

Sierra Club Letter and Response to Comment

February 1, 2024

City of Manteca

Via e-mail

Re: Comments on the Addendum Manteca General Plan Update

Dear Planning Commissioners and staff:

The Sierra Club formally submits these comments on the proposed changes to the 2023 Manteca General Plan Update.

We strongly object to the use by the City of a an "EIR Addendum" to satisfy the need for environmental analysis of these major changes to the 2023 General Plan Update. A city cannot process a General Plan Amendment that involves 498 acres of land use changes and a reconfiguration of a major truck arterial with an EIR Addendum.

This is a blatantly unlawful action that is in gross violation of the California Environmental Quality Act (CEQA).

The CEQA Guidelines which discuss when an EIR Addendum may be used to satisfy CEQA are contained in Sec. 15164 of the law.

Sec. 15164 states:

- (a) The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- (b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.
- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence. Cal. Code Regs. Tit. 14, § 15164 (emphasis added)

The changes described in the legal agreement signed by the City Council and Delicato describe the changes that are proposed to the existing General Plan land use diagram (and to the circulation diagram for Roth Road). These changes are not “minor technical changes or additions” as required by Sec. 15164(b). These changes are potentially significant and the City must analyze the potential impacts related to the proposal before the City can adopt the General Plan Amendment.

The changes involve the redesignation and delete 244 acres of residential land (equal to 1,296 units), add 188 acres of industrial land (1.3 million square feet), and add 66 acres of parks.

It is patently absurd for the City to claim that these changes would have no significant environmental impact, as the EIR Addendum does. The City must study whether there could be impacts related to these very specific changes.

Instead, this deficient EIR Addendum repeats over and over the unsubstantiated claim that “There would be no change to the level of significance of these impacts or new significant impacts associated with the Modified Project. There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162.”

The EIR Addendum’s lack of an “explanation [that] must be supported by substantial evidence” is in clear violation of Sec. 15164(b) of the law.

This lack of analysis that is “supported by substantial evidence” is tellingly indicated in the EIR Addendum’s discussion of impacts (or lack thereof) for air quality issues. The Addendum states that “The Modified Project would result in additional industrial and other non-residential uses that could generate stationary source emissions and expose sensitive receptors to substantial pollutant concentrations. (page 16, bottom). Yet, the EIR Addendum contains no further analysis based on facts of how this addition of 188 acres of industrial land (equal to 1.3 million square feet) could impact existing and future residents.

Likewise, the EIR Addendum contains a Project Description for the Modified Project that is also deficient. The description fails to describe the major shift in the proposed alignment of Roth Road and this new alignment could affect existing and planned land uses.

For all these reasons, and based on the numerous comments raised by concerned residents, the City must abandon this EIR Addendum and prepare a subsequent (or supplemental) EIR as required by CEQA. To proceed with this inadequate environmental document is a clear violation of CEQA and could be challenged in a court of law.

If you have any questions about this letter, you may contact Eric Parfrey at parfrey@sbcglobal.net or (209) 641-3380.

Sincerely,

s/s Margo Praus, Chair

Delta-Sierra Group, Sierra Club

cc: Rob Swanson, California Attorney General's Office
Aaron Isherwood, Sierra Club Environmental Law Program
Manteca City Council

Sierra Club, February 1, 2024 Letter - Response to Comment

This is a response to the comment letter submitted by the Sierra Club, Delta-Sierra Group, Mother Lode Chapter (Sierra Club, Commenter), dated February 1, 2024, regarding the preparation of an Addendum to the Manteca General Plan Update Environmental Impact Report (GPU EIR), certified by the City of Manteca City Council on July 18, 2023.

Generally, the Commenter expresses their objection to the preparation of an Addendum to the certified GPU EIR, as they feel that an Addendum would not adequately evaluate the proposed modifications to the Manteca General Plan Update (the Modified Project) in accordance with the California Environmental Quality Act (CEQA). However, as discussed in more detail below, the Addendum to the GPU EIR (2024 Addendum) satisfies the requirements of Sections 15162 and 15164 of the CEQA Guidelines for preparation of an Addendum, and the additional technical studies and evaluations undertaken as a part of the 2024 Addendum provide the substantial evidence needed to demonstrate that the Modified Project would not result in new significant environmental effects or a substantial increase in the severity of a previously identified significant effect. As such, the Commenter's statement that the 2024 Addendum would result in a violation of CEQA, or that a subsequent or supplemental EIR would be required, is not supported and inaccurate.

The Modified Project does not involve 498 acres of land use changes, as stated by the Commenter, as the Modified Project would only affect some of the land use designations in one portion of the General Plan area. The Modified Project would result in changes to approximately 250 acres, with a reduction of approximately 244 acres of residential land uses, an increase of approximately 213 acres of employment-generating industrial and commercial land uses, and an increase of approximately 31 acres of park uses. The Modified Project would also require revisions to the Circulation Element to address the alignment of the future Roth Road Extension from S. Airport Way to Highway 99. Refer to 2024 Addendum Table 1, *Comparison of the Adopted 2043 General Plan Land Use Designations to the 2043 General Plan Amendment Land Use Designations for the Affected Area*. In the overall scheme of the project evaluated in the certified GPU EIR (the Original Project), these do not constitute significant changes.

Notably, in order to create additional job-generating and recreational opportunities within the Planning Area west of Highway 99, as well as adjust the future Roth Road alignment, some residential and business industrial park designations were replaced by an Industrial land use designation and a Park land use designation. The Industrial designation would accommodate a range of industrial uses, as well as agricultural processing and agriculture-related ancillary uses while including Policy LU-8.8 to guide the planning of the area, including specifying that residential uses would not be permitted in this area. Furthermore, the City determined that based on existing uses with this portion of the Planning Area, removal of some residential uses from proximity to existing agricultural processing uses would be preferential to having residences in this area. Creating additional job opportunities and park land was a more appropriate use of this area, and residential uses would still be adequately accommodated in other areas of the City, as described in the certified GPU EIR and the Addendum.

With respect to the future realignment and extension of Roth Road, as the GPU EIR is a programmatic document for a general plan, and specific design for the road extension has not yet been considered, the project description need not provide precise details regarding the roadway. The degree of specificity in an EIR project description corresponds to the degree of specificity available for the underlying activity being evaluated (see CEQA Guidelines Section 15146.). For a planning approval, such as a general plan

amendment, the project description must include reasonably anticipated physical development that could occur in view of the approval. (City of Redlands v. County of San Bernardino (2002) 96 Cal. App. 4th 398.) Therefore, project-specific detail is not required for descriptions of general plans and other high-level programs, as details about specific subsequent projects typically are not known and will be addressed in future project-specific CEQA documents. Nevertheless, impacts related to the future roadway were considered in the 2024 Addendum to the extent that information regarding the roadway is known and impacts of the 2043 General Plan with the modified potential roadway extension location were not greater than the impacts of the Original Project in the certified GPU EIR. Furthermore, an express policy was included in the revised Circulation Element requiring future project applicants to pay for their fair share towards roadway and related impacts, and Action C-2e guides planning for the roadway, including measures to accommodate on-going agricultural uses on adjacent lands. The specific location of the future Roth Road extension will be refined at the time that the roadway extension is designed, and compliance with all applicable regulations and policies will be required related to design, permitting, and construction at that time.

Summary of 2024 Addendum Findings

The changes to the General Plan Land Use Element and Circulation Element were evaluated in the 2024 Addendum for the Modified Project, including a re-evaluation of all topics listed in the CEQA Checklist, as provided in Appendix G of the CEQA Guidelines, as described below. Based on the additional evaluation undertaken, the Modified Project would not result in a change to any impact determinations, including an increase in significance of environmental impacts or in new significant environmental impacts. Furthermore, it is important to note that future development projects that would be implemented under the General Plan would be required to prepare their own evaluations, on a project-by-project basis, to address project-specific details subject to the requirements of CEQA and to address compliance with the General Plan and its policies and programs (including those listed below that apply to subsequent projects), the City of Manteca Municipal Code, and all other applicable regulations.

Aesthetics: Visual impacts resulting from the Modified Project are anticipated to be minor, as all projects would be required to comply with applicable regulations related to scenic vistas, the potential to degrade visual character, or create new sources of light and glare. The Original Project EIR considered the introduction of more intensive land uses, including industrial and park uses, into areas that are currently undeveloped or underutilized. The Original Project EIR identified robust General Plan policies and actions that guide future development; future projects under the Modified Project would be required to comply with these policies and programs. Applicable Modified Project General Plan policies and actions that address aesthetic impacts and ensure that impacts would be comparable with those considered under the Original Project EIR are described in the Addendum and include, but are not limited to:

LU-4.4: Ensure that all commercial and other non-residential development is compatible with adjacent land uses, particularly residential uses, based upon the location and scale of buildings, lighting, and in conformance with the noise standards of the Safety Element. When development is incompatible, require commercial uses to provide adequate buffers and/or architectural features to protect residential areas, developed or undeveloped, from intrusion of nonresidential activities that may degrade the quality of life in such residential areas.

LU-5.4: Ensure that employment-generating development, such as industrial, warehouse, distribution, logistics, and fulfillment projects, does not result in adverse impacts (including health risks and nuisances), particularly to residential uses and other sensitive receptors, including impacts related to the location and scale of buildings,

lighting, noise, smell, and other environmental and environmental justice considerations. When development is incompatible, require adequate buffers and/or architectural consideration to protect residential areas, developed or undeveloped, from intrusion of nonresidential activities that may degrade the quality of life in such residential areas.

LU-4b: As part of the City's development review process, ensure that commercial projects are designed to minimize conflicts with residential uses. Review of commercial projects should ensure that the following design concepts are avoided in projects that abut residential areas:

- Inappropriate building scale and/or siting on the lot.*
- Excessive glare or excessive impacts from light sources onto adjacent properties.*
- Excessive noise generated from freight and waste management activities during night hours.*
- Excessive air pollutant emissions from freight trucks and large expanses of parking lot areas.*

LU-5d: As part of the City's development review process, continue to ensure that employment-generating projects are designed to minimize conflicts with residential uses, sensitive receptors, and disadvantaged communities. Review of employment generating projects should ensure that the following design concepts are addressed in projects that abut residential areas, sensitive receptors, or disadvantaged communities:

- Appropriate building scale and/or siting;*
- Site design and features to protect residential uses and other sensitive receptors, developed or undeveloped, from impacts of non-residential development activities that may cause unwanted nuisances and health risks and to ensure that disadvantaged communities are not exposed to disproportionate environmental or health risks. The site design and features shall be based on best management practices as recommended by CARB, SJVAPCD, and the California Attorney General;*
- Site design and noise-attenuating features to avoid exposure to excessive noise due to long hours of operation or inappropriate location of accessory structures;*
- Site and structure design to avoid excessive glare or excessive impacts from light sources onto adjacent properties; and*
- Site design to avoid unnecessary loss of community and environmental resources (archaeological, historical, ecological, recreational, etc.).*

CD-5d: Establish design guidelines for non-residential uses within 200 feet of SR 99 and SR 120. The guidelines should address the following concepts.

