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CITY OF TRACY
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**FILIOS/DOBLER ANNEXATION AND DEVELOPMENT
PROJECT**

**FINAL
ENVIRONMENTAL IMPACT REPORT
(State Clearinghouse No. 2010072043)**

September 2011

Prepared for:

**City of Tracy
333 Civic Center Plaza
Tracy, CA 95376**

Prepared by:

**RBF Consulting
500 Ygnacio Valley Road, Suite 270
Walnut Creek, CA 94596**





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10.0 RESPONSES TO COMMENTS

10.1 INTRODUCTION

The Filios/Dobler Annexation and Development Project Draft Environmental Impact Report (Draft EIR) was circulated for a 45-day public review period beginning June 10, 2011, and ending July 25, 2011, as assigned by the State of California Governor's Office of Planning and Research, State Clearinghouse, and consistent with the California Environmental Quality Act Guidelines (CEQA Guidelines). Copies of the document were distributed to state, regional and local agencies, as well as organizations and individuals, for their review and comment.

Section 15088(a) of the CEQA Guidelines states that:

“The lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response. The lead agency shall respond to comments received during the noticed comment period and any extension and may respond to late comments.”

In accordance with Section 15088(a) of the CEQA