasslands near the Project site. Nesting usually commences in the early spring, concurrent with other resident Central Valley raptors, and most young fledge by early-July. Pursuant to the HCP/ SJMSCP, if construction is scheduled to commence during the nesting season (i.e., between February 15 through September 15), and white-tailed kites are nesting in or near the Project site, a construction setback of a 100-foot construction setback from the nest would be required until nesting is complete. The implementation of Project Requirement BIO-3 would ensure that white-tailed kites are not impacted during construction activities. The implementation of Project Requirement BIO-3

would ensure that the Project implements the requirements specified in the General Plan to protect biological resources.

Project Requirement(s)

Project Requirement BIO-1: *Prior to the commencement of grading activities or other ground disturbing activities on the Project site, the Project applicant shall arrange for a qualified biologist to conduct a preconstruction survey for Swainson's hawks. If no hawks or hawk nests are detected, then construction activities may commence. If Swainson's hawks or occupied nests are discovered, then the following shall be implemented:*

- *During the nesting season (February 15 through August 31) and Swainson's hawks are nesting in or near the Project site, a construction setback of 250 feet of the nest tree (as measured from under the nest) would be required until nesting is complete.*

Implementation of this requirement shall occur prior to grading or site clearing activities. SJCOG shall be responsible for monitoring and a qualified biologist shall conduct surveys as required.

Project Requirement BIO-2: *Prior to the commencement of grading activities or other ground disturbing activities on the Project site, the Project applicant shall arrange for a qualified biologist to conduct a preconstruction survey for burrowing owls. If no owls or owl nests are detected, then construction activities may commence. If burrowing owls or occupied nests are discovered, then the following shall be implemented:*

- *During the nesting season (February 1 and August 31) and burrowing owls are present on-site, a 250-foot construction setback from the natal burrow would be required until nesting is complete.*
- *Outside the nesting season (September 1 and January 31) burrowing owls occupying the Project site should be evicted from the Project site by passive relocation as described in the California Department of Fish and Game's Staff Report on Burrowing Owls (Oct., 1995)*

Implementation of this requirement shall occur prior to grading or site clearing activities. SJCOG shall be responsible for monitoring and a qualified biologist shall conduct surveys and relocate owls as required.

Project Requirement BIO-3: *Prior to the commencement of grading activities or other ground disturbing activities on the Project site, the Project applicant shall arrange for a qualified biologist to conduct a preconstruction survey for white-tailed kites. If no kites or kite nests are detected, then construction activities may commence. If white-tailed kite or occupied nests are discovered, then the following shall be implemented:*

- *During the nesting season (February 15 through September 15) occupied nests shall not be disturbed and shall be provided with a 100-foot construction setback 100-foot construction setback from the nest would be required until nesting is complete.*

Implementation of this requirement shall occur prior to grading or site clearing activities. SJCOG shall be responsible for monitoring and a qualified biologist shall conduct surveys as required.

Response b): No Impact. There is no riparian habitat or other sensitive natural communities located on the Project site. As such, the proposed Project would have **no impact** on these resources, and no mitigation is required.

Response c): Less than Significant. The Project site does not contain protected wetlands or other jurisdictional areas and there is no need for permitting associated with the federal or state Clean Water Acts. Absent any wetlands or jurisdictional waters, implementation of the proposed Project would have **less than significant** impact relative to this topic.

Response d): Less than Significant. There are no documented wildlife corridors or wildlife nursery sites on or adjacent to the Project site. The Project site is located within a mostly developed area that includes roads and existing residential developments. The development of the proposed commercial Project is not anticipated to interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or wildlife nursery sites. Implementation of the proposed Project would have a **less than significant** impact.

Responses e), f): Less than Significant. The proposed Project is subject to the SJMSCP. The SJMSCP is administered by a Joint Powers Authority consisting of members of the SJCOG, the California Department of Fish and Wildlife (CDFW), and the United States Fish and Wildlife Service (USFWS). According to the SJMSCP, adoption and implementation by local planning jurisdictions provides full compensation and mitigation for impacts to plants, fish and wildlife. Adoption and implementation of the SJMSCP also secures compliance pursuant to the state and federal laws such as CEQA, the National Environmental Policy Act (NEPA), the Planning and Zoning Law, the State Subdivision Map Act, the Porter-Cologne Act and the Cortese-Knox Act in regard to species covered under the SJMSCP. Applicants pay mitigation fees on a per-acre basis. The entire County is mapped according to these categories so that landowners, project proponents and project reviewers are easily aware of the applicable SJMSCP fees for the proposed development. The appropriate fees are collected by the City and remitted to SJCOG for administration. SJCOG uses the funds to preserve open space land of comparable types throughout the County, often coordinating with other private or public land trusts to purchase conservation easements or buy land outright for preservation. The fees are automatically adjusted on an annual basis. The fees have been designed to sufficiently mitigate the impacts of projects on candidate, sensitive, and special status species. In addition, additional field surveying is required as part of the SJMSCP process prior to any construction activities.

The proposed Project does not conflict with the SJMSCP, as Project Requirement BIO-4 below requires participation in the plan. Therefore, the proposed Project would have a **less than significant** impact relative to this topic.

Project Requirement(s)

Project Requirement BIO-4: *The Project applicant shall obtain coverage under the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan. Coverage shall consist of approval of the Master Plan-specific "Section 8.2.1 (10) Checklist for Unmapped SJMSCP Projects" by the San Joaquin Council of Governments Technical Advisory Committee. The applicant shall pay all required fees to the San Joaquin Council of Governments prior to the commencement of construction activities.*

V. CULTURAL RESOURCES

	<i>Significant Impact Peculiar to the Project or the Project Site</i>	<i>Significant Impact due to New Information</i>	<i>Impact Adequately Addressed in the General Plan EIR</i>	<i>Impact not Previously Addressed in General Plan EIR</i>
a) Cause a substantial adverse change in the significance of a historical resource pursuant to '15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?			X	
c) Disturb any human remains, including those interred outside of formal cemeteries?			X	

Project Impacts:

The Project site does not contain any resources that are listed with the California Register of Historical Resources or that have been determined by the lead agency to have significance to a California Native American Tribe. The Central California Information Center (CCIC) record search provided in the Cultural Resource Analysis, Appendix B, did not identify any known prehistoric or historic-era archaeological resources within 0.25 miles of the Project area. No impacts to tribal cultural resources are anticipated.

Prior Environmental Analysis:

The General Plan EIR analyzed the anticipated impacts that would occur to historical, cultural, and paleontological resources within the Planning area because of the future urban development that was contemplated by the General Plan. These impacts included potential destruction or damage to any historical, cultural, and paleontological resources (City of Manteca General Plan Draft EIR, pages 3.5-14 through 3.5-21). However, the General Plan contains goals, policies, and actions for the preservation and treatment of archaeological, historical, cultural, and paleontological resources. The following are General Plan policies presented in the General Plan EIR relative to this environmental topic:

Policies: Resource Conservation Element

- RC-100.1. Protect, and support efforts of community members and organizations to protect, important historic resources and use these resources to promote a sense of place and history in Manteca.
- RC-10.2. Encourage historic resources to remain in their original use whenever possible. The adaptive use of historic resources is preferred, particularly as museums, educational facilities, or visitor-serving uses, when the original use can no longer be sustained. Older residences may be converted to office/retail use in commercial areas and to tourist or business use, so long as their historical authenticity is maintained or enhanced.
- RC-10.3. Do not 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 CEQA and the National Historic Preservation Act.

- RC-10.4. 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.
- RC-10.9. Review new development projects and work in conjunction with the California Historical Resources Information System to determine whether project areas contain known archaeological resources, either prehistoric and/or historic-era, or have the potential for such resources.
- RC-10.10. Ensure that human remains are treated with sensitivity and dignity, and ensure compliance with the provisions of California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98.
- RC-10.11. Consistent with State, local, and tribal intergovernmental consultation requirements such as SB 18, consult as necessary with Native American tribes that may be interested in proposed new development and land use policy changes.

Implementation: Resource Conservation Element

- RC-10a. Require a records search for any proposed development project, to determine whether the site contains known archaeological, historic, cultural, or paleontological resources and/or to determine the potential for discovery of additional cultural or paleontological resources. This requirement may be waived if determined by the City that the proposed project area is already sufficiently surveyed.
- RC-10b. Require a cultural and archaeological survey prior to approval of any project which would require excavation in an area that is sensitive for cultural or archaeological resources and require a paleontological survey in an area that is sensitive for paleontological resources. If significant cultural, archaeological, or paleontological resources, including historic and prehistoric resources, are identified, appropriate measures shall be implemented, such as documentation and conservation, to reduce adverse impacts to the resource.
- RC-10c. Require all City permits for reconstruction or modification of existing buildings to include the 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-10d. Incorporate significant archaeological sites, where feasible, into open space areas.
- RC-10e. Continue to inventory 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-10f. Continue to support the local historical society in their efforts to:
 - Archive historic information, including photographs, publications, oral histories and other materials, and
 - make the information available to the public for viewing and research.
- RC-10g. Encourage the placement of monuments or plaques that recognize and celebrate historic sites, structures, and events.
- RC-10j. Require all new development, infrastructure, and other ground-disturbing projects to comply with the following conditions in the event of an inadvertent discovery of cultural resources or human remains:
 - If construction or grading activities result in the discovery of significant historic or prehistoric archaeological artifacts or unique paleontological resources, all work within 100 feet of the discovery shall cease, the Development Services Director shall be notified, the resources shall be examined by a qualified archaeologist, paleontologist, or historian for recommended protection and preservation measures; and work may only resume when recommended protections are in place and have been approved by the Development Services Director;
 - If construction or grading activities result in the discovery of significant tribal cultural resources, all work within 100 feet of the discovery shall cease, the Development Services Director shall be notified, the resources shall be examined by a qualified archaeologist and Native American tribes on the City's SB 18 and AB 52 list for recommended protection and preservation measures and work may only resume when recommended protections are in place and have been approved by the Development Services Director; and
 - If human remains are discovered during any ground disturbing activity, work shall stop until the Development Services Director and the San Joaquin County Coroner have been contacted; if the human remains are determined to be of Native American origin, the Native American Heritage Commission and the most likely descendants have been consulted; and work may only resume when measures to relocate or preserve the remains in place, based on the above consultation, have been taken and approved by the Development Services Director.

The General Plan policies described above, combined with the Manteca Municipal Code requirements, would protect historical archaeological deposits in the EIR planning area by providing for the early detection of potential conflicts between development and resource protection, and by preventing or minimizing the material impairment of the ability of archaeological deposits to convey their significance through excavation or preservation. Implementation of the proposed action identified above, as well as compliance with federal, State, and local laws and regulations, would reduce potential impacts to historical archaeological deposits to a less-than-significant level.

Responses to Checklist Questions

Response a), b), c): Less than Significant. Because the Project site has been previously disturbed by the agricultural operations, it is not anticipated that site grading and preparation activities would result in impacts to cultural, historical, archaeological, or paleontological resources. The CCIC record search demonstrated that no previously documented prehistoric or historic-era sites, features, artifacts, or other properties are located within the Project area. The CCIC record search did not identify any known prehistoric or historic-era archaeological resources within 0.25 miles of the Project area. Site investigations revealed that there are no known human remains located on the Project site, nor is there evidence to suggest that human remains may be present on the Project site. The Manteca General Plan includes policies and actions that would reduce impacts to cultural, historic, and archaeological resources, as well as policies and actions for the conservation of cultural, historic, and archaeological resources. The proposed Project would be subject to all relevant General Plan policies and actions that provide protections for cultural, historical, and tribal resources. The General Plan policies and actions provide a framework for ensuring that effects on significant unknown historic, archaeological, and tribal cultural resources are reduced to the extent feasible. The Project would be subject to all General Plan Requirements, and is consistent with the development types anticipated under the General Plan and General Plan EIR. However, there is always the possibility that ground-disturbing activities during Project development could potentially impact previously unknown historic resources. As such, Project Requirement CUL-1 requires standard inadvertent discovery procedures to be implemented in the event that subsurface historical or archaeological resources are encountered during construction. Implementation of the following Project requirement would ensure the potential impacts are **less than significant**.

Project Requirement(s)

Project Requirement CUL-1: *If presently undocumented buried archaeological deposits are encountered during construction activities, work must cease within a 50-foot radius of the discovery. A qualified archaeologist must be retained to document the discovery, assess its significance, and recommend treatment. If human remains or any associated funerary artifacts are discovered during construction, all work must cease within the immediate vicinity of the discovery. In accordance with the California Health and Safety Code (Section 7050.5), the San Joaquin County Sheriff/Coroner must be contacted immediately. If the Coroner determines the remains to be of Native American origin, the Coroner will notify the Native American Heritage Commission, which will in turn appoint a Most Likely Descendent (MLD) to act as a tribal representative. The MLD will work with the Project proponent/applicant and a qualified archaeologist to determine the proper treatment of the human remains and any associated funerary objects. Construction activities will not resume until either the human remains are exhumed, or the remains are avoided via Project construction design change.*

VI. ENERGY

<i>Significant Impact Peculiar to the Project or the Project Site</i>	<i>Significant Impact Peculiar to the Project or the Project Site</i>	<i>Significant Impact due to New Information</i>	<i>Impact Adequately Addressed in the General Plan EIR</i>	<i>Impact not Previously Addressed in General Plan EIR</i>
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

Project Impacts:

As discussed below, energy would be used during both the construction phase and during the operational phase of the proposed Project. Energy usage during the construction phase would originate from mobile and stationary construction equipment. Construction-related energy usage can vary substantially depending on the level of activity, length of the construction period, specific construction operations, and types of equipment. Operational energy usage would be generated by electricity use for the onsite facilities and landscaping at the Project site. Energy usage during both the construction and operational phases of the proposed Project would be typical for a project of this kind, and would not represent a wasteful, inefficient, or unnecessary consumption of energy resources. Additionally, the proposed Project would not conflict with or obstruct any state or local plan for renewable energy or energy efficiency.

Prior Environmental Analysis:

The General Plan EIR did not include a dedicated analysis of energy impacts as consideration of the potentially significant energy implications of a project were not required at the time it was written. However, the General Plan EIR included a host of other adopted regulations that require energy efficiency standards, including:

- Assembly Bill (AB) 1493: Pavley Fuel Efficiency Standards
- Title 20 California Code of Regulations (CCR): Appliance Energy Efficiency Standards
- Title 24, Part 6, CCR: Building Energy Efficiency Standards
- Title 24, Part 11, CCR: Green Building Standards Code

Consistency with these standards, as well as other applicable city regulations, would ensure energy efficiency to greatest extent feasible.

Mitigation Measures from Uniformly Applied Development Policies and Standards:

Consumption of energy because of development activities is discussed in the Manteca General Plan. Policies and mitigation measures have been included in the General Plan that encourage coordination with utility service providers and the conservation of energy and resources.

All applicable mitigation measures from the General Plan EIR, including the mitigation measures for energy impacts incorporated as goals and policies in the General Plan, will be applied to the

proposed Project. These serve as uniformly applied development policies and standards and/or as conditions of approval for this Project to ensure consistency with the General Plan and compliance with City rules and regulations.

Responses to Checklist Questions

Responses a-b): Less than Significant. Appendix G of the State CEQA Guidelines requires consideration of the potentially significant energy implications of a Project. CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usage (Public Resources Code Section 21100, subdivision [b][3]). According to Appendix G of the CEQA Guidelines, the means to achieve the goal of conserving energy include decreasing overall energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources. In particular, the proposed Project would be considered “wasteful, inefficient, and unnecessary” if it were to violate state and federal energy standards and/or result in significant adverse impacts related to project energy requirements, energy inefficiencies, energy intensiveness of materials, cause significant impacts on local and regional energy supplies or generate requirements for additional capacity, fail to comply with existing energy standards, otherwise result in significant adverse impacts on energy resources, or conflict or create an inconsistency with applicable plan, policy, or regulation.

The amount of energy used at the Project site would directly correlate to the energy consumption (including fuel) used by vehicle trips generated during Project construction, fuel used by off-road construction vehicles during construction, fuel used by vehicles during Project operation, and electricity usage during Project operation.

The proposed Project would comply with all existing energy standards, including those established by the City of Manteca and San Joaquin County. For example, buildings developed as part of the proposed Project would be required to comply with the latest version of the California Building Energy Efficiency Standards (Title 24), which require a high degree of energy efficiency for new buildings. Additionally, the Project would be required to comply with other statewide measures, including those intended to improve the energy efficiency of the statewide passenger and heavy-duty truck vehicle fleet (e.g., the Pavley Bill and the Low Carbon Fuel Standard), which improve vehicle fuel economies, thereby conserving gasoline and diesel fuel for any trips that would be generated by the Project. These energy savings would continue to accrue over time.

The amount of energy used by the proposed Project during operation would include the amount of energy used by the Project building and outdoor lighting, the fuel used by vehicle trips generated during operation, and fuel used by Project maintenance activities during Project operation. For construction, the proposed Project would not require energy consumption that would be out of the ordinary for a project of its size and type.

Overall, the proposed Project would not violate any state or federal energy standards and/or result in significant adverse impacts related to Project energy requirements, energy efficiencies, energy intensiveness of materials, cause significant impacts on local and regional energy supplies or generate requirements for additional capacity, fail to comply with existing energy standards,

otherwise result in significant adverse impacts on energy resources, or conflict or create an inconsistency with applicable plan, policy, or regulation. Therefore, the proposed Project would not be expected to cause an inefficient, wasteful, or unnecessary use of energy resources nor cause a significant impact on any of the threshold as described by Appendix G of the CEQA Guidelines. This is a **less than significant** impact.

VII. GEOLOGY AND SOILS

	<i>Significant Impact Peculiar to the Project or the Project Site</i>	<i>Significant Impact due to New Information</i>	<i>Impact Adequately Addressed in the General Plan EIR</i>	<i>Impact not Previously Addressed in General Plan EIR</i>
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:			X	
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?			X	
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	

Project Impacts:

The proposed Project includes the development of a commercial RV and boat storage and office facilities in a seismically active region. The Project site is not located within a currently designated Alquist-Priolo Earthquake Fault Zone and no known surface expressions of active faults are believed to exist within the Project site. The closest known faults classified as active by the U.S. Geological Survey include an unnamed fault east of the City of Tracy, located approximately 5 miles to the west of Manteca, and the San Joaquin fault, located approximately

15 miles to the southwest of the city. The Midway fault is located approximately 20 miles to the west, and the Greenville Fault, located approximately 25 miles west of the Project site.

Construction of the proposed Project will involve clearing and grading of the Project site, which could render the Project site susceptible to a temporary increase in erosion from the grading and construction activities.

Prior Environmental Analysis:

The General Plan EIR analyzed the potential impacts due to local soils and geologic conditions that would occur because of the future urban development that was contemplated by the General Plan. These impacts included seismic hazards such as groundshaking and liquefaction, erosion, soil stability, and wastewater conflicts (City of Manteca General Plan Update Draft EIR, pages 3.6-16 through 3.6-28). The analysis found that while development and buildout of the General Plan can result in geological impacts, these impacts would be reduced to a less than significant level through the application of development standards contained in the Manteca Municipal Code, the application of General Plan goals and policies that would assist in minimizing or avoiding geologic hazards and compliance with local, state, and federal standards related to geologic conditions. The following are General Plan policies presented in the General Plan EIR relative to this environmental topic:

Policies: Safety Element

- S-2.1. Enforce adopted regulations to identify and address potential hazards relating to seismic, geologic, and soils conditions.
- S-2.2. Regulate development in areas of seismic and geologic hazards to reduce risks to life and property associated with earthquakes, liquefaction, erosion, and expansive soils.
- S-2.3. Require new development to mitigate the potential impacts of geologic and seismic hazards, including uncompacted fill, liquefaction, and subsidence, through the development review process.
- S-2.6. Continue to require professional inspection of foundation, excavation, earthwork, and other geotechnical aspects of site development during construction on those sites specified in geotechnical studies as being prone to moderate or greater levels of seismic or geologic hazard.
- S-2.8. Ensure that all public facilities, including buildings, water tanks, and reservoirs, are structurally sound and able to withstand seismic shaking and the effects of seismically-induced ground failure, consistent with the California Building Standards Codes and other applicable standards.

Implementation: Safety Element

- S-2a. Continue to require preparation of geotechnical reports for proposed development projects, public projects, and all critical structures. The reports should include, but not be limited to: evaluation of and recommendations to mitigate the effects of fault displacement, ground shaking, uncompacted fill, expansive soils, liquefaction, subsidence, and settlement. Recommendations from the report shall be incorporated into the development project to address seismic and geologic risks identified in the report.
- S-2b. Review development proposals to ensure compliance with the current State

- building standards.
- S-2c. Review development proposals to ensure compliance 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 such as earthquakes and wind.

In addition, all construction in California is required to be designed in accordance with the latest seismic design standards of the California Building Code. The California Building Code, Title 24, Part 2, Chapter 16 addresses structural design and Chapter 18 addresses soils and foundations. Collectively, these state requirements, which have been adopted by the City of Manteca, include design standards and requirements that are intended to minimize impacts to structures in seismically active areas of California. Section 1613 specifically provides structural design standards for earthquake loads. Section 1803.5.11 and 1803.5.12 provide requirements for geotechnical investigations for structures assigned varying Seismic Design Categories in accordance with Section 1613. Additionally, the City of Manteca has adopted Design and Construction Standards and incorporated numerous policies relative to seismicity to ensure the health and safety of all people.

The General Plan EIR determined that impacts due to geologic and seismic conditions were less than significant. These impacts were adequately addressed in Chapter 3.6 of the General Plan EIR. The proposed Project would not result in a new or substantially more severe impact than what was previously analyzed in the General Plan EIR.

Mitigation Measures from Uniformly Applied Development Policies and Standards:

All applicable mitigation measures from the General Plan EIR, including the mitigation measures for geology and soils impacts incorporated as goals and policies in the Manteca General Plan will be applied to the proposed Project. These serve as uniformly applied development policies and standards and/or as conditions of approval for this Project to ensure consistency with the General Plan and compliance with City ordinances, rules, and regulations.

Responses to Checklist Questions

Responses a.i), a.ii): Less than Significant. The Project site is in an area of moderate to high seismicity. However, no known active faults cross the Project site, and the Project site is not located within an Alquist-Priolo Earthquake Fault Zone. Nevertheless, relatively large earthquakes have historically occurred in the Bay Area and along the margins of the Central Valley. Many earthquakes of low magnitude occur every year in California.

Portions of the Great Valley fault are considered seismically active thrust faults; however, since the Great Valley fault segments are not known to extend to the ground surface, the State of California has not defined Earthquake Fault Hazard Zones around the postulated traces. The Great Valley fault is considered capable of causing significant ground shaking at the Project site, but the recurrence interval is believed longer than for more distant, strike-slip faults. Further seismic activity can be expected to continue along the western margin of the Central Valley, and as with all projects in the area, the proposed Project will be designed to accommodate strong

earthquake ground shaking, in compliance with the applicable California building code standards.

Since there are no known active faults crossing the Project site and the Project site is not located within an Earthquake Fault Special Study Zone, the potential for ground rupture at the Project site is considered low.

An earthquake of moderate to high magnitude generated within the San Francisco Bay Region and along the margins of the central valley could cause considerable ground shaking at the Project site, like that which has occurred in the past. To minimize potential damage to the proposed structures caused by groundshaking, all construction would comply with the latest California Building Code standards, as required by the City of Manteca Municipal Code.

Seismic design provisions of current building codes generally prescribe minimum lateral forces, applied statically to the structure, combined with the gravity forces of dead-and-live loads. The code-prescribed lateral forces are generally considered to be substantially smaller than the comparable forces that would be associated with a major earthquake. Therefore, structures should be able to: (1) resist minor earthquakes without damage, (2) resist moderate earthquakes without structural damage but with some nonstructural damage, and (3) resist major earthquakes without collapse but with some structural as well as nonstructural damage.

Building new structures for human use would increase the number of people exposed to local and regional seismic hazards. Seismic hazards are a significant risk for most property in California.

The City reviews all proposed development projects for consistency with the General Plan policies and California Building Code provisions identified above. This review occurs throughout the project application review and processing stage, and throughout plan check and building inspection phases prior to the issuance of a certificate of occupancy. In order to minimize potential damage to the buildings and site improvements, all construction in California is required to be designed in accordance with the latest seismic design standards of the California Building Code. The California Building Code, Title 24, Part 2, Chapter 16 addresses structural design and Chapter 18 addresses soils and foundations. Collectively, these state requirements, which have been adopted by the City of Manteca, include design standards and requirements that are intended to minimize impacts to structures in seismically active areas of California. Section 1613 specifically provides structural design standards for earthquake loads. Section 1803.5.11 and 1803.5.12 provide requirements for geotechnical investigations for structures assigned varying Seismic Design Categories in accordance with Section 1613. Additionally, the City of Manteca has adopted Design and Construction Standards and incorporated numerous policies relative to seismicity to ensure the health and safety of all people. Design in accordance with these standards and policies would reduce any potential impact to a less than significant level. Because all development in the Project site must be designed in conformance with these state and local standards and policies, any potential impact would be considered **less than significant**.

Responses a.iii): Less than Significant. Liquefaction normally occurs when sites underlain by saturated, loose to medium dense, granular soils are subjected to relatively high ground shaking. During an earthquake, ground shaking may cause certain types of soil deposits to lose shear strength, resulting in ground settlement, oscillation, loss of bearing capacity, landsliding, and the buoyant rise of buried structures. Most liquefaction hazards are associated with sandy soils, some silty soils of low plasticity, and some gravelly soils. Cohesive soils are generally not considered to be susceptible to liquefaction. In general, liquefaction hazards are most severe within the upper 50 feet of the surface, except where slope faces or deep foundations are present.

The City of Manteca General Plan requires geotechnical investigations to be completed prior to approval of any buildings to ensure that these facilities are constructed in a way that mitigates site-specific seismic and/or geological hazards. Any future development would be required to prepare soils investigations to address seismic safety issues and provide adequate mitigation for potential hazards identified, and would be required to comply with all CBC seismic requirements.

The City requires that, prior to development of the Project site, a subsurface geotechnical investigation must be performed to identify onsite soil conditions and identify any site-specific engineering measures to be implemented during the construction of building foundations and subsurface utilities. As a condition of approval, a geotechnical investigation would be prepared for the proposed Project which includes recommendations to be incorporated in the design of the Project and implemented during construction. Adherence to the engineering requirements contained in the subsurface geotechnical report would ensure that the Project implements the requirements specified in the General Plan. As such, this is a **less than significant** impact.

Responses a.iv): Less than Significant. The Project site is relatively flat and there are no major slopes in the vicinity of the Project site. As such, the Project site is exposed to little or no risk associated with landslides. This is a **less than significant** impact.

Response b): Less than Significant. During the construction preparation process, exposed surfaces could be susceptible to erosion from wind and water. Effects from erosion include impacts on water quality and air quality. Exposed soils that are not properly contained or capped increase the potential for increased airborne dust and increased discharge of sediment and other pollutants into nearby stormwater drainage facilities. Risks associated with erosive surface soils can be reduced by using appropriate controls during construction and properly re-vegetating exposed areas. The proposed Project would not result in new or substantially more severe impacts than identified in the General Plan EIR. Therefore, this is **less than significant** impact.

Responses c), d): Less than Significant. The potential for the Project to be exposed to unstable soil conditions resulting from on-or off-site landslide, and liquefaction are discussed above under Responses a.iii, and a.iv., and were found to be **less than significant** impacts.

Lateral Spreading: The geologic conditions conducive to lateral spreading include gentle surface slope (0.3-5% slope), and liquefiable soils. The proposed Project would not result in new or substantially more severe impacts than identified in the General Plan EIR. Therefore, this is **less than significant** impact.

Expansive Soils: Expansive soils shrink/swell when subjected to moisture fluctuations, which could cause heaving and cracking of slabs-on-grade, pavements, and structures founded on shallow foundations. Building damage due to moisture changes in expansive soils could be reduced by appropriate grading practices and using posttensioned slab foundations or similarly stiffened foundation systems which are designed to resist the deflections associated with soil expansion. As noted in Section 3.6, Geology and Soils, of the General Plan EIR, all construction in the city is required to be designed in accordance with the latest seismic design standards of the California Building Code. The California Building Code, Title 24, Part 2, Chapter 16 addresses structural design and Chapter 18 addresses soils and foundations. Collectively, these state requirements, which have been adopted by the City of Manteca, include design standards and requirements that are intended to minimize impacts to structures in seismically active areas of California. Section 1803.5.11 and 1803.5.12 provide requirements for geotechnical investigations for structures assigned varying Seismic Design Categories in accordance with Section 1613. Additionally, the City of Manteca has adopted Design and Construction Standards and incorporated numerous policies relative to seismicity to ensure the health and safety of all people. Design in accordance with these standards and policies would reduce any potential impact to a less than significant level. Because all development in the Project site must be designed in conformance with these state and local standards and policies, any potential impact would be considered **less than significant**.

Response e): No Impact. The Project site would be served by public wastewater facilities and does not require an alternative wastewater system such as septic tanks. Implementation of the proposed Project would have **no impact** on this environmental issue.