- New office and commercial land use shall provide attractive landscaping, lighting, and signage adjacent to all buildings oriented to SR 99 or SR 120.*
- Encourage buildings that include attractive focal elements, such as a tower or articulated roofline in each non-residential development adjacent to SR 99 or SR 120 to serve as visual landmarks.*
- New non-residential buildings oriented to SR 99 or SR 120 shall provide an attractive facade similar in articulation, and using the same materials and colors, as the primary facade of the building.*
- Truck loading and refuse collection areas adjacent to SR 99 and SR 120 shall be screened from view.*
- The landscape along SR 120 and SR 99 will reflect the natural character of the region in the selection of trees and groundcover.*

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.

Agricultural and Forest Resources: The Modified Project includes measures to protect agricultural lands, to the extent feasible, from the effects of urbanization, including industrial uses and the future Roth Road

extension. With adherence to the Modified Project General Plan policies and actions for future development, including industrial and roadway projects, there would be no new significant impacts or increase in the significance of impacts associated with agricultural or forestry resources. Applicable Modified Project General Plan policies and actions that address agricultural impacts and ensure that impacts would be comparable with those considered under the Original Project EIR are described in the Addendum and include, but are not limited to:

RC-7.5: Minimize conflicts between agricultural and urban land uses.

RC-7.6: 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-7.7: Prohibit the fragmentation of agricultural parcels into small rural residential parcels except in areas designated for urban development in the Land Use Diagram.

RC-7.8: Encourage agricultural landowners in Manteca's Planning Area to participate in Williamson Act contracts and other programs that provide long-term protection of agricultural lands. Discourage the cancellation of Williamson Act contracts outside the Primary Urban Service Boundary line.

RC-7.10: Prohibit re-designation of Agricultural lands to other land use designations unless all of the following findings can be made:

- a. 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.*
- b. 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.*
- c. The use would not have a significant adverse effect on existing or potential agricultural activities on surrounding lands designated Agriculture.*

RC-7.11: 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 and through payment of the Agricultural Mitigation Fee established by Municipal Code Chapter 13.42, as may be amended.

Air Quality: Additional technical studies were undertaken to compare the change in vehicle miles traveled and associated air quality impacts of the Modified Project and the Original Project evaluated in the certified GPU EIR. With respect to emissions associated with vehicle miles traveled (VMT), the Modified Project would result in a 0.5 percent increase in total VMT, as compared to the Original Project. While this increase in and of itself would not constitute a significant increase in the impact evaluated in the GPU EIR, it was already determined that air quality impacts would be significant and unavoidable in the GPU EIR. As with the Original Project, there are no feasible criteria air pollutant reduction measures to ensure that impacts would be less than significant at the programmatic level of review, and the potential for cumulatively considerable net increases in criteria pollutants and cumulatively considerable air quality impacts would remain under the Modified Project. New stationary sources would be required to comply with General Plan policies and actions to address potential exposure of sensitive receptors to toxic air contaminants and substantial pollutant concentrations. There would be no change to the level of significance of air quality impacts or new significant impacts associated with the Modified Project. Applicable Modified Project General Plan policies and actions that address air quality impacts and ensure

that impacts would be comparable with those considered under the Original Project EIR are described in the Addendum and include, but are not limited to:

LU-3.9: *Locate residences and sensitive receptors 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-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.*

C-4.1: *Through regular updates to the City's Active Transportation Plan inclusive of community members and stakeholders, establish a more safe and more convenient network of identified bicycle and pedestrian routes connecting residential areas with schools, recreation, shopping, and employment areas within the city, generally as shown in Figure CI-2). The City shall also strive to develop connections with existing and planned regional routes shown in the San Joaquin County Bicycle Master Plan.*

C-4.2: *Improve safety conditions, efficiency, and comfort for bicyclists and pedestrians by providing native and drought-tolerant shade trees and controlling traffic speeds by implementing narrow lanes or other traffic calming measures in accordance with the City Neighborhood Traffic Calming Program on appropriate streets, in particular residential and downtown areas.*

C-4.5: *Expand the existing network of off-street bicycle facilities as shown in the City's Active Transportation Plan to accommodate cyclists who prefer to travel on dedicated trails. Further, the City shall strive to develop: 1) a "city-loop" Class I bike path for use by both bicyclists and pedestrians that links Austin Road, Atherton Drive, Airport Way, and a route along or near Lathrop Road to the Tidewater bike path and its existing and planned extensions, and 2) an off-street bicycle trail extension between the Tidewater Bike Trail near the intersection of Moffat Boulevard and Industrial Park Drive to the proposed regional route between Manteca and Ripon.*

C-5.10: *Ensure that development projects provide adequate facilities to accommodate school buses, including loading and turn-out locations in multifamily and other projects that include medium and high density residential uses, and that the school districts are provided an opportunity to address specific needs associated with school busing.*

C-5.11: *As new areas and neighborhoods of the City are developed, fund transit and paratransit expansion (including capital, operations, and maintenance) to provide service levels consistent with existing development.*

C-7.2: *Require development projects that accommodate or employ 50 or more full-time equivalent employees to establish a transportation demand management (TDM) program that meets or exceeds applicable standards, including Air District requirements.*

RC-5.1: *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 zero emission or alternative fuel for city vehicle fleets, when feasible.
- Developing consistent procedures for evaluating and mitigating project-specific and cumulative air quality impacts of projects.
- Promoting participation of major existing and new employers in the transportation demand management (TDM) program facilitated by the San Joaquin Council of Governments.

RC-5.2: 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 and, where uses or facilities pose substantial health risks, ensure that a Health Risk Assessment is conducted to identify and mitigate exposure to toxic air contaminants.

RC-5.3: Require construction and operation of new development to be managed to minimize fugitive dust and air pollutant emissions.

RC-5.4: Require installation of energy-efficient 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-5.5: 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.

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 community needs over time as technology, social expectations, and business practices change.

LU-5f: Update the Municipal Code to include Good Neighbor Guidelines for Warehouse Distribution Facilities, including:

- A definition of the type and size of facility that is subject to the Guidelines;
- Standards to minimize exposure to diesel emissions to sensitive receptors that are situated in close proximity to the proposed facility;
- Standards and practices that eliminate diesel trucks from unnecessarily traversing through residential neighborhoods;
- Standards and practices that eliminate trucks from using residential areas and repairing vehicles on the streets;
- Strategies to reduce and/or eliminate diesel idling within the facility's site;
- 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.

- C-2b: When planning roadway facilities, incorporate the concept of complete streets. Complete streets include design elements for more safe travel by all modes that use streets, including autos, transit, pedestrians, and bicycles. Complete streets shall be developed in a context-sensitive manner. For example, it may be more appropriate to provide a Class I bike path instead of bike lanes along a major arterial. Pedestrian districts like Downtown Manteca or areas near school entrances should have an enhanced streetscape (e.g., narrower travel lanes, landscape buffers with street trees, etc.) to better accommodate and encourage pedestrian travel.
- C-2q (formerly C=2f): Ensure that bicycle and pedestrian access is both provided and prioritized through providing openings to increase access where soundwalls and berms are located to minimize travel distances and increase the viability walking and bicycling.

C-5f: Through the development review process, ensure that projects provide increased land use densities and mixed uses, consistent with the Land Use Element to enhance the feasibility of transit and promote alternative transportation modes.

C-5g: Along fixed route corridors, require that new development to be compatible with and further the achievement of the Circulation Element. Requirements for compatibility may include but are not limited to:

- Orienting pedestrian access to transit centers and existing and planned transit routes.
- Orienting buildings, walkways, and other features to provide pedestrian access from the street and locating parking to the side or behind the development, rather than separating the development from the street and pedestrian with parking.
- Providing clearly delineated routes through parking lots to safely accommodate pedestrian and bicycle circulation.

C-7b: Develop TDM program requirements with consideration of addressing CEQA vehicle miles traveled impact analysis requirements (i.e., SB 743) in accordance with implementation measure C-1b. TDM programs shall include measures to reduce total vehicle miles traveled and peak hour vehicle trips. A simplified version of the Air District's Rule 9410 could be used to implement this measure.

C-7c: Coordinate with the San Joaquin Council of Governments on a Congestion/Mobility Management Program to identify TDM strategies to reduce VMT and mitigate peak-hour congestion impacts. Strategies may include: growth management and activity center strategies, telecommuting, increasing transit service frequency and speed, transit information systems, subsidized and discount transit programs, alternative work hours, carpooling, vanpooling, guaranteed ride home program, parking management, addition of general purpose lanes, channelization, computerized signal systems, intersection or midblock widenings, and Intelligent Transportation Systems.

C-7d: Proposed development projects shall incorporate measures to reduce VMT, including consideration of the measures listed below. This list is not intended to be exhaustive, and not all measures may be feasible, reasonable, or applicable to all projects. The purpose of this list is to identify options for future development proposals, not to constrain projects to this list, or to require that a project examine or include all measures from this list. Potential measures, with possible ranges of VMT reduction for a project, include:*

- Increase density of development (up to 10.75 percent)
- Increase diversity of land uses (up to 12 percent)
- Implement car-sharing programs (up to 5 percent)
- Implement parking management and pricing (up to 6 percent)
- Implement subsidized or discounted transit program (up to 0.7 percent)
- Implement commute trip reduction marketing and launch targeted behavioral interventions (up to 3 percent)
- Participating in local or regional carpool matching programs**

- Providing preferential carpool and vanpool parking**
- Providing secure bicycle parking, showers, and lockers at work site**

**Note: VMT reduction ranges based on Quantifying Greenhouse Gas Mitigation Measures, California Air Pollution Control Officers Association (2010), and new research compiled by Fehr & Peers (2020). Additional engineering analysis is required prior to applying reductions to specific projects. Actual reductions will vary by project and project context.*

***Reduction determined at the project-level*

RC-4b: *Implement development standards, mitigation measures (as applicable), and best practices that promote energy conservation and the reduction in greenhouse gases, including:*

- *Require new development to incorporate energy-efficient features 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 or, when feasible, exceed the most current “green” development standards in the California Green Building Standards Code;*
- *Require developments to include vehicle charging stations that meet or exceed the requirements of State law and to include outdoor electrical outlets. Discourage portable generators or other portable power sources;*
- *Require best practices in selecting construction methods, building materials, project appliances and equipment, and project design;*
- *Encourage projects to incorporate enhanced energy conservation measures, electric-only appliances, and other methods of reducing energy usage and greenhouse gas emissions; and*
- *Require large energy users to implement an energy conservation plan, which may include solar or other non-fossil fuel sources to meet the operation’s full power demand and 100% fleet electrification as part of the project review and approval process, and develop a program to monitor compliance with and effectiveness of that plan.*

RC-4c: *Continue to review development projects to ensure that all new public and private development complies with or exceeds 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-5a: *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.*
- *Cooperate with the Air District and community organizations to promote public awareness of air quality issues.*

RC-5b: *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-5c: *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-5e: *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). Appropriate separation shall be determined through a Health Risk Assessment that demonstrates the project would not expose sensitive receptors to toxic air contaminants at or above significance thresholds as determined by the SJVAPCD.*

RC-5f: *Construction activity plans shall comply with Air District Rule 8021, including implementation of all required dust control measures and shall, where required, provide 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.*

Biological, Cultural and Tribal Cultural Resources: *The Modified Project would not identify any new sites for urbanization or development that were not previously analyzed or designated for development by the Original Project as provided in the certified GPU EIR and thus would not change the potential locations for*

urbanization and associated potential for biological, cultural, or tribal cultural resources to be affected. The Modified Project would modify potential sites identified for development by the Original Project as previously described; however, as urbanization and disturbance on the sites associated with the Modified Project was anticipated under the Original Project, potential impacts to biological, cultural or tribal cultural resources in the vicinity of these sites would remain similar to those identified for the Original Project. **Applicable Modified Project General Plan policies and actions that address biological, cultural, or tribal cultural resources impacts and ensure that impacts would be comparable with those considered under the Original Project EIR are described in the Addendum and include, but are not limited to:**

RC-6.2: 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.

RC-8.1: 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-8.2: 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-6e: Review all development proposals within or adjacent to the Sphere of Influence, to ensure adequate preservation of community separators and open space resources.

RC-8a: Continue to require projects to comply with the requirements of the County Habitat Plan when reviewing proposed public and private land use changes.

RC-8b: Require project proponents who opt not to participate in the SJMSCP to:

- *Satisfy applicable U.S. Endangered Species Act (ESA), California Endangered Species Act (CESA), National Environmental Policy Act (NEPA), California Environmental Quality Act (CEQA), and other applicable local, state, and federal laws and regulation provisions through consultations with the Permitting Agencies and local planning agencies.*
- *Provide site-specific research and ground surveys for proposed development projects. This research must include a detailed inventory of all biological resources onsite, and appropriate mitigation measures for avoiding or reducing impact to these biological resources. This requirement may be waived if determined by the City that the proposed project area is already sufficiently surveyed.*

RC-8c: Until such time that a Clean Water Act regional general permit or its equivalent is issued for coverage under the SJMSCP, acquisition of a Section 404 permit by project proponents will continue to occur as required by existing regulations. Project proponents shall comply with all requirements for protecting federally protected wetlands.

RC-8g: Where sensitive biological habitats have been identified on or immediately adjacent to a project site, the project shall include appropriate mitigation measures identified by a qualified biologist.

RC-11a: Review all projects affecting areas within the Delta Secondary Zone to ensure they are consistent with the criteria and policies set forth by the Delta Stewardship Council's "Delta Plan".

RC-11c: Review all projects located within or adjacent to priority habitat restoration areas, and consult the California Department of Fish and Wildlife to ensure that any impacts do not have a significant effect on the opportunity to restore habitat as described in the Delta Plan.

RC-10.1 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-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-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; and*
- 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.*

Geology, Soils, and Mineral Resources: The Modified Project would not identify any new sites for urbanization or development that were not previously analyzed or anticipated for urbanization and development in the Original Project EIR. The Modified Project could increase the potential intensity and scale of development on sites anticipated for development, particularly sites that would be redesignated to accommodate industrial uses the Original Project. Potential impacts associated with geology, soils and mineral resources on these sites would remain consistent with those identified for in the certified GPU EIR through adherence to adopted regulations and the Modified Project's policies and actions in the General Plan. Applicable Modified Project General Plan policies and actions that address geology, soils, and mineral resources impacts and ensure that impacts would be comparable with those considered under the Original Project EIR are described in the Addendum and include, but are not limited to:

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-2.4: 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.

CF-8.2: Require all development projects to demonstrate how storm water 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.

RC-3a: Require development projects to comply with the California Building Standards Code requirements for specific site development and construction standards for specific soil types.

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.

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.

S-2d: Review and update the City's inventory of potentially hazardous buildings and require any development or change in occupancy proposals to address hazards, through measures such as strengthening buildings, changing the use of the buildings to an acceptable occupancy level, or demolishing or rehabilitating the building.

CF-8d: Continue to review development projects to identify potential stormwater and drainage impacts and require development to include measures to ensure that off-site runoff is not increased as a during rain and flood events.

Greenhouse Gases, Climate Change and Energy: Additional evaluations were undertaken to compare the impacts associated with the Modified Project and the Original Project evaluated in the certified GPU EIR. With respect to greenhouse gas (GHG) emissions, climate change and energy, the Modified Project would result in a decrease of 1,296 residential units while increase non-residential uses by approximately 1,281,108 square feet. While the Modified Project would result in an increase in development and associated GHG emissions, household-based VMT would decrease, as compared to the Original Project. The Modified Project would not remove or modify components of the Original Project that promote reduction of greenhouse gases emissions and energy conservation to ensure impacts related to greenhouse gases, climate change, and energy are reduced to less than significant. Implementation of the Modified Project's General Plan policies and programs would ensure that the Modified Project continues to be consistent with adopted plans, regulations, and policies associated with greenhouse gas emissions and energy. Applicable Modified Project General Plan policies and actions that address greenhouse gases, climate change, and energy impacts and ensure that impacts would be comparable with those considered under the Original Project EIR are described in the Addendum and include, but are not limited to:

C-5.8: Design future roadways to accommodate transit facilities, as appropriate. These design elements should include installation of transit stops adjacent to intersections and provision of bus turnouts and sheltered stops, where feasible.

C-5.10: Ensure that development projects provide adequate facilities to accommodate school buses, including loading and turn-out locations in multifamily and other projects that include medium and high density residential uses, and that the school districts are provided an opportunity to address specific needs associated with school busing.

C-5.11: As new areas and neighborhoods of the City are developed, fund transit and paratransit expansion (including capital, operations, and maintenance) to provide service levels consistent with existing development.

C-7.2: Require development projects that accommodate or employ 50 or more full-time equivalent employees to establish a transportation demand management (TDM) program that meets or exceeds applicable standards, including Air District requirements.

C-7.4: Require proposed development projects that could have a potentially significant VMT impact to consider reasonable and feasible project modifications and other measures during the project design and environmental review stage of project development that would reduce VMT effects in a manner consistent with state guidance on VMT reduction.

RC-4.6 *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-4.7 *Require expanded innovative and green building best practices, where feasible, including, but not limited to, LEED certification for all new development and retrofitting existing uses, and encourage public and private projects to exceed the most current “green” development standards in the California Green Building Standards Code.*

C-7d: *Proposed development projects shall incorporate measures to reduce VMT, including consideration of the measures listed below. This list is not intended to be exhaustive, and not all measures may be feasible, reasonable, or applicable to all projects. The purpose of this list is to identify options for future development proposals, not to constrain projects to this list, or to require that a project examine or include all measures from this list. Potential measures, with possible ranges of VMT reduction for a project, include:**

- *Increase density of development (up to 10.75 percent)*
- *Increase diversity of land uses (up to 12 percent)*
- *Implement car-sharing programs (up to 5 percent)*
- *Implement parking management and pricing (up to 6 percent)*
- *Implement subsidized or discounted transit program (up to 0.7 percent)*
- *Implement commute trip reduction marketing and launch targeted behavioral interventions (up to 3 percent)*
- *Participating in local or regional carpool matching programs***
- *Providing preferential carpool and vanpool parking***
- *Providing secure bicycle parking, showers, and lockers at work site***

**Note: VMT reduction ranges based on Quantifying Greenhouse Gas Mitigation Measures, California Air Pollution Control Officers Association (2010), and new research compiled by Fehr & Peers (2020). Additional engineering analysis is required prior to applying reductions to specific projects. Actual reductions will vary by project and project context.*

***Reduction determined at the project-level*

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. Report on the City’s progress annually, and schedule public hearings at the Planning Commission and City Council. The Climate Action Plan shall be updated by 2025 and subsequently reviewed every 5 years and updated as necessary to be consistent with State-adopted GHG reduction targets, including revisions to GHG reduction measures to ensure effective implementation.*

RC-4b: *Implement development standards, mitigation measures (as applicable), and best practices that promote energy conservation and the reduction in greenhouse gases, including:*

- *Require new development to incorporate energy-efficient features 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 or, when feasible, exceed the most current “green” development standards in the California Green Building Standards Code;*
- *Require developments to include vehicle charging stations that meet or exceed the requirements of State law and to include outdoor electrical outlets. Discourage portable generators or other portable power sources;*
- *Require best practices in selecting construction methods, building materials, project appliances and equipment, and project design;*

- Encourage projects to incorporate enhanced energy conservation measures, electric-only appliances, and other methods of reducing energy usage and greenhouse gas emissions; and
- Require large energy users to implement an energy conservation plan, which may include solar or other non-fossil fuel sources to meet the operation's full power demand and 100% fleet electrification as part of the project review and approval process, and develop a program to monitor compliance with and effectiveness of that plan.

RC-4c: Continue to review development projects to ensure that all new public and private development complies with or exceeds 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-4i: Implement transportation measures, as outlined in the Circulation Element, which reduce the need for automobile use and petroleum products.

RC-4j: Develop a Zero Emissions Vehicle Market Development Strategy that ensures expeditious implementation of the systems of policies, programs and regulations necessary to address Executive Order N-79-20.

RC-5b: 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-5c: 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-5d: *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.*

Hazards and Hazardous Materials: As previously discussed, the Modified Project would allow for an increase in density on sites that are currently designated in the General Plan to allow for commercial, public institutional, residential, and business professional uses by the General Plan. The Modified Project would not identify any new areas for development in comparison to the Original Project. The Modified Project does not include types of uses that would result in hazards or use of hazardous materials not considered for the Original Project. Applicable Modified Project General Plan policies and actions that address hazards and hazardous materials impacts and ensure that impacts would be comparable with those considered under the Original Project EIR are described in the Addendum and include, but are not limited to:

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-2.7: *Require compliance with the State's building standards in the design and siting of critical facilities, including police and fire stations, school facilities, hospitals, hazardous materials manufacturing and storage facilities, and large public assembly halls.*

S-4.2: *Strictly regulate the production, use, storage, transport, and disposal of hazardous materials in compliance with local, federal, and State requirements 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.*

CF-3d: *The Planning Commission and City Engineer will review proposed residential street patterns to evaluate the accessibility for fire engines and emergency response.*

S-2b: *Review development proposals to ensure compliance with the current State building standards.*

S-4a: *As part of the development review process, require projects that may 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, and to ensure adequate measures are in place to reduce risks to an acceptable level.*

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.