Response f): Less than Significant. The Project site is in an area known to have paleontological resources. The Manteca General Plan includes policies and actions that would reduce impacts to paleontological resources, as well as policies and actions for the conservation of paleontological resources. The proposed Project would be subject to all relevant General Plan policies and actions that provide protections for paleontological resources.

The General Plan policies and actions provide a framework for ensuring that effects on significant unknown paleontological resources are reduced to the extent feasible. The Project would be subject all General Plan Requirements, and is consistent with the development types anticipated under the General Plan and General Plan EIR. As such, this is a **less than significant** impact.

XIII. GREENHOUSE GAS EMISSIONS

	<i>Significant Impact Peculiar to the Project or the Project Site</i>	<i>Significant Impact due to New Information</i>	<i>Impact Adequately Addressed in the General Plan EIR</i>	<i>Impact not Previously Addressed in General Plan EIR</i>
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?			X	

Project Impacts:

As discussed below, development of the proposed Project will result in an increase in greenhouse gas emissions from construction and operational activities. The proposed Project is allowed under the existing General Plan land use designation and is consistent with the growth assumptions of applicable plans. There is nothing peculiar about the site that presents impacts greater than was anticipated under the General Plan. As discussed below, compliance with the mitigation measures incorporated into the General Plan goals and policies and applicable City Code and compliance with applicable Federal, State, and local laws and regulations would reduce impacts related to greenhouse gas emissions to a less than significant level.

Prior Environmental Analysis:

The General Plan EIR analyzed the anticipated impacts of greenhouse gas emissions associated with the future urban development that was contemplated by the General Plan. These impacts included direct and indirect greenhouse gas emissions and compliance with applicable adopted greenhouse gas plans, policies, or regulations resulting from implementation of the General Plan. The General Plan EIR concluded that due to the magnitude of growth associated with the buildout of the General Plan, development anticipated by the General Plan could remain substantial and would not contribute to net achievement of the State’s long-term climate stabilization goals. However, implementation of the proposed General Plan policies and actions, combined with application of the Federal and State regulations, the CARB’s Scoping Plan, and SJCOG’s RTP/SCS, would reduce GHG emissions to the extent feasible. In addition, findings of fact and a statement of overriding consideration were adopted by the Manteca City Council regarding these impacts. The following are General Plan policies presented in the General Plan EIR relative to this environmental topic:

Policies: Land Use Element

- LU-3.9: Locate residences away from areas of excessive noise, smoke, dust, odor, and lighting, and ensure that adequate provisions, including buffers or transitional uses, such as less intensive renewable energy production, light industrial, office, or commercial uses, separate the proposed residential uses from more intensive uses, including industrial, agricultural, or agricultural industrial uses and designated truck routes, to ensure the health and well-being of existing and future residents.

- LU-6.9: Require mixed-use development to provide strong connections with the surrounding development and neighborhoods through the provision of pedestrian and bicycle facilities and, where feasible, site consolidation.
- LU-9.1: Require future planning decisions, development, and infrastructure and public projects to consider the effects of planning decisions on the overall health and well-being of the community and its residents, with specific consideration provided regarding addressing impacts to disadvantaged populations and communities and ensuring disadvantaged communities have equitable access to services and amenities.
- LU-9.2: As part of land use decisions, ensure that environmental justice issues related to potential adverse health impacts associated with land use decisions, including methods to reduce exposure to hazardous materials, industrial activity, vehicle exhaust, other sources of pollution, and excessive noise on residents regardless of age, culture, gender, race, socioeconomic status, or geographic location, are considered and addressed.

Implementation: Land Use Element

- LU-1b: Regularly review and revise, as necessary, the Zoning Code to accomplish the following purposes:
 - Ensure consistency with the General Plan in terms of zoning districts and development standards;
 - Provide for a Downtown zone that permits the vibrant mixing of residential, commercial, office, business-professional, and institutional uses within the Central Business District;
 - Ensure adequate buffers and transitions are required between intensive uses, such as industrial and agricultural industrial, and sensitive receptors, including residential uses and schools; and
 - Provide for an Agricultural Industrial zone that accommodates the processing of crops and livestock.
 - Ensure that land use requirements meet actual demand and needs over time as technology, social expectations, and business practices change.
- LU-6a: Consider implementing incentives to support developers who construct vertical mixed-use projects and/or who build housing above non-residential ground-floor uses within Downtown.
- LU-9a: Review all development proposals, planning projects, and infrastructure projects to ensure that potential adverse impacts to disadvantaged communities, such as exposure to pollutants, including toxic air contaminants, and unacceptable levels of noise and vibration are reduced to the extent feasible and that measures to improve quality of life, such as connections to bicycle and pedestrian paths, community services, schools, and recreation facilities, access to healthy foods, and improvement of air quality are included in the project. The review shall address both the construction and operation phases of the project.
- LU-9c: Encourage and support local transit service providers to increase and expand services for people who are transit-dependent, including seniors, persons with mobility disabilities, and persons without regular access to automobiles by improving connections

to regional medical facilities, senior centers, and other support systems that serve residents and businesses.

Policies: Resource Conservation Element

- RC-4.1: Prepare for and respond to the expected impacts of climate change.
- RC-4.2: Assess and monitor the effects of climate change and the associated levels of risk in order to adapt to changing climate conditions and be resilient to negative changes and impacts associated with climate change.
- RC-5.1: Ensure that land use and circulation improvements are coordinated to reduce the number and length of vehicle trips.
- RC-5.2: Encourage private development to explore and apply non-traditional energy sources such as co-generation, wind, and solar to reduce dependence on traditional energy sources.
- RC-5.3: Require all new public and privately constructed buildings to meet and comply with construction and design standards that promote energy conservation, including the most current “green” development standards in the California Green Building Standards Code.
- RC-5.4: Support innovative and green building best practices including, but not limited to, LEED certification for all new development, and encourage public and private projects to exceed the most current “green” development standards in the California Green Building Standards Code.
- RC-5.5: Encourage the conservation of public utilities.
- RC-5.6: Encourage the conservation of petroleum products.
- RC-6.1: Coordinate with the San Joaquin Valley Air Pollution Control District (Air District), San Joaquin Council of Governments, and the California Air Resources Board (State Air Board), and other agencies to develop and implement regional and county plans, programs, and mitigation measures that address cross-jurisdictional and regional air quality impacts, including land use, transportation, and climate change impacts, and incorporate the relevant provisions of those plans into City planning and project review procedures. Also cooperate with the Air District, SJCOG, and State Air Board in:
 - Enforcing the provisions of the California and Federal Clean Air Acts, state and regional policies, and established standards for air quality.
 - Identifying baseline air pollutant and greenhouse gas emissions.
 - Encouraging economy clean fuel for city vehicle fleets, when feasible.
 - Developing consistent procedures for evaluating and mitigating project-specific and cumulative air quality impacts of projects.
- RC-6.2: Minimize exposure of the public to toxic or harmful air emissions and odors through requiring an adequate buffer or distance between residential and other sensitive land uses and land uses that typically generate air pollutants, toxic air contaminants, or obnoxious fumes or odors, including but not limited to industrial, manufacturing, and processing facilities, highways, and rail lines.
- RC-6.3: Ensure that new construction is managed to minimize fugitive dust and construction vehicle emissions.

- RC-6.4: Require appliances and equipment, including wood-burning devices, in development projects to meet current standards for controlling air pollution, including particulate matter and toxic air contaminants.
- RC-6.5: Require and/or cooperate with the Air District to ensure that burning of any combustible material within the City is consistent with Air District regulations to minimize particulate air pollution.

Implementation: Resource Conservation Element

- RC-4a: Continue to assess and monitor performance of greenhouse gas emissions reduction efforts, including progress toward meeting longer-term GHG emissions reduction goals for 2035 and 2050 by reporting on the City's progress annually, updating the Climate Action Plan and GHG inventory regularly to demonstrate consistency with State-adopted GHG reduction targets, including those targets established beyond 2020, and updating the GHG Strategy in the General Plan, as appropriate.
- RC-4b: When updating master plans for infrastructure, including water supply, flood control, and drainage, and critical facilities, review relevant climate change scenarios and ensure that the plans consider the potential effects of climate change and include measures to provide resilience.
- RC-4c: Incorporate the likelihood of climate change impacts into City emergency response planning and training.
- RC-5a: Implement development standards and best practices that promote energy conservation and the reduction in greenhouse gases, including:
 - Require new development to be energy-efficient through passive design concepts (e.g., techniques for heating and cooling, building siting orientation, street and lot layout, landscape placement, and protection of solar access;
 - Require construction standards which promote energy conservation including window placement, building eaves, and roof overhangs;
 - Require all projects to meet minimum State and local energy conservation standards;
 - Require best practices in selecting construction methods, building materials, project appliances and equipment, and project design;
 - Encourage and accommodate projects that incorporate alternative energy;
 - Encourage projects to incorporate enhanced energy conservation measures and other voluntary methods of reducing energy usage and greenhouse gas emissions; and
 - Require large energy users to implement an energy conservation plan as part of the project review and approval process, and develop a program to monitor compliance with and effectiveness of that plan.
- RC-5b: Continue to review development projects to ensure that all new public and private development complies with the California Code of Regulations, Title 24 standards as well as the energy efficiency standards established by the General Plan and the Municipal Code.
- RC-5c: Develop a public education program to increase public participation in energy conservation.

- RC-5d: Connect residents and businesses with programs that provide free or low-cost energy efficiency audits and retrofits to existing buildings.
- RC-5e: Update the Municipal Code to incentivize the use of small-scale renewable energy facilities and, where appropriate, to remove impediments to such uses.
- RC-5f: Cooperate with other agencies, jurisdictions, and organizations to expand energy conservation programs.
- RC-5g: Explore alternative energy sources, including co-generation, active solar energy, and wind generation, and identify opportunities for alternative energy to be used in public and private projects.
- RC-5h: Implement transportation measures, as outlined in the Circulation Element, which reduce the need for automobile use and petroleum products.
- RC-6a: Work with the Air District to implement the Air Quality Management Plan (AQMP).
 - Cooperate with the Air District to develop consistent and accurate procedures for evaluating project-specific and cumulative air quality impacts.
 - Cooperate with the Air District and the State Air Board in their efforts to develop a local airshed model.
 - Cooperate with the Air District in its efforts to develop a cost/benefit analysis of possible control strategies (mitigation measures to minimize short and long-term stationary and area source emissions as part of the development review process, and monitoring measures to ensure that mitigation measures are implemented).
- RC-6b: Review development, land use, transportation, and other projects that are subject to CEQA for potentially significant climate change and air quality impacts, including toxic and hazardous emissions and require that projects provide adequate, appropriate, and cost-effective mitigation measures reduce significant and potentially significant impacts. This includes, but is not limited to, the following:
 - Use of the Air District “Guide for Assessing and Mitigating Air Quality Impacts”, as may be amended or replaced from time to time, in identifying thresholds, evaluating potential project and cumulative impacts, and determining appropriate mitigation measures;
 - Contact the Air District for comment regarding potential impacts and mitigation measures as part of the evaluation of air quality effects of discretionary projects that are subject to CEQA;
 - Require projects to participate in regional air quality mitigation strategies, including Air District-required regulations, as well as recommended best management practices when applicable and appropriate ;
 - Promote the use of new and replacement fuel storage tanks at refueling stations that are clean fuel compatible, if technically and economically feasible;
 - The use of energy efficient lighting (including controls) and process systems beyond Title 24 requirements shall be encouraged where practicable (e.g., water heating, furnaces, boiler units, etc.);
 - The use of energy efficient automated controls for air conditioning beyond Title 24 requirements shall be encouraged where practicable; and

- Promote solar access through building siting to maximize natural heating and cooling, and landscaping to aid passive cooling and to protect from winds;
- The developer of a sensitive air pollution receptor shall submit documentation that the project design includes appropriate buffering (e.g., setbacks, landscaping) to separate the use from highways, arterial streets, hazardous material locations and other sources of air pollution or odor;
- Identify sources of toxic air emissions and, if appropriate, require preparation of a health risk assessment in accordance with Air District-recommended procedures; and
- Circulate the environmental documents for projects with significant air quality impacts to the Air District for review and comment.
- RC-6c: Review area and stationary source projects that could have a significant air quality impact, either individually or cumulatively, to identify the significance of potential impacts and ensure that adequate air quality mitigation is incorporated into the project, including:
 - The use of best available and economically feasible control technology for stationary industrial sources;
 - All applicable particulate matter control requirements of Air District Regulation VIII;
 - The use of new and replacement fuel storage tanks at refueling stations that are clean fuel compatible, if technically and economically feasible;
 - Provision of adequate electric or natural gas outlets to encourage use of natural gas or electric barbecues and electric gardening equipment; and
 - Use of alternative energy sources.
- RC-6d: Maintain adequate data to analyze cumulative land use impacts on air quality and climate change. This includes tracking proposed, planned, and approved General Plan amendments, development, and land use decisions so that projects can be evaluated for cumulative air quality impacts, including impacts associated with transportation and land use decisions.
- RC-6e: Prior to entitlement of a project that may be an air pollution point source, such as a manufacturing and extracting facility, the developer shall provide documentation that the use is located and appropriately separated from residential areas and sensitive receptors (e.g., homes, schools, and hospitals).
- RC-6f: Construction activity plans shall include and/or provide for a dust management plan to prevent fugitive dust from leaving the property boundaries and causing a public nuisance or a violation of an ambient air standard.

Project development applicants shall be responsible for ensuring that all adequate dust control measures are implemented in a timely manner during all phases of project development and construction.

Mitigation Measures from Uniformly Applied Development Policies and Standards:

Generation of greenhouse gas emissions because of development activities are discussed in the Manteca General Plan. Policies and mitigation measures have been included in the General Plan that promote mixed use and infill development.

All applicable mitigation measures from the General Plan EIR, including the mitigation measures for greenhouse gas emissions impacts incorporated as goals and policies in the General Plan, will be applied to the proposed Project. These serve as uniformly applied development policies and standards and/or as conditions of approval for this Project to ensure consistency with the General Plan and compliance with City rules and regulations.

Background Discussion

Various gases in the Earth's atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the Earth's surface temperature. Solar radiation enters Earth's atmosphere from space, and a portion of the radiation is absorbed by the Earth's surface. The Earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation (heat). As a result, this radiation that otherwise would have escaped back into space is now retained, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect.

Naturally occurring GHGs include water vapor (H₂O), carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and ozone (O₃). Several classes of halogenated substances that contain fluorine, chlorine, or bromine are also GHGs, but they are, for the most part, solely a product of industrial activities. Although the direct GHGs, including CO₂, CH₄, and N₂O, occur naturally in the atmosphere, human activities have changed their atmospheric concentrations. From the pre-industrial era (i.e., ending about 1750) to 2024, concentrations of CO₂ increased approximately by one-third from approximately 320 ppm in 1960 to 425 ppm in 2024 (NASA, 2025).

Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. Consumption of fossil fuels in the transportation sector was the single largest source of California's GHG emissions in 2022, accounting for 39% of total GHG emissions in the state. This category was followed by the industrial sector (23%), the electricity generation sector (including both in-state and out-of-state sources) (16%), the agriculture and forestry sector (8%), the residential sector (8%), and the commercial sector (8%) (California Energy Commission, 2024).

As the name implies, global climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern, respectively. California produced approximately 381 million gross metric tons of carbon dioxide equivalents (MMTCO₂e) in 2021 (California Energy Commission, 2024). Given that that worldwide emissions from human activities totaled nearly 54 billion gross metric tons of carbon dioxide equivalents (BMTCO₂e) in 2023, California's incremental contribution to global GHGs is approximately 2% (Our World in Data, 2025).

Carbon dioxide equivalents are a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the global warming potential of a GHG, is also dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO₂ were being emitted.

Responses to Checklist Questions

Response a): Less than Significant. Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. Therefore, the cumulative global emissions of GHGs contributing to global climate change can be attributed to every nation, region, and city, and virtually every individual on Earth. A project's GHG emissions are at a micro-scale relative to global emissions but could result in a cumulatively considerable incremental contribution to a significant cumulative macro-scale impact. Implementation of the proposed Project would contribute to increases of GHG emissions that are associated with global climate change. Estimated GHG emissions attributable to future development would be primarily associated with increases of CO₂ and other GHG pollutants, such as methane (CH₄) and nitrous oxide (N₂O), from mobile sources and utility usage.

The proposed Project's short-term construction-related and long-term operational GHG emissions were estimated using the California Emission Estimator Model (CalEEMod)TM. CalEEMod is a statewide model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify GHG emissions from land use projects. The model quantifies direct GHG emissions from construction and operation (including vehicle use), as well as indirect GHG emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. Emissions are expressed in annual metric tons of CO₂ equivalent units of measure (i.e., MT CO₂e), based on the global warming potential of the individual pollutants.

SHORT-TERM CONSTRUCTION GHG EMISSIONS

Estimated maximum mitigated GHG emissions associated with construction of the proposed Project are summarized in Table GHG-1. These emissions include all vehicle trips related to workers, vendors, truck hauls, and off-road construction vehicle emissions. The emissions associated with the Project are based on equipment estimates and construction durations developed by CalEEMod.

Table GHG-1: Maximum Construction GHG Emissions (Average MT CO₂e/year)

YEAR	NON-BIO-CO ₂	TOTAL CO ₂	CH ₄	N ₂ O	REFRIGERANTS	CO ₂ E
2026	584	584	<0.1	<0.1	<1	592
2027	239	239	<0.1	<0.1	<1	243

SOURCE: CAL EEMOD (v.2022.1.1.29)

As presented in the table above, short-term construction emissions of GHGs are estimated at a maximum of approximately 592 MT CO₂e per year.

OPERATIONAL GHG EMISSIONS

The operational GHG emissions estimate for the proposed Project includes on-site area, energy, mobile, waste, and water emissions generated by the Project during its operation. Estimated GHG emissions associated with the proposed Project are summarized in Table GHG-2, below. It should be noted that CalEEMod does not account for Governor Newsom’s Zero-Emission by 2035 Executive Order (N-79-20), which requires that all new cars and passenger trucks sold in California be zero-emission vehicles by 2035. Additionally, the CalEEMod modeling conducted does not account for the incorporation of additional Renewables Portfolio Standard attainment beyond CalEEMod defaults, incorporation of AB 341, and incorporation of Title 24 requirements for the EV charging stations. This is anticipated to substantially reduce the operational emissions associated with passenger vehicles (i.e. mobile emissions), energy emissions, and waste emissions, over time, including prior the 2035 final implementation year. Therefore, the operational emissions results are likely an overestimate for mobile, energy, and waste emissions. As shown in the following table, as conservatively modeled, the annual GHG emissions associated with the proposed Project would be approximately 2,048 MT CO₂e.

Table GHG-2: Operational GHG Emissions at Buildout (Metric Tons/Year)

Sector	BIO- CO ₂	NON-BIO- CO ₂	TOTAL CO ₂	CH ₄	N ₂ O	R	CO ₂ E
Mobile	0	1,418	1,418	<1	<1	<1	1,437
Area	0	4	4	<1	<1	0	4
Energy	0	401	401	<1	<1	0	405
Water	22	21	43	2	<1	0	115
Waste	25	0	25	3	<1	0	88
Total	45	1,845	1,892	5	<1	<1	2,048

SOURCE: CAL EEMOD (v.2022.1.1.29)

Pacific Gas & Electric (PG&E), the electrical service provider for the Project site, will need to continue to annually increase renewable electricity through 2045 in order to meet the carbon-free electricity target set by SB 100. The Project would need to comply with AB 341, which set a target of reducing landfill waste by 75 percent by 2020, and the Title 24 standards, which require incorporation of rooftop PV systems and solar panels, as well as electric vehicle charging capabilities. The potential reductions in GHG emission associated with this requirement were not

incorporated in the reductions, as the amount would be confirmed at a later stage; therefore, the operational emissions shown in Table GHG-2 are conservative.

PROJECT CONSISTENCY WITH APPLICABLE PLANS

Several plans and policies have been adopted to reduce GHG emissions in the San Joaquin Valley region. The Project’s consistency with the State’s 2022 Scoping Plan, as well as SJCOG’s 2022 RTP/SCS.

The CARB’s 2022 Scoping Plan

The 2022 Scoping Plan strategies that are applicable to the Project include reducing fossil fuel use, energy demand, and vehicle miles traveled (VMT); maximizing recycling and diversion from landfills; and increasing water conservation. The Project would be consistent with these goals through Project design, which includes complying with the latest requirements of the CALGreen Code and Building Energy Efficiency Standards, providing EV parking spaces and charging equipment, and complying with the AB 341 waste diversion goal of 75 percent. In addition, the Project would receive electricity from PG&E, which is required to reduce GHG emissions by increasing procurement from eligible renewable energy by set target years. Moreover, the Project would provide extensive pedestrian connectivity to encourage alternative modes of transportation, and be consistent with the requirements of the latest (2022) version of the Title 24 Energy Code, or better. Therefore, the Project would be consistent with the 2022 Scoping Plan.

SJCOG 2022 RTP/SCS

The SJCOG’s 2022 RTP/SCS includes eight policies with corresponding implementation strategies for conserving energy, maximizing mobility and accessibility, increasing safety and security, preserving the transportation system, supporting economic development, promoting interagency cooperation and public participation, maximizing cost effectiveness, and improving quality of life for residents. These strategies include similar measures to the 2022 Scoping Plan, such as supporting energy and water efficiency. The Project’s consistency with the applicable 2022 RTP/SCS strategies is discussed in Table GHG-3, below. As shown therein, the Project would be consistent with the GHG emissions reduction strategies contained in the SJCOG’s 2022 RTP/SCS.

Table GHG-3: Project Consistency with the SJCOG’s 2022 RTP/SCS

<i>POLICY</i>	<i>PROJECT CONSISTENCY</i>
Enhance the Environment for Existing and Future Generations and Conserve Energy	<u>Consistent.</u> The Project would utilize electricity provided by Pacific Gas & Electric (PG&E) which is required to meet the year 2030, 2045, and 2050 performance standards. In addition, future development associated with Project implementation would be required to meet the applicable requirements of the 2022 (or more current) Title 24 Building Energy Efficiency Standards.
Maximize Mobility and Accessibility	<u>Consistent.</u> The Project would support the use of zero-emission and low-emission vehicles, by implementing EV-ready charging spaces, consistent with the requirements of the 2022 Title 24 Building Energy Efficiency Standards.
Increase Safety and Security	<u>Consistent.</u> The Project would be developed using the latest State and local requirements relating to safety and security. Development of the

<i>POLICY</i>	<i>PROJECT CONSISTENCY</i>
	Project site would include other uses to support and compliment the proposed residential development include public utility infrastructure, public and private roadways, curb/gutters/sidewalks, other pedestrian facilities, private parking, street lighting, and street signage, which would enhance the safety and security of the site and it surroundings, by connecting to existing development.
Preserve the Efficiency of the Existing Transportation System	<u>Not applicable.</u> This is not a transportation improvement Project and is therefore not applicable. However, the Project would not interfere with the efficiency of any existing transportation system.
Support Economic Vitality	<u>No Conflict.</u> The Project would add commercial land uses to the local community, adding tax revenues, thereby supporting economic vitality.
Promote Interagency Coordination and Public Participation for Transportation Decision-Making and Planning Efforts	<u>Not applicable.</u> This is not a transportation improvement Project and is therefore not applicable.
Maximize Cost Effectiveness	<u>No Conflict.</u> The Project would add commercial land uses to the local community, in a location that is logical and appropriate form a cost effectiveness perspective.
Improve the Quality of Life for Residents	<u>No Conflict.</u> The Project would in-demand commercial land uses the community.

SOURCE: SJCOG 2022 RTP/SCS

Consistency with the SJVAPCD Requirements: The proposed Project would be required to comply with all applicable SJVAPCD (i.e. Air District) Rules and regulations. For example, Regulations and rules that may apply to the proposed Project could include Regulation VIII provides fugitive PM₁₀ dust prohibitions; Rule 8021 provides rules for PM₁₀ dust prohibition associated with construction, demolition activities, excavation, extraction, and other earthmoving activities; Rule 4601 provides rules to limit VOC emissions for architectural coatings. In sum, the proposed Project would comply with all applicable SJVAPCD Rules and regulations.

CONCLUSION

In summary, the Project, including the off-site improvements, would be consistent with the plans, policies, regulations, and GHG emissions reduction actions/strategies outlined in the 2022 Scoping Plan Update and the SJCOG’s 2022 RTP/SCS. Furthermore, because the Project is consistent and does not conflict with these plans, policies, and regulations, the Project’s incremental increase in GHG emissions as described above would not result in a new significant impact or in a substantially greater impact than the General Plan EIR projected for buildout of the Project site on the environment. Therefore, Project-related impacts related to GHG emissions would be **less than significant**.

IX. HAZARDS AND HAZARDOUS MATERIALS

	<i>Significant Impact Peculiar to the Project or the Project Site</i>	<i>Significant Impact due to New Information</i>	<i>Impact Adequately Addressed in the General Plan EIR</i>	<i>Impact not Previously Addressed in General Plan EIR</i>
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?			X	
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	

Project Impacts:

The proposed Project includes the development of a commercial RV and boat storage and office facilities and would not result in activities that transport, store, or use hazards and hazardous materials. As discussed below, compliance with the mitigation measures incorporated into the General Plan goals and policies and applicable City Code and compliance with applicable Federal, State, and local laws and regulations would reduce impacts related to hazards and hazardous materials to a less than significant level.

Prior Environmental Analysis:

The General Plan EIR analyzed the anticipated human health and hazards impacts that would occur because of the future urban development that was contemplated by the General Plan. These impacts included wildland fire hazards, transportation, use and disposal of hazardous materials,

and emergency response and evacuation plans (City of Manteca General Plan Draft EIR, 3.8-23 through 3.8-35). The analysis found that while development and buildout of the Manteca General Plan can introduce a variety of human health and hazards impacts, these impacts would be reduced to a less than significant level through the application of development standards in the Manteca Municipal Code, the application of General Plan goals and policies that would assist in minimizing or avoiding hazardous conditions, and compliance with local, state and federal standards related to hazards and hazardous materials. These impacts were adequately addressed in Chapter 3.8 of the General Plan EIR. The proposed Project would not result in a new or substantially more severe impact than what was previously analyzed. The General Plan did not identify any mitigation measures, but did include policies that would serve to minimize potential impacts to hazards or hazardous materials. The following are General Plan policies presented in the General Plan EIR relative to this environmental topic:

Policies: Safety Element

- S-1.1. Maintain and periodically update the City's Emergency Plan.
- S-1.2. Ensure the availability and functionality of critical facilities during flooding events.
- S-1.3. Locate new critical City facilities, and promote the location of non-City critical facilities, including hospitals, emergency shelters, emergency response centers, and emergency communications facilities, outside of flood hazard zones and geologic hazard areas where feasible. Critical facilities that are, or must be, located within flood hazard zones or areas with geologic hazards should incorporate feasible site design or building construction features to mitigate potential risks, including those associated with geologic, seismic, and flood events, to ensure accessibility, operation, and structural integrity, during an emergency and to minimize damage to the facility.
- S-1.4. Encourage community awareness of seismic, flooding, and other disaster safety issues, including building safety, emergency response plans, and understanding steps to take for safety during and after a disaster, including identified evacuation routes.
- S-1.5. Continue to cooperate with San Joaquin County and other public agencies in implementing the Countywide Emergency Preparedness Plan and Local Hazard Mitigation Plan.
- S-4.1. Maintain an awareness of hazardous materials throughout the Manteca region.
- S-4.2. Strictly regulate the production, use, storage, transport, and disposal of hazardous materials to protect the health and safety of Manteca residents.
- S-4.3. As part of the development review process, consider the potential for the production, use, storage, transport, and/or disposal of hazardous materials and provide for appropriate controls on such hazardous materials consistent with federal, state, and local standards.
- S-4.4. Use the environmental review process to comment on Hazardous Waste Transportation, Storage and Disposal Facilities proposed in the Manteca Planning Area and throughout the County to request a risk assessment and ensure that potentially significant, widespread, and long-term impacts on public health and safety of these

facilities are identified and mitigated, as such impacts do not respect jurisdictional boundaries.

Implementation: Safety Element

- S-1a. Regularly conduct periodic emergency response exercises to test the effectiveness of City emergency response procedures.
- S-1b. Regularly review County and State emergency response procedures that must be coordinated with City procedures.
- S-1c. Cooperate with San Joaquin County OES, Manteca Fire Department, Lathrop Manteca Fire District, Manteca Police Services, the reclamation districts, and other agencies with responsibility for emergency management in emergency response planning, training and provision of logistical support.
- S-4a. As part of the development review process, require projects that result in significant risks associated with hazardous materials to include measures to address the risks and reduce the risks to an acceptable level.
- S-4b. Review development proposals to address proximity of users and transporters of significant amounts of hazardous materials relative to sensitive uses, such as schools and residential neighborhoods.
- S-4c. Continue to require the submittal of information regarding hazardous materials manufacturing, storage, use, transport, and/or disposal by existing and proposed businesses and developments to the Manteca Fire Department.
- S-4d. Annually coordinate with the Manteca Fire Department and 911 dispatch center to ensure that the City maintains a current database of hazardous materials.
- S-4e. Coordinate with the Manteca Fire Department, other local agencies, and Union Pacific Railroad to strictly regulate and enforce the use, storage, transport, and/or disposal of hazardous materials under California Administrative Code Title 19 requirements.
- S-4f. Continue to work with San Joaquin County and other public agencies to inform consumers about household use and disposal of hazardous materials.
- S-4g. Cooperate fully with Union Pacific Railroad and other agencies, such as the California Highway Patrol, in the event of a hazardous material emergency.
- S-4h. Continue the City hazardous waste pick-up program for household hazardous materials.