Hydrology and Water Quality: The Modified Project would decrease residential development potential and allow for an increase in non-residential development, including industrial and park uses. The Modified Project anticipates urbanization and disturbance of the same areas within the Planning Area as the Original Project and would not designate additional sites for urban development in comparison to the Original Project. Future development under the Modified Project would be subject to the Manteca Municipal Code and to Original Project policies and actions identified to reduce potential impacts associated with water quality, including water quality standards and waste discharge requirements, depletion of groundwater supplies, alteration to existing drainage patterns, release pollutants due to project inundation by a flood, tsunami, or seiche, and cumulative impacts associated with hydrology and water quality. The Modified Project does not include any modifications to the Original Project policies and actions that address and reduce impacts associated with hydrology and water quality. **Applicable Modified Project General Plan policies and actions that address hydrology and water quality impacts and ensure that impacts would be comparable with those considered under the Original Project EIR are described in the Addendum and include, but are not limited to:**

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, increase water conservation, and establish water reuse and recycling systems.

CF-8.2: Require all development projects to demonstrate how storm water 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.

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-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.

RC-3b: Require site-specific land management and development practices for proposed development projects, including appropriate measures for drainage control and avoiding or reducing erosion.

RC-3c: Continue to implement, and periodically review/update as necessary, Municipal Code Section 17.48.070(G) (Grading Design Plan). The City shall review projects to ensure that best management practices are implemented during construction and site grading activities, as well as in project design to reduce pollutant runoff into water bodies.

CF-8d: Continue to review development projects to identify potential stormwater and drainage impacts and require development to include measures to ensure that off-site runoff is not increased as a during rain and flood events.

S-3g: Amend Chapter 8.30 (Floodplain Management) of the Municipal Code to reflect flood protection requirements specified in the Safety Element as well as any relevant updates to Federal or State requirements.

S-3h: Consider potential effects of climate change in planning, design, and maintenance of levee improvements and other flood control facilities.

Land Use, Population and Housing: The Original Project does not include any uses or features that would physically divide existing communities, includes policies and measures to promote consistency with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, would not induce substantial unplanned population growth, and would not displace substantial numbers of existing people or housing. The Modified Project anticipates development and urbanization of sites designated for residential, commercial, industrial, business industrial park, and park uses by the General Plan. Furthermore, the Modified Project would not designate additional sites for urban development as compared to the Original Project. Applicable Modified Project General Plan policies and actions that address land use and planning, population, and housing impacts and ensure that impacts would be comparable with those considered under the Original Project EIR are described in the Addendum and include, but are not limited to:

LU-1.2: Promote land use compatibility through use restrictions, development standards, environmental review, and design considerations.

LU-1.4: Assign the land use designations throughout the City and to parcels within the Planning Area, as included in this element and shown in the Land Use Map (Figure LU-2).

LU-2.6: Evaluate applications for annexations based upon the following criteria:

- The annexation shall mitigate its impacts through consistency with the General Plan goals and polices and shall provide a positive benefit to Manteca.*
- The annexation area is contiguous with city boundaries and provides for logical expansion and development.*
- The annexation area creates clear and reasonable boundaries for the City and service providers.*
- The annexation area will be adequately served by municipal services.*

- *The annexation area will be adequately served by schools.*
- *The annexation, when reviewed cumulatively with other annexations, provides a long-term fiscal balance for the City and its residents.*
- *The annexation is consistent with State law and San Joaquin County Local Agency Formation Commission standards.*
- *The annexation is consistent with the General Plan.*
- *The annexation contributes its fair-share to applicable infrastructure and public services needs, including facilities identified in the Regional Transportation Plan, Public Facilities Implementation Plan, and Capital Improvement Program.*
- *The effect of the proposal on maintaining the physical and economic integrity of agricultural lands and achievement of Resource Conservation and Community Design Elements goals.*
- *The extent to which the proposal will assist the City in achieving the adopted fair share of the Regional Housing Needs Assessment as determined by the San Joaquin Council of Governments.*
- *The extent to which the proposal will promote environmental justice. As used in this policy, “environmental justice” means the fair treatment of people of all races, cultures, and incomes with respect to the location of public facilities and the provision of public services.*
- *The extent in which the proposal facilitates achievement of the City’s jobs/housing balance goal of a 1:1 ratio.*

LU-2.7: *Review public and private development proposals and land use changes within the City’s Sphere of Influence (SOI) and Planning Area for consistency within the General Plan.*

EF-5.1: *Plan and encourage residential development with a broad range of housing types and densities to accommodate all income levels and job classifications and take into account anti-gentrification measures to preserve existing affordable housing.*

EF-5.2: *Plan for a balanced community where the Manteca workforce will be able to afford housing within the city of Manteca.*

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-11.3: *Support funding mechanisms that provide for the longer-term improvement and maintenance of Delta levees, and coordinate Delta emergency preparedness, response, and recovery with local agencies.*

LU-1a: *As part of the annual report on the implementation of the General Plan to the Planning Commission and City Council, provide an evaluation of the year’s development trends, current land supply, and the ability of infrastructure and public services to meet future needs.*

LU-2d: *Prior to the consideration of any General Plan amendment to modify the land use allocation or expand the City’s boundaries or sphere of influence, the City shall complete or cause to be completed the following City-wide studies/plans:*

- a. *Recreational needs assessment and consistency with the Open Space and Conservation Element and Parks and Recreation Master Plan.*
- b. *Economic Development Studies and consistency with Economic Development and Fiscal Element goals and policies.*
- c. *Public Facilities and Services Capacity Study consistent with the Public Facilities and Services Element.*
- d. *Transportation System Capacity Study, including Long Range Transit Plan consistent with the Circulation Element.*

The studies shall define overall holding capacities and identify additional performance standards that will need to be met to ensure the achievement of the goals and policies of the General Plan.

EF-5a: Use the Policies and Implementation Measures outlined in the Housing Element to assure provision of housing affordable to the existing and future workforce.

RC-11a: Review all projects affecting areas within the Delta Secondary Zone to ensure they are consistent with the criteria and policies set forth by the Delta Stewardship Council's "Delta Plan".

Noise: As discussed in the certified GPU EIR, the Original Project would have a significant and unavoidable impact related to exposure to traffic noise sources and would result in a cumulatively considerable contribution to cumulative noise impacts that are significant and unavoidable. Nevertheless, an evaluation of noise impacts associated with the Modified Project, as compared to the Original Project evaluated in the certified GPU EIR, was based on updated technical studies related to traffic and VMT. As discussed previously, the Modified Project would result in a reduction in per household VMT and an increase in per employee VMT in comparison to the Original Project. The Modified Project would result in an increase in traffic levels on roadways, with increases from one to four percent over the Original Project buildout scenario, as well as minor reductions in several locations. While these increased traffic levels would result in minor increases in noise levels, the traffic levels would not result in new significant impacts associated with traffic noise, as the increases would occur either along segments already identified as having a significant increase, or the identified segment is not near the threshold and the ADT increase would be modest and would not result in an increase in noise beyond the threshold for the segment. **Applicable Modified Project General Plan policies and actions that address noise impacts and ensure that impacts would be comparable with those considered under the Original Project EIR are described in the Addendum and include, but are not limited to:**

S-6.1 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-6.4 Require residential and other noise-sensitive development projects to satisfy the noise level criteria in Tables S-1 and S-2.

S-6.7 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 development 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-6.12 For new residential development backing on to a freeway or railroad right-of-way, the developer shall be required to incorporate appropriate noise attenuation measures to satisfy the performance standards in Table S-1.

S-6.15 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.

S-6a Require an acoustical analysis that complies with the requirements of S-5.7 where:

- Noise sensitive land uses are proposed in areas exposed to existing or projected noise levels exceeding the levels specified in Table S-1 or S-2.
- Proposed transportation projects are likely to produce noise levels exceeding the levels specified in Table S-1 or S-2 at existing or planned noise sensitive uses.

S-6c Update the City's Noise Ordinance (Chapter 9.52) to reflect the noise standards established in this Safety Element and proactively enforce the City's Noise Ordinance, including requiring the following measures for construction:

- Restrict construction activities to the hours of 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. No exemption shall be issued for construction within 200 feet of residential uses.
- A Construction Noise Management Plan shall be submitted by the applicant for construction projects that exceed ambient noise levels by more than 12dBA or produce perceptible vibrations at any off-site structures. The Construction Noise Management Plan shall include proper posting of construction schedules, appointment of a noise disturbance coordinator, methods for assisting in noise reduction measures, and shall establish allowed truck routes to access the site that minimize exposure of residential areas to heavy truck traffic.

Noise reduction measures shall include, but are not limited to, the following:

- a. Equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically attenuating shields or shrouds) wherever feasible.
- b. Except as provided herein, impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction shall be hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used. This muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used, if such jackets are commercially available. This

would achieve a reduction of up to 5 dBA. Quieter procedures shall be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.

- c. Temporary power poles or zero-emission power sources shall be used instead of generators where feasible.
- d. Stationary noise sources shall be located as far from adjacent properties as possible, and they shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the City to provide equivalent noise reduction.
- e. The noisiest phases of construction shall be limited to less than 10 days at a time. Exceptions may be allowed if the City determines an extension is necessary and all available noise reduction controls are implemented.
- f. Delivery of materials shall observe the hours of operation described above.
- g. Truck traffic shall avoid residential areas to the greatest extent feasible.

S-6d In making a determination of impact under the California Environmental Quality Act (CEQA), a substantial increase will occur if ambient noise levels have a substantial increase. Generally, a 3 dB increase in noise levels is barely perceptible, and a 5 dB increase in noise levels is clearly perceptible. Therefore, increases in noise levels shall be considered to be substantial when the following occurs:

Transportation Noise

- When existing noise levels are less than 60 dB, a 5 dB increase in noise will be considered substantial;
- When existing noise levels are between 60 dB and 65 dB, a 3 dB increase in noise will be considered substantial;
- When existing noise levels exceed 65 dB, a 1.5 dB increase in noise will be considered substantial.

Non-Transportation Noise

- An 5dB increase in noise will be considered substantial.

Construction Noise

- An increase in 12dBA in noise will be considered substantial.

S-6e Control noise at the source through use of insulation, berms, building design and orientation, buffer space, staggered operating hours, and similar techniques. Where such techniques would not be sufficient to meet acceptable noise levels, use noise barriers to attenuate noise associated with new noise sources to acceptable levels.

S-6g Evaluate new transportation projects, such as truck routes, rail or public transit routes, and transit stations, using the standards contained in Table S-1. However, noise from these projects may be allowed to exceed the standards contained in Table S-1, if the City Council finds through the CEQA process that there are overriding considerations.

S-6h Work with the Federal Rail Authority and passenger and freight rail service providers to establish a Quiet Zone and/or Wayside Horns at at-grade crossings in the City. Where new development would be affected by the train and rail noise, require project applicants to fund a fair-share of: a) studies associated with the application for a Quiet Zone and/or Wayside Horns, and b) alternative safety measures associated with the Quiet Zone (including, but not limited to signage, gates, lights, etc.).

As with the Original Project, the use of noise control treatments would reduce noise exposure but would not reduce to a level of less than significance, as measures such as sound walls or quiet pavement may not be practical in all locations and would also not reduce noise levels to a less than significant level in all locations. Therefore, under the Modified Project, traffic noise increases are expected to exceed the noise exposure criteria, and impacts associated with traffic noise would remain significant and unavoidable. As with the Original Project, the Modified Project would have a cumulatively considerable contribution to significant and unavoidable cumulative noise impacts.

Potential impacts associated with construction activities, substantial temporary, periodic, or permanent increase in ambient noise levels, noise associated with stationary sources, groundborne vibration, and excessive railroad noise are anticipated to be comparable under the Modified Project to the Original Project, as the sites included in the Modified Project were designated for urban development with residential, commercial, park, and business industrial park uses by the Original Project. Future residential, industrial, parks, and commercial development proposed by the Modified Project would be required to comply with the Modified Project's General Plan policies and actions which would result in noise impacts that are comparable to the Original Project. Applicable Modified Project General Plan policies and actions that address stationary source noise, groundborne vibration, and railroad noise impacts and ensure that impacts would be comparable with those considered under the Original Project EIR are described in the Addendum and include, but are not limited to:

S-6.1 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-6.4 Require residential and other noise-sensitive development projects to satisfy the noise level criteria in Tables S-1 and S-2.

S-6.5 Require new stationary noise sources proposed adjacent to noise sensitive uses to incorporate noise attenuating measures 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-6.6 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-6.7 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 development 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-6.8 *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-6.12 *For new residential development backing on to a freeway or railroad right-of-way, the developer shall be required to incorporate appropriate noise-attenuation measures to satisfy the performance standards in Table S-1.*
- S-6.16 *Work with the Federal Railroad Administration and passenger and freight rail operators to reduce exposure to rail and train noise, including establishing train horn “quiet zones” and/or wayside horns consistent with the federal regulations.*

S-6a *Require an acoustical analysis that complies with the requirements of S-5.7 where:*

- *Noise sensitive land uses are proposed in areas exposed to existing or projected noise levels exceeding the levels specified in Table S-1 or S-2.*
- *Proposed transportation projects are likely to produce noise levels exceeding the levels specified in Table S-1 or S-2 at existing or planned noise sensitive uses.*

S-6c *Update the City’s Noise Ordinance (Chapter 9.52) to reflect the noise standards established in this Safety Element and proactively enforce the City’s Noise Ordinance, including requiring the following measures for construction:*

- *Restrict construction activities to the hours of 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. No exemption shall be issued for construction within 200 feet of residential uses.*
- *A Construction Noise Management Plan shall be submitted by the applicant for construction projects that exceed ambient noise levels by more than 12dBA or produce perceptible vibrations at any off-site structures. The Construction Noise Management Plan shall include proper posting of construction schedules, appointment of a noise disturbance coordinator, methods for assisting in noise reduction measures, and shall establish allowed truck routes to access the site that minimize exposure of residential areas to heavy truck traffic.*

Noise reduction measures shall include, but are not limited to, the following:

- Equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically attenuating shields or shrouds) wherever feasible.*
- Except as provided herein, impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction shall be hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used. This muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used, if such jackets are commercially available. This would achieve a reduction of up to 5 dBA. Quieter procedures shall be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.*
- Temporary power poles or zero-emission power sources shall be used instead of generators where feasible.*
- Stationary noise sources shall be located as far from adjacent properties as possible, and they shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use*

other measures as determined by the City to provide equivalent noise reduction.

- l. The noisiest phases of construction shall be limited to less than 10 days at a time. Exceptions may be allowed if the City determines an extension is necessary and all available noise reduction controls are implemented.*
- m. Delivery of materials shall observe the hours of operation described above.*
- n. Truck traffic shall avoid residential areas to the greatest extent feasible.*

S-6d *In making a determination of impact under the California Environmental Quality Act (CEQA), a substantial increase will occur if ambient noise levels have a substantial increase. Generally, a 3 dB increase in noise levels is barely perceptible, and a 5 dB increase in noise levels is clearly perceptible. Therefore, increases in noise levels shall be considered to be substantial when the following occurs:*

Transportation Noise

- When existing noise levels are less than 60 dB, a 5 dB increase in noise will be considered substantial;*
- When existing noise levels are between 60 dB and 65 dB, a 3 dB increase in noise will be considered substantial;*
- When existing noise levels exceed 65 dB, a 1.5 dB increase in noise will be considered substantial.*

Non-Transportation Noise

- An 5dB increase in noise will be considered substantial.*

Construction Noise

- An increase in 12dBA in noise will be considered substantial.*

S-6e *Control noise at the source through use of insulation, berms, building design and orientation, buffer space, staggered operating hours, and similar techniques. Where such techniques would not be sufficient to meet acceptable noise levels, use noise barriers to attenuate noise associated with new noise sources to acceptable levels.*

S-6f *Require that all noise-attenuating features, including soundwalls and quieter pavements, are designed to be attractive and to minimize maintenance.*

S-6h *Work with the Federal Rail Authority and passenger and freight rail service providers to establish a Quiet Zone and/or Wayside Horns at at-grade crossings in the City. Where new development would be affected by the train and rail noise, require project applicants to fund a fair-share of: a) studies associated with the application for a Quiet Zone and/or Wayside Horns, and b) alternative safety measures associated with the Quiet Zone (including, but not limited to signage, gates, lights, etc.).*

S-6i *Work in cooperation with Caltrans, the Union Pacific Railroad, San Joaquin Regional Rail Commission, and other agencies where appropriate to maintain noise level standards for both new and existing projects in compliance with Table S-1.*

S-6j *The City shall require new residential projects located adjacent to major freeways, truck routes, hard rail lines, or light rail lines to follow the FTA screening distance criteria to ensure that groundborne vibrations to do not exceed acceptable levels.*

Public Services and Recreation: The Modified Project would result in a reduction in residential units and an increase in non-residential uses. The Modified Project would also necessitate provision of public services and recreation and has the potential to require new or altered governmental and recreation

facilities. Similar to the Original Project, no specific development projects or governmental facility or recreation projects are proposed under the Modified Project. However, the Modified Project anticipates urbanization of the same areas anticipated to be urbanized and developed under the Original Project. The Modified Project has retained and would be subject to the Original Project policies and programs to ensure that environmental impacts associated with the substantial adverse physical impacts associated with new development and redevelopment and to address the demand for fire protection, police protection, schools, and other public facilities and to address adverse physical impacts associated with recreation facilities. The General Plan policies and programs also ensure that cumulative environmental impacts associated with provision of public services and recreation would be reduced to less than significant. Implementation of General Plan policies and programs would continue to ensure that environmental impacts to public facilities and recreation associated with development, including development accommodated by the Modified Project, would remain less than significant. The potential effects of constructing new or altered governmental public services and recreation facilities would be consistent with the impacts identified for the Original Project evaluated in the certified GPU EIR. Applicable Modified Project General Plan policies and actions that address public services and recreation impacts and ensure that impacts would be comparable with those considered under the Original Project EIR are described in the Addendum and include, but are not limited to:

CF-1.1: Encourage the implementation of new and sustainable 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 or environmental burden on existing residents.

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-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, while striving to provide a minimum of 1.0 officer per 1,000 population.

CF-2.5: Endeavor through adequate staffing and patrol arrangements to maintain the minimum feasible police response times for police calls.

CF-2.6: Ensure crime-reduction and public safety features are incorporated into the design of new development projects through implementation of Crime Prevention Through Environmental Design (CPTED) techniques.

CF-2.7: Emphasize the use of CPTED to ensure that physical site planning is an effective means of preventing crime. Residential, commercial, industrial, and open spaces land uses shall incorporate, landscaping, sidewalks, parking lots, parks, play areas, and other public spaces that are designed with maximum feasible visual and aural exposure to community residents.

CF-2.7: Promote coordination between land use planning, urban design, and CPTED 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 2 or better for all developed areas within the City, and a minimum staffing of 3 personnel for all fire stations.

CF-3.2: Provide fire services to serve the existing and projected population.

CF-3.5: 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-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-4.4: Maintain an overall minimum ratio of 5 acres of developed neighborhood and community parkland per 1,000 residents within the city limits, requiring new development to contribute to its fair share of park and recreation needs. The distribution of land between park types and guidelines for park types shall be determined within the Parks and Recreation Master Plan.

CF-4.5: Develop new parks, trails, and recreation facilities through developer fees in areas which are accessible and convenient to the community, prioritizing areas that are lacking these facilities.

CF-4.6: Endeavor to develop one or more community parks as defined in the Parks and Recreation Master Plan, with a focus on accommodating community-wide events.

CF-4.7: As part of the next Parks and Recreation Master Plan update, address opportunities to create a nature-based park, with priority to a park developed as part of a conservation program for natural resource lands. Priority should be given to City-owned site that could provide opportunities for hiking and fishing.

CF-4.8: Consider the effects of new development on parks, trails, and recreation facilities, programs, and services, and condition new development appropriately to ensure that the City maintains an adequate inventory and network of facilities and resources.

CF-4.9: Cooperate with the school districts in opportunities for joint-use of school and park and recreational facilities.

CF-4.10: Actively promote and participate in regional coordination and planning efforts to provide quality parks, trails, and recreation facilities throughout Manteca and the surrounding areas. The City should emphasize regional coordination to leverage funding, maintenance, and/or resources to develop a diverse range of regional recreational opportunities.

CF-4.11: Emphasize and prioritize public outreach and educational programs that inform the community of available parks, trails, and recreation facilities, programs, and services available in order to increase and enhance community use of these facilities, programs, and services.

CF-4.12: Encourage the expansion of private commercial recreational facilities.

CF-4.13: Develop a convenient system of pedestrian sidewalks and pathways and multiuse trails, linking City parks, major open space areas, and the downtown core.

CF-4.14: Support recreational activities, events, organized sports leagues, and other programs that serve broad segments of the community.

CF-4.15: Allow parks as a permitted use in all residential land use designations.

CF-5.2: Continue to work with local school districts to develop criteria for the designation of school sites and ensure that adequate sites are designated and facilities are planned to accommodate new residential development, with a focus on providing neighborhood schools. Criteria should address the following:

- School locations are encouraged to be sited to relate well to adjacent and nearby uses, including neighborhood focal areas and park sites.*
- School sites and school enrollment sizes should contribute to the neighborhood character and provide opportunities for joint-use, including capacity to accommodate a broad range of programs and services and augment neighborhood parks and recreation facilities.*
- School districts are encouraged to comply with City standards in the design and landscaping of school facilities.*

It is noted that school site locations can be adjusted if the school district chooses not to locate in the area and the land will be designated Medium Density Residential.

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-6.5: 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-6.6: Limit development of private water wells to occur only if the City makes a finding that it cannot feasibly provide water service. Such systems shall only be allowed to be used until such time as City water service becomes available.