Mitigation Measures from Uniformly Applied Development Policies and Standards:

All applicable mitigation measures from the General Plan EIR, including the mitigation measures for human health and hazards impacts incorporated as goals and policies in the General Plan and the City's Improvement Standards, will be applied to the proposed Project. These serve as uniformly applied development policies and standards and/or as conditions of approval for this Project to ensure consistency with the General Plan and compliance with the Manteca Municipal Code and other City rules and regulations.

Responses to Checklist Questions

Responses a), b): Less than Significant. The proposed Project would place a commercial use in an area of the City that currently contains predominantly residential uses and future commercial uses. The proposed land uses do not routinely transport, use, or dispose of hazardous materials, or present a reasonably foreseeable release of hazardous materials, except for common commercial grade hazardous materials such as cleaners, paint, etc. The operational phase of the proposed Project does not pose a significant hazard to the public or the environment. According to the California Department of Toxic Substances Control (DTSC) there are no Federal Superfund Sites, State Response Sites, or Voluntary Cleanup Sites on, or in the near vicinity of the Project site. The Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5. There are no other listed cleanup sites located within 1,000 feet of the Project site. The nearest site identified within these databases are located approximately 0.70 miles to the west of the Project site:

- **Oxychem Agrochemical Plant Lathrop (39070065):** The Oxychem Agrochemical Plant is undergoing environmental investigation and cleanup under a Voluntary Agreement with the California DTSC. This agreement outlines a structured process for site assessment, remediation, and long-term oversight, all conducted under DTSC supervision to address contamination concerns from past industrial activities. The scope includes detailed work plans, schedules, cost recovery provisions, and public involvement requirements to ensure transparency and compliance with environmental standards. The goal is to assess and mitigate potential risks to human health and the environment in a responsible and regulated manner.

Any operations that involve the use of hazardous materials would be required to have the hazardous material transported, stored, used, and disposed of in compliance with local, state, and federal regulations. The San Joaquin County Department of Environmental Health is the Certified Unified Program Agencies (CUPA) for San Joaquin County and is responsible for the implementation of statewide programs within the city including Hazardous Materials Business Plan (HMBP) requirements, among numerous other programs. Additionally, businesses are regulated by Cal/Occupational Safety and Health Administration (OSHA) and are therefore required to ensure employee safety. Specific requirements include identifying hazardous materials in the workplace, providing safety information to workers that handle hazardous materials, and adequately training workers. To further ensure the safety of employees, and reduce the potential for accidental release of hazardous materials into the environment, the applicant must submit a HMBP to San Joaquin County Department of Environmental Health for review and approval prior to bringing hazardous materials onsite.

Construction equipment and materials would likely require the use of petroleum-based products (oil, gasoline, diesel fuel), and a variety of common chemicals including paints, cleaners, and solvents. Transportation, storage, use, and disposal of hazardous materials during construction activities would be required to comply with applicable federal, state, and local statutes and regulations. Compliance would ensure that human health and the environment are not exposed to hazardous materials. In addition, Project Requirement HYD-1 (Hydrology and Water Quality)

requires the Project applicant to implement a SWPPP during construction activities, which would prevent any contaminated runoff from leaving the Project site. Therefore, compliance with applicable federal, state, local statutes, and regulations, and the SWPPP provided in Project Requirement HYD-1, the proposed Project would have a **less than significant** impact relative to this issue.

Response c): Less than Significant. The Project site is not located within 1/4-mile of an existing school. The nearest school to the Project site is the Mossdale Elementary School, located approximately 1.85 miles northwest of the Project site. Therefore, this is a **less than significant** impact.

Response d): Less than Significant. The proposed Project would not be located on a Cortese List site. The Project would not result in new or more severe impacts than what was disclosed in the General Plan EIR. Therefore, this is a **less than significant** impact.

Response e): Less than Significant. The proposed Project is not located within one mile of the airport, nor along the extended runway centerline, or within an Airport Influence Area (AIA). Additionally, there are no private airstrips within the vicinity of the Project site. There are no public or private airports within the City of Manteca. The closest airport or airstrip is the Stockton Metropolitan Airport, located approximately 4.0 miles north of the Project site. The proposed Project does not propose any structures of substantial height that would protrude into active airspace. Therefore, safety hazards related to the Project's proximity to an airport are **less than significant**.

Response f): No Impact. The proposed Project does not include any actions that would impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. The Project involves the development of commercial land uses within an urbanized environment and would not interfere with any emergency response or evacuation plans. Implementation of the proposed Project would result in **no impact** on this environmental topic.

Response g): Less than Significant. The risk of wildfire is related to a variety of parameters, including fuel loading (vegetation), fire weather (winds, temperatures, humidity levels and fuel moisture contents) and topography (degree of slope). Steep slopes contribute to fire hazard by intensifying the effects of wind and making fire suppression difficult. Fuels such as grass are highly flammable because they have a high surface area to mass ratio and require less heat to reach the ignition point, while fuels such as trees have a lower surface area to mass ratio and require more heat to reach the ignition point.

The City has areas with an abundance of flashy fuels (i.e. grassland) in the outlying residential parcels, agricultural lands, and open lands that, when combined with warm and dry summers with temperatures often exceeding 100 degrees Fahrenheit, create a situation that results in higher risk of wildland fires. Most wildland fires are human caused, so areas with easy human access to land with the appropriate fire parameters generally result in an increased risk of fire.

Since the Project site is not located within a designated wildfire hazard area, this is a **less than significant** impact.

X. HYDROLOGY AND WATER QUALITY

	<i>Significant Impact Peculiar to the Project or the Project Site</i>	<i>Significant Impact due to New Information</i>	<i>Impact Adequately Addressed in the General Plan EIR</i>	<i>Impact not Previously Addressed in General Plan EIR</i>
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:			X	
(i) result in substantial erosion or siltation on- or off-site;			X	
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			X	
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems to provide substantial additional sources of polluted runoff; or			X	
(iv) impede or redirect flood flows?			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

Project Impacts:

The proposed Project includes the development of a commercial RV and boat storage and office facilities and would require grading activities that would remove some limited vegetation cover and expose soil to wind and water erosion and potentially impact water quality. Waterways in the area have the potential to flood and expose people or structures to flooding. Additional impervious surfaces would be created with the development of the proposed Project.

Prior Environmental Analysis:

The General Plan EIR analyzed the anticipated hydrology and water quality impacts that would occur because of the future urban development that was contemplated by the General Plan. These

impacts included water quality, ground water quality and supply, drainage, flooding, risks of seiche, tsunami and mudflow (City of Manteca General Plan Draft EIR, pages 3.9-21 through 4.9-36). The analysis found that while development and buildout of the General Plan can result in hydrology and water quality impacts, these impacts would be reduced to a less than significant level through the application of development standards contained in the Grading and Erosion Control Ordinance and Stormwater Management and Discharge Control Ordinance of the Manteca Municipal Code, the application of General Plan goals and policies related to hydrology, flooding and water quality, and compliance with local, state, and federal water quality standards and floodplain development requirements. The following are General Plan policies presented in the General Plan EIR relative to this environmental topic:

Policies: Safety Element

- S-3.3 Require evaluation of potential flood hazards prior to approval of development projects to determine whether the proposed development is reasonably safe from flooding and consistent with California Department of Water Resources Urban Level of Flood Protection Criteria (ULOP). The City shall not approve the execution of a development agreement, a tentative map, or a parcel map for which a tentative map is not required, or a discretionary permit or other discretionary entitlement that would result in the construction of a new building, or construction that would result in an increase in allowed occupancy for an existing building, or issuance of a ministerial permit that would result in the construction of a new residence for property that is located within a 200-year flood hazard zone, unless the adequacy of flood protection as described in Government Code §65865.5(a), 65962(a), or 66474.5(a), has been demonstrated.
- S-3.4 New development may be permitted in areas not identified as "urban" or "urbanizing" provided that:
 - Such areas are protected from 100-year flooding by FEMA-accredited levees or equivalent flood protection as shown on an adopted FEMA Flood Insurance Rate Map, a FEMA-approved Letter of Map Revision or a Conditional Letter of Map Revision, subject to conditions specified in the letter; or
 - Where not protected by FEMA-accredited 100-year levees, such areas are subject to all applicable requirements of Municipal Code Chapter 8.30 (Floodplain Management), the California Building Standards Code as adopted by the City, and the latest promulgated FEMA standards for development in the 100-year floodplain, provided that new development approval will not cause the project site or area to be defined as "urban" or "urbanizing."

Policies: Resource Conservation Element

- RC-1.1 Where feasible, protect and enhance surface water resources in creeks, streams, channels, seasonal and permanent marshland, wetlands, sloughs, riparian habitat, and vernal pools through sound land use planning, community design, and site planning.
- RC-1.2 Require water conservation in both City operations and private development to minimize the need for the development of new water sources.
- RC-1.3 Require use of recycled water and treated wastewater to the extent allowable and feasible, including use for irrigation, agriculture, industrial, and groundwater recharge purposes, when such opportunities become available.

- RC-1.4 Encourage the rehabilitation of culverted or open existing channelized waterways to a more natural condition, as feasible, to remove concrete linings and allow for a connection between the stream channel and the natural water table. Avoid creating additional culverted or open channelized waterways, unless no other alternative is available to protect human health, safety, and welfare.
- RC-1.7 Maximize stormwater filtration and/or infiltration in areas that are not subject to high groundwater by maximizing the natural drainage patterns and the retention of natural vegetation and other pervious surfaces.
- RC-1.8 Minimize pollution of water resources, including the San Joaquin River, other waterways, and the groundwater basin, from urban runoff, soil erosion, and sedimentation.
- RC-1.9 Require discretionary projects and flood control and storm water conveyance projects to consider effects on storm water quality and to integrate best management practices, including the integration of natural features such as bioswales, vegetation, and retention ponds to remove surface water pollutants to the greatest extent feasible, while ensuring that these features adequately convey and control storm water to protect human health, safety, and welfare.
- RC-1.10 Where feasible, encourage and support multipurpose detention basins that provide water quality protection, storm water detention, open space amenities, and recreational amenities.
- RC-22 Prohibit new septic tanks where sewer service has been extended to incorporated areas.
- RC-2.1 Protect the quantity and quality of Manteca's groundwater.
- RC-2.2 Manage groundwater as part of a broader integrated approach that includes surface water, conservation, water quality, reuse, environmental stewardship, and other water management strategies.
- RC-2.3 Operate the City's well system in such a manner as to not exceed the sustainable yield of the local groundwater aquifer.
- RC-2.4 Recognize the importance of open space lands, including agricultural lands, parks, greenways, lakes.
- RC-2.5 Conserve groundwater recharge features, encourage new groundwater recharge opportunities, and protect aquifers from degradation of water quality and reduction of recharge.
- RC-2.6 Promote the use of permeable surface materials and provide for ample areas of open space, including agricultural land, parks and greenways, and naturalized land, in order to decrease surface runoff and promote groundwater recharge.
- RC-2.9 Consider the effects of development on groundwater quality, and implement measures to reduce water contamination.

Implementation: Resource Conservation Element

- RC-2a Participate in regional groundwater management efforts with the Eastern San Joaquin County Groundwater Basin Authority and other local agencies to implement the Integrated Regional Water Management Plan and to review and update the plan as necessary to meet the federal and state requirements.
- RC-2b Coordinate with water purveyors and water users to manage supplies to avoid long-term overdraft, water quality degradation, land subsidence, and other potential problems.
- RC-2c Continue to monitor City wells to track local groundwater levels and monitor

- water quality. Share data with state and regional agencies and the public to ensure that regional groundwater sustainability planning efforts include the most complete and comprehensive data available.
- RC-2d Investigate opportunities to utilize recycled water supplies to assist with groundwater recharge.
 - RC-2e Monitor groundwater resources and consider locating required detention basins where recharge potential is determined to be high.
 - RC-2f Initiate and support a range of educational and public outreach programs to inform residents, agriculture, businesses and other groundwater users of best management practices in the areas of efficient water use, water conservation, and increasing groundwater recharge. Make these resources available to the public through the City's website.
 - RC-2h Require development projects and infrastructure projects to implement low impact development practices, when appropriate, such as techniques that increase surface infiltration in landscaped, turf, and undeveloped areas.

These goals, policies and standards include, but are not limited to, erosion control measures, the City's Grading and Erosion Control Ordinance, the City's Stormwater Management and Discharge Control Ordinance, the State Water Resources Control Board General Construction Activity Storm Water Permit requirements, and goals and policies in the General Plan Safety Elements requiring the protection of new and existing development from flood and drainage hazards, the prevention of storm drainage run-off in excess of pre-development levels, and the development and application of erosion control plans and best management practices.

These impacts were adequately addressed in Chapter 3.9 of the General Plan EIR. The proposed Project would not result in a new or substantially more severe impact than what was previously analyzed. The General Plan did not identify any mitigation measures, but did include policies that would serve to minimize potential water quality impacts from the operation of new development.

Mitigation Measures from Uniformly Applied Development Policies and Standards:

All applicable mitigation measures from the General Plan EIR as well as relevant standards from the City's Improvement Standards for hydrology and water quality impacts will be applied to the proposed Project. These serve as uniformly applied development policies and standards and/or as conditions of approval for this Project to ensure consistency with the General Plan and compliance with the Manteca Municipal Code and other City rules and regulations.

Responses to Checklist Questions

Response a): Less than Significant. To ensure that stormwater runoff from the Project site does not adversely increase pollutant levels in adjacent surface waters and stormwater conveyance infrastructure, the City requires the application of BMPs to effectively reduce pollutants from stormwater leaving the Project site during both the construction and operational phases of the Project. Additionally, projects are required to prepare a Stormwater Pollution Prevention Plan (SWPPP). The final storm drainage infrastructure plan for the Project would also be submitted to the City for review and approval.

The collection of fees and determined fair share fee amounts are adopted by the City as Conditions of Approval (COAs) for all new development projects prior to Project approval. The payment of applicable development impact fees by the proposed Project would ensure that the Project pays its fair-share of capital improvement fees towards future system expansions. Additionally, through compliance with the NPDES permit requirements, and compliance with the SWPPP, the proposed Project would not result in a violation of any water quality standards or waste discharge requirements. Compliance with the NPDES, the SWPPP required by Project Requirement HYD-1, and the final storm drainage infrastructure plan required by Project Requirement HYD-2 would ensure that the project implements the requirements specified in the General Plan.

Project Requirement(s)

Project Requirement HYD-1: *The Project applicant shall prepare a Storm Water Pollution Prevention Plan (SWPPP) that includes specific types and sources of stormwater pollutants, determine the location and nature of potential impacts, and specify appropriate control measures to eliminate any potentially significant impacts on receiving water quality from stormwater runoff. The SWPPP shall require treatment BMPs that incorporate, at a minimum, the required hydraulic sizing design criteria for volume and flow to treat projected stormwater runoff. The SWPPP shall comply with the most current standards established by the Central Valley RWQCB. Best Management Practices shall be selected from the City's Post-Construction Stormwater Standards Manual according to site requirements and shall be subject to approval by the City Engineer and Central Valley RWQCB.*

Project Requirement HYD-2: *Prior to approval of the Final Map, the Project applicant shall submit a detailed storm drainage infrastructure plan to the City of Manteca Development Services Department for review and approval. The Project's storm drainage infrastructure plans shall, to the satisfaction of the City Engineer, demonstrate adequate infrastructure capacity to collect and direct all stormwater generated on the Project site within onsite retention/detention facilities to the City's existing stormwater conveyance system, and demonstrate that the Project would not result in on- or off-site flooding impacts. The Project shall also pay all applicable development impact fees, which would include funding for offsite Citywide storm drainage infrastructure improvements identified in the City of Manteca Storm Drain Master Plan.*

Response b): Less than Significant. The proposed Project would result in the construction of a storm treatment areas. As previously discussed, the proposed Project is consistent with the General Plan land use designation and therefore was considered in the City's planning projections. Therefore, development of the proposed Project would not be considered to interfere substantially with groundwater recharge. The Project would be required to prepare a SWPPP that would include BMPs for capturing stormwater. Therefore, the Project would not result in new or more severe impacts than what was disclosed in the General Plan EIR.

Groundwater recharge occurs primarily through percolation of surface waters through the soil and into the groundwater detention basin. The addition of significant areas of impervious

surfaces (such as roads, driveways, buildings, etc.) can interfere with this natural groundwater recharge process. Upon full Project buildout, portions of the Project site would be covered in impervious surfaces, which would limit the potential for groundwater percolation to occur on the Project site. However, because the City has adequate existing water service capacity to serve the Project, the inclusion of drainage infrastructure throughout the Project site, and the limited scope of impervious surface coverage (when compared to the groundwater detention basin and well site), the proposed Project would result in **less than significant** impacts related to depletion of groundwater supplies and interference with groundwater recharge.

Response c): Less than Significant. When land is in a natural or undeveloped condition, soils, mulch, vegetation, and plant roots absorb rainwater. This absorption process is called infiltration or percolation. Much of the rainwater that falls on natural or undeveloped land slowly infiltrates the soil and is stored either temporarily or permanently in underground layers of soil. When the soil becomes completely soaked or saturated with water or the rate of rainfall exceeds the infiltration capacity of the soil, the rainwater begins to flow on the surface of land to low lying areas, ditches, channels, streams, and rivers. Rainwater that flows off a site is defined as storm water runoff. When a site is in a natural condition or is undeveloped, a larger percentage of rainwater infiltrates into the soil and a smaller percentage flow off the Project site as storm water runoff.

The infiltration and runoff process is altered when a site is developed with urban uses. Houses, buildings, roads, and parking lots introduce asphalt, concrete, and roofing materials to the landscape. These materials are relatively impervious, which means that they absorb less rainwater. As impervious surfaces are added to the ground conditions, the natural infiltration process is reduced. As a result, the volume and rate of storm water runoff increases. The increased volumes and rates of storm water runoff may result in flooding if adequate storm drainage facilities are not provided.

Development of the Project site would place impervious surfaces on portions of the Project site. Development of the Project site would potentially increase local runoff production, and would introduce constituents into storm water that are typically associated with urban runoff. These constituents include heavy metals (such as lead, zinc, and copper) and petroleum hydrocarbons. BMPs will be applied to the proposed site development to limit the concentrations of these constituents in any site runoff that is discharged into downstream facilities to acceptable levels. Storm mains will be installed within the subdivision to serve the Project.

The Project is also required to pay all applicable development impact fees. To ensure that stormwater runoff from the Project site does not adversely increase pollutant levels in adjacent surface waters and stormwater conveyance infrastructure, or otherwise degrade water quality, Project Requirement HYD-1 requires the preparation of a SWPPP, and structural BMPs. As described above, the SWPPP would require the application of BMPs to effectively reduce pollutants from stormwater leaving the Project site, which would ensure that stormwater runoff does not adversely increase pollutant levels, and would reduce the potential for disturbed soils and ground surfaces to result in erosion and sediment discharge into adjacent surface waters

during construction and operational phases of the Project. The implementation of this requirement would reduce this impact to a less than significant level.

Ultimately, to ensure that stormwater runoff generated at the Project site because of new impervious surfaces does not exceed the capacity of the existing or planned stormwater drainage system, Project Requirement HYD-2 above requires the Project applicant to submit a detailed storm drainage infrastructure plan to the City of Manteca Community Development Department for review and approval. The Project's storm drainage infrastructure plans shall, to the satisfaction of the City Engineer, demonstrate adequate infrastructure capacity to collect and direct all stormwater generated on the Project site within onsite retention/detention facilities to the City's existing stormwater conveyance system, and demonstrate that the Project would not result in on- or off-site flooding impacts. The implementation of this requirement would reduce this impact to a less than significant level.

Through the payment of all applicable fees, and the implementation of Project Requirements HYD-1 and HYD-2, would ensure that this impact is **less than significant**.

Response d): Less than Significant. The General Plan EIR identifies special flood hazard areas mapped on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM). As shown, the Project site is not located within a regulatory floodway or flood zone delineated by FEMA. The Project site is in the FEMA flood zone X which is an area with reduced flood risk due to levee. Similarly, the Project site is located within a dam inundation area for the New Melones Dam and the San Luis Reservoir Dam. Dam failure is generally a result of structural instability caused by improper design or construction, instability resulting from seismic shaking, or overtopping and erosion of the dam. Larger dams that are higher than 25 feet or with storage capacities over 50 acre-feet of water are regulated by the California Dam Safety Act, which is implemented by the California Department of Water Resources, Division of Safety of Dams (DSD). The DSD is responsible for inspecting and monitoring these dams. The Act also requires that dam owners submit to the California Office of Emergency Services inundation maps for dams that would cause significant loss of life or personal injury as a result of dam failure. The County Office of Emergency Services is responsible for developing and implementing a Dam Failure Plan that designates evacuation plans, the direction of floodwaters, and provides emergency information.

Regular inspection by DSD and maintenance by the dam owners ensure that the dams are kept in safe operating condition. As such, failure of these dams is considered to have an extremely low probability of occurring and is not considered to be a reasonably foreseeable event.

The proposed Project would not expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam. Therefore, the Project would not result in new or substantially more severe impacts than what was disclosed in the General Plan EIR. Therefore, this is a **less than significant** impact.

Response e): Less than Significant. The proposed Project would be subject to a Municipal National Pollutant Discharge Elimination System Permit and would ensure that adequate drainage would be provided through connection to the City's existing water and sanitary sewer

lines and development of bioretention areas for stormwater runoff. As previously mentioned, the proposed Project would be required to prepare and implement a SWPPP in accordance with applicable federal and state requirements. The SWPPP would identify BMPs that are intended to prevent erosion runoff during construction. Furthermore, the General Plan contains several policies intended to protect groundwater supplies. The General Plan designates the Project site for commercial use, and the Project site would be developed consistent with that land use designation. Therefore, the proposed Project is considered planned growth and would not conflict with the Water Quality Control Plan, Urban Water Management Plan, or Comprehensive Groundwater Management Plan. Impacts would be less than significant. As such, the Project would not result in new or more severe impacts than what was disclosed in the General Plan EIR and the criteria for requiring further CEQA review is not met. Therefore, this impact is **less than significant**.

XI. LAND USE AND PLANNING

	<i>Significant Impact Peculiar to the Project or the Project Site</i>	<i>Significant Impact due to New Information</i>	<i>Impact Adequately Addressed in the General Plan EIR</i>	<i>Impact not Previously Addressed in General Plan EIR</i>
a) Physically divide an established community?			X	
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X	

Project Impacts:

The development of a commercial RV and boat storage and office facilities would not physically divide an established community, and there are no conflicts with land use plans, policies, or regulations.

Prior Environmental Analysis:

The General Plan EIR analyzed the anticipated impacts on land use because of the future urban development that was contemplated by the General Plan. These impacts included dividing an established community and potential conflicts with established land uses within and adjacent to the City (City of Manteca General Plan Draft EIR, pages 3.10-18 through 3.10-28). The analysis found that while development and buildout of the General Plan can result in land use impacts, these impacts would be reduced to a less than significant level through the application of General Plan goals and policies that would assist in minimizing or avoiding land use impacts. The following are General Plan policies presented in the General Plan EIR relative to this environmental topic:

Policies: Land Use Element

- LU-3.1 Provide for the development of a variety of housing types and at a range of prices to meet the needs of all segments of the city’s population, including individuals and families who qualify for affordable housing assistance in accordance with the housing element.
- LU-3.2. Require the design of new residential development to be consistent with any applicable design guidelines, to ensure harmony with Manteca’s unique character and compatibility with existing surrounding land uses.
- LU-3.3. Encourage residential development to occur in a balanced and efficient pattern that reduces sprawl, preserves open space, and creates convenient connections to other land uses.
- LU-3.4. Prioritize the location of higher density housing in close proximity to employment areas, services, schools, retail, transit stops, near community destinations, and near major streets with high access to transit and non-vehicle transportation modes.
- LU-3.6. Encourage new neighborhoods to include a mix and distribution of land uses, including schools, parks, shopping, restaurants, and services, that reduce auto trips and support walking, biking, and transit use.
- LU-3.10. Encourage the development of additional executive housing units and

neighborhoods.

- LU-3.12. Encourage and support development patterns at the highest limits permitted within each General Plan land use designation consistent with the policies of all other General Plan elements.

General Plan Update Implementation Programs

The following implementation measures of the General Plan Update related to land use and population are applicable to the proposed Project:

- LU-3a. Through the development review and permit process, screen development proposals for land use compatibility, including conformance with existing development or neighborhoods.
- LU-3b. Through the development review and permit process, ensure that residential developments meet the minimum density requirement stipulated on the Land Use Map in order to ensure that Manteca has an ample number of housing units to meet all of its housing needs.
- LU-3d. Require proposed residential subdivisions of 10 or more units with an average lot size less than one acre that are within 500 feet of an existing industrial, commercial, agricultural industrial, or agricultural processing use or a designated truck route to submit a Site Analysis Plan to ensure compliance with standards of Chapter 17.58 of the Zoning Code, as amended.
 - The Site Analysis Plan will quantify existing conditions of the site relative to compliance with Chapter 17.58 of the Zoning Code as amended, and how new development will meet these standards. The Site Analysis Plan shall incorporate a written narrative explaining how the project design has responded to the existing conditions and how new development will ensure that new residents will have an environment that is in compliance with the standards of Chapter 17.58, as amended. Such a statement, to form part of the material required for an application, is intended to assist the City's design and evaluation processes, and result in residential projects that meet quantifiable performance standards.
- LU-3e. Develop and periodically update design and performance standards that update and complement Chapter 17.58 of the Zoning Code to provide recommended design solutions available to proposed development projects to reduce impacts associated with aesthetics, noise, safety, odor, glare, and lighting, including land use conflicts between residential uses and nearby industrial and agricultural uses, in compliance with Chapter 17.58 of the Zoning Ordinance, as amended.
- LU-3f. Implement the policies and actions in the Housing Element in order to enhance opportunities to provide affordable housing within the community and to accommodate a range of household types, special need populations, and income levels.
- LU-3g. Explore and encourage creative approaches to providing affordable housing, including market rate housing affordable to moderate income households, within the community. Such approaches may include public/private partnerships, land trusts, housing cooperatives, co-housing, and/or inclusionary housing.
- LU-3h. Continue to fund existing and provide assistance to additional neighborhood improvement programs designed to stabilize and enhance the quality of existing neighborhoods. Such improvements may include, but are not limited to sidewalk upgrade and repair, street tree programs, street lighting, signage, trash collectors, bus stop shelters and benches and similar improvements to the public areas.
- LU-3k. Upgrade and provide infrastructure in existing neighborhoods as funding is

available.

- LU-3o. Evaluate, in cooperation with the Building Industry Association, fiscal alternatives that will encourage development at the highest levels permitted by general plan land use designations such as Public Facilities Implementation Plan fees collected at the per acre basis compared to the per dwelling unit basis.

These goals and policies include but are not limited to goals and policies in the General Plan Land Use Element requiring buffering of land uses, reviewing development proposals for compatibility issues, establishing, and maintaining development standards and encouraging communication between adjacent jurisdictions.

Mitigation Measures from Uniformly Applied Development Policies and Standards:

All applicable mitigation measures from the General Plan EIR, including the mitigation measures for impacts to land use incorporated as goals and policies in the Manteca General Plan, will be applied to the proposed Project. These serve as uniformly applied development policies and standards and/or as conditions of approval for this Project to ensure consistency with the General Plan and compliance with City rules and regulations.

Responses to Checklist Questions

Response a): No Impact. The Project site is surrounded by residential, vacant and future commercial uses. The Project would be consistent and compatible with the surrounding land uses and would not divide an established community. There is **no impact**.

Response b): Less than Significant. The proposed Project would be consistent with the land use designation for the Project site evaluated in the General Plan EIR. The Project has been designed consistent with the City's General Plan land use designation, goals and policies, and relevant ordinances, and is therefore considered planned growth that would not conflict with the General Plan. Therefore, the proposed Project would result in no impact and would not result in new or substantially more severe impacts than identified in the General Plan EIR. This is a **less than significant** impact.

XII. MINERAL RESOURCES

	<i>Significant Impact Peculiar to the Project or the Project Site</i>	<i>Significant Impact due to New Information</i>	<i>Impact Adequately Addressed in the General Plan EIR</i>	<i>Impact not Previously Addressed in General Plan EIR</i>
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?			X	
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?			X	

Responses to Checklist Questions

Responses a), b): No Impact. The Manteca General Plan EIR does not identify significant mineral resources within the area. Furthermore, there are no mineral resources of local or statewide importance within the Project site. Therefore, there is no possibility of loss of mineral resources of local or statewide importance. Therefore, the proposed Project would not result in the loss of availability of known mineral resources or mineral resource recovery sites. The proposed Project would result in no impact and would not result in new or substantially more severe impacts than identified in the General Plan EIR. There is **no impact**.