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-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-7.4: Only allow the development of individual septic systems where it is not feasible to provide public sewer service. Such systems shall only be used until such time as City sewer service becomes available and meet the minimum standards of the San Joaquin County Health Department.

CD-11.1: Strengthen the public understanding of the important role that physical design plays in helping reduce the incidence and fear of crime to promote the development of a safe and healthy city.

CD-11.2: Consider adopting Crime Prevention through Environmental Design (CPTED) standards to ensure that the built environment supports Manteca as the “The Family City” by applying safer design principles to development projects.

CD-11.3: Review projects in accordance with the four overlapping principles of CPTED of: 1) Natural Surveillance; 2) Natural Access Control; 3) Territorial Reinforcement; and, 4) Maintenance.

CD-11.4: Develop review processes that take into account CPTED principles that can be applied to address specific sites and situations.

CF-1a: Require new development to demonstrate that the City's existing or planned community services and facilities can accommodate the increased demand prior to or at completion of the project.

CF-1b: Require new development to offset or mitigate impacts to community services and facilities, including fair-share contribution of the costs of required public infrastructure and services, to ensure that service levels for existing users are not degraded or impaired.

CF-1c: Consider the creation of and/or the participation in Enhanced Infrastructure Financing Districts (EIFD) in all areas of the city to generate tax increment funding for community facilities of communitywide significance that support new and infill development.

CF-1d: Periodically review the fee schedules for water and sewer connections, city facilities and major equipment, and development impact fees and revise fees as necessary to cover the cost of services and facilities.

CF-1e: Cooperate with other jurisdictions, agencies, and utility providers where appropriate to achieve timely and cost-effective provision of public facilities and services.

CF-2c: As part of the development review process, consult with the Police Department in order to ensure that the project design facilitates adequate police services and that the project addresses its impacts on police services.

CF-2d: Require new development, if appropriate, to provide a funding mechanism to support and maintain Manteca's high level of police services.

CF-2f: Monitor new development projects in the unincorporated parts of the Manteca Planning Area that would require law enforcement services from the City.

CF-4a: Continuously monitor the condition of parks, trails, and recreation facilities throughout the community and prioritize the rehabilitation of existing facilities that serve the greatest number of residents.

CF-4b: Bi-annually review the City's Parks and Recreation Master Plan to ensure that parks and recreation needs are adequately identified and prioritized, to update cost estimates for park acquisition and development and remaining development potential based on the General Plan and to ensure that the City maintains a minimum overall ratio of 5 acres of parkland for every 1,000 residents.

CF-4c: As part of the next Parks and Recreation Master Plan Update, prepare the plan through an open and engaging process inclusive of community residents and stakeholders that assesses the quality and distribution of existing parks, facilities, and community centers throughout the city relative to the population served and their needs and consider the community needs identified during the General Plan process, including a community park and a combined or separate facility to accommodate community-wide events, a nature-based park, bicycle and pedestrian improvements necessary to improve access to park and recreation facilities, methods to increase physical activity opportunities in the community, and increased joint use of facilities with the school districts. Based on this information, identify and prioritize park and community recreation projects and identify funding means and timelines.

CF-4d: Investigate and pursue a diverse range of funding opportunities for parks, trails, and recreation facilities, including but not limited to, grants, joint use/management strategies, user fees, private sector funding, assessment districts, homeowners' associations, non-profit organizations, funding mechanisms for

the maintenance of older parks, and management assistance through Federal, State, and regional partnerships.

CF-4e: Periodically review, and if necessary, update the Parks and Recreation development impact fees in order to ensure that the City's parks and recreation needs are adequately identified and prioritized and that new development continues to provide a fair-share contribution towards parks, trails, and recreation facilities.

CF-4f: Implement a wide range of public outreach programs, including the City's website, newsletters, other emerging communications technologies, and partnerships with community organizations to keep the public informed about available parks, trails, and recreation facilities, programs, and services.

CF-4g: Continue to pursue joint-use of schools and detention facilities to supplement the parks, trails, and recreation needs of the community.

CF-4h: Through conditions of approval and/or development agreements, ensure that new development provides for its fair-share of park and recreation facilities, including connections to adjacent facilities, and that the development of new parks, trails, and recreation facilities occurs during the infrastructure construction phase of new development projects so that they are open and available to the public prior to completion of the project.

CF-6a: Update the Public Facilities Implementation Plan, regarding water supply and distribution, every five years. The update shall reflect the most recent adopted groundwater studies that establish a safe yield for the groundwater basin and/or establish maximum extraction from the basin. The update shall be reviewed annually for adequacy and consistency with the General Plan.

CF-6c: Develop new water sources, storage facilities, and major distribution lines as necessary to serve new development.

CF-6e: Continue to assess a water development fee on all new commercial, industrial, and residential development sufficient to fund system-wide capacity improvements. The water development fee schedule shall be periodically reviewed and revised as necessary.

CF-6g: Require, as a condition of project approval, dedication of land and easements, or payment of appropriate fees and exactions, to help offset municipal costs of expansion of water treatment facilities and delivery systems.

CF-7a: Update the Public Facilities Implementation Plan regarding wastewater collection and treatment every five years. The update shall be reviewed annually for adequacy and consistency with the General Plan.

CF-7b: Require new development to provide for and fund a fair share of the costs for adequate sewer distribution, including line extensions, easements, and plant expansions.

CD-11a: Encourage development projects to incorporate Crime Prevention through Environmental Design (CPTED) techniques and defensible space design concepts.

LU-2h: Coordinate with the cities of Lathrop and Ripon in implementing the respective Memorandums of Understanding regarding future land use and public services and facilities in mutually agreed upon areas of common interest and ensure any updates to the Memorandums of Understanding address best practices for reducing exposure to environmental risks and promoting environmental justice.

LU-7d: Regularly contact the school districts to request identification of planned school sites and update the Land Use Map as necessary.

Transportation and Traffic: The Original Project would result in per capita and per employee VMT under buildout conditions that exceed the threshold, which is based on a threshold of a 15 percent reduction below the existing VMT per dwelling unit for single family, multifamily, and age-restricted units and a 15 percent reduction below the existing VMT per employee for restaurant, industrial, office, and retail uses. As discussed in the certified GPU EIR, the Original Project would have a cumulatively considerable contribution to cumulative impacts on the transportation network. The Original Project includes transportation network components to reduce VMT, encourage alternatives support safe walking and biking, promote transit use, and promote mobility and includes policies and actions to support and encourage the use of integration and use of multi-modal transportation options throughout the Planning Area, ensure that facilities are designed to address safety and hazards, promote accessibility, and promote adequate access for emergency response and evacuation conditions.

An analysis of VMT that would occur with buildout of the Modified Project in comparison to the Original Project was conducted. The Modified Project would result in VMT under buildout conditions that would be similar to the Original Project. Specifically, the Modified Project would result in VMT levels per dwelling unit that are below the threshold for single family, multifamily, and age-restricted units; these home-based VMT levels are consistent with the VMT levels projected for the Original Project. The Modified Project would result in per employee VMT levels that are slightly reduced over the baseline condition but above the threshold for industrial employees and that are above the threshold for restaurant, office, and retail employees; these levels are similar to the Original Project. The Modified Project has retained and would implement Original Project policies and actions to reduce VMT to the extent feasible through planning for an efficient circulation system, providing adequate pedestrian, bicycle, and transit facilities and opportunities, promoting non-vehicle travel modes, requiring development projects that accommodate or employ 50 or more employees to implement TDM programs, and ensuring regional coordination on trip and VMT reduction efforts. Applicable Modified Project General Plan policies and actions that address transportation impacts associated with VMT and ensure that impacts would be comparable with those considered under the Original Project EIR are described in the Addendum and include, but are not limited to:

C-2.1 Promote development of a future roadway system as shown in the Major Streets Master Plan, Figure CI-1, with streets designed in accordance with the City's standard plans to provide multiple, direct, and convenient routes for all modes and to provide high-volume, multi-lane facilities with access controls, as needed, to preserve the through traffic carrying capacity of the facility.

C-2.5 (formerly C-2.4) Design street improvements to provide multiple, direct, and convenient routes for all modes.

C-6.3 Support regional freight planning efforts including regional improvement of logically networked STAA truck routes Roth Road, SR 99 Frontage Roads, and French Camp Road that minimize impacts to existing City residents.

C-7.2 Require development projects that accommodate or employ 50 or more full-time equivalent employees to establish transportation demand management (TDM) programs that meets or exceeds applicable standards, including Air District requirements.

C-7.4 Require proposed development projects that could have a potentially significant VMT impact to consider reasonable and feasible project modifications and other measures during the project design and environmental review stage of project development that would reduce VMT effects in a manner consistent with state guidance on VMT reduction.

C-7.6 Expand alternatives to driving by increasing opportunities to walk, bike, and use transit.

CD-10.5 Integrate pedestrian elements, including, but not limited to walkways, plazas, and terraces, with buildings to make the pedestrian experience comfortable and convenient, and to protect pedestrians from climatic conditions.

CD-10.6 Incorporate outdoor plazas or other common areas that provide space for special landscaping, public art, food service, outdoor retail sales, or seating areas for patrons in retail settings appropriate to such pedestrian activity. The plaza or other common area shall be appropriately scaled to the retail use and shall be directly connected to the primary walkway.

CD-10.7 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-10.8 Configure buildings to provide “outdoor rooms,” including, but not limited to courtyards, paseos, and promenades.

RC-4.4 Ensure that land use and circulation improvements are coordinated to reduce the number and length of vehicle trips.

C-2b When planning roadway facilities, incorporate the concept of complete streets. Complete streets include design elements for more safe travel by all modes that use streets, including autos, transit, pedestrians, and bicycles. Complete streets shall be developed in a context-sensitive manner. For example, it may be more appropriate to provide a Class I bike path instead of bike lanes along a major arterial. Pedestrian districts like Downtown Manteca or areas near school entrances should have an enhanced streetscape (e.g., narrower travel lanes, landscape buffers with street trees, etc.) to better accommodate and encourage pedestrian travel.

C-2g (formerly C-2f) Ensure that bicycle and pedestrian access is both provided and prioritized through providing openings to increase access where soundwalls and berms are located to minimize travel distances and increase the viability walking and bicycling.

C-7a Provide information about transit services, ridesharing, vanpools, and other transportation alternatives to single occupancy vehicles at City Hall, the library, on the City website, and through other channels.

C-7b Develop TDM program requirements with consideration of addressing CEQA vehicle miles traveled impact analysis requirements (i.e., SB 743) in accordance with implementation measure C-1b. TDM programs shall include measures to reduce total vehicle miles traveled and peak hour vehicle trips. A simplified version of the Air District’s Rule 9410 could be used to implement this measure.