XIII. NOISE

	<i>Significant Impact Peculiar to the Project or the Project Site</i>	<i>Significant Impact due to New Information</i>	<i>Impact Adequately Addressed in the General Plan EIR</i>	<i>Impact not Previously Addressed in General Plan EIR</i>
a) Generation of a temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X	

Project Impacts:

As discussed below, development of the proposed Project will result in an increase in noise from construction and operational activities. Compliance with the mitigation measures incorporated into the General Plan goals and policies, and the City of Manteca Noise Ordinance, in addition to specific project requirements provided herein, would ensure noise related impacts are less than significant.

Prior Environmental Analysis:

The General Plan EIR analyzed the anticipated impacts of noise associated with the future urban development that was contemplated by the General Plan. These impacts included construction noise, traffic noise, operational noise, groundborne vibration, and overall increased in noise resulting from implementation of the General Plan (City of Manteca General Plan Draft EIR, pages 3.12-20 through 3.12-43).

Mitigation measures to address these impacts are incorporated into the General Plan in the Noise Element, which includes policies that require acoustical analyses to determine noise compatibility between land uses, application of stationary and mobile noise source sound limits/design standards, restriction of development of noise-sensitive land uses unless effective noise mitigations are incorporated into projects, and mitigation of noise levels to ensure that the noise level design standards of the Noise Element are not exceeded. The following are General Plan policies presented in the General Plan EIR relative to this environmental topic:

Policies: Safety

- S-5.1. Incorporate noise considerations into land use, transportation, and infrastructure planning decisions, and guide the location and design of noise-producing uses to

- minimize the effects of noise on adjacent noise-sensitive land uses, including residential uses and schools.
- S-5.2. Ensure that Downtown noise levels remain acceptable and compatible with a pedestrian-oriented environment and higher density residential land uses.
 - S-5.3. Areas within Manteca exposed to existing or projected exterior noise levels from mobile noise sources exceeding the performance standards in Table S-1 shall be designated as noise-impacted areas.
 - S-5.4. Require residential and other noise-sensitive development projects to satisfy the noise level criteria in Tables S-1 and S-2.
 - S-5.5. Require new stationary noise sources proposed adjacent to noise sensitive uses to be mitigated so as to not exceed the noise level performance standards in Table S-2, or a substantial increase in noise levels established through a detailed ambient noise survey.
 - S-5.6. Regulate construction-related noise to reduce impacts on adjacent uses to the criteria identified in Table S-2 or, if the criteria in Table S-2 cannot be met, to the maximum level feasible using best management practices and complying with the MMC Chapter 9.52.
 - S-5.7. Where the development of residential or other noise-sensitive land use is proposed for a noise-impacted area or where the development of a stationary noise source is proposed in the vicinity of noise-sensitive uses, an acoustical analysis is required as part of the environmental review process so that noise mitigation may be considered in the project design. The acoustical analysis shall:
 - Be the responsibility of the applicant.
 - Be prepared by a qualified acoustical consultant experienced in the fields of environmental noise assessment and architectural acoustics.
 - Include representative noise level measurements with sufficient sampling periods and locations to adequately describe local conditions and the predominant noise sources.
 - Estimate existing and projected (20 years) noise levels in terms of the standards of Table S-1 or Table S-2, and compare those levels to the adopted policies of the Noise Element.
 - Recommend appropriate mitigation measures to achieve compliance with the adopted policies and standards of the Noise Element.
 - Estimate noise exposure after the prescribed mitigation measures have been implemented.
 - If necessary, describe a post-project assessment program to monitor the effectiveness of the proposed mitigation measures.
 - S-5.8. Apply noise level criteria applied to land uses other than residential or other noise-sensitive uses consistent with noise performance levels of Table S-1 and Table S-2.
 - S-5.9. Enforce the Sound Transmission Control Standards of the California Building Code concerning the construction of new multiple occupancy dwellings such as hotels, apartments, and condominiums.
 - S-5.10. Ensure that new equipment and vehicles purchased by the City comply with noise

level performance standards consistent with the best available noise reduction technology.

- S-5.11. Require the Manteca Police Department to actively enforce requirements of the California Vehicle Code relating to vehicle mufflers and modified exhaust systems.
- S-5.12. For new residential development backing on to a freeway or railroad right-of-way, the developer shall be required to provide appropriate mitigation measures to satisfy the performance standards in Table S-1.
- S-5.13. It is recognized that the City and surrounding areas are considered to be urban in nature and rely upon both the industrial and agricultural economy of the area. Therefore, it is recognized that noise sources of existing uses may exceed generally accepted standards.
- S-5.14. Carefully review and give potentially affected residents an opportunity to fully review any proposals for the establishment of helipads or heliports.
- S-5.15. Recognizing that existing noise-sensitive uses may be exposed to increase noise levels due to circulation improvement projects associated with development under the General Plan and that it may not be feasible to reduce increased traffic noise levels to the criteria identified in Table S-1, the following criteria may be used to determine the significance of noise impacts associated with circulation improvement projects:
 - Where existing traffic noise levels are less than 60 dB Ldn at the outdoor activity areas of noise-sensitive uses, a +5 dB Ldn increase in noise levels due to roadway improvement projects will be considered significant; and
 - Where existing traffic noise levels range between 60 and 65 dB Ldn at the outdoor activity areas of noise-sensitive uses, a +3 dB Ldn increase in noise levels due to roadway improvement projects will be considered significant; and
 - Where existing traffic noise levels are greater than 65 dB Ldn at the outdoor activity areas of noise-sensitive uses, a + 1.5 dB Ldn increase in noise levels due to roadway improvement projects will be considered significant.

The General Plan EIR concluded that, despite these goals and policies, significant noise impacts will occur because of development under the General Plan and further, that these impacts cannot be reduced to a less than significant level. Specifically, the General Plan EIR noted that the existing and proposed policies, actions, and regulations would serve to reduce noise from vehicles at the source and to otherwise shield sensitive uses from excessive noise. However, while these policies, actions, and regulations would help to mitigate the severity of the effects of traffic noise, they would not prevent all the anticipated traffic noise increases along the impacted roadway segments identified in Table 3.12-1 of the EIR, and the impact would be significant. Thus, because no feasible mitigation measures are available to mitigate noise impacts to a less than significant level, traffic noise would remain a significant and unavoidable impact. Findings of fact and a statement of overriding consideration were adopted by the Manteca City Council regarding these impacts.

*Responses to Checklist Questions***Response a): Less than Significant.***Existing Noise Receptors*

Some land uses are considered more sensitive to noise than others. Land uses often associated with sensitive receptors generally include residences, schools, libraries, hospitals, and passive recreational areas. Sensitive noise receptors may also include threatened or endangered noise-sensitive biological species, although many jurisdictions have not adopted noise standards for wildlife areas. Noise-sensitive land uses are typically given special attention in order to achieve protection from excessive noise.

Sensitivity is a function of noise exposure (in terms of both exposure duration and insulation from noise) and the types of activities involved. In the vicinity of the project site, sensitive land uses include existing single family residential uses to the north, south, and east of the Project site.

Traffic Noise

Traffic generated by the proposed project has the potential to contribute to roadway noise levels in the vicinity of the project site and throughout other areas of the City. Increases in roadway noise associated with buildout of the Manteca General Plan were addressed in the General Plan EIR. As described in this Draft EIR, vehicular traffic on existing roadways in Manteca would increase as development proceeds and the city's population increases. Under buildout of the General Plan, which includes the proposed Project site, noise levels would increase substantially (3 A-weighted decibels [dBA] day/night average sound level [L_{DN}] or greater) along major roadways throughout Manteca. Development of the site for urban uses and the subsequent increase in vehicle roadway noise was taken into consideration in the City of Manteca General Plan and General Plan EIR.

The proposed project would not directly generate increased noise beyond those activities commonly found in commercial developments. The noise directly generated by the project would not differ from the existing ambient noises currently generated by the surrounding residential and future commercial land uses. The Project is not anticipated to generate significant noise levels, given that activities would be limited to vehicle traffic.

Construction Noise

During the construction phases of the project, noise from construction activities would add to the noise environment in the immediate project vicinity. Activities involved in construction would generate maximum noise levels ranging from 76 to 90 dBA L_{max} at a distance of 50 feet. Construction activities would also be temporary in nature and are anticipated to occur during normal daytime working hours. The City of Manteca General Plan exempts construction noise from the noise ordinance between the hours 7:00 a.m. to 7:00 p.m. on Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturdays. No construction shall be permitted outside of these hours or on Sundays or federal holidays, without a specific exemption issued by the City.

Noise would also be generated during the construction phase by increased truck traffic on area roadways. A project-generated noise source would be truck traffic associated with transport of heavy materials and equipment to and from the construction site. This noise increase would be of short duration and would occur during daytime hours.

Although construction activities are temporary in nature and would occur during normal daytime working hours, construction-related noise could result in sleep interference at existing noise-sensitive land uses in the vicinity of the construction if construction activities were to occur outside the normal daytime hours. Therefore, impacts resulting from noise levels temporarily exceeding the threshold of significance due to construction would be considered potentially significant. Implementation of Project Requirement NOI-1 would ensure that construction noise impacts remain **less than significant**.

Project Requirement(s)

Project Requirement NOI-1: *The following requirements shall be implemented during all construction phases of the project:*

- a) Construction activities (excluding activities that would result in a safety concern to the public or construction workers) shall be limited to between the hours of 7:00 a.m. and 7:00 p.m. Construction activities shall be prohibited on Sundays and federal holidays.*
- b) Construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations.*
- c) Construction equipment staging areas shall be located at the furthest distance possible from nearby noise-sensitive land uses.*

Response b): Less than Significant. No major stationary sources of groundborne vibration were identified in the project area that would result in the long-term exposure of proposed onsite land uses to unacceptable levels of ground vibration. In addition, the proposed project would not involve the use of any major equipment or processes that would result in potentially significant levels of ground vibration that would exceed these standards at nearby existing land uses. However, construction activities associated with the proposed project would require the use of various tractors, trucks, and potentially jackhammers that could result in intermittent increases in groundborne vibration levels. The use of major groundborne vibration-generating construction equipment/processes (i.e., blasting, pile driving) is not anticipated to be required for construction of the proposed project.

Groundborne vibration levels commonly associated with construction equipment are summarized in Table NOI-1. Based on the levels presented in Table NOI-1, groundborne vibration generated by construction equipment would not be anticipated to exceed approximately 0.09 inches per second (in/sec) peak particle velocity (ppv) at 25 feet. Predicted vibration levels would not be anticipated to exceed recommended criteria for structural damage and human annoyance (0.2 and 0.1 in/sec ppv, respectively) at nearby land uses. As a result,

short-term groundborne vibration impacts would be considered **less than significant** and no mitigation is required.

Table NOI-1: Representative Vibration Source Levels for Construction Equipment

<i>EQUIPMENT</i>	<i>PEAK PARTICLE VELOCITY AT 25 FEET (IN/SEC)</i>
Large Bulldozers	0.089
Loaded Trucks	0.076
Jackhammer	0.035
Small Bulldozers	0.003

SOURCE: FTA 2006, CALTRANS 2004.

Response c): Less than Significant. The Tracy Municipal Airport is the closest airport to the project site, located approximately 4.8 miles to the southwest. The Airport is a general aviation airport owned by the City and managed by the Public Works Department. The City of Tracy adopted an Airport Master Plan in 1998, analyzing the impacts to safety on surrounding development from the Tracy Municipal Airport.

The San Joaquin County Airport Land Use Plan establishes noise contours surrounding the Tracy Municipal Airport. The project site is located outside of both the 65 dB Community Noise Equivalent Level (CNEL) and the 60 dB CNEL noise contours for the Tracy Municipal Airport, and the project site is outside of the Airport Influence Area (AIA). As such, the project site would not be exposed to excessive noise from the Tracy Municipal Airport. This is a **less than significant** impact.

XIV. POPULATION AND HOUSING

	<i>Significant Impact Peculiar to the Project or the Project Site</i>	<i>Significant Impact due to New Information</i>	<i>Impact Adequately Addressed in the General Plan EIR</i>	<i>Impact not Previously Addressed in General Plan EIR</i>
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?			X	

Project Impacts:

The proposed Project will result in the construction of a commercial RV and boat storage and office facilities and would not increase population growth within the Project area.

Prior Environmental Analysis:

The General Plan EIR analyzed the anticipated population and housing impacts that would occur because of the future urban development that was contemplated by the General Plan. These impacts included population growth and availability of housing opportunities (City of Manteca General Plan Draft EIR, pages 3.10-18 through 3.10-28). The analysis found that while development and buildout of the General Plan can result in population and housing impacts, implementation of the General Plan would not contribute to a significant generation of growth that would substantially exceed any established growth projections nor would it displace substantial numbers of housing units or people. Moreover, the proposed Project will not construct off-site infrastructure that would induce substantial development, unplanned or otherwise. As such, population and housing impacts were determined to be less than significant. These impacts were adequately addressed in Chapter 3.10 of the General Plan EIR. The proposed Project would not result in a new or substantially more severe impact than what was previously analyzed.

Responses to Checklist Questions

Response a): Less than Significant. The proposed Project is consistent with the land use designation in the General Plan, and can be considered planned growth assumed under the General Plan. The proposed commercial uses does not generate population like a residential development would. Therefore, the Project would not result in new or substantially more severe impacts than identified in the General Plan EIR. This is a **less than significant** impact.

Response b): Less than Significant. The Project site is undeveloped and does not include any housing or residents. Therefore, **no impact** would occur, and the Project would not result in new or substantially more severe impacts than identified in the General Plan EIR.

XV. PUBLIC SERVICES

	<i>Significant Impact Peculiar to the Project or the Project Site</i>	<i>Significant Impact due to New Information</i>	<i>Impact Adequately Addressed in the General Plan EIR</i>	<i>Impact not Previously Addressed in General Plan EIR</i>
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:			X	
i) Fire protection?			X	
ii) Police protection?			X	
iii) Schools?			X	
iv) Parks?			X	
v) Other public facilities?			X	

Project Impacts:

The proposed Project includes the development of a commercial RV and boat storage and office facilities and would be anticipated to increase the need for the provision of new and/or expanded public services or facilities.

Prior Environmental Analysis:

The General Plan EIR analyzed the anticipated impacts on the demand for fire and police protection and school and recreation facilities because of the future urban development that was contemplated by the General Plan. These impacts included increased demand for fire, police and school services, provision of adequate fire flow, and increased demand for parks and recreation (City of Manteca General Plan Draft EIR, pages 3.12-18 through 3.12-21). The analysis found that while development and buildout of the General Plan can result in public services and facilities impacts, these impacts would be reduced to a less than significant level through compliance with state and local standards related to the provision of public services and facilities and through the application of General Plan goals and policies that would assist in minimizing or avoiding impacts to public services and facilities. The following are General Plan policies presented in the General Plan EIR relative to this environmental topic:

Policies: Community Facilities Element

- CF-1.1. Encourage the implementation of new techniques and technologies to provide the best available level of community services in a cost-effective manner.
- CF-1.2. Ensure that new growth and development participates in the provision and expansion of essential community services and facilities, including parks, fire and

- police facilities, schools, utilities, roads, and other needed infrastructure, does not exceed the City's ability to provide services, and does not place an economic burden on existing residents.
- CF-1.3. Require new development to demonstrate that the City's existing or planned community services and facilities can accommodate the increased demand for said services and facilities prior to or at completion of the project.
 - CF-1.4. Require new development to offset or mitigate impacts to community services and facilities, including fair share contribution of all costs of required public infrastructure and services, to ensure that service levels for existing users are not degraded or impaired.
 - CF-1.5. Require public improvements and facilities to enhance, rather than degrade, the natural environment.
 - CF-1.6. Encourage comprehensive development of public facilities and services rather than incremental, single projects.
 - CF-1.7. Plan and develop public services and facilities to support economic development and residential growth.
 - CF-1.8. Make use of the public right-of-way as a tool for facilitating quality design and development.
 - CF-2.1. Prioritize public safety through ensuring adequate staffing, implementing best available technologies, capital investments in public safety, and organizing and utilizing community volunteers.
 - CF-2.2. Ensure that the Police Department has adequate funding, staff, and equipment to accommodate existing and future growth in Manteca.
 - CF-2.3. Strive to provide a police force level of a minimum of 1.00 officers per 1,000 population.
 - CF-2.4. Endeavor through adequate staffing and patrol arrangements to maintain the minimum feasible police response times for police calls.
 - CF-2.5. Periodically review and, if necessary, amend the criteria for determining the circumstances under which police service will be enhanced.
 - CF-2.6. Promote and support community-based crime prevention programs, as an important augmentation to the provision of professional police services.
 - CF-2.7. Emphasize the use of physical site planning as an effective means of preventing crime. Open spaces, landscaping, parking lots, parks, play areas, and other public spaces should be designed with maximum feasible visual and aural exposure to community residents.
 - CF-2.8. Promote coordination between land use planning and urban design through consultation and coordination with the Police Department during the review of new development applications.
 - CF-3.1. Through adequate staffing and station locations, maintain a maximum five-minute travel response time 90% of the time for fire and emergency calls and an overall fire insurance (ISO) rating of 3 or better for all developed areas within the City.

- CF-3.2. Provide fire services to serve the existing and projected population.
- CF-3.3. Periodically review, and if necessary amend, the criteria for determining the circumstances under which fire service will be enhanced.
- CF-3.4. Design and maintain roadways in such a way so as to maintain acceptable emergency vehicle response times.
- CF-3.5. Ensure that new development is designed, constructed, and equipped consistent with the requirements of the California Fire Code in order to minimize the risk of fire.
- CF-3.6. Ensure that new development is served with adequate water volumes and water pressure for fire protection.
- CF-4.1. Ensure the provision of sufficient parks, trails, and recreation facilities that are well distributed and interconnected throughout the community.
- CF-4.2. Expand, renovate, and maintain high quality parks, trails, and recreation facilities, programs, and services to accommodate existing and future needs that address traditional and non-traditional recreation, active and passive recreation, wellness, historical, cultural arts, environmental education, conservation, accessibility, inclusion, diversity, safety, and new technology.
- CF-4.3. Uphold design, construction, implementation, and maintenance standards to ensure high quality parks, trails, and recreation facilities, programs, and services, now and into the future.
- CF-5.1. Continue to work cooperatively with the local school districts to encourage the maintenance of high quality schools and to order to ensure that superior educational facilities and opportunities for all students are provided in a timely manner in accordance with the pace of residential development.

These goals, policies and standards include, but are not limited to the California Fire Code, the California Health and Safety Code, the Manteca Municipal Code, and goals and policies in the General Plan Safety Element requiring periodic review of the City's Development Impact Fee requirements, proportional share participation in the financial costs of public services and facilities, maintaining adequate staffing levels, providing adequate access for emergency vehicles and evacuation routes, and requiring certain types of development that may generate higher demand or special needs to mitigate the demands/needs.

These impacts were adequately addressed in Chapter 3.12 of the General Plan EIR. The proposed Project would not result in a new or substantially more severe impact than what was previously analyzed. The General Plan did not identify any mitigation measures, but did include policies that would serve to minimize potential impacts to public services of the City.

Mitigation Measures from Uniformly Applied Development Policies and Standards:

All applicable mitigation measures from the General Plan EIR, including the mitigation measures for impacts to public services incorporated as goals and policies in the Manteca General Plan, will be applied to the proposed Project. These serve as uniformly applied development policies and standards and/or as conditions of approval for the proposed Project to ensure consistency with the General Plan and compliance with City rules and regulations.

*Responses to Checklist Questions***Response a):**

i) Fire Protection and Emergency Medical Services: Less than Significant. The proposed Project is located within the jurisdiction of the Manteca Fire Department (MFD). All new future construction would meet all applicable building and safety codes and would be required to be reviewed for safety access. The Project would not require the development of any new MFD facilities. Emergency vehicle access is anticipated to be sufficient since the onsite road would connect to the entrance of the Project site and emergency vehicles would have adequate ability to turn around on the Project site. Furthermore, impact fees from new development are collected based upon projected impacts from each development. The adequacy of impact fees is reviewed on an annual basis to ensure that the fee is commensurate with the service. Payment of the applicable impact fees by the Project applicant as COAs prior to Project approval, and ongoing revenues that would come from property taxes, sales taxes, and other revenues generated by the Project, would fund capital and labor costs associated with fire protection services.

To provide adequate fire protection and suppression services to the Project site, the MFD must have access to adequate onsite hydrants with adequate fire-flow pressure available to meet the needs of fire suppression units. The final site plans and development specifications developed for the proposed Project will indicate the location and design specifications of the fire hydrants that will be required within the Project site.

The proposed Project would comply with all applicable General Plan policies related to reducing fire risks. Project plans would also be reviewed by the MFD to ensure that the Project site is acceptable for fire safety purposes. The proposed Project is consistent with the Commercial land use designation for the Project site, and therefore to the extent that the Project would increase demand for fire protection services was previously considered by the General Plan EIR. The Project would not result in new or substantially more severe impacts than identified in the General Plan EIR, no mitigation measures are required, and the criteria for requiring further CEQA review are not met. Therefore, this is considered a **less than significant** impact.

ii) Police Protection: Less than Significant. Impact fees from new developments are collected based upon projected impacts from each development by the City as COAs prior to Project approval. The adequacy of impact fees is reviewed on an annual basis to ensure that the fee is commensurate with the service. Payment of the applicable impact fees by the Project applicant, and ongoing revenues that would come from property taxes, and other revenues generated by the Project, would fund capital and labor costs associated with police services.

The Project site would be served by the Manteca Police Department. As previously discussed, the proposed Project is consistent with the Commercial land use designation for the Project site, and therefore the extent that the Project would increase demand for police protection services was previously considered by the General Plan EIR. The Project would not result in new or substantially more severe impacts than identified in the General Plan EIR, no mitigation measures are required, and the criteria for requiring further CEQA review are not met.

It is not anticipated that implementation of the proposed Project would result in significant new demand for police services. Project implementation would not require the construction of new police facilities to serve the Project site, nor would it result in impacts to the existing response times and existing police protection service levels. Therefore, this is considered a **less than significant** impact.

iii) Schools: Less than Significant. All new commercial development in the City is required to pay a developer impact fee to fund school improvement projects to mitigate impacts to school facilities, as applicable. The development impact fee is the source of school capital improvement funding provided by new development. Payment of the applicable impact fees by the Project applicant, and ongoing revenues that would come from property taxes, sales taxes, and other revenues generated by the proposed Project, would fund improvements associated with school services. According to Government Code Section 65996, the development fees authorized by SB 50 (1998) are deemed to be “full and complete school facilities mitigation” for any demands or impacts on school facilities caused by new development. The proposed Project does not include any residential units, and therefore would not directly increase the student population in the area.

Payment of development fees is considered to fully mitigate the impacts of new development on school facilities under Section 65996 of the California Government Code. Therefore, the proposed Project would not result in new or substantially more severe impacts than identified in the General Plan EIR. No mitigation measures are required and the criteria for requiring further CEQA review are not met. Therefore, this is considered a **less than significant** impact.

iv) Parks: The proposed Project does not include the construction of residential uses, does not directly increase the need for additional parks. Potential Project impacts to parks and recreational facilities are addressed in Section XVI below.

v) Other Public Facilities: Less than Significant. The Project is within the scope of projected growth under the General Plan and the anticipated uses on the Project site are assumed in the General Plan EIR. The proposed Project would not result in a need for other public facilities that are not addressed above, or in Section XVIII, Utilities and Service Systems.

As described in the General Plan EIR Impact 3.12-1 the General Plan implementation potential to result in adverse physical impacts associated with the deterioration of other public facilities, such as the Manteca Branch Library, a branch of the Stockton-San Joaquin County Public Library (SSJCPL) library facilities, was found to be less than significant. Development anticipated under the proposed Project would be consistent with development levels analyzed in the Manteca General Plan EIR. In-lieu fees would be required upon issuance of a building permit. In-lieu fees would ultimately fund the construction of other public facilities to offset the increased demand for these facilities. Therefore, the Project would not result in new or substantially more severe impacts than identified in the General Plan EIR. No mitigation measures are required and the criteria for requiring further CEQA review are not met. Therefore, this is considered a **less than significant** impact.

XVI. RECREATION

	<i>Significant Impact Peculiar to the Project or the Project Site</i>	<i>Significant Impact due to New Information</i>	<i>Impact Adequately Addressed in the General Plan EIR</i>	<i>Impact not Previously Addressed in General Plan EIR</i>
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	

Project Impacts:

The proposed Project would not result in the construction of any new homes, and would provide new employment opportunities. Therefore, the use of existing parks and other recreational facilities would not be substantially increased, and no new or expanded facilities would be required.

Prior Environmental Analysis:

The General Plan EIR analyzed the anticipated impacts on the demand for recreation facilities because of the future urban development that was contemplated by the General Plan. These impacts included increased demand for parks and recreation (City of Manteca General Plan Draft EIR, pages 3.13-13 through 3.13-22). The analysis found that while development and buildout of the General Plan can result in recreation facilities impacts, these impacts would be reduced to a less than significant level through the application of General Plan goals and policies that would assist in minimizing or avoiding impacts to recreation facilities. The General Plan has established a parkland standard of 5 acres of developed neighborhood and community parkland per 1,000 residents. The General Plan has adopted goals and policies to ensure that this standard is met. These goals and policies call for the provision of new park and recreational facilities as needed by new development through parkland dedication and the payment of park and recreation fees. These programs and practices are recognized in the General Plan Community Facilities and Services Element, which mitigates these impacts to a less than significant level.

In addition, compliance with state and local standards related to the provision of public services and facilities and the application of General Plan goals and policies would assist in minimizing or avoiding impacts to public services and facilities, as noted above. The General Plan did not identify any mitigation measures, but did include policies that would serve to minimize potential impacts to park and recreational facilities of the City.

Mitigation Measures from Uniformly Applied Development Policies and Standards:

All applicable mitigation measures from the General Plan EIR, including the mitigation measures for impacts to recreation incorporated as goals and policies in the Manteca General Plan, will be

applied to the proposed Project. These serve as uniformly applied development policies and standards and/or as conditions of approval for this Project to ensure consistency with the General Plan and compliance with City rules and regulations.

Responses to Checklist Questions

Responses a), b): Less than Significant. The proposed Project does not include the construction of public recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. The proposed commercial use would not result in increases in demand on the local recreational facilities. Implementation of the proposed Project would have a **less than significant** impact relative to this topic.

XVII. TRANSPORTATION

	<i>Significant Impact Peculiar to the Project or the Project Site</i>	<i>Significant Impact due to New Information</i>	<i>Impact Adequately Addressed in the General Plan EIR</i>	<i>Impact not Previously Addressed in General Plan EIR</i>
a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?			X	
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
d) Result in inadequate emergency access?			X	

Project Impacts:

Appendix C outlines the trip generation and transportation analysis required by the California Environmental Quality Act (CEQA) for the proposed Project. Fehr & Peers conducted this study based on the understanding of the Project and analysis guidelines provided in the City of Manteca SB 743 Implementation Policy (City of Manteca, July 2022).

The Project will be accessed via a driveway on the north side of the cul-de-sac at the western end of Bronzan Road.

Project Trip Generation

This section presents the forecasted Project trip generation, including trip distribution and assignment. It also includes the recommended study intersections to be evaluated as part of the upcoming LTA based on the City’s TIA Guidelines.

Trip Generation

The proposed Project’s trip generation was estimated using trip rates published in the Trip Generation Manual 11th Edition (Institute of Transportation Engineers, 2021). Table Traffic-1 displays the estimated number of daily, AM peak hour, and PM peak hour vehicle trips for the proposed Project. As shown in Table TRAF-1, the proposed Project is projected to generate approximately 200 daily, 15AM peak hour, and 18 PM peak hour trips.

Table TRAF-1: Project Trip Generation Rates

Land Use	Units	Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
			In	Out	Total	In	Out	Total
RV & Boat Storage (Minimum Estimate) ²	365	70	2	2	4	3	3	6
RV & Boat Storage (Maximum Estimate) ²	730	130	5	4	9	6	6	12
Total		200	7	6	15	9	9	18

Notes:

- Units = storage units. The trip generation reflects a range of occupancy, assuming a minimum of one boat or RV storage unit per stall and a maximum of two storage units per stall.
- RV and Boat Storage trip generation based on ITE Trip Generation Manual, 11th Edition Land Use Code 151 - Adj. Streets, 7-9 AM, 4-6 PM, General Urban/Suburban:
 - a. Daily: 17.96 trips per 100 storage units
 - b. AM Peak Hour: 1.21 trips per 100 storage units
 - c. PM Peak Hour: 1.68 trips per 100 storage units

Source: Fehr & Peers, December 2025.

SOURCE: FEHR AND PEERS. CEQA TRANSPORTATION ANALYSIS FOR THE PROPOSED GATEWAY SOLAR RV & STORAGE PROJECT, CA. 2025.

Trip Distribution

Project trip distribution refers to the directions of approach and departure that vehicles would take to access and leave the site. Estimates of the Project’s trip distribution were developed based on the trip distribution estimates from nearby storage spaces. Specifically, Fehr & Peers conducted a StreetLight Data evaluation of the existing West Coast RV & Boat Storage facility located at 4052 Yosemite Avenue, Lathrop, CA:

- 10 percent of trips are expected to travel to and from McKinley Avenue north of State Route (SR) 120
- 20 percent of trips are expected to travel to and from McKinley Ave south of Bronzan Road
- 35 percent of trips are expected to travel to and from SR 120 east of the McKinley Avenue interchange
- 35 percent of trips are expected to travel to and from SR 120 west of the McKinley Avenue interchange.

Trip Assignment

While Project trip distribution provides information regarding larger-scale trip patterns, Project trip assignment refers to Project trip loading on specific roadway segments and intersection turning movements in the study area. The Project is estimated to add fewer than 10 vehicle trips to nearby arterial and freeway segments during the AM and PM peak hours. This level of traffic increase is within the range of normal daily volume fluctuations on nearby roadways and does not warrant additional operational analysis of adjacent intersections or roadway segments.

Responses to Checklist Questions

Response a): Less than Significant. Fehr and Peers reviewed the *City of Manteca 2040 General Plan (2023)*, *City of Manteca Public Facilities Improvement Plan (PFIP, 2018)*, *City of Manteca Active Transportation Plan (2020)*, and existing transit service to determine if the proposed Project results in any inconsistencies with adopted transportation related policies or design standards. The policy consistency evaluation is summarized below.

Manteca General Plan

Relevant General Plan policies include:

- C-2.2: Design roadway improvements to occur in a contiguous, orderly fashion and strive to build roadway improvements in advance of new development particularly when addressing existing deficiencies. However, major circulation improvements shall be constructed no later than when abutting lands develop or redevelop, with dedication of right-of-way and construction of improvements, or participation in construction of such improvements, required as a condition of approval.
- C-2.3: Require new development to pay a fair share of the costs of street and other transportation improvements based on impacts in conformance with the goals and policies established in this Circulation Element and the Public Facilities Implementation Program (PFIP).
- C-2.5: Design street improvements to provide multiple, direct, and convenient routes for all modes.
- C-2.8: Provide access for bicycles and pedestrians at the ends of cul-de-sacs, where right of-way is available, to provide convenient access within and between neighborhoods and to encourage walking and bicycling to neighborhood destinations.
- C-2.20: In the development of projects, ensure there are adequate corner sight distances appropriate for the speed and type of facility, including intersections of city streets and private access drives and roadways.
- C-2.21: Encourage the development of landscape-separated sidewalks along roadways (particularly arterials and non-residential streets) when feasible to discourage pedestrian/vehicle conflicts and be consistent with complete streets concepts.
- C-2.23: Incorporate emergency access, mountable medians, shoulders to bypass queued vehicles, emergency signal preemption, and other features into development and infrastructure projects to improve emergency response times as appropriate and feasible on new roadways and on existing roadways.
- C-3.2: Require new development to provide an appropriate number of off-street parking spaces to accommodate the typical parking demands of the type of development on the site. The City may dictate both minimum and maximum amounts of parking to ensure that adequate parking is available for typical activities associated with a use as well as for special events, where anticipated and appropriate, and to ensure that parking standards encourage alternatives to single occupant vehicles.
- C-4.3: Provide a sidewalk and bicycle route system that serves all pedestrian and bicycle users and meets the latest guidelines related to the Americans with Disabilities Act (ADA).

- C-4.4: Provide bicycle parking facilities at commercial, business/professional and light industrial uses in accordance with Part 11 of the California Building Standards Code.

Project consistency with relevant General Plan transportation policies is summarized in the sections below.

Street Improvements

The City of Manteca's Public Facilities Improvement Plan (PFIP) outlines a funding and implementation plan for near-term public facility improvements within the City. The Transportation Element of the PFIP, released in January 2018, identifies citywide transportation improvements and the funding mechanisms to support their implementation. The PFIP does not identify any roadway improvements along the Project frontage on Bronzan Road. However, Bronzan Road improvements are subject to the City of Manteca street standards. Bronzan Road is classified as a small collector.

Bronzan Road must provide a minimum curb to-curb width of 44 feet, in addition to a five-foot-wide sidewalk, which the Project improvements meet. However, the property line is currently set back five feet from the face of curb along Bronzan Road east of the cul-de-sac, whereas the small collector street section standard requires a minimum eight-foot setback from the face of curb.

Based on Fehr & Peers' evaluation of the small collector street section standard, the Project meets the minimum dimension requirements for curb-to-curb and sidewalk widths. However, the City of Manteca should confirm whether the proposed property line meets the required setback standards.

The City's street standards also specify minimum dimensions for the cul-de-sac improvement proposed by the Project. According to these standards, cul-de-sacs shall terminate with a turnaround having a radius of no less than 50 feet and a face-of-curb radius of 43 feet. The bulb may be offset to either side. The cul-de-sac improvements proposed by the Project meet these minimum standards.

Driveway Sight Distance

According to General Plan Policy C-2.20, development projects must ensure adequate corner sight distances appropriate for the speed and type of facility, including at intersections with private access driveways. The Project proposes driveway access on a cul-de-sac, which provides adequate corner sight distance given the low speeds at which vehicles would maneuver around the cul-de-sac. The Project also proposes an on-street parking stall for the temporary parking of RVs and vehicles towing boat trailers. This stall is located within the cul-de-sac on public right-of-way. Due to the angle of the parking stall relative to the Bronzan Road segment north of the cul-de-sac, the available stopping sight distance for drivers exiting the stall is approximately 50 feet. According to the Caltrans Highway Design Manual, the minimum stopping sight distance is 50 feet for roadways with a design speed of 10 miles per hour (mph). Vehicles are expected to enter and navigate the cul de-sac at approximately 10 mph; therefore, the 50-foot stopping sight distance is expected to be adequate for the on-street parking stall as currently proposed.

Active Transportation Infrastructure Improvements

The City of Manteca Active Transportation Plan (ATP, August 2020) outlines a vision for the future pedestrian and bicycling network within the City. Fehr & Peers reviewed the City's ATP to confirm compliance with the locally adopted plan. There are no pedestrian or bicycle facilities planned near the Project site. General Plan Policy C-2.5 states that street improvements should be designed to provide direct routes for all modes. The Project proposes five-foot-wide sidewalks along the site frontage and bicyclists can access the Project site via improvements proposed along Bronzan Road; which is consistent with the General Plan policy for active transportation modes. General Plan Policy C-2.8 requires the provision of bicycle and pedestrian access at the ends of cul-de-sacs to ensure convenient connectivity within and between neighborhoods. An existing multi-use path connecting the western terminus of Bronzan Road to Rapallo Way is already in place and will remain as part of the proposed Project. Therefore, the Project is consistent with General Plan Policy C-2.8. Although General Plan Policy C-2.21 encourages landscape-separated sidewalks along roadways when feasible, the Project does not include them. However, the street section standards for minor collector streets, as described above, do not require landscape-separated sidewalks. Therefore, they are not required for the Project. General Plan Policy C-4.3 requires a sidewalk and bicycle route system that serves all pedestrian and bicycle users and meets ADA requirements. The Project includes a sidewalk system that is ADA compliant and provides a connection from Bronzan Road to the proposed on-site office building. Since the City of Manteca ATP does not identify existing or planned dedicated bikeways along Bronzan Road, the Project is not required to provide designated bikeway infrastructure along its Bronzan Road frontage.

Transit Network Improvements

Manteca Transit operates a fixed-route and Dial-a-Ride bus service with stops throughout the City. The nearest transit stop is the Stadium Center at Daniels Street stop located on the southwest corner of Daniels Street and Milo Candini Drive, approximately 1.5 miles northeast of the Project site. Route 1 and Route 2 provide weekday and Saturday fixed route service to the Stadium Center at Daniels Street transit stop with 60-minute headways. The Project site is not currently served by existing routes. Based on Fehr & Peers review of the Manteca Transit Short Range Transit Plan (December 2018), the Project is not expected to conflict with existing or planned transit facilities.

Off-Street Vehicle Parking Requirements

Per General Plan Policy C-3.2, the Project is required to provide an appropriate number of off-street parking spaces to accommodate the typical parking demands of the type of development on the site. The City may dictate both minimum and maximum amounts of parking to ensure that adequate parking is available for typical activities associated with a use. The City of Manteca Municipal Code (MMC, see § 17.52.050) provides the minimum off-street parking requirements by land type. According to MMC Tabel 17.52.050-1, self-storage facilities must provide one (1) parking stall per 50 storage units or five (5) parking stalls, whichever is greater. According to the preliminary staff review letter dated March 27, 2023, Development Services Department staff specified a minimum requirement of five (5) off-street parking stalls. The Project proposes six (6) off-street parking stalls, meeting the requirement set by City staff and aligning with General

Plan Policy C-3.2. All proposed employee and visitor parking stalls on-site are 90-degree angled stalls. The minimum dimensions for standard 90-degree stalls are nine (9) feet wide by 18 feet long, with a minimum drive aisle width of 24 feet for two-way aisles (see § 17.52.090). Up to 30 percent of the required parking spaces may be designated for compact cars, with minimum stall dimensions of eight (8) feet wide by 16 feet long (see § 17.52.080). All proposed standard stalls meet the minimum dimensions required by the MMC; the Project does not propose compact stalls.

Accessible Parking

The MMC (§ 17.52.070) states that parking spaces for individuals with disabilities shall comply with the Uniform Building Code and the Americans with Disabilities Act. The Project proposes one (1) accessible parking stall, which meets the minimum requirement under the California Building Code (CBC). Additionally, the accessible routes comply with CBC § 11B-206.2.1, which requires at least one accessible route from accessible parking spaces, public streets, and sidewalks to the proposed office building.

Electric Vehicle Parking

Section 5.106.5.3 of the 2022 California Green Building Standards Code (CALGreen) outlines the minimum requirements for electric vehicle (EV) charging. According to CALGreen, projects that provide fewer than 10 on-site parking stalls are not required to include EV charging spaces or EV-capable infrastructure. Therefore, the Project is not required to provide any designated EV parking stalls.

Bicycle Parking

Per General Plan Policy C-4.4, the Project must provide bicycle parking. The MMC (see § 17.52.110) specifies the minimum bicycle parking requirements based on the total number of parking spaces. The Project is required to provide a minimum of two (2) bicycle parking spaces located on a paved surface in a visibly secure location in proximity to a building entrance. Although the Project will provide the minimum parking requirements, the current site plan does not identify the planned bicycle parking accommodations.

Fair Share Transportation Infrastructure Project Responsibilities

The Project's trip assignment on nearby roadways is minimal, and no adverse effects to off-site intersection level of service (LOS) are expected. However, per General Plan Policy C-2.3, the Project is still required to contribute its fair share to off-site transportation improvements through payment of the City's public facility fees and the Regional Transportation Impact Fee (RTIF) administered by the San Joaquin Council of Governments (SJCOG).

The City of Manteca has the final authority to determine the fair share improvements and/or fee payments required for the Project as Conditions of Approval.

Policy Consistency Determination

Improvements proposed by the Project are consistent with transportation-related programs, plans, ordinances, and policies. Therefore, the impact is considered *less than significant*.

Response b): Less than Significant. As of July 1, 2020, CEQA Guidelines Section 15064.3(b) states that the recommended metric for the evaluation of transportation impacts is VMT. It outlines the criteria for analyzing a project's transportation impacts. For land use projects, this section states that "vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact."

According to *City of Manteca SB 743 Implementation Policy* (City of Manteca, 2022), a project would result in a significant transportation VMT impact if it would:

- Not qualify for screening per the screening criteria outlined in the City's VMT screening guidelines, which states that a project may be screened from additional VMT analysis if it complies with one or more of the following conditions: (1) is a small project generating fewer than 1,000 trips a day and consistent with City's General Plan; or (2) 100% affordable housing; or (3) is local-serving retail less than 125,000 square feet in building floor area; or (4) located in a High-Quality Transit Area; or (5) located in a low VMT area; or (6) is consistent with the City's General Plan.
- Exceed the applicable VMT threshold, which for a residential project is set to 15% below Citywide baseline for VMT per single-family dwelling unit.

The Project qualifies for screening criteria (1) listed above given that the Project would generate less than 1,000 trips per day.

VMT Screening Determination

The Project meets the screening criteria outlined in the City of Manteca SB 743 Implementation Policy (City of Manteca, July 2022) as it would generate fewer than 1,000 daily trips and is consistent with the General Plan land use map. Therefore, a detailed VMT analysis is not required for CEQA purposes.

Furthermore, CEQA Guidelines Section 15183(a) states: "CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site."

Response c): Less than Significant. As discussed in the Policy Consistency section above, the transportation infrastructure improvements proposed by the Project meet the minimum City of Manteca design standards. Therefore, the Project is not expected to increase hazards due to a geometric design feature, and the impact is considered *less than significant*.

Response d): Less than Significant. Per General Plan Policy C-2.23, the Project must incorporate adequate emergency access. The on site office building is assumed to be under 30 feet in height,

therefore a minimum 20-foot clear width is required for emergency vehicle access. The Project's on-site drive aisles all exceed the 20 foot minimum requirement. The California Fire Code (CFC) requires that dead-end fire access roads in excess of 150 feet shall be provided with a minimum 96-foot-diameter cul-de-sac. Although the 86-foot cul-de-sac diameter proposed by the Project is below the CFC standard, the cul-de-sac dimensions meet the City's street standards and fire trucks are also able to turnaround within the cul-de-sac by utilizing the Project driveway to maneuver. Therefore, the Project's impact to emergency access is considered ***less than significant***.

The City of Manteca Fire Department has the final authority to determine emergency access improvements required for the Project as Conditions of Approval.

XVIII. TRIBAL CULTURAL RESOURCES

	<i>Significant Impact Peculiar to the Project or the Project Site</i>	<i>Significant Impact due to New Information</i>	<i>Impact Adequately Addressed in the General Plan EIR</i>	<i>Impact not Previously Addressed in General Plan EIR</i>
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:			X	
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?			X	
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resources to a California Native American tribe.			X	

Project Impacts:

The Project site does not contain any resources that are listed with the California Register of Historical Resources or that have been determined by the lead agency to have significance to a California Native American Tribe. No impacts to tribal cultural resources are anticipated.

Prior Environmental Analysis:

The General Plan EIR analyzed the anticipated impacts that would occur to historical, cultural, and paleontological resources within the Planning area because of the future urban development that was contemplated by the General Plan. These impacts included potential destruction or damage to any historical, cultural, and paleontological resources (City of Manteca General Plan Draft EIR, pages 3.5-13 through 3.5-20). However, the General Plan contains goals, policies, and actions for the preservation and treatment of archaeological, historical, cultural, and paleontological resources. The following are General Plan policies presented in the General Plan EIR relative to this environmental topic:

Policies: Resource Conservation Element

- RC-100.1. Protect, and support efforts of community members and organizations to protect, important historic resources and use these resources to promote a sense of place and history in Manteca.
- RC-10.2. Encourage historic resources to remain in their original use whenever possible. The adaptive use of historic resources is preferred, particularly as museums, educational

- facilities, or visitor-serving uses, when the original use can no longer be sustained. Older residences may be converted to office/retail use in commercial areas and to tourist or business use, so long as their historical authenticity is maintained or enhanced.
- RC-10.3. Do not 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 CEQA and the National Historic Preservation Act.
 - RC-10.4. 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.
 - RC-10.9. Review new development projects and work in conjunction with the California Historical Resources Information System to determine whether project areas contain known archaeological resources, either prehistoric and/or historic-era, or have the potential for such resources.
 - RC-10.10. Ensure that human remains are treated with sensitivity and dignity, and ensure compliance with the provisions of California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98.
 - RC-10.11. Consistent with State, local, and tribal intergovernmental consultation requirements such as SB 18, consult as necessary with Native American tribes that may be interested in proposed new development and land use policy changes.

Implementation: Resource Conservation Element

- RC-10a. Require a records search for any proposed development project, to determine whether the site contains known archaeological, historic, cultural, or paleontological resources and/or to determine the potential for discovery of additional cultural or paleontological resources. This requirement may be waived if determined by the City that the proposed project area is already sufficiently surveyed.
- RC-10b. Require a cultural and archaeological survey prior to approval of any project which would require excavation in an area that is sensitive for cultural or archaeological resources and require a paleontological survey in an area that is sensitive for paleontological resources. If significant cultural, archaeological, or paleontological resources, including historic and prehistoric resources, are identified, appropriate measures shall be implemented, such as documentation and conservation, to reduce adverse impacts to the resource.
- RC-10c. Require all City permits for reconstruction or modification of existing buildings to include the 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-10d. Incorporate significant archaeological sites, where feasible, into open space areas.
- RC-10e. Continue to inventory 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-10f. Continue to support the local historical society in their efforts to:
 - Archive historic information, including photographs, publications, oral histories and other materials, and
 - make the information available to the public for viewing and research.
 - RC-10g. Encourage the placement of monuments or plaques that recognize and celebrate historic sites, structures, and events.
 - RC-10j. Require all new development, infrastructure, and other ground-disturbing projects to comply with the following conditions in the event of an inadvertent discovery of cultural resources or human remains:
 - If construction or grading activities result in the discovery of significant historic or prehistoric archaeological artifacts or unique paleontological resources, all work within 100 feet of the discovery shall cease, the Development Services Director shall be notified, the resources shall be examined by a qualified archaeologist, paleontologist, or historian for recommended protection and preservation measures; and work may only resume when recommended protections are in place and have been approved by the Development Services Director;
 - If construction or grading activities result in the discovery of significant tribal cultural resources, all work within 100 feet of the discovery shall cease, the Development Services Director shall be notified, the resources shall be examined by a qualified archaeologist and Native American tribes on the City's SB 18 and AB 52 list for recommended protection and preservation measures and work may only resume when recommended protections are in place and have been approved by the Development Services Director; and
 - If human remains are discovered during any ground disturbing activity, work shall stop until the Development Services Director and the San Joaquin County Coroner have been contacted; if the human remains are determined to be of Native American origin, the Native American Heritage Commission and the most likely descendants have been consulted; and work may only resume when measures to relocate or preserve the remains in place, based on the above consultation, have been taken and approved by the Development Services Director.

The General Plan policies would protect historical archaeological deposits in the EIR planning area by providing for the early detection of potential conflicts between development and resource protection, and by preventing or minimizing the material impairment of the ability of archaeological deposits to convey their significance through excavation or preservation. Implementation of the proposed action identified above, as well as compliance with federal, State, and local laws and regulations, would reduce potential impacts to historical archaeological deposits to a less-than-significant level.

Responses to Checklist Questions

Responses a-b): The CCIC record search demonstrated that no previously documented prehistoric or historic-era sites, features, artifacts, or other properties are located within the Project area. The CCIC record search did not identify any known prehistoric or historic-era archaeological resources within 0.25 miles of the Project area. Site investigations revealed that there are no known human remains located on the Project site, nor is there evidence to suggest

that human remains may be present on the Project site. Nevertheless, the proposed Project is in a region where cultural resources have been recorded and there remains a potential that undocumented archaeological resources that may meet the Tribal Cultural Resource definition could be unearthed or otherwise discovered during ground-disturbing and construction activities.

Due to the possible presence of undiscovered/undocumented archeological or Tribal Cultural Resources within the Project site, appropriate steps to preserve and/or document any previously undiscovered resources that may be encountered during construction and/or operational activities, including human remains, would be required. The Manteca General Plan includes policies and actions that would reduce impacts to cultural, historic, and archaeological resources, as well as policies and actions for the conservation of cultural, historic, and archaeological resources. As such, the proposed Project is consistent with the adopted vision and uses identified within the General Plan, and would not result in any new or increased impacts beyond those that were already addressed in the General Plan EIR. The General Plan EIR determined that impacts to these environmental topics were less than significant. These impacts were adequately addressed in Chapter 3.5 of the General Plan EIR. The proposed Project would not result in a new or substantially more severe impact than what was previously analyzed. The General Plan did not identify any mitigation measures, but did include policies that would serve to minimize potential impacts to archaeological, historical, cultural, and paleontological resources of the City. Furthermore, in accordance with the City of Manteca General Plan, a cultural resources constraints analysis was prepared for the Project, which included several recommendations to be incorporated into the construction of the proposed Project. These recommendations have been incorporated into the following Project requirements. Implementation of the following Project requirement would ensure the potential impacts are **less than significant**.

Project Requirement(s)

Project Requirement TCR-1: *If presently undocumented buried archaeological deposits are encountered during future Project-associated construction activities, work must cease within a 50-foot radius of the discovery. A qualified archaeologist must be retained to document the discovery, assess its significance, and recommend treatment. If human remains or any associated funerary artifacts are discovered during construction, all work must cease within the immediate vicinity of the discovery. In accordance with the California Health and Safety Code (Section 7050.5), the San Joaquin County Sheriff/Coroner must be contacted immediately. If the Coroner determines the remains to be of Native American origin, the Coroner will notify the Native American Heritage Commission, which will in turn appoint a Most Likely Descendent (MLD) to act as a tribal representative. The MLD will work with the Project proponent/applicant and a qualified archaeologist to determine the proper treatment of the human remains and any associated funerary objects. Construction activities will not resume until either the human remains are exhumed, or the remains are avoided via Project construction design change.*

XIX. UTILITIES AND SERVICE SYSTEMS

	<i>Significant Impact Peculiar to the Project or the Project Site</i>	<i>Significant Impact due to New Information</i>	<i>Impact Adequately Addressed in the General Plan EIR</i>	<i>Impact not Previously Addressed in General Plan EIR</i>
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments?			X	
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reductions goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

Project Impacts:

The proposed Project includes the development of a commercial RV and boat storage and office facilities and would be anticipated to increase the use of, and demand for utilities and service systems. Public utilities will be constructed with the proposed Project, including the extension of water, sewer, storm, and dry utilities into the Project site. Fire hydrants will be installed per City of Manteca standards. Storm mains will be installed within the subdivision to serve the Project.

As discussed in greater detail below, there is adequate wastewater treatment and water capacity to meet the water and wastewater treatment demands of the proposed Project, and no expansions would be required because of the Project. Utility extensions to the Project site are nearby and would need to extend services to serve the Project area.

Prior Environmental Analysis:

The General Plan EIR analyzed the anticipated impacts on the demand for utilities and service systems because of the future urban development that was contemplated by the General Plan. These impacts included increased demand for utilities and service systems (City of Manteca General Plan Draft EIR, pages 3.15-9 through 3.15-46). The analysis found that while development and buildout of the General Plan can result in utilities and service system impacts,

these impacts would be reduced to a less than significant level through the application of General Plan goals and policies that would assist in minimizing or avoiding impacts to utilities and service systems. In addition, compliance with state and local standards related to the provision of utilities and service systems and the application of General Plan goals and policies would assist in minimizing or avoiding impacts to utilities and service systems, as noted above. The General Plan did not identify any mitigation measures, but did include policies that would serve to minimize potential impacts to utilities and service systems of the City. The following are General Plan policies presented in the General Plan EIR relative to this environmental topic:

Policies: Community Facilities Element

- CF-6.1. Ensure the water system and supply is adequate to meet the needs of existing and future development and is utilized in a sustainable manner.
- CF-6.2. Ensure safe drinking water standards are met throughout the community.
- CF-6.3. Pursue additional water supply agreements to supplement the City's existing system in order to meet projected demand and to reduce the City's reliance on groundwater resources.
- CF-6.4. Ensure that the City's water supply provides for and supports a balance of jobs and housing in future development.
- CF-6.5. Prohibit extension of City water services to unincorporated areas except in extraordinary circumstances. Existing commitments for City water service outside the City limits shall continue to be honored.
- CF-6.7. Ensure that all new development provides for and funds a fair share of the costs for adequate water distribution, including line extensions, easements, and plant expansions.
- CF-6.8. Continue efforts to reduce potable water use and increase water conservation.
- CF-6.9. Encourage the use of recycled water for industrial uses and landscape irrigation where feasible, within the parameters of State and County Health Codes and standards.
- CF-6.10. Consider the effect of incremental increases in the demands on groundwater supply and water quality when reviewing development applications.
- CF-7.1. Ensure adequate wastewater collection and treatment infrastructure to serve existing and future development and the safe disposal of wastes.
- CF-7.2. Develop new sewage treatment and trunk line capacity as necessary to serve new development. The City shall incorporate current technologies into the design and operation of these facilities.
- CF-7.3. Only extend sewer services to unincorporated areas under extraordinary circumstances. Existing commitments for sewer service outside the city limits shall continue to be honored.
- CF-7.5. Maintain the ability to handle peak discharge flow while meeting State Regional Water Quality Control Board Standards as established in the current NPDES Permit.
- CF-7.6. Maintain the existing wastewater system on a regular basis to increase the lifespan of the system and ensure public safety.
- CF-8.1. Maintain and improve Manteca's storm drainage facilities.

- CF-8.2. Require all development projects to demonstrate how Stormwater runoff will be detained or retained on-site and/or conveyed to the nearest drainage facility as part of the development review process and as required by the City's NPDES Municipal Regional Permit. Project applicants shall mitigate any drainage impacts as necessary and shall demonstrate that the project will not result in any increase in off-site runoff during rain and flood events.
- CF-8.3. Continue to allow dual-use detention basins for parks, ball fields, and other uses where appropriate.
- CF-8.4. Incorporate recreational trails and parkway vegetation design where open stormwater facilities are appropriate and ensure that vegetation does not reduce channel capacity.
- CF-8.5. Maintain drainage channels in a naturalized condition where appropriate, incorporating recreational trails, parkway vegetation, and other amenities and ensuring that vegetation does not reduce channel capacity, and consistent with the Resource Conservation Element.
- CF-11.1. Continue to require mandatory refuse collection throughout the city.
- CF-11.2. Implement and enforce the provisions of the City's Source Reduction and Recycling Program and update the program as necessary to meet or exceed the State waste diversion requirements.
- CF-11.3. Reduce municipal waste generation by increasing recycling, on-site composting, and mulching, where feasible, at municipal facilities, as well as using resource efficient landscaping techniques in new or renovated medians and parks.
- CF-11.4. Encourage residential, commercial, and industrial recycling and reuse programs and techniques.
- CF-11.5. Coordinate with and support other local agencies and jurisdictions in the region to develop and implement effective waste management strategies and waste-to-energy technologies.
- CF-11.6. Support the continued use of the Lovelace Transfer Station on Lovelace Road, between Union Road and Airport Way, for the processing and shipping of solid waste materials.

Mitigation Measures from Uniformly Applied Development Policies and Standards:

All applicable policies and standards, including the mitigation measures addressing impacts of urban development under the General Plan on utility and service systems incorporated as goals and policies in the General Plan, will be applied to the proposed Project. These serve as uniformly applied development policies and standards and/or as conditions of approval for this Project to ensure consistency with the General Plan and compliance with City rules and regulations.

Responses to Checklist Questions

Responses a), c): Less than Significant. Municipal wastewater is treated at the City's Wastewater Quality Control Facility (WQCF), which treats municipal sanitary sewage from the City of Manteca, portions of Lathrop, and Raymus Village, just northeast of Manteca. Per contractual agreement, 8.42 mgd of plant capacity is allocated to the City of Manteca and 1.45

mgd is allocated to the City of Lathrop. The WQCF treats an average dry weather flow (ADWF) of about 6 mgd and has an average dry weather design capacity of 9.87 mgd. The anticipated buildout ADWF within areas served by the WQCF is 27 mgd. Wastewater treatment requirements for discharges from the Manteca WQCF are set forth in CVRWQCB Order No. R5-2015-0026 NPDES NO. CA0081558.

The General Plan EIR concluded that wastewater generation and discharges from development allowed under the General Plan would not cause exceedances of wastewater treatment requirements for effluent or capacity of the WQCF, and impacts would be less than significant. The City has adequate capacity to serve the Project's projected demand for wastewater treatment services in addition to its existing commitments, and no improvements or expansions to the existing WQCF are required to serve the proposed Project. The addition of Project-generated wastewater would not result in any CVRWQCB violations related to effluent treatment or discharge.

The General Plan designates the Project site for C use and the proposed Project is consistent with that land use designation. Therefore, the proposed Project is considered planned growth and to the extent that the Project would require new or expanded water, wastewater, stormwater, electrical and natural gas facilities, this was previously considered by the General Plan EIR. For these reasons, the proposed Project would not result in new or more severe impacts disclosed in the General Plan EIR. The criteria for requiring further CEQA review are not met. Implementation of the proposed Project would have a **less than significant** impact.

Response b): Less than Significant. The City of Manteca has prepared an Urban Water Management Plan (UWMP 2020) that predicts the water supply available to the City of Manteca in normal, single-dry, and multiple-dry years out to 2045.

The construction of the proposed Project would increase water demand on-site. The General Plan designates the Project site for C use and the proposed Project is consistent with that land use designation. Furthermore, the General Plan EIR concluded that the City of Manteca will have sufficient water supplies to meet the projected demands from development allowed by the General Plan, and therefore has sufficient water supplies available to serve the proposed Project from existing entitlements and resources, and would not require new or expanded entitlements during normal, dry, and multiple dry years. The proposed Project is considered planned growth and to the extent that the proposed Project would require additional water supply, this was previously considered by the General Plan EIR. For these reasons, the proposed Project would not result in new or more severe impacts disclosed in the General Plan EIR. The criteria for requiring further CEQA review are not met. Therefore, this is a **less than significant** impact.

Responses d), e): Less than Significant. The proposed Project would not generate significant or abnormal volumes of solid waste. Because the General Plan EIR determined that solid waste capacity is adequate to serve the demand resulting from General Plan build-out and the proposed Project's use is consistent with the General Plan land use designation for the Project site and would not result in new or increased impacts. Furthermore, the General Plan EIR concluded that

construction and operation of development allowed under the General Plan would not conflict with State and local regulations governing solid waste disposal and diversion, and the proposed General Plan includes policies and actions to promote consistency with other solid waste regulations. The proposed Project would be required to comply with all federal, state, and local regulations regarding solid waste. To the extent that the proposed Project would generate both construction and operational solid waste, this was previously considered by the General Plan EIR. For these reasons, the proposed Project would not result in new or more severe impacts disclosed in the General Plan FEIR. The criteria for requiring further CEQA review are not met. Therefore, this is a **less than significant** impact.

XX. WILDFIRE

	<i>Significant Impact Peculiar to the Project or the Project Site</i>	<i>Significant Impact due to New Information</i>	<i>Impact Adequately Addressed in the General Plan EIR</i>	<i>Impact not Previously Addressed in General Plan EIR</i>
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			X	
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			X	
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			X	

Project Impacts

The Project site is not located in or near a State Responsibility Area (SRA). The City of Manteca is not categorized as a "Very High" Fire Hazard Severity Zone (FHSZ) by CalFire.

Prior Environmental Review:

The General Plan EIR analyzed the anticipated impacts of wildland fires that would occur because of the future urban development that was contemplated by the General Plan. These impacts included exposure of people or structures to significant risk of loss, injury or death involving wildland fires, impairment, or interference with implementation of emergency response and evacuation plans and cumulative hazard impacts (City of Manteca General Plan Draft EIR, page 3.16-7). The analysis concluded that because there are no High or Very High FHSZs within the EIR planning area, and because existing State and local regulations, combined with General Plan policies and actions, would further prevent the exposure of people and structures to significant risks from wildland fires, the impact would be less than significant.

As discussed in the General Plan EIR, the General Plan includes policies and actions that support effective response in the event of an emergency, including from a wildfire. In addition, the General Plan ensures that there are adequate fire protection service providers in the event of a fire by directing the City to maintain adequate staffing levels to support achieving the City's service level goals for fire protection. Furthermore, as discussed in Section 3.16 of the General Plan EIR, State

and City regulations have established structural fire resistance and protection standards, as well as requirements regarding debris and vegetation in wildfire hazard areas.

Mitigation Measures from Uniformly Applied Development Policies and Standards:

All applicable policies and standards, including the mitigation measures addressing impacts of urban development under the General Plan on wildland fire and emergency response incorporated as goals and policies in the General Plan, will be applied to the proposed Project. These serve as uniformly applied development policies and standards and/or as conditions of approval for this Project to ensure consistency with the General Plan and compliance with City rules and regulations.

Responses to Checklist Questions

Response a): Less than Significant. The Project site would connect to an existing network of City streets. The appropriate turning radiuses have been planned to accommodate fire trucks on-site. The proposed circulation improvements would allow for greater emergency access relative to existing conditions. Moreover, the proposed Project would require building construction to meet the fire code requirements, and would have fire hydrants consistent with the standards of the City; such fire hydrants would assist with fire suppression efforts if a fire was to occur on or near the Project site. The proposed Project would also not impair an adopted emergency response plan or emergency evacuation plan. Implementation of the proposed Project would not alter any roadways, access points, or otherwise degrade traffic operations and access to the area in such a way as to interfere with an emergency response or evacuation plan. Therefore, impacts from Project implementation would be considered **less than significant** impact relative to adopted emergency response plans or evacuation plans. Moreover, the Project would also be constructed consistent with California Fire Code requirements for emergency access as directed by the City's Fire Department preliminary review. For these reasons, the proposed Project would not result in new or more severe impacts disclosed in the General Plan EIR.

Response b): Less than Significant. The risk of wildfire is related to a variety of parameters, including fuel loading (vegetation), fire weather (winds, temperatures, humidity levels and fuel moisture contents) and topography (degree of slope). Steep slopes contribute to fire hazard by intensifying the effects of wind and making fire suppression difficult. Fuels such as grass are highly flammable because they have a high surface area to mass ratio and require less heat to reach the ignition point. The Project site is in an area that is predominately residential and future commercial uses, which is not considered at a significant risk of wildfire. There are no steep slopes on or near the Project site. Development of the Project would not exacerbate fire risks. Therefore, impacts from Project implementation would be considered **less than significant** impact relative to the spread of wildfire. Moreover, the Project would also be constructed consistent with California Fire Code requirements for emergency access as directed by the City's Fire Department preliminary review. The General Plan EIR determined that implementation of the General Plan would have a less than significant impact relative to this topic. For these reasons, the proposed Project would not result in new or more severe impacts disclosed in the General Plan EIR.

Response c): Less than Significant. The Project includes development of infrastructure (water, sewer, and storm drainage) to serve the proposed commercial canopies and building. The Project does not include the construction of fuel breaks, emergency water sources, or power lines. As noted above, the proposed Project would require fire hydrants consistent with the standards of the City, and such fire hydrants would assist with fire suppression efforts if a fire was to occur. The proposed infrastructure improvements would allow for decreased fire risk relative to existing conditions. Therefore, impacts from Project implementation would be considered **less than significant** impact relative to infrastructure that may exacerbate fire risk. Moreover, the Project would also be constructed consistent with California Fire Code requirements for emergency access as directed by the City's Fire Department preliminary review. The General Plan EIR determined that implementation of the General Plan would have a less than significant impact relative to this topic. For these reasons, the proposed Project would not result in new or more severe impacts disclosed in the General Plan EIR.

Response d): Less than Significant. The proposed Project would require the installation of storm drainage infrastructure to ensure that storm waters properly drain from the Project site and does not result in downstream flooding or major drainage changes. Overall, impacts from Project implementation would be considered **less than significant** impact relative to risks, including downslope or downstream flooding or landslides, because of runoff, post-fire slope instability, or drainage changes. Moreover, the Project would also be constructed consistent with California Fire Code requirements for emergency access as directed by the City's Fire Department preliminary review. The General Plan EIR determined that implementation of the General Plan would have a **less than significant** impact relative to this topic. For these reasons, the proposed Project would not result in new or more severe impacts disclosed in the General Plan EIR.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	<i>Significant Impact Peculiar to the Project or the Project Site</i>	<i>Significant Impact due to New Information</i>	<i>Impact Adequately Addressed in the General Plan EIR</i>	<i>Impact not Previously Addressed in General Plan EIR</i>
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X	
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

Project Impacts:

The preceding analysis demonstrates that these effects will not occur because of the proposed Project.

Responses to Checklist Questions

Response a): Less than Significant. As discussed in this document, the proposed Project would not result in new or substantially more severe impacts than identified in the General Plan EIR and would comply with applicable General Plan EIR mitigation measures. The criteria for requiring further CEQA review are not met. Therefore, these are **less than significant** impacts.

Response b): Less than Significant. The General Plan EIR assumed full development and buildout of the Project site, consistent with the use and density proposed by the Project. The cumulative impacts associated with buildout of the City of Manteca General Plan, including the Project site, were fully addressed in the General Plan EIR. Additionally, as described throughout the analysis above, the proposed Project would not result in any significant individual or cumulative impacts that would not be reduced to less than significant levels through the application of uniformly applied development policies and/or standards. Therefore, this is considered a **less than significant** impact.

Response c): Less than Significant. As described throughout the analysis above, the proposed Project would not result in any significant impacts that would have environmental effects which will cause substantial adverse effects on humans. The analysis in the relevant sections above provides the application of uniformly applied development policies and/or standards reduce any

potentially significant impacts on humans to less than significant levels. A variety of requirements including those related to biological resources, cultural and tribal cultural resources, GHG and air quality, hazardous materials, water pollution and water quality, and noise, ensure any adverse effects on humans are reduce to an acceptable standard. Therefore, this is considered a **less than significant** impact.

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Manteca - Gateway Solar Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Manteca - Gateway Solar
Construction Start Date	1/1/2026
Operational Year	2027
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.40
Precipitation (days)	9.00
Location	Manteca, CA, USA
County	San Joaquin
City	Manteca
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2157
EDFZ	4
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Unrefrigerated Warehouse-No Rail	299	1000sqft	6.86	298,965	0.00	0.00	—	—

Parking Lot	6.92	Acre	6.92	0.00	0.00	0.00	—	—
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1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	73.7	73.7	11.8	19.6	0.03	0.40	1.43	1.83	0.37	0.35	0.72	—	4,897	4,897	0.15	0.27	7.25	4,987
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.81	3.21	29.2	29.5	0.06	1.24	7.81	9.06	1.14	3.97	5.12	—	6,762	6,762	0.27	0.27	0.19	6,787
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.63	4.55	10.7	14.2	0.03	0.39	1.31	1.70	0.36	0.42	0.78	—	3,525	3,525	0.12	0.16	1.75	3,576
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.84	0.83	1.95	2.60	< 0.005	0.07	0.24	0.31	0.07	0.08	0.14	—	584	584	0.02	0.03	0.29	592

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2026	1.89	1.61	11.8	19.6	0.03	0.40	1.43	1.83	0.37	0.35	0.72	—	4,897	4,897	0.15	0.27	7.25	4,987
2027	73.7	73.7	11.2	19.1	0.03	0.36	1.43	1.79	0.33	0.35	0.68	—	4,850	4,850	0.14	0.27	6.45	4,939
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.81	3.21	29.2	29.5	0.06	1.24	7.81	9.06	1.14	3.97	5.12	—	6,762	6,762	0.27	0.27	0.19	6,787
2027	1.74	1.50	11.4	17.9	0.03	0.36	1.43	1.79	0.33	0.35	0.68	—	4,744	4,744	0.15	0.27	0.17	4,828
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.57	1.33	10.7	14.2	0.03	0.39	1.31	1.70	0.36	0.42	0.78	—	3,525	3,525	0.12	0.16	1.75	3,576
2027	4.63	4.55	3.61	5.73	0.01	0.12	0.42	0.53	0.11	0.10	0.21	—	1,443	1,443	0.04	0.08	0.80	1,467
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.29	0.24	1.95	2.60	< 0.005	0.07	0.24	0.31	0.07	0.08	0.14	—	584	584	0.02	0.03	0.29	592
2027	0.84	0.83	0.66	1.05	< 0.005	0.02	0.08	0.10	0.02	0.02	0.04	—	239	239	0.01	0.01	0.13	243

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	16.7	16.3	7.97	23.7	0.09	0.24	2.91	3.15	0.22	0.75	0.97	284	11,280	11,564	29.2	0.70	10.5	12,512
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	12.4	12.2	8.58	8.58	0.09	0.21	2.91	3.13	0.21	0.75	0.96	284	11,083	11,367	29.2	0.71	0.27	12,309
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	14.1	13.8	8.40	15.4	0.09	0.22	2.90	3.12	0.21	0.75	0.96	284	11,144	11,428	29.2	0.71	4.54	12,372
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	2.57	2.52	1.53	2.81	0.02	0.04	0.53	0.57	0.04	0.14	0.18	47.0	1,845	1,892	4.83	0.12	0.75	2,048
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2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.48	7.36	7.41	10.3	0.09	0.18	2.91	3.09	0.17	0.75	0.92	—	8,677	8,677	0.07	0.33	10.5	8,789
Area	9.14	8.96	0.11	13.0	< 0.005	0.02	—	0.02	0.02	—	0.02	—	53.5	53.5	< 0.005	< 0.005	—	53.7
Energy	0.05	0.02	0.45	0.37	< 0.005	0.03	—	0.03	0.03	—	0.03	—	2,423	2,423	0.35	0.04	—	2,443
Water	—	—	—	—	—	—	—	—	—	—	—	132	126	258	13.6	0.33	—	695
Waste	—	—	—	—	—	—	—	—	—	—	—	151	0.00	151	15.1	0.00	—	530
Total	16.7	16.3	7.97	23.7	0.09	0.24	2.91	3.15	0.22	0.75	0.97	284	11,280	11,564	29.2	0.70	10.5	12,512
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	5.50	5.38	8.13	8.21	0.08	0.18	2.91	3.09	0.17	0.75	0.92	—	8,534	8,534	0.07	0.35	0.27	8,641
Area	6.82	6.82	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.05	0.02	0.45	0.37	< 0.005	0.03	—	0.03	0.03	—	0.03	—	2,423	2,423	0.35	0.04	—	2,443
Water	—	—	—	—	—	—	—	—	—	—	—	132	126	258	13.6	0.33	—	695
Waste	—	—	—	—	—	—	—	—	—	—	—	151	0.00	151	15.1	0.00	—	530
Total	12.4	12.2	8.58	8.58	0.09	0.21	2.91	3.13	0.21	0.75	0.96	284	11,083	11,367	29.2	0.71	0.27	12,309
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	6.04	5.92	7.90	8.61	0.08	0.18	2.90	3.08	0.17	0.75	0.92	—	8,568	8,568	0.07	0.34	4.54	8,677
Area	7.97	7.88	0.05	6.41	< 0.005	0.01	—	0.01	0.01	—	0.01	—	26.4	26.4	< 0.005	< 0.005	—	26.5
Energy	0.05	0.02	0.45	0.37	< 0.005	0.03	—	0.03	0.03	—	0.03	—	2,423	2,423	0.35	0.04	—	2,443
Water	—	—	—	—	—	—	—	—	—	—	—	132	126	258	13.6	0.33	—	695
Waste	—	—	—	—	—	—	—	—	—	—	—	151	0.00	151	15.1	0.00	—	530

Total	14.1	13.8	8.40	15.4	0.09	0.22	2.90	3.12	0.21	0.75	0.96	284	11,144	11,428	29.2	0.71	4.54	12,372
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.10	1.08	1.44	1.57	0.02	0.03	0.53	0.56	0.03	0.14	0.17	—	1,419	1,419	0.01	0.06	0.75	1,437
Area	1.45	1.44	0.01	1.17	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.37	4.37	< 0.005	< 0.005	—	4.38
Energy	0.01	< 0.005	0.08	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	401	401	0.06	0.01	—	405
Water	—	—	—	—	—	—	—	—	—	—	—	21.9	20.9	42.8	2.25	0.05	—	115
Waste	—	—	—	—	—	—	—	—	—	—	—	25.1	0.00	25.1	2.51	0.00	—	87.7
Total	2.57	2.52	1.53	2.81	0.02	0.04	0.53	0.57	0.04	0.14	0.18	47.0	1,845	1,892	4.83	0.12	0.75	2,048

3. Construction Emissions Details

3.1. Demolition (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.72	2.29	20.7	19.0	0.03	0.84	—	0.84	0.78	—	0.78	—	3,427	3,427	0.14	0.03	—	3,438
Demolition	—	—	—	—	—	—	0.10	0.10	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

ATTACHMENT 5

Off-Road	0.15	0.13	1.13	1.04	< 0.005	0.05	—	0.05	0.04	—	0.04	—	188	188	0.01	< 0.005	—	188
Demolition	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.21	0.19	< 0.005	0.01	—	0.01	0.01	—	0.01	—	31.1	31.1	< 0.005	< 0.005	—	31.2
Demolition	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.05	0.57	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	123	123	< 0.005	0.01	0.01	124
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.15	0.03	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	120	120	< 0.005	0.02	0.01	126
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.90	6.90	< 0.005	< 0.005	0.01	7.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.58	6.58	< 0.005	< 0.005	0.01	6.90
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.14	1.14	< 0.005	< 0.005	< 0.005	1.16
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.09	1.09	< 0.005	< 0.005	< 0.005	1.14
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3.3. Site Preparation (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.74	3.14	29.2	28.8	0.05	1.24	—	1.24	1.14	—	1.14	—	5,298	5,298	0.21	0.04	—	5,316
Dust From Material Movement	—	—	—	—	—	—	7.67	7.67	—	3.94	3.94	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.09	0.80	0.79	< 0.005	0.03	—	0.03	0.03	—	0.03	—	145	145	0.01	< 0.005	—	146
Dust From Material Movement	—	—	—	—	—	—	0.21	0.21	—	0.11	0.11	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

ATTACHMENT 5

Off-Road Equipment	0.02	0.02	0.15	0.14	< 0.005	0.01	—	0.01	0.01	—	0.01	—	24.0	24.0	< 0.005	< 0.005	—	24.1
Dust From Material Movement	—	—	—	—	—	—	0.04	0.04	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.06	0.67	0.00	0.00	0.15	0.15	0.00	0.03	0.03	—	143	143	< 0.005	0.01	0.01	145
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.02	4.02	< 0.005	< 0.005	0.01	4.08
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.67	0.67	< 0.005	< 0.005	< 0.005	0.68
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Grading (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

ATTACHMENT 5

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.62	3.04	27.2	27.6	0.06	1.12	—	1.12	1.03	—	1.03	—	6,599	6,599	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	3.59	3.59	—	1.42	1.42	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.30	0.25	2.24	2.27	0.01	0.09	—	0.09	0.08	—	0.08	—	542	542	0.02	< 0.005	—	544
Dust From Material Movement	—	—	—	—	—	—	0.30	0.30	—	0.12	0.12	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.05	0.41	0.41	< 0.005	0.02	—	0.02	0.02	—	0.02	—	89.8	89.8	< 0.005	< 0.005	—	90.1
Dust From Material Movement	—	—	—	—	—	—	0.05	0.05	—	0.02	0.02	—	—	—	—	—	—	—

ATTACHMENT 5

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.06	0.76	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	164	164	< 0.005	0.01	0.02	166	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	0.01	0.01	< 0.005	0.06	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	13.8	13.8	< 0.005	< 0.005	0.02	14.0	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.28	2.28	< 0.005	< 0.005	< 0.005	2.32	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	

3.7. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

ATTACHMENT 5

Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.70	0.58	5.36	7.05	0.01	0.21	—	0.21	0.19	—	0.19	—	1,304	1,304	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.11	0.98	1.29	< 0.005	0.04	—	0.04	0.03	—	0.03	—	216	216	0.01	< 0.005	—	217
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.53	0.49	0.32	6.05	0.00	0.00	1.05	1.05	0.00	0.25	0.25	—	1,137	1,137	0.02	0.04	3.90	1,154
Vendor	0.07	0.04	1.65	0.55	0.01	0.02	0.37	0.39	0.02	0.10	0.12	—	1,362	1,362	0.03	0.21	3.35	1,427

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.50	0.46	0.40	4.79	0.00	0.00	1.05	1.05	0.00	0.25	0.25	—	1,028	1,028	0.03	0.04	0.10	1,042	
Vendor	0.07	0.04	1.76	0.57	0.01	0.02	0.37	0.39	0.02	0.10	0.12	—	1,363	1,363	0.03	0.21	0.09	1,425	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	0.27	0.25	0.19	2.67	0.00	0.00	0.57	0.57	0.00	0.13	0.13	—	573	573	0.01	0.02	0.92	582	
Vendor	0.04	0.02	0.94	0.31	0.01	0.01	0.20	0.21	0.01	0.06	0.07	—	741	741	0.01	0.11	0.79	776	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	0.05	0.05	0.04	0.49	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	94.9	94.9	< 0.005	< 0.005	0.15	96.3	
Vendor	0.01	< 0.005	0.17	0.06	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	123	123	< 0.005	0.02	0.13	128	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	

3.9. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

ATTACHMENT 5

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.34	0.29	2.63	3.62	0.01	0.09	—	0.09	0.09	—	0.09	—	671	671	0.03	0.01	—	673
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.05	0.48	0.66	< 0.005	0.02	—	0.02	0.02	—	0.02	—	111	111	< 0.005	< 0.005	—	111
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.51	0.47	0.28	5.62	0.00	0.00	1.05	1.05	0.00	0.25	0.25	—	1,119	1,119	0.02	0.04	3.51	1,136
Vendor	0.07	0.04	1.58	0.53	0.01	0.02	0.37	0.39	0.02	0.10	0.12	—	1,334	1,334	0.03	0.21	2.94	1,399
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.44	0.43	0.36	4.43	0.00	0.00	1.05	1.05	0.00	0.25	0.25	—	1,012	1,012	0.03	0.04	0.09	1,026

Vendor	0.07	0.04	1.68	0.55	0.01	0.02	0.37	0.39	0.02	0.10	0.12	—	1,335	1,335	0.03	0.21	0.08	1,397
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.12	0.09	1.27	0.00	0.00	0.29	0.29	0.00	0.07	0.07	—	290	290	0.01	0.01	0.42	294
Vendor	0.02	0.01	0.46	0.15	< 0.005	0.01	0.10	0.11	0.01	0.03	0.03	—	373	373	0.01	0.06	0.35	391
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.23	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	48.1	48.1	< 0.005	< 0.005	0.07	48.8
Vendor	< 0.005	< 0.005	0.08	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	61.8	61.8	< 0.005	0.01	0.06	64.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Paving (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.88	0.74	6.94	9.95	0.01	0.30	—	0.30	0.27	—	0.27	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.91	0.91	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

ATTACHMENT 5

Off-Road	0.05	0.04	0.38	0.55	< 0.005	0.02	—	0.02	0.02	—	0.02	—	82.8	82.8	< 0.005	< 0.005	—	83.1
Paving	0.05	0.05	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8
Paving	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.03	0.67	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	134	134	< 0.005	< 0.005	0.42	136
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.79	6.79	< 0.005	< 0.005	0.01	6.89
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.12	1.12	< 0.005	< 0.005	< 0.005	1.14
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Architectural Coating (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	73.5	73.5	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.32	7.32	< 0.005	< 0.005	—	7.34
Architectural Coatings	4.03	4.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

ATTACHMENT 5

Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.21	1.21	< 0.005	< 0.005	—	1.22
Architectural Coatings	0.73	0.73	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.06	1.12	0.00	0.00	0.21	0.21	0.00	0.05	0.05	—	224	224	< 0.005	0.01	0.70	227
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	11.4	11.4	< 0.005	< 0.005	0.02	11.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.88	1.88	< 0.005	< 0.005	< 0.005	1.91
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Mobile source emissions results are presented in Sections 2.6. No further detailed breakdown of emissions is available.

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	1,743	1,743	0.28	0.03	—	1,761
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	148	148	0.02	< 0.005	—	149
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,891	1,891	0.31	0.04	—	1,910
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	1,743	1,743	0.28	0.03	—	1,761
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	148	148	0.02	< 0.005	—	149
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,891	1,891	0.31	0.04	—	1,910
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unrefrigerated	—	—	—	—	—	—	—	—	—	—	—	—	—	289	289	0.05	0.01	—	291
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	—	24.4	24.4	< 0.005	< 0.005	—	24.7
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	313	313	0.05	0.01	—	316

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.05	0.02	0.45	0.37	< 0.005	0.03	—	0.03	0.03	—	0.03	—	532	532	0.05	< 0.005	—	534
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.05	0.02	0.45	0.37	< 0.005	0.03	—	0.03	0.03	—	0.03	—	532	532	0.05	< 0.005	—	534
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.05	0.02	0.45	0.37	< 0.005	0.03	—	0.03	0.03	—	0.03	—	532	532	0.05	< 0.005	—	534
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.05	0.02	0.45	0.37	< 0.005	0.03	—	0.03	0.03	—	0.03	—	532	532	0.05	< 0.005	—	534
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unrefrigerated Warehouse	0.01	< 0.005	0.08	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	88.1	88.1	0.01	< 0.005	—	88.4
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.01	< 0.005	0.08	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	88.1	88.1	0.01	< 0.005	—	88.4

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	6.42	6.42	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.40	0.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	2.31	2.14	0.11	13.0	< 0.005	0.02	—	0.02	0.02	—	0.02	—	53.5	53.5	< 0.005	< 0.005	—	53.7
Total	9.14	8.96	0.11	13.0	< 0.005	0.02	—	0.02	0.02	—	0.02	—	53.5	53.5	< 0.005	< 0.005	—	53.7
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	6.42	6.42	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architect Coatings	0.40	0.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	6.82	6.82	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	1.17	1.17	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.07	0.07	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.21	0.19	0.01	1.17	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.37	4.37	< 0.005	< 0.005	—	4.38
Total	1.45	1.44	0.01	1.17	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.37	4.37	< 0.005	< 0.005	—	4.38

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	132	126	258	13.6	0.33	—	695
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	132	126	258	13.6	0.33	—	695

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	132	126	258	13.6	0.33	—	695
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	132	126	258	13.6	0.33	—	695
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	21.9	20.9	42.8	2.25	0.05	—	115
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	21.9	20.9	42.8	2.25	0.05	—	115

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	151	0.00	151	15.1	0.00	—	530

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Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	151	0.00	151	15.1	0.00	—	530
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	151	0.00	151	15.1	0.00	—	530
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	151	0.00	151	15.1	0.00	—	530
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	25.1	0.00	25.1	2.51	0.00	—	87.7
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	25.1	0.00	25.1	2.51	0.00	—	87.7

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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ATTACHMENT 5

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	1/1/2026	1/29/2026	5.00	20.0	—
Site Preparation	Site Preparation	1/30/2026	2/13/2026	5.00	10.0	—
Grading	Grading	2/14/2026	3/28/2026	5.00	30.0	—
Building Construction	Building Construction	3/29/2026	5/23/2027	5.00	300	—
Paving	Paving	5/24/2027	6/21/2027	5.00	20.0	—
Architectural Coating	Architectural Coating	6/22/2027	7/20/2027	5.00	20.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Excavators	Diesel	Average	3.00	8.00	36.0	0.38
Demolition	Rubber Tired Dozers	Diesel	Average	2.00	8.00	367	0.40
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Back hoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40

Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
Grading	Tractors/Loaders/Back hoes	Diesel	Average	2.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Back hoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	15.0	11.9	LDA,LDT1,LDT2
Demolition	Vendor	—	9.10	HHDT,MHDT
Demolition	Hauling	1.75	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	11.9	LDA,LDT1,LDT2
Site Preparation	Vendor	—	9.10	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—

Grading	Worker	20.0	11.9	LDA,LDT1,LDT2
Grading	Vendor	—	9.10	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	126	11.9	LDA,LDT1,LDT2
Building Construction	Vendor	49.0	9.10	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	11.9	LDA,LDT1,LDT2
Paving	Vendor	—	9.10	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	25.1	11.9	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	9.10	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	448,448	149,483	18,086

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Ton of Debris)	Material Exported (Ton of Debris)	Acres Graded (acres)	Material Demolished (Building Square Footage)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	3,000	—
Site Preparation	0.00	0.00	15.0	0.00	—
Grading	0.00	0.00	90.0	0.00	—
Paving	0.00	0.00	0.00	0.00	6.92

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Unrefrigerated Warehouse-No Rail	0.00	0%
Parking Lot	6.92	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	204	0.03	< 0.005
2027	0.00	204	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VM/Weekday	VM/Saturday	VM/Sunday	VM/Year
Total all Land Uses	130	130	130	47,450	3,900	3,900	3,900	1,423,500

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	448,448	149,483	18,086

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Unrefrigerated Warehouse-No Rail	3,119,604	204	0.0330	0.0040	1,660,701
Parking Lot	264,057	204	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Unrefrigerated Warehouse-No Rail	69,135,656	0.00
Parking Lot	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Unrefrigerated Warehouse-No Rail	281	—
Parking Lot	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
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5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
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5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
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5.17. User Defined

Equipment Type	Fuel Type
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5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	20.4	annual days of extreme heat
Extreme Precipitation	1.60	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	0	0	0	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	1	1	1	2
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	57.8
AQ-PM	55.5

AQ-DPM	31.3
Drinking Water	99.0
Lead Risk Housing	80.1
Pesticides	75.1
Toxic Releases	51.3
Traffic	17.2
Effect Indicators	—
CleanUp Sites	38.4
Groundwater	50.3
Haz Waste Facilities/Generators	53.5
Impaired Water Bodies	0.00
Solid Waste	75.7
Sensitive Population	—
Asthma	90.7
Cardio-vascular	94.0
Low Birth Weights	61.9
Socioeconomic Factor Indicators	—
Education	68.4
Housing	76.5
Linguistic	59.4
Poverty	77.7
Unemployment	94.1

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	18.68343385

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Employed	17.00243809
Median HI	19.55601181
Education	—
Bachelor's or higher	6.877967407
High school enrollment	14.0639035
Preschool enrollment	39.79212113
Transportation	—
Auto Access	17.1435904
Active commuting	55.76799692
Social	—
2-parent households	18.33696907
Voting	30.69421276
Neighborhood	—
Alcohol availability	40.67753112
Park access	81.35506224
Retail density	67.77877582
Supermarket access	94.25125112
Tree canopy	69.12613884
Housing	—
Homeownership	17.61837547
Housing habitability	20.65956628
Low-inc homeowner severe housing cost burden	11.22802515
Low-inc renter severe housing cost burden	72.70627486
Uncrowded housing	19.45335558
Health Outcomes	—
Insured adults	39.29167201
Arthritis	11.1
Asthma ER Admissions	5.0

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High Blood Pressure	6.5
Cancer (excluding skin)	32.7
Asthma	19.7
Coronary Heart Disease	9.8
Chronic Obstructive Pulmonary Disease	7.7
Diagnosed Diabetes	34.4
Life Expectancy at Birth	4.2
Cognitively Disabled	15.2
Physically Disabled	25.6
Heart Attack ER Admissions	9.7
Mental Health Not Good	23.9
Chronic Kidney Disease	14.8
Obesity	16.2
Pedestrian Injuries	55.8
Physical Health Not Good	23.1
Stroke	17.3
Health Risk Behaviors	—
Binge Drinking	48.9
Current Smoker	16.1
No Leisure Time for Physical Activity	22.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	19.0
Elderly	44.5
English Speaking	48.5
Foreign-born	24.0
Outdoor Workers	27.7

Climate Change Adaptive Capacity	—
Impervious Surface Cover	36.5
Traffic Density	30.2
Traffic Access	0.0
Other Indices	—
Hardship	86.6
Other Decision Support	—
2016 Voting	18.8

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	91.0
Healthy Places Index Score for Project Location (b)	15.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
--------	---------------

Operations: Fleet Mix

Assumes fleet mix is 50% motor homes (RVs), 25% LDT1 and 25% LDT2 (light duty trucks).

Appendix B: Cultural Resources Analysis

May 28, 2025

Steve McMurtry

De Novo Planning

1020 Suncoast Lane #106

El Dorado Hills, CA 95762

For: Manteca Gateway Project Cultural Resources

The Manteca Gateway Project area consists of 12.28 acres proposed for new development. Figure 1 shows the boundaries of the Project.

To determine the presence of cultural resources. A record search was conducted through the Central California Information Center (CCIC) of the California Historical Resources Information System for the Project area with an 0.25-mile buffer area (Research File No.:133611, attached).

No sites have been reported for the Project area. Three historic period sites are reported in the buffer area, but all appear to have been removed.

Four reports on file with the CCIC address cultural resource studies in the Project area, with Windmiller apparently surveying the Project area in 2003.

There appear to be no cultural resource issues for the Project area.

There is always a possibility that a site may exist in the project and be obscured by vegetation, siltation, or historic activities such as plowing and levelling for the establishment of an orchard, leaving no surface evidence. To assist in the recognition of cultural resources, a training session for all construction crew members should be conducted in advance of the initiation of any construction activities at the site. The training session will provide information on recognition of artifacts, human remains, and cultural deposits to help in the recognition of potential issues.

If artifacts, exotic rock, shell, or bone are uncovered during the construction, work should stop in that area immediately. A qualified archeologist should be contacted to examine and evaluate the deposit, and consult with the appropriate Native American group(s).

Discovery of Human Remains

In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area suspected to overlies adjacent remains until the San Joaquin County Coroner has determined that the remains are not subject to any provisions of law concerning investigation of the circumstances, manner and cause of death, and the recommendations concerning the treatment

and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains.

If the Sam Joaquin County Coroner determines that the remains are not subject to his or her authority and if the County Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC).

After notification, the NAHC will follow the procedures outlined in Public Resources Code Section 5097.98, that include notification of most likely descendants (MLDs), and recommendations for treatment of the remains.

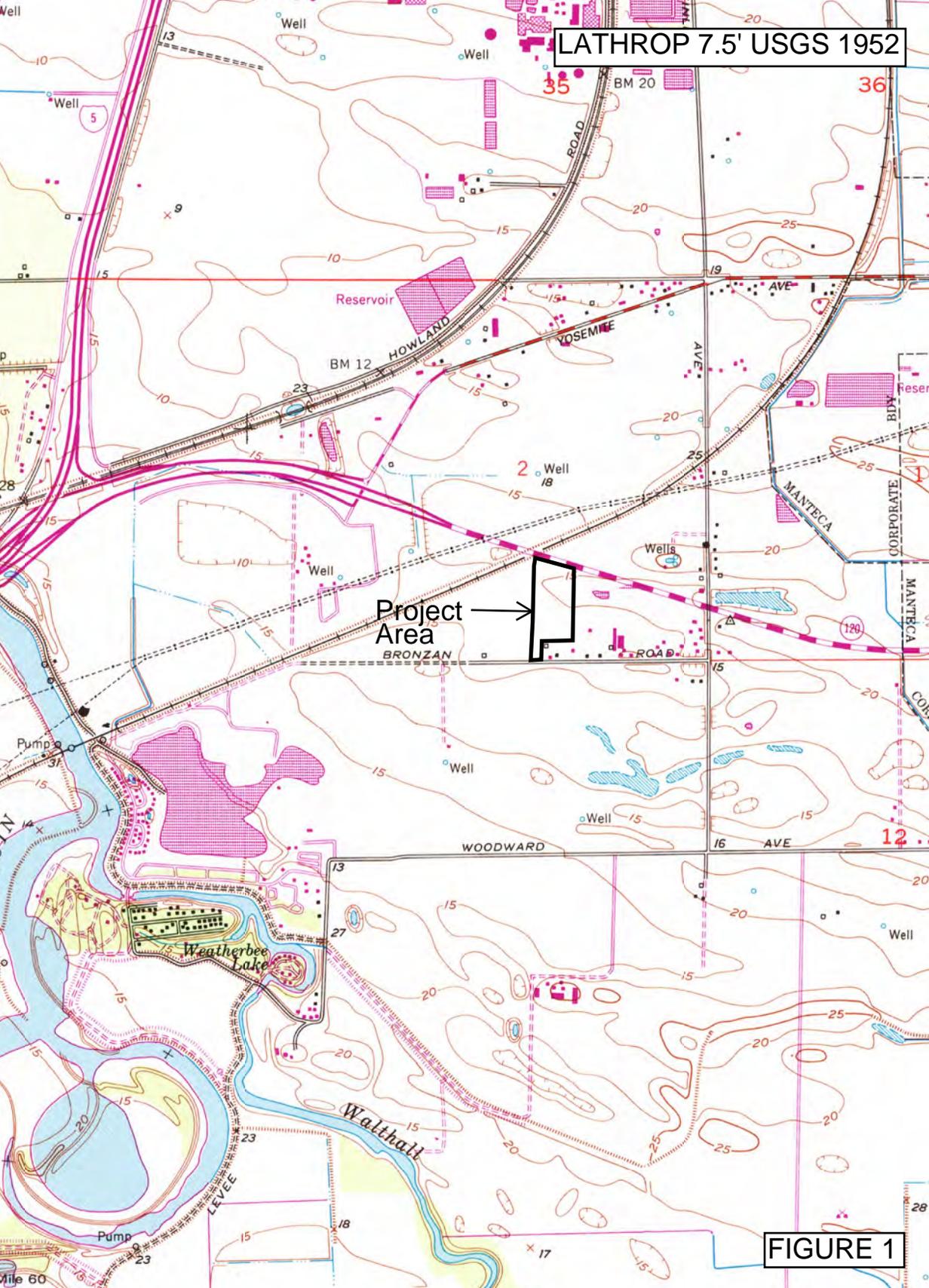
If you need any further information, please contact me.

Melinda Peak

Peak & Associates, Inc.

3941 Park Drive, Suite 20 #329

El Dorado Hills, CA 95762



Project Area

FIGURE 1



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CENTRAL CALIFORNIA INFORMATION CENTER

California Historical Resources Information System
Department of Anthropology – California State University, Stanislaus
One University Circle, Turlock, California 95382
(209) 667-3307

Alpine, Calaveras, Mariposa, Merced, Mono, San Joaquin, Stanislaus & Tuolumne Counties

Date: 5/22/2025

Records Search File No.: 13361L

Project: Manteca Gateway, 2371 Bronzan Road

Robert Gerry
Peak & Associates, Inc.
3941 Park Drive, Suite 30-329
El Dorado Hills, CA 95762
916-939-2405

Invoice phone: 916-283-5238

robertgerry482@gmail.com

The Central California Information Center received your record search request for the project area referenced above, located on the Lathrop 7.5' quadrangle in San Joaquin County. The following reflects the results of the records search for the project study area and radius:

As per data currently available at the CCalC, the locations of resources/reports are provided in the following format: Custom GIS maps GIS Data/shape files

Summary Data:

Resources within the project area:	None formally reported to the Information Center.
Resources within the 1/4-mile radius:	3: P-39-005147, 5164, 5165
Reports within the project area:	4: SJ-01900, 4786, 4901, 4982
Reports within the 1/4-mile radius:	13: See Report Database List

- Resource Database Printout (list):** enclosed not requested nothing listed
- Resource Database Printout (details):** enclosed not requested nothing listed
- Resource Digital Database Records:** enclosed not requested nothing listed
- Report Database Printout (list):** enclosed not requested nothing listed
- Report Database Printout (details):** enclosed not requested nothing listed
- Report Digital Database Records:** enclosed not requested nothing listed
- Resource Record Copies:** enclosed not requested nothing listed
- Report Copies:** enclosed not requested nothing listed

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OHP Historic Properties Directory: New Excel File: Built Environment Resource Directory (BERD)

Dated 9/23/2022: NOTE: Not all resources listed in the BERD are mapped in GIS, nor do we have records on file for; if you identify additional resources in the BERD that you need copies of, contact the IC.

enclosed not requested nothing listed on project

Archaeological Resource Directory (ARD excerpt): enclosed not requested nothing listed on project

CA Inventory of Historic Resources (1976): enclosed not requested nothing listed

Caltrans Bridge Survey: enclosed not requested nothing listed

Ethnographic Information: enclosed not requested nothing listed

Historical Literature: enclosed not requested nothing listed

Historical Maps: enclosed not requested nothing listed

See also: <http://ngmdb.usgs.gov>topoview>

Local Inventories: enclosed not requested nothing listed

GLO and/or Rancho Plat Maps: enclosed not requested nothing listed

See also: <https://glorerecords.blm.gov>

Shipwreck Inventory: not available at CaCIC; please go to
http://shipwrecks.slc.ca.gov/ShipwrecksDatabase/Shipwrecks_Database.asp

Soil Survey Maps: not available at CCaIC; please go to
<http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>

Please forward a copy of any resulting reports from this project to the office as soon as possible. Due to the sensitive nature of archaeological site location data, we ask that you do not include resource location maps and resource location descriptions in your report if the report is for public distribution. If you have any questions regarding the results presented herein, please contact the office at the phone number listed above.

The provision of CHRIS Data via this records search response does not in any way constitute public disclosure of records otherwise exempt from disclosure under the California Public Records Act or any other law, including, but not limited to, records related to archeological site information maintained by or on behalf of, or in the possession of, the State of California, Department of Parks and Recreation, State Historic Preservation Officer, Office of Historic Preservation, or the State Historical Resources Commission.

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the CHRIS Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

Should you require any additional information for the above referenced project, reference the record search number listed above when making inquiries. Requests made after initial invoicing will result in the preparation of a separate invoice.

Thank you for using the California Historical Resources Information System (CHRIS). **Note:** Billing will be transmitted separately via email by our Financial Services office* (\$332.70), payable within 60 days of receipt of the invoice.

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If you wish to include payment by Credit Card, you must wait to receive the official invoice from Financial Services so that you can reference the CMP # (Invoice Number), and then contact the link below:

<https://commerce.cashnet.com/ANTHROPOLOGY>

Sincerely,

E. A. Greathouse

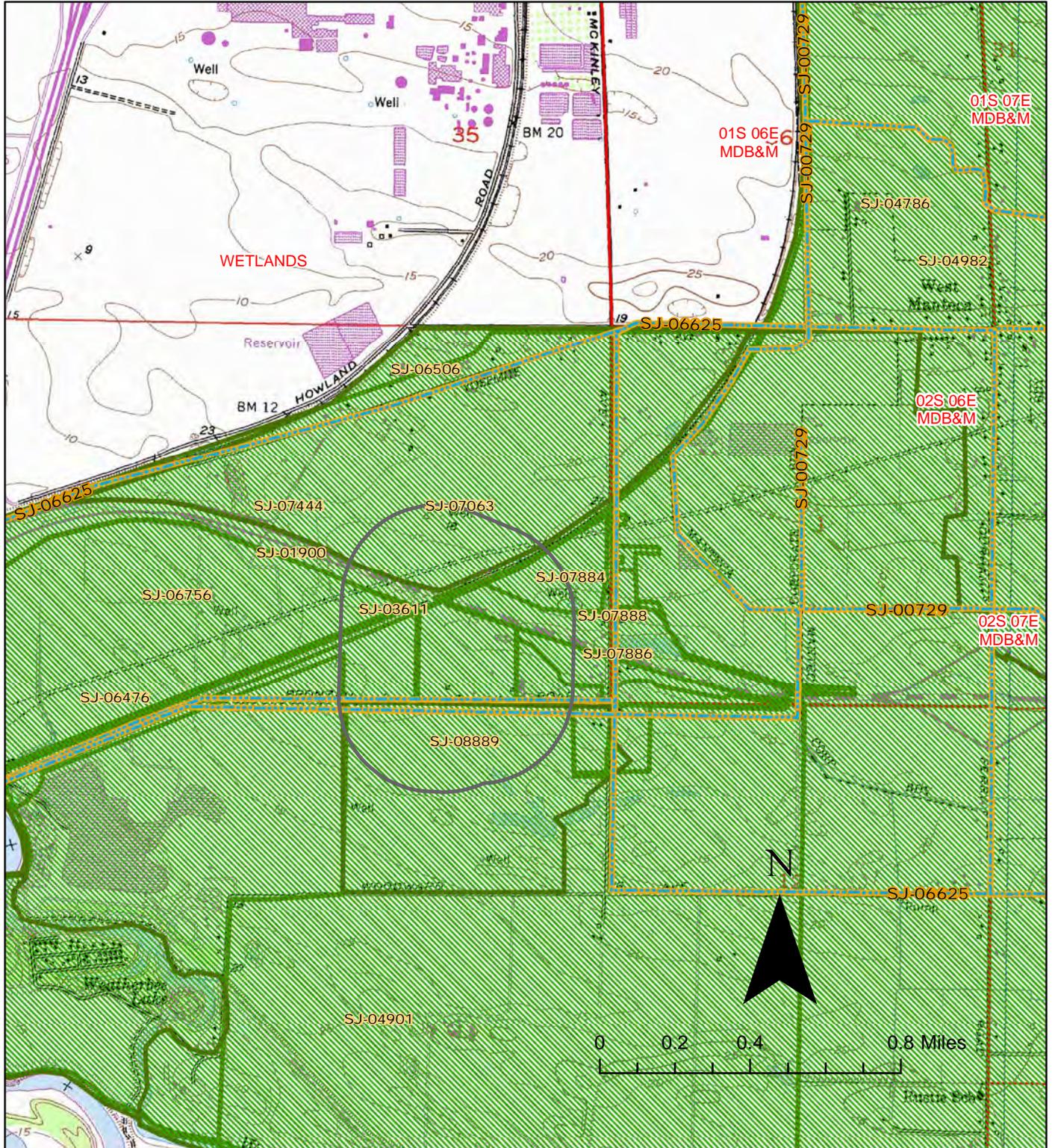
E. A. Greathouse, Coordinator
Central California Information Center
California Historical Resources Information System

* Invoice Request sent to: ARBilling@csustan.edu, CSU Stanislaus Financial Services

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-39-005157		Other - Map Reference #1; Resource Name - 18871 McKinley Avenue, Manteca	Building	Historic	HP02; HP04; HP33	2012 (Hibma, LSA Associates, Inc.)	SJ-07884, SJ-07888
P-39-005164		Other - Map Reference #8; Resource Name - 2693 Bronzan Rd, Manteca	Building	Historic	HP02; HP04	2012 (M. Hibma, LSA Associates, Inc.)	SJ-04901, SJ-07884, SJ-07888
P-39-005165		Other - Map Reference #9; Resource Name - 2785 Bronzan Rd, Manteca	Building	Historic	HP02	2012 (M. Hibma, LSA Associates, Inc.)	SJ-04901, SJ-07884, SJ-07888

CCaIC 13361L Manteca Gateway Reports 1/4-mile radius 1:24,000-scale Lathrop USGS 7.5' Quadrangle



Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SJ-00729	NADB-R - 1361539	1981	Chavez, D.	Cultural Resource Evaluation for the Manteca Wastewater Project, San Joaquin County, California	David Chavez, Consulting Archaeologist; for James M. Montgomery Consulting Engineers, Inc.	
SJ-01900	NADB-R - 1360590	1993	Napton, L. K.	A Preliminary Cultural Resources Investigation of the South Manteca Area Plan, 7,800 acres in San Joaquin County, California.	CSU Stanislaus, Institute for Archaeological Research for WPM Planning Team	39-000282
SJ-03611	NADB-R - 1363615	1999	William Self Associates	Cultural Resources Assessment Report Oakwood Lake Expansion EIR, San Joaquin County, CA	William Self Associates For Mills Associates	39-000282
SJ-04786	NADB-R - 1364725	2002	Windmiller, Ric and Donald Napoli	City of Manteca--General Plan Update, Background Reports: Archaeological Resources, Historical Resources, Records Search Results	Ric Windmiller, Consulting Archaeologist (and) Donald Napoli, of Historic Preservation Planning; for Wade Associates, Sacramento, CA	39-000002, 39-000015, 39-000098, 39-000099, 39-000102, 39-000103, 39-000111, 39-000282, 39-000354, 39-000681, 39-000682, 39-000683, 39-000684, 39-004148, 39-004188, 39-004189, 39-004190, 39-004191, 39-004192
SJ-04901	NADB-R - 1364814	2003	Windmiller, R. and D. Napoli	Southwest Manteca Area Specific Plan, Background Reports: Archaeological Resources, Historical Resources, Records Search Results.	R. Windmiller, Consulting Archaeologist (and) Donald Napoli, Historic Preservation Planning; for Wade Associates	39-005161, 39-005162, 39-005163, 39-005164, 39-005165
SJ-04982	NADB-R - 1364868	1988	Shideler, H.	Manteca: City in Transition.	San Joaquin County Historical Society	
SJ-06476	NADB-R - 1366701	2006	ECORP Consulting, Inc.	Cultural Resources Inventory and Assessment, South Lathrop South Village, San Joaquin County, California, Project 2004-096	ECORP Consulting, Inc. for Richland Planned Communities	39-004603, 39-004604, 39-004605, 39-004606, 39-004607, 39-004608, 39-004609, 39-004610
SJ-06506	NADB-R - 1366740	2006	ECORP Consulting, Inc.	Cultural Resources Survey Report South Lathrop, North Village, San Joaquin County, California Project 2006-011	ECORP Consulting, Inc. for Lazares Companies	39-004611, 39-004612, 39-004613, 39-004614, 39-004615, 39-004616, 39-004617, 39-004618, 39-004619, 39-004620, 39-004621, 39-004622, 39-004623, 39-004624, 39-004625, 39-004626, 39-004627, 39-004628, 39-004629, 39-004630, 39-004631, 39-004632, 39-004633, 39-004634, 39-004635, 39-004636, 39-004637, 39-004638

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SJ-06625	NADB-R - 1367290	1998	ASI Archaeology and Cultural Resource Management	Cultural Resources Survey, South County Surface Water Project, San Joaquin County, California, South San Joaquin Irrigation District	ASI Archaeology and Cultural Resource Management (prepared for Environmental Science Associates, Inc.)	39-000002, 39-000098, 39-000129, 39-000317, 39-000531, 39-000548, 50-000001
SJ-06756	NADB-R - 1366997	2008	ECORP Consulting, Inc.	Confidential Subsurface Testing and Evaluation at South Lathrop South Village, San Joaquin County, California, Project 2007-213	ECORP Consulting, Inc. for Richland Planned Communities	39-004603, 39-004604, 39-004605, 39-004606, 39-004607, 39-004608, 39-004609, 39-004610
SJ-07063	NADB-R - 1367391	2009	Jensen, S. M.	Archaeological Inventory Survey Gateway Business Park Project, City of Lathrop, San Joaquin, County, California.	Genesis Society for Insite Environmental, Inc.	39-000002, 39-000098, 39-000141, 39-004608, 39-004611, 39-004612, 39-004613, 39-004614, 39-004615, 39-004616, 39-004617, 39-004618, 39-004619, 39-004620, 39-004621, 39-004622, 39-004623, 39-004624, 39-004625, 39-004626, 39-004627, 39-004628, 39-004629, 39-004630, 39-004631, 39-004632, 39-004633, 39-004634, 39-004635, 39-004636, 39-004637, 39-004638
SJ-07444	NADB-R - 1367805	2010	Jensen, S. M.	Archaeological Inventory Survey Gateway Business Park Project, c. 384 acres + 1.5-mile Off Site Storm Drain Pipeline, City of Lathrop, San Joaquin County, California.	Genesis Society for Insite Environmental, Inc.	39-004612, 39-004613, 39-004614, 39-004615, 39-004616, 39-004617, 39-004618, 39-004619, 39-004620, 39-004621, 39-004622, 39-004623, 39-004624, 39-004625, 39-004626, 39-004627, 39-004628, 39-004629, 39-004630, 39-004631, 39-004632, 39-004633, 39-004634, 39-004635, 39-004636, 39-004637, 39-004638
SJ-07884		2014	Jordan, N.	Historic Property Survey Report for the SR-120/McKinley Avenue Interchange Project, City of Manteca, San Joaquin County, California, 10-SJ-120, P. M. 2.2, EA 10-0H890, Caltrans District 10	LSA Associates, Inc.; for City of Manteca Public Works Dept.	39-005156, 39-005157, 39-005158, 39-005159, 39-005160, 39-005161, 39-005162, 39-005163, 39-005164, 39-005165
SJ-07886		2013	Kaptain, N.	Archaeological Survey Report for the SR-120/McKinley Avenue Interchange Project, City of Manteca, San Joaquin County, California, 10-SJ_120, P.M. 2.2, EA 10-0H890	LSA Associates, Inc.; for Caltrans District 10	39-005156
SJ-07887		2014	Meyer, J., and N. Jordan	Extended Phase I Report, SR-120/McKinley Avenue Interchange Project, San Joaquin County, California, Caltrans District 10 EA #10-0H890	LSA Associates, Inc.; for Caltrans District 10	39-005156

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SJ-07888		2013	Hibma, M.	Historical Resources Evaluation Report for the State Route 120/McKinley Avenue Interchange Project, City of Manteca, San Joaquin County, California, 10-SJ-120, P.M. 2.2, EA 10-0H890, 1012000159, Caltrans District 10, Federal Project No. CML (5089(016))	LSA Associates, Inc.; for Caltrans District 10	39-005157, 39-005158, 39-005159, 39-005160, 39-005161, 39-005162, 39-005163, 39-005164, 39-005165
SJ-08889		2018	Peak & Associates, Inc.	Determination of Eligibility and Effect for the Proposed Oakwood Trails Subdivision, City of Manteca, San Joaquin County, California	Peak & Associates, Inc.	39-005163

Appendix C: Transportation CEQA Analysis

Fehr & Peers

Memo

Date: June 10, 2025

To: Steve McMurtry – De Novo Planning Group

From: Francisco Martin and Korinne Tarien – Fehr & Peers

Subject: CEQA Transportation Analysis for the Proposed Gateway Solar RV & Storage Project

Introduction

This memorandum outlines the trip generation and transportation analysis required by the California Environmental Quality Act (CEQA) for the proposed Gateway Solar & Recreational Vehicle (RV) Storage project in Manteca, CA. Fehr & Peers conducted this study based on our understanding of the project and analysis guidelines provided in the *City of Manteca SB 743 Implementation Policy* (City of Manteca, July 2022).

The primary objective of this study is to estimate the project's trip generation and assess whether it would result in a significant vehicle miles traveled (VMT) impact on the surrounding transportation system. Additionally, the study evaluates the project's consistency with transportation-related policies and plans outlined in the *City of Manteca 2040 General Plan* (City of Manteca, February 2023), as well as other applicable local and regional transportation plans.

Project Description

The project site includes approximately 13.8 acres of mostly vacant land located at 2371 Bronzan Road in Manteca, California. **Figure 1**, attached to the end of this memorandum, shows the project site location. The project site plan is provided in **Figure 2**. The project will be accessed via a driveway on the north side of the cul-de-sac at the western end of Bronzan Road.

Project Trip Generation

This section presents the forecasted project trip generation, including trip distribution and assignment.

Trip Generation

Trip generation refers to the process of estimating the amount of vehicular traffic a project would add to the surrounding roadway system. The project's trip generation was estimated using trip rates

published in the *Trip Generation Manual 11th Edition* (Institute of Transportation Engineers, ITE, September 2021). The trip generation was estimated based on the number of stalls shown on the site plan. Although the site plan does not specify the exact number of stalls, Fehr & Peers counted approximately 365 stalls of varying lengths. Some stalls can accommodate a single boat or RV, while others can accommodate two to three boats and/or RVs. Fehr & Peers estimated trip generation based on a range of storage unit configurations. The lower end of the range assumes one storage unit per stall, while the upper end assumes two units per stall. **Table 1** presents the estimated minimum and maximum number of daily, AM peak hour, and PM peak hour vehicle trips for the proposed project.

Table 1. Project Trip Generation

Land Use	Units ¹	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
RV & Boat Storage (Minimum Estimate) ²	365	70	2	2	4	3	3	6
RV & Boat Storage (Maximum Estimate) ²	730	130	5	4	9	6	6	12

Notes:

1. Units = storage units. The trip generation reflects a range of occupancy, assuming a minimum of one boat or RV storage unit per stall and a maximum of two storage units per stall.
2. RV and Boat Storage trip generation based on ITE *Trip Generation Manual*, 11th Edition Land Use Code 151 – Adj. Streets, 7–9 AM, 4–6 PM, General Urban/Suburban:
 - a. Daily: 17.96 trips per 100 storage units
 - b. AM Peak Hour: 1.21 trips per 100 storage units
 - c. PM Peak Hour: 1.68 trips per 100 storage units

Source: Fehr & Peers, June 2025.

The ITE Trip Generation Manual does not provide specific data for RV and boat storage facilities. However, the proposed RV and boat storage facility is expected to operate similarly to self-storage facilities. Therefore, trip generation for the trailer storage facility was estimated based on data for ITE Land Use Code 151. This land use code applies to mini-warehouse facilities where multiple storage units are rented for goods or vehicle storage.

As shown in **Table 1**, the project is estimated to generate up to 130 daily, 9 AM peak hour, and 12 PM peak hour trips.

Trip Distribution

Project trip distribution refers to the directions of approach and departure that vehicles would take to access and leave the site. Estimates of the project’s trip distribution were developed based on the trip distribution estimates from nearby storage spaces. Specifically, Fehr & Peers conducted a StreetLight Data evaluation of the existing West Coast RV & Boat Storage facility located at 4052 Yosemite Avenue, Lathrop, CA.

Project distribution is presented in **Figure 3** and summarized below:

- 10 percent of trips are expected to travel to and from McKinley Avenue north of State Route (SR) 120
- 20 percent of trips are expected to travel to and from McKinley Ave south of Bronzan Road
- 35 percent of trips are expected to travel to and from SR 120 east of the McKinley Avenue interchange
- 35 percent of trips are expected to travel to and from SR 120 west of the McKinley Avenue interchange

Trip Assignment

While project trip distribution provides information regarding larger-scale trip patterns, project trip assignment refers to project trip loading on specific roadway segments and intersection turning movements in the study area. Applying the trip distribution assumptions shown in **Figure 3** to the maximum trip generation estimates shown in **Table 1** results in the two-way traffic trip assignment summarized in **Table 2**.

Table 2. Project Trip Generation

Roadway Segment	Trip Distribution	Trip Assignment for Maximum Trip Generation Estimate		
		Daily	AM Peak Hour	PM Peak Hour
McKinley Avenue north of SR 120	20%	14	2	3
McKinley Avenue south of Bronzan Road	10%	26	1	1
SR 120 east of McKinley Avenue	35%	45	3	4
SR 120 west of McKinley Avenue	35%	45	3	4

Source: Fehr & Peers, June 2025.

As shown in Table 2, the project is estimated to add fewer than 10 vehicle trips to nearby arterial and freeway segments during the AM and PM peak hours. This level of traffic increase is within the range of normal daily volume fluctuations on nearby roadways and does not warrant additional operational analysis of adjacent intersections or roadway segments.

CEQA Analysis

This section summarizes the transportation CEQA analysis required per the City’s TIA Guidelines. Fehr & Peers addressed the following four questions for the project:

- Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*
- Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) (requirement to use VMT)?*
- Would the project substantially increase hazards due to a geometric design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?*
- Would the project result in inadequate emergency access?*

The CEQA analysis results are summarized in **Table 3** and described in greater detail below.

Table 3. CEQA Transportation Impact Assessment

Would the project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			✓	
b. Conflict or be inconsistent with CEQA Guidelines, section 15064.3, subdivision (b)?			✓	
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			✓	
d. Result in inadequate emergency access?			✓	

Source: Environmental checklist established by Cal. Code Regs., tit. 14, Div. 6, Ch. 3, Appendix G, transportation.

Policy Consistency

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

The *City of Manteca General Plan* (General Plan, City of Manteca, February 2024), *City of Manteca Active Transportation Plan* (ATP, City of Manteca, August 2020), *City of Manteca Public Facilities Implementation Plan* (PFIP, City of Manteca, January 2018), and existing transit service were reviewed to determine if the proposed project results in any inconsistencies with adopted transportation related policies or design standards. The policy consistency evaluation is summarized below.

City of Manteca General Plan

Relevant transportation policies outlined in the *City of Manteca 2040 General Plan* include:

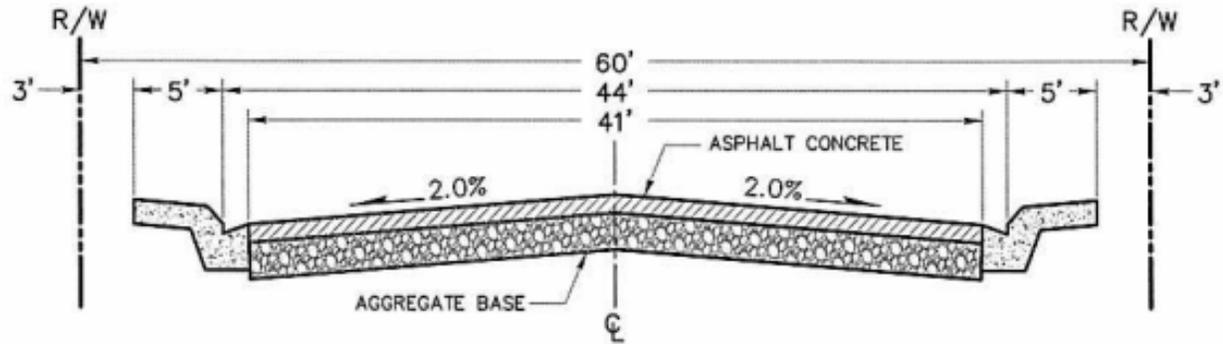
- C-2.2:** Design roadway improvements to occur in a contiguous, orderly fashion and strive to build roadway improvements in advance of new development particularly when addressing existing deficiencies. However, major circulation improvements shall be constructed no later than when abutting lands develop or redevelop, with dedication of right-of-way and construction of improvements, or participation in construction of such improvements, required as a condition of approval.

- **C-2.3:** Require new development to pay a fair share of the costs of street and other transportation improvements based on impacts in conformance with the goals and policies established in this Circulation Element and the Public Facilities Implementation Program (PFIP).
- **C-2.5:** Design street improvements to provide multiple, direct, and convenient routes for all modes.
- **C-2.8:** Provide access for bicycles and pedestrians at the ends of cul-de-sacs, where right-of-way is available, to provide convenient access within and between neighborhoods and to encourage walking and bicycling to neighborhood destinations.
- **C-2.20:** In the development of projects, ensure there are adequate corner sight distances appropriate for the speed and type of facility, including intersections of city streets and private access drives and roadways.
- **C-2.21:** Encourage the development of landscape-separated sidewalks along roadways (particularly arterials and non-residential streets) when feasible to discourage pedestrian/vehicle conflicts and be consistent with complete streets concepts.
- **C-2.23:** Incorporate emergency access, mountable medians, shoulders to bypass queued vehicles, emergency signal preemption, and other features into development and infrastructure projects to improve emergency response times as appropriate and feasible on new roadways and on existing roadways.
- **C-3.2:** Require new development to provide an appropriate number of off-street parking spaces to accommodate the typical parking demands of the type of development on the site. The City may dictate both minimum and maximum amounts of parking to ensure that adequate parking is available for typical activities associated with a use as well as for special events, where anticipated and appropriate, and to ensure that parking standards encourage alternatives to single occupant vehicles.
- **C-4.3:** Provide a sidewalk and bicycle route system that serves all pedestrian and bicycle users and meets the latest guidelines related to the Americans with Disabilities Act (ADA).
- **C-4.4:** Provide bicycle parking facilities at commercial, business/professional and light industrial uses in accordance with Part II of the California Building Standards Code.

The following sections summarize the review of consistency with General Plan transportation policies, as well as the evaluation of other adopted transportation plans.

Street Improvements

The City of Manteca's Public Facilities Improvement Plan (PFIP) outlines a funding and implementation plan for near-term public facility improvements within the City. The Transportation Element of the PFIP, released in January 2018, identifies citywide transportation improvements and the funding mechanisms to support their implementation. The PFIP does not identify any roadway improvements along the project frontage on Bronzan Road. However, Bronzan Road improvements are subject to the City of Manteca street standards. Bronzan Road is classified as a small collector, the City's standard for small collectors is illustrated in the diagram below.



SMALL COLLECTOR STREET
60' RIGHT-OF-WAY WITH DRIVE-OVER OR VERTICAL CURB

Source: City of Manteca Standard Street Cross Sections (August 2004)

As shown in the standard street cross section above, Bronzan Road must provide a minimum curb-to-curb width of 44 feet, in addition to a five-foot-wide sidewalk, which the project improvements meet. However, the property line is currently set back five feet from the face of curb along Bronzan Road east of the cul-de-sac, whereas the small collector street section standard requires a minimum eight-foot setback from the face of curb.

Please note that in the preliminary staff review letter dated March 27, 2023, Development Services Department staff specified that the street section for Bronzan Road frontage improvements must be designed in accordance with the approved Oakwood Trails Improvement Plans, shown on Sheet C1.04, Section G1, prepared by NorthStar Engineering and dated October 13, 2022. Fehr & Peers did not have access to the approved Oakwood Trails Improvement Plans during this evaluation; therefore, street section standards were compared only to the City's adopted standards for minor collector streets.

Based on Fehr & Peers' evaluation of the small collector street section standard, the project meets the minimum dimension requirements for curb-to-curb and sidewalk widths. However, the City of Manteca should confirm whether the proposed property line meets the required setback standards.

- **Recommendation TRANS-1:** The City of Manteca should confirm that the proposed property line meets the minimum setback requirements.

The City's street standards also specify minimum dimensions for the cul-de-sac improvement proposed by the project. According to these standards, cul-de-sacs shall terminate with a turnaround having a radius of no less than 50 feet and a face-of-curb radius of 43 feet. The bulb may be offset to either side. The cul-de-sac improvements proposed by the project meet these minimum standards.

According to General Plan Policy C-2.2, roadway improvements shall be constructed no later than when abutting lands develop or redevelop, with dedication of right-of-way and construction of improvements, or participation in construction of such improvements, required as a condition of approval.

Driveway Sight Distance

According to General Plan Policy C-2.20, development projects must ensure adequate corner sight distances appropriate for the speed and type of facility, including at intersections with private access driveways. The project proposes driveway access on a cul-de-sac, which provides adequate corner sight distance given the low speeds at which vehicles would maneuver around the cul-de-sac.

The project also proposes an on-street parking stall for the temporary parking of RVs and vehicles towing boat trailers. This stall is located within the cul-de-sac on public right-of-way. Due to the angle of the parking stall relative to the Bronzan Road segment north of the cul-de-sac, the available stopping sight distance for drivers exiting the stall is approximately 50 feet. According to Table 201.1 of the Caltrans Highway Design Manual, the minimum stopping sight distance is 50 feet for roadways with a design speed of 10 miles per hour (mph). Vehicles are expected to enter and navigate the cul-de-sac at approximately 10 mph; therefore, the 50-foot stopping sight distance is expected to be adequate for the on-street parking stall as currently proposed.

However, if the design speed on Bronzan Road is determined to be greater than 10 mph, this may result in a deficiency in stopping sight distance between parked vehicles and those traveling westbound on Bronzan Road. In such a case, removal of the on-street parking stall should be considered.

- **Recommendation TRANS-2:** Remove the proposed on-street parking stall from the cul-de-sac if the design speed for the Bronzan Road frontage segment exceeds 10 mph.

Recommended site improvements are shown on **Figure 4**.

Active Transportation Infrastructure Improvements

The *City of Manteca Active Transportation Plan* (ATP, August 2020) outlines a vision for the future pedestrian and bicycling network within the City. Fehr & Peers reviewed the City's ATP to confirm compliance with the locally adopted plan. There are no pedestrian or bicycle facilities planned near the project site.

General Plan Policy C-2.5 states that street improvements should be designed to provide direct routes for all modes. The project proposes five-foot-wide sidewalks along the site frontage and bicyclists can access the project site via improvements proposed along Bronzan Road; which is consistent with the General Plan policy for active transportation modes.

General Plan Policy C-2.8 requires the provision of bicycle and pedestrian access at the ends of cul-de-sacs to ensure convenient connectivity within and between neighborhoods. An existing multi-use path connecting the western terminus of Bronzan Road to Rapallo Way is already in place and will remain as part of the proposed project. Therefore, the project is consistent with General Plan Policy C-2.8.

Although General Plan Policy C-2.21 encourages landscape-separated sidewalks along roadways when feasible, the project does not include them. However, the street section standards for minor collector streets, as described above, do not require landscape-separated sidewalks. Therefore, they are not required for the project.

General Plan Policy C-4.3 requires a sidewalk and bicycle route system that serves all pedestrian and bicycle users and meets ADA requirements. The project includes a sidewalk system that is ADA-

compliant and provides a connection from Bronzan Road to the proposed on-site office building. Since the City of Manteca ATP does not identify existing or planned dedicated bikeways along Bronzan Road, the project is not required to provide designated bikeway infrastructure along its Bronzan Road frontage.

Transit Network Improvements

Manteca Transit operates a fixed-route and Dial-a-Ride bus service with stops throughout the City. The nearest transit stop is the Stadium Center at Daniels Street stop located on the southwest corner of Daniels Street and Milo Candini Drive, approximately 1.5 miles northeast of the project site. Route 1 and Route 2 provide weekday and Saturday fixed route service to the Stadium Center at Daniels Street transit stop with 60-minute headways.

The project site is not currently served by existing routes. Based on Fehr & Peers review of the *Manteca Transit Short Range Transit Plan* (December 2018), the project is not expected to conflict with existing or planned transit facilities.

Off-Street Vehicle Parking Requirements

Per General Plan Policy C-3.2, the project is required to provide an appropriate number of off-street parking spaces to accommodate the typical parking demands of the type of development on the site. The City may dictate both minimum and maximum amounts of parking to ensure that adequate parking is available for typical activities associated with a use.

The City of Manteca Municipal Code (MMC, see § 17.52.050) provides the minimum off-street parking requirements by land type. According to MMC Tabel 17.52.050-1, self-storage facilities must provide one (1) parking stall per 50 storage units or five (5) parking stalls, whichever is greater.

According to the preliminary staff review letter dated March 27, 2023, Development Services Department staff specified a minimum requirement of five (5) off-street parking stalls. The project proposes six (6) off-street parking stalls, meeting the requirement set by City staff and aligning with General Plan Policy C-3.2.

All proposed employee and visitor parking stalls on-site are 90-degree angled stalls. The minimum dimensions for standard 90-degree stalls are nine (9) feet wide by 18 feet long, with a minimum drive aisle width of 24 feet for two-way aisles (see § 17.52.090). Up to 30 percent of the required parking spaces may be designated for compact cars, with minimum stall dimensions of eight (8) feet wide by 16 feet long (see § 17.52.080). All proposed standard stalls meet the minimum dimensions required by the MMC; the project does not propose compact stalls.

ACCESSIBLE PARKING

The MMC (§ 17.52.070) states that parking spaces for individuals with disabilities shall comply with the Uniform Building Code and the Americans with Disabilities Act. The project proposes one (1) accessible parking stall, which meets the minimum requirement under the California Building Code (CBC). Additionally, the accessible routes comply with CBC § 11B-206.2.1, which requires at least one accessible route from accessible parking spaces, public streets, and sidewalks to the proposed office building.

ELECTRIC VEHICLE PARKING

Section 5.106.5.3 of the 2022 California Green Building Standards Code (CALGreen) outlines the minimum requirements for electric vehicle (EV) charging. According to CALGreen, projects that provide fewer than 10 on-site parking stalls are not required to include EV charging spaces or EV-capable infrastructure. Therefore, the project is not required to provide any designated EV parking stalls.

Bicycle Parking

Per General Plan Policy C-4.4, the project must provide bicycle parking. The MMC (see § 17.52.110) specifies the minimum bicycle parking requirements based on the total number of parking spaces. The project is required to provide a minimum of two (2) bicycle parking spaces located on a paved surface in a visibly secure location in proximity to a building entrance. Although the project will provide the minimum parking requirements, the current site plan does not identify the planned bicycle parking accommodations.

- **Recommendation TRANS-3:** Update the project site plan to include bicycle rack(s) accommodating a minimum of two (2) bicycle parking spaces. Bicycle parking shall be located on a paved surface, near a building entrance, and in a visibly secure location adjacent to the building.

Recommended site improvements are also shown on **Figure 4**.

Fair Share Transportation Infrastructure Project Responsibilities

As shown in **Table 2**, the project's trip assignment on nearby roadways is minimal, and no adverse effects to off-site intersection level of service (LOS) are expected. However, per General Plan Policy C-2.3, the project is still required to contribute its fair share to off-site transportation improvements through payment of the City's public facility fees and the Regional Transportation Impact Fee (RTIF) administered by the San Joaquin Council of Governments (SJCOG).

The City of Manteca has the final authority to determine the fair share improvements and/or fee payments required for the project as Conditions of Approval.

Policy Consistency Determination

Improvements proposed by the project are consistent with transportation-related programs, plans, ordinances, and policies. Therefore, the impact is considered **less than significant**.

VMT Screening

b. Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

As of July 1, 2020, CEQA Guidelines Section 15064.3(b) states that the recommended metric for the evaluation of transportation impacts is VMT. It outlines the criteria for analyzing a project's transportation impacts. For land use projects, this section states that "vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact."

According to *City of Manteca SB 743 Implementation Policy* (July 2022), a project would result in a significant transportation VMT impact if it would:

- Not qualify for screening per the screening criteria outlined in the City's VMT screening guidelines, which states that a project may be screened from additional VMT analysis if it complies with one or more of the following conditions: (1) is a small project generating fewer than 1,000 trips a day and consistent with City's General Plan; or (2) 100% affordable housing; or (3) is local-serving retail less than 125,000 square feet in building floor area; or (4) located in a High-Quality Transit Area; or (5) located in a low VMT area; or (6) is consistent with the City's General Plan, and
- Exceed the applicable VMT threshold, which for an industrial project is set to 15% below Citywide baseline for VMT per employee.

The project qualifies for screening criteria (1) listed above given that the project would generate less than 1,000 trips per day.

VMT Screening Determination

The project meets the screening criteria outlined in the *City of Manteca SB 743 Implementation Policy* (July 2022) as it would generate fewer than 1,000 daily trips. Therefore, the project is anticipated to have a **less than significant** VMT impact on the surrounding transportation network and a detailed VMT analysis is not required for CEQA purposes.

Hazards Due to Geometric Design Features

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

As discussed in the Policy Consistency section above, the transportation infrastructure improvements proposed by the project meet the minimum City of Manteca design standards. Therefore, the project is not expected to increase hazards due to a geometric design feature, and the impact is considered **less than significant**.

Emergency Vehicle Access

Would the project result in inadequate emergency access?

Per General Plan Policy C-2.23, the project must incorporate adequate emergency access. The on-site office building is assumed to be under 30 feet in height, therefore a minimum 20-foot clear width is required for emergency vehicle access. The project's on-site drive aisles all exceed the 20-foot minimum requirement. The California Fire Code (CFC) requires that dead-end fire access roads in excess of 150 feet shall be provided with a minimum 96-foot-diameter cul-de-sac. Although the 86-foot cul-de-sac diameter proposed by the project is below the CFC standard, the cul-de-sac dimensions meet the City's street standards and fire trucks are also able to turnaround within the cul-de-sac by utilizing the project driveway to maneuver. Therefore, the project's impact to emergency access is considered **less than significant**.

The City of Manteca Fire Department has the final authority to determine emergency access improvements required for the project as Conditions of Approval.

Conclusions

Fehr & Peers conducted a trip generation and transportation analysis for the proposed Gateway Solar & RV Storage Project in Manteca, California, consistent with CEQA and the City of Manteca's *SB 743 Implementation Policy* (July 2022). The Project is estimated to generate 130 daily vehicle trips, qualifying it for VMT screening. The low trip generation anticipated for the project doesn't warrant analysis of intersection operations as the project is not expected to trigger off-site impacts.

The analysis also evaluated the project's consistency with the City of Manteca General Plan, Active Transportation Plan, and other local transportation policies. All transportation related project features were found to be consistent with applicable policies, standards and plans. Fehr & Peers recommends the following City staff reviews and site plan modifications:

- **Recommendation TRANS-1:** The City of Manteca should confirm that the proposed property line meets the minimum setback requirements.
- **Recommendation TRANS-2:** Remove the proposed on-street parking stall from the cul-de-sac if the design speed for the Bronzan Road frontage segment exceeds 10 mph.
- **Recommendation TRANS-3:** Update the project site plan to include bicycle rack(s) accommodating a minimum of two (2) bicycle parking spaces. Bicycle parking shall be located on a paved surface, near a building entrance, and in a visibly secure location adjacent to the building.

The project is required to contribute its fair share to off-site transportation improvements through payment of the City's public facility fees and the RTIF administered by SJCOG.

FIGURES

Figure 1 Project Location

Figure 2 Project Site Plan

Figure 3 Project Trip Distribution

Figure 4 Recommended Site Plan Improvements

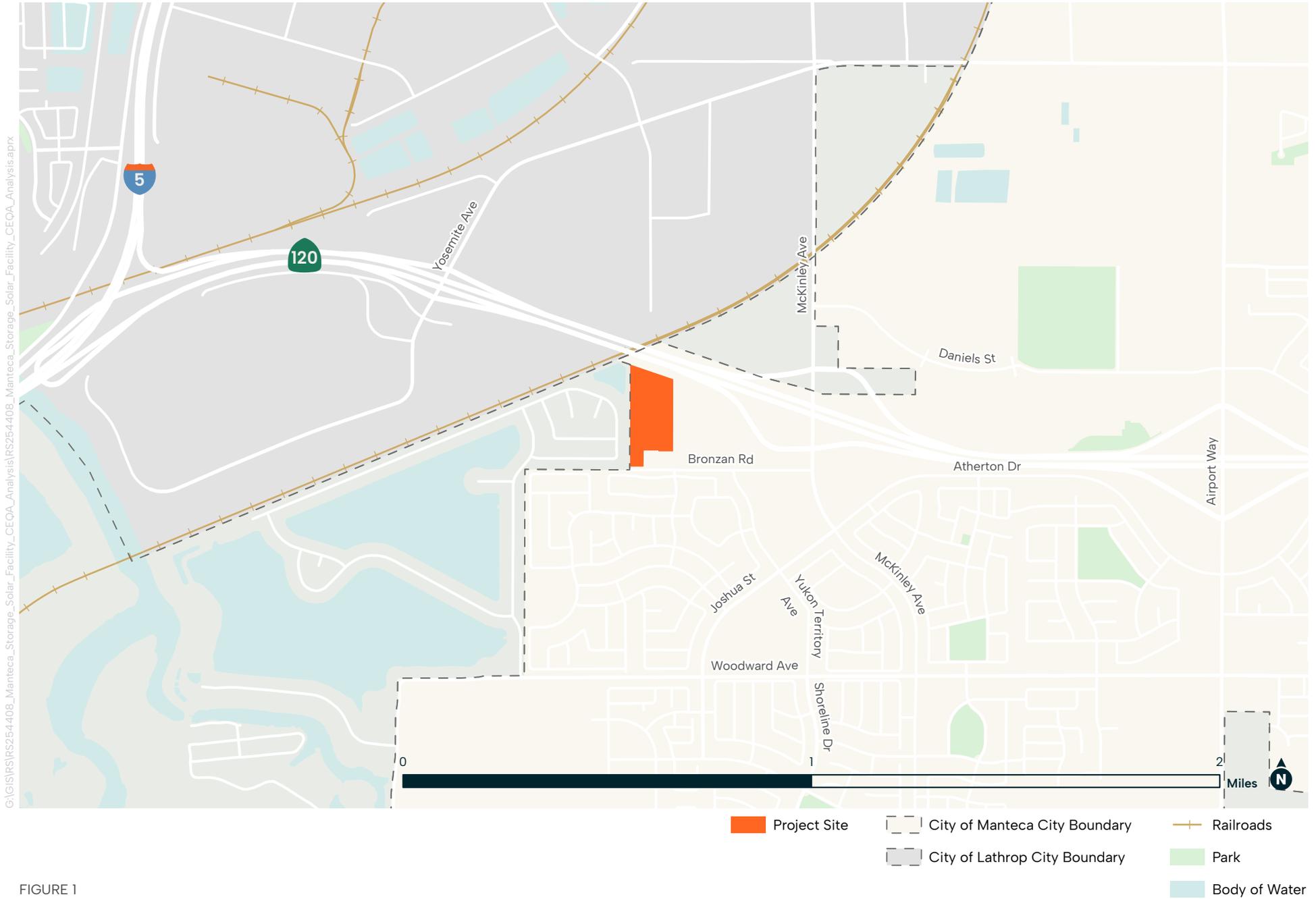


FIGURE 1
Site Location

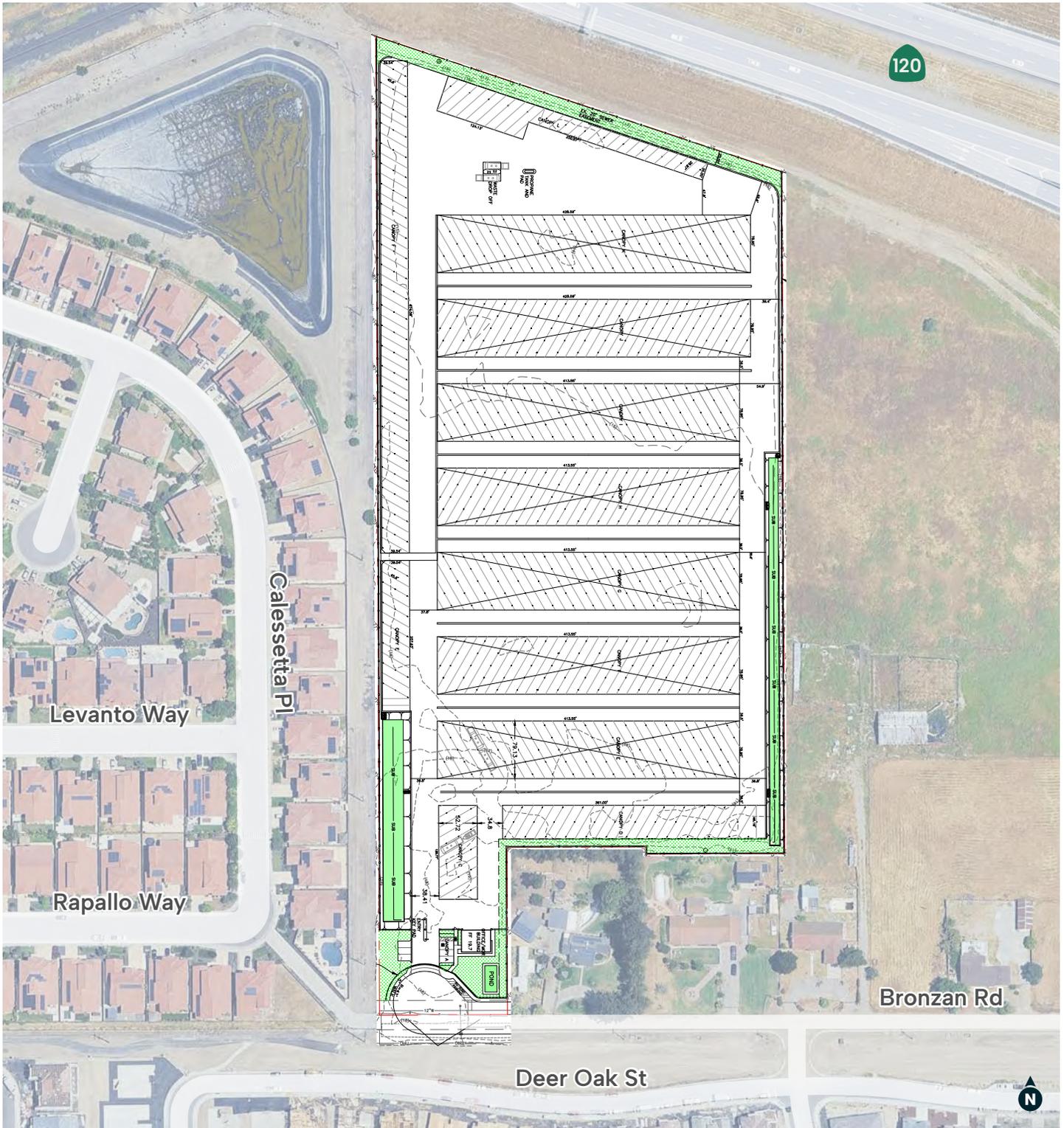


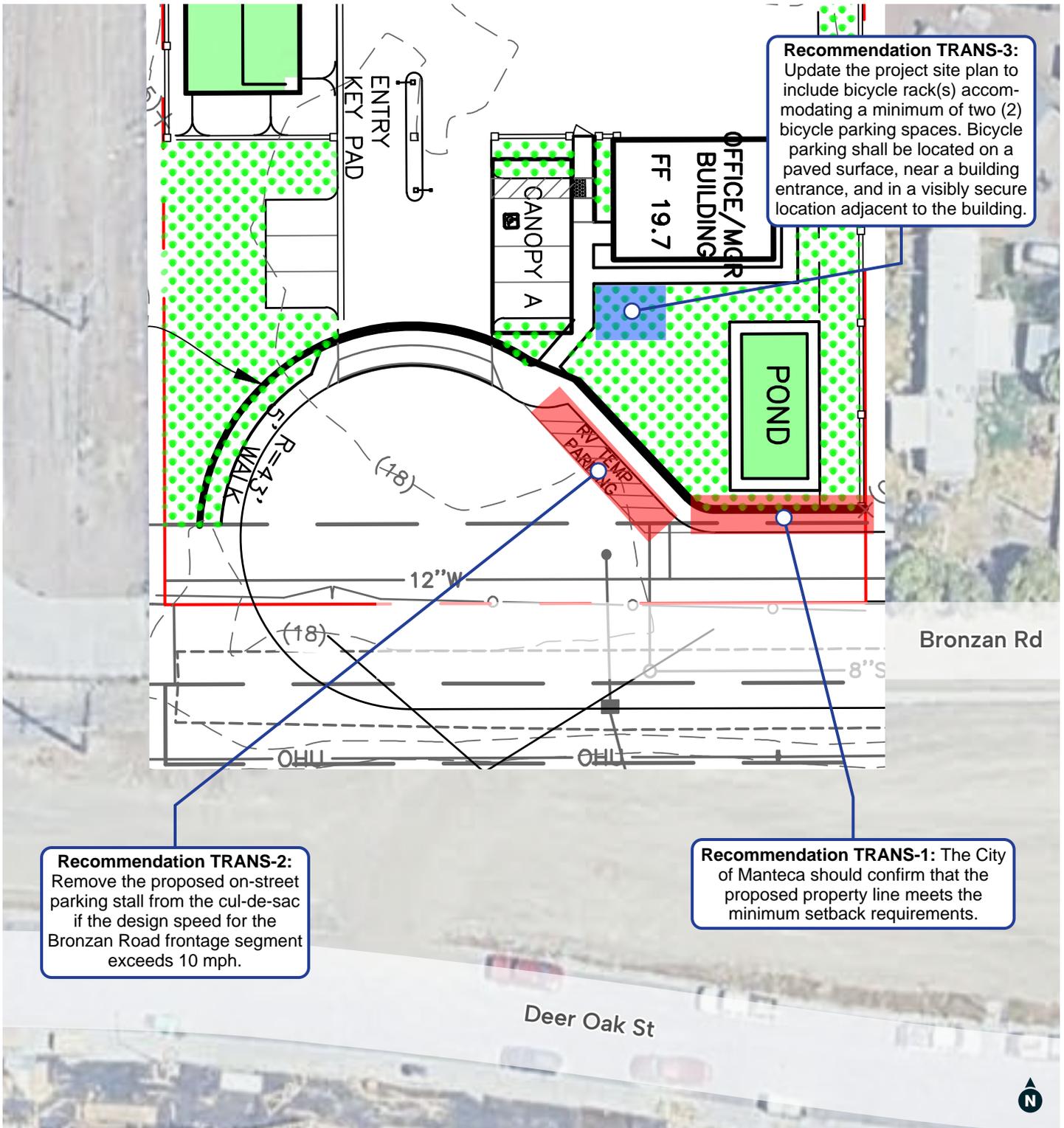
FIGURE 2

Project Site Plan



FIGURE 3

Project Trip Distribution



Recommendation TRANS-3:
 Update the project site plan to include bicycle rack(s) accommodating a minimum of two (2) bicycle parking spaces. Bicycle parking shall be located on a paved surface, near a building entrance, and in a visibly secure location adjacent to the building.

Recommendation TRANS-2:
 Remove the proposed on-street parking stall from the cul-de-sac if the design speed for the Bronzan Road frontage segment exceeds 10 mph.

Recommendation TRANS-1: The City of Manteca should confirm that the proposed property line meets the minimum setback requirements.

FIGURE 4

Recommended Site Plan Improvements