C-7c Coordinate with the San Joaquin Council of Governments on a Congestion/Mobility Management Program to identify TDM strategies to reduce VMT and mitigate peak-hour congestion impacts. Strategies may include: growth management and activity center strategies, telecommuting, increasing transit service frequency and speed, transit information systems, subsidized and discount transit programs, alternative work hours, carpooling, vanpooling, guaranteed ride home program, parking management, addition of general purpose lanes, channelization, computerized signal systems, intersection or midblock widenings, and Intelligent Transportation Systems.

*C-7d Proposed development projects shall incorporate measure to reduce VMT, including consideration of the measures listed below. This list is not intended to be exhaustive, and not all measures may be feasible, reasonable, or applicable to all projects. The purpose of this list is to identify options for future development proposals, not to constrain projects to this list, or to require that a project examine or include all measures from this list. Potential measures, with possible ranges of VMT reduction for a project, include:**

- *Increase density of development (up to 10.75 percent)*

- Increase diversity of land uses (up to 12 percent)
- Implement car-sharing programs (up to 5 percent)
- Implement parking management and pricing (up to 0.7 percent)
- Implement subsidized or discounted transit program (up to 3 percent)
- Implement commute trip reduction marketing and launch targeted behavioral interventions (up to 3 percent)
- Participating in local or regional carpool matching programs**
- Providing preferential carpool and vanpool parking**
- Providing secure bicycle parking, showers, and lockers at work site**

**Note: VMT reduction ranges based on Quantifying Greenhouse Gas Mitigation Measures, California Air Pollution Control Officers Association (2010) and new research compiled by Fehr & Peers (2020). Additional engineering analysis is required prior to applying reductions to specific projects. Actual reductions will vary by project and project context.*

***Reduction determined at the project-level*

C-7f Implement the Active Transportation Plan and other Bikeway and Pedestrian Systems goals and policies (C-4).

C-7a Expand transit service and increase transit frequency and implement Public Transit goals and policies (C-5).

RC-5b 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.

The Original Project would have a significant and unavoidable impact associated with the potential to conflict with a program, plan, policy, or ordinance addressing the circulation system, particularly the potential to conflict with policies for safe travel including by transit users, bicycles, and pedestrians. The certified GPU EIR identifies a significant and unavoidable impact with the potential for the Original Project to increase hazards due to a design feature, incompatible uses, or inadequate emergency access based on the potential that traffic collisions may not be maintained at current or lower levels. Applicable Modified Project General Plan policies and actions that address consistency with programs, plans, policies or ordinances addressing the circulation system and hazards due to a design feature, incompatible uses, or inadequate emergency access and ensure that impacts would be comparable with those considered under the Original Project EIR are described in the Addendum and include, but are not limited to:

The Modified Project anticipates urbanization on sites anticipated for urbanization and development in the Original Project. Future development under the Modified Project would be subject to the Manteca Municipal Code and to the General Plan policies and actions in the Modified Project identified to reduce potential impacts associated with conflicts with a program, plan, ordinance, or policy addressing the circulation system, hazards due to a geometric design feature or incompatible use, and emergency access. However, similar to the Original Project, the potential for an increase in collisions would remain and impacts associated with conflicts with a program, plan, ordinance, or policy addressing the circulation system, hazards, and emergency access would remain significant and unavoidable under the Modified Project. The Modified Project does not modify any of the Original Project policies and actions that address transportation and circulation impacts, including those that promote reductions in VMT and promote a multi-modal transportation system that is safe for all users. Applicable Modified Project General Plan policies and actions that address the circulation system and safety impacts and ensure that impacts would be comparable with those considered under the Original Project EIR are described in the Addendum and include, but are not limited to:

C-1.1 Strive to balance levels of service (LOS) for all modes (vehicle, transit, bicycle, and pedestrian) to maintain a high level of access and mobility, while developing a safe, complete, and efficient circulation system. The impact of new development and land use proposals on VMT, LOS and accessibility for all modes should be considered in the review process.

C-2.3 Require new development to pay a fair share of the costs of street and other transportation improvements based on impacts to LOS and other modes in conformance with the goals and policies established in this Circulation Element and the Public Facilities Implementation Program (PFIP).

C-2.6 (formerly 2.5) In areas adjacent to existing or planned residential development or sensitive receptors, include sound attenuation walls in the frontage improvements associated with freeway, highway, parkway, arterial, and major collector roadways in accordance with City adopted Street Standards and Specifications, as amended.

C-2.7 (formerly 2.6) Align residential and collector street intersections with collector and arterial streets with other residential and collector streets, where feasible, to maintain a high degree of connectivity between neighborhoods, minimize circuitous travel, and to allow bicyclists and pedestrians to travel more conveniently and more safely from one neighborhood to another without using major streets.

C-2.8 (formerly 2.7) *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-2.9 (formerly 2.8) *Signals, roundabouts, traffic circles, and other traffic management, calming and safety techniques shall be applied according to industry standards at residential and collector street intersections with collector and arterial streets in order to allow bicyclists and pedestrians to travel more conveniently and more safely from one neighborhood to another.*

C-2.10 (formerly 2.9) *Where traffic congestion, pedestrian travel, collision history, or other factors warrant the installation of a traffic signal, the feasibility of a roundabout shall also be evaluated on a whole life cycle cost basis. In general, a roundabout should be installed at these locations unless right of way, cost, operational concerns, design limitations, or other issues preclude the installation of a roundabout.*

C-2.11 (formerly 2.10) *Development of private streets may be allowed in new residential projects that demonstrate the ability to facilitate police patrol, emergency access, and solid waste collection as well as fund on-going maintenance.*

C-2.12 (formerly 2.11) *Promote infill development that closes gaps and bottlenecks in the circulation system, especially in disadvantaged and older neighborhoods.*

C-2.13 (formerly 2.12) *Require new development to establish joint-use driveways and/or cross access easements to provide access when feasible and/or if: 1) located on street segments identified in C-1.2, 2) located on streets with intersections approaching not meeting LOS D, or 3) the shared access will reduce vehicle miles traveled as determined by the City's Community Development Department. The requirement is intended to preserve the movement function of the major thoroughfare system by requiring development of parallel roads or cross access easements to connect developments as they are permitted along major roads, providing more efficient connections to destinations, and reducing air emissions.*

C-2.14 (formerly 2.13) *Require development projects to arrange streets in an interconnected block pattern, so that pedestrians, bicyclists, and drivers are not forced onto arterial streets for inter- or intra-neighborhood travel to support safer travel. This approach will also add redundancy to the street network, supporting more safe and more efficient movement of emergency responders and help reduce vehicle miles traveled within the community.*

C-2.15 (formerly 2.14) *Residential subdivisions with lots fronting on an existing arterial street shall provide for separate roadway access for vehicles, pedestrians, and bicyclists to the maximum extent feasible, with access to residential lots provided from residential or collector streets. For those properties that currently front arterial streets, consideration should be given to providing separate roadway access where feasible as a condition of approval for any redevelopment or subdivision of the property.*

C-2.16 (formerly 2.15) *Ensure that development and infrastructure projects are designed in a way that provides pedestrian and bicycle connectivity to adjacent neighborhoods and areas (such as ensuring that sound walls, berms, and similar physical barriers are considered and gaps or other measures are provided to ensure connectivity).*

C-2.17 (formerly 2.16) *Aggressively pursue state and federal funding to augment the PFIP and implement the City's Circulation Element.*

C-2.18 (formerly 2.17) *Coordinate with neighboring jurisdictions, including Caltrans, San Joaquin Council of Governments (SJCOG), San Joaquin County, the City of Lathrop, and the City of Ripon to pursue funding for the following regional facilities:*

- *A new interchange at McKinley Avenue and SR 120;*
- *A new interchange at Austin Road/Raymus Parkway and SR 99;*

- A new interchange on SR 99 between Lathrop Road and French Camp Road;
- An easterly extension of the SR 120 freeway towards Oakdale;
- Grade separated crossings of the Union Pacific Railroad line at Roth Road, Louise Avenue, Yosemite Avenue, and McKinley Avenue; and
- Regional bicycle lanes and bicycle paths.

C-2.19 (formerly 2.18) Prohibit the creation of traffic, bicycle, and pedestrian hazards and conflicts with vehicular traffic movements in new development, infill development, and redevelopment areas and pursue opportunities to improve conditions where there are existing conflicts to ensure that the pedestrian and bicycle network provides a direct and convenient route equal to or greater than vehicular routes in new development, infill, and redevelopment areas.

C-2.20 (formerly 2.19) 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 (formerly 2.20) 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-2.22 (formerly 2.21) Pursue funding for grade separation of the remaining at-grade railroad crossings within the City.

C-2.23 (formerly 2.22) 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-2.24 (formerly 2.23) Construct new facilities for emergency services as new areas of the City are developed to maintain response time consistent with existing development.

C-4.1 Through regular updates to the City's Active Transportation Plan inclusive of community members and stakeholders, establish a more safe and more convenient network of identified bicycle and pedestrian routes connecting residential areas with schools, recreation, shopping, and employment areas within the city, generally as shown in Figure CI-2). The City shall also strive to develop connections with existing and planned regional routes shown in the San Joaquin County Bicycle Master Plan.

C-4.2 Improve safety conditions, efficiency, and comfort for bicyclists and pedestrians by providing native and drought-tolerant shade trees and controlling traffic speeds by implementing narrow lanes or other traffic calming measures in accordance with the City Neighborhood Traffic Calming Program on appropriate streets, in particular residential and downtown areas.

C-6.2 Develop and maintain a truck circulation network that connects Surface Transportation Assistance Act (STAA) trucks to industrial areas while balancing the safety needs of motorists in passenger vehicles and persons walking, biking, or riding a bus.

C-1a Maintain an up-to-date master list of multimodal conditions, including volume data for key intersections and roadway segments. This master list shall be updated regularly with traffic counts (for autos, transit, bicycles, and pedestrians) taken in conjunction with project traffic studies and by special counts conducted by the City as necessary and shall include periodic evaluation of the mobility and access on major streets, including access and mobility issues faced by transit riders, bicyclists, and pedestrians.

C-2a Maintain the Major Street Master Plan (Figure CI-1) showing the existing and proposed ultimate right-of-way and street width for each road segment within the City's Sphere of Influence and Area of Interest. The Major Street Master Plan shall also indicate the necessary right-of-way to be acquired or dedicated and the

expected method of financing roadway improvements (i.e., City-funded or property owner/developer-funded). The Major Street Master Plan shall be updated at least every 5 years and more frequently if needed to address new streets or modifications to planned streets.

C-2b When planning roadway facilities, incorporate the concept of complete streets. Complete streets include design elements for more safe travel by all modes that use streets, including autos, transit, pedestrians, and bicycles. Complete streets shall be developed in a context-sensitive manner. For example, it may be more appropriate to provide a Class I bike path instead of bike lanes along a major arterial. Pedestrian districts like Downtown Manteca or areas near school entrances should have an enhanced streetscape (e.g., narrower travel lanes, landscape buffers with street trees, etc.) to better accommodate and encourage pedestrian travel.

C-2c Review and update the City's standard plans to ensure that the plans reflect the City's goals and policies for the circulation system, including cross-sections that provide for landscape-separated sidewalks along arterials and non-residential streets; best practices for safer travel by vehicles, bicycles, and pedestrians; and accommodate all users. Complete these updates within three years of adoption of this General Plan.

C-2d Require new development to participate in the implementation of transportation improvements identified in the Major Street Master Plan. Participation shall include the construction of roadways, improvements to roadways, including grade-separated crossings of railroads, payment into the PFIP program, payment into other fee programs, or fair-share payments. In general, the infrastructure needs and methods of participation will be determined through an environmental impact report or transportation impact analysis.

C-2j (formerly C-2i) Pursue funding to improve and address areas of traffic, bicycle, and pedestrian hazards and conflicts with vehicular traffic movements.

C-2k (formerly C-2j) Identify and remove, as feasible, obstacles limiting corner-sight distances at existing street corners.

C-2l (formerly C-2k) In conjunction with the creation of a Vision Zero Action Plan or Local Road Safety Plan, create an ongoing identification and surveillance program of above average vehicle, bicycle, and pedestrian collision locations, with emphasis on early detection and correction of conditions that create safety issues for users.

C-2m (formerly C-2l) Require all new signs, roadway striping, and traffic signals to be consistent with the latest edition of the California Manual on Uniform Traffic Control Devices (MUTCD).

C-2n (formerly C-2m) Through the development review process, require joint use access, cross access easements, emergency access, and access prohibitions wherever traffic patterns and physical features make it possible and ensure that proposed street networks are designed to balance local access needs with street capacity.

C-2o (formerly C-2n) Create a Vision Zero Action Plan or Local Road Safety Plan that prioritizes systems-based approach to preventing traffic fatalities, focusing on the built environment, systems, and policies that influence behavior as well as messaging that emphasizes that these traffic losses are preventable. Complete this plan within four years of adoption of this General Plan.

C-2p (formerly C-2o) Upon completion of a Vision Zero Action Plan or Local Road Safety Plan, update the PFIP to address recommended safety improvements for all modes, including vehicles, bicyclists, and pedestrians. Complete this update within two years of adoption of the Vision Zero Action or Local Road Safety Plan.

C-4c Increase bicyclist and pedestrian safety by:

- Providing and maintaining bicycle paths and lanes that promote bicycle travel.
- Sweeping, repairing, and maintaining vegetation growth along bicycle lanes and paths on a continuing, regular basis.

- Ensuring that bikeways are delineated and signed in accordance with the latest editions of the California MUTCD and AASHTO standards and lighting is provided, where feasible.
- Ensuring that all new and improved streets have bicycle-safe drainage grates and eliminate uneven pavement, gravel, encroaching vegetation, and other conditions that may impede user safety, expectations, and convenience.
- Providing and maintaining sidewalks and crosswalks.

C-6a Where intersections and roadway segments are modified to accommodate STAA truck movement, the City shall ensure that the design of such take into account the needs of all modes of transportation. Acceptable design solutions include, but are not limited to, features such as: shoulders for trailer tracking recovery; Class I and IV bicycle lanes; pedestrian and bicyclist shelter islands; and, longer crosswalk crossing phases at traffic signals.

C-6aa Update the PFIP program and other applicable programs to implement additional grade separations at existing and planned at-grade rail crossings in Manteca and to provide features to improve response time on new roadways and existing roadways.

Utilities and Service Systems: The Modified Project would result in an increase in the potential for non-residential uses on sites designated for residential, commercial, park, and business industrial park uses as compared to the Original Project. The Modified Project would accommodate approximately 1,281,108 net additional square feet of non-residential uses and 604 additional jobs and would have a reduction of 937 single family and 359 multifamily units compared to the Original Project.

An evaluation of the impacts associated with the Modified Project as compared to the Original Project was conducted to determine impacts utilities and service systems. It was determined that estimated water demand and wastewater generation under the Modified Project would be less than under the Original Project. Under the Modified Project, as with the Original Project, it would be speculative and not reasonably foreseeable to determine the specific impacts of providing new and expanded water treatment and distribution infrastructure under the Modified Project, since there are no specific development projects proposed and the source of additional water supply (e.g., groundwater, surface water, or recycled water), as well as the location and specifics of water infrastructure improvements, would be determined with subsequent water plan and Public Facility Infrastructure Plan (PFIP) updates and during the planning process for future development projects. It is anticipated that any future improvements to the existing water distribution infrastructure would be primarily provided on sites with land use designations that allow for urbanized land uses and development of public facilities, and the environmental impacts of constructing and operating the new water distribution infrastructure would be similar to those associated with new development, redevelopment, and infrastructure projects under the Original Project. Applicable Modified Project General Plan policies and actions that address water supply and treatment, wastewater, storm drainage, and solid waste impacts and ensure that impacts would be comparable with those considered under the Original Project EIR are described in the Addendum and include, but are not limited to:

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, increase water conservation, and establish water reuse and recycling systems.

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-7.5: 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 health and safety.

CF-8.2: Require all development projects to demonstrate how storm water 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.

LU-5g: Require proposed major industrial development to provide the City with an engineering report of the anticipated potable water and wastewater demand. Additional review will be required for proposed industrial uses with a high potable water and wastewater demand.

CF-6e: Continue to assess a water development fee on all new commercial, industrial, and residential development sufficient to fund system-wide capacity improvements. The water development fee schedule shall be periodically reviewed and revised as necessary.

CF-6g: Require, as a condition of project approval, dedication of land and easements, or payment of appropriate fees and exactions, to help offset municipal costs of expansion of water treatment facilities and delivery systems.

CF-6h: Retain a water conservation ordinance requiring the installation of low-flush toilets, low-flow showerheads, and similar features in all new development.

CF-7b: Require new development to provide for and fund a fair share of the costs for adequate sewer distribution and treatment, including line extensions, easements, and plant expansions.

CF-7c: Require all sewage generators within the City's service area to connect to the City's system, except those areas where on-site treatment and disposal facilities are deemed appropriate.

CF-7d: Require an industrial pretreatment program for business parks and other industrial uses when deemed necessary in accordance with state and federal requirements.

CF-7e: Investigate methods of improving the quality of the effluent from the City wastewater treatment plant and options for reuse of treated wastewater including direct potable reuse. The recycled wastewater will be used for irrigation of public recreation lands, restoration of wetland areas, irrigation of landscaped areas, dust control, fire protection, and soil compaction.

CF-7f: Promote reduced wastewater system demand through efficient water use by:

- Requiring water conserving design and equipment in new construction,

- *Encouraging retrofitting with water conserving devices,*
- *Designing wastewater systems to minimize inflow and infiltration to the extent economically feasible; and*
- *Maintaining a Citywide map of all sewer collection system components and monitoring the condition of the system on a regular basis.*

CF-8d: *Continue to review development projects to identify potential stormwater and drainage impacts and require development to include measures to ensure that off-site runoff is not increased as a during rain and flood events.*

CF-11f: *Encourage recycling, reuse, and appropriate disposal of hazardous materials, including the following:*

- *Increased participation in single family and multifamily residential curbside recycling programs;*
- *Increased participation in commercial and industrial recycling programs for paper, cardboard, and plastics;*
- *Reduce yard and landscaping waste through methods such as composting, grass recycling, and using resource efficient landscaping techniques;*
- *Encourage local businesses to provide electronic waste (e-waste) drop-off services and encourage residents and businesses to properly dispose of, or recycle, e-waste;*
- *Consider an ordinance mandating that single use food utensils, wrappers and containers be made from bio-degradable materials and prohibiting Styrofoam containers and coolers.*

The Modified Project retains the Original Project General Plan policies and actions that address adequate water supplies, including addressing the demand associated with projected new development, implementation of water conservation measures, planning for expanded recycled water use, and requirements that development projects mitigate their infrastructure service impacts, including addressing the demand associated with projected new development, ensuring periodic review and update to the City's various master plans for the provision of services to serve existing and future development, and ensuring that new development contributes its fair share toward necessary infrastructure. The same logic applies to wastewater infrastructure and stormwater drainage. The Modified Project would result in similar impacts to water supply, water treatment, and wastewater treatment facilities as the Original Project. As with the Original Project, the Modified Project does not include any components that would conflict with federal, state, and local management and reduction statutes and regulations related to solid waste or otherwise impair the attainment of solid waste reduction goals.

Wildfire: The Planning Area is not located in or near any State Responsibility Areas and there are no lands classified as very high fire hazard severity zones within or near the Planning Area. The Original Project was determined to have no impact related to wildfire risks associated with lands in or near State Responsibility Areas or lands classified as very high fire hazard severity zones. The Modified Project would not change the boundaries of the Planning Area and would also have no impact related to wildfire risks associated with lands in or near State Responsibility Areas or lands classified as very high fire hazard severity zones and would have a less than cumulatively considerable contribution to cumulative wildfire impacts.

Growth Inducing Effects

The Modified Project plans for growth in the same locations as the Original Project and does not include extensions of water, wastewater, or utilities that could induce growth beyond the area planned for growth in the Original Project. Similar to the Original Project, the Modified Project would extend roadways to serve planned development; General Plan policies and actions to limit unplanned growth would apply for the Modified Project and address the potential to induce-unplanned growth. These policies and actions include Policy RC-6.1, RC-6.2, RC-7.5, RC-7.6, RC-7.10, RC-7.11, RC-7.14, RC-6.e, RC-7c, RC-7e, LU-2.6, LU-2.9, LU-11.1, LU-11.2, LU-1b, and LU-11a. The Modified Project does not include any extensions of water, sewer, or dry utility infrastructure or other features that would accommodate unplanned growth that are not included in the Original Project.

As discussed in the 2024 Addendum, the Modified Project has adequate residential capacity to accommodate the employment generated by the change in uses, with a total of 36,807 residential units and to accommodate 29,380 new employees. The Modified Project identifies multiple areas for employment growth throughout the City, as does the Original Project. While the specific characteristics of the growth will change, there are no features of the Modified Project that would induce growth beyond that anticipated for the Original Project. Furthermore, the VMT analysis took into consideration the generation of 1,932 new jobs and concluded that there would not be any new impact or a change in the significance of existing impacts. Therefore, implementation of the Modified Project would not directly or indirectly result in any growth inducing impacts beyond what was previously analyzed in the Original Project EIR.

Conclusion: Based on the above summary of findings of the 2024 Addendum, there would be no new significant impacts or increase in the significance of impacts associated with any of the environmental impact topics evaluated in the Appendix G Checklist, as provided in the CEQA Guidelines. The Modified Project does not increase the severity of the impacts beyond what was addressed in certified GPU EIR. There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. Substantial evidence was provided through the 2024 Addendum to demonstrate compliance with CEQA. As demonstrated in the environmental analysis summarized herein, the Modified Project does not meet the criteria for preparing a subsequent EIR or negative declaration. An Addendum is appropriate, because none of the conditions calling for preparation of a subsequent or supplemental EIR have occurred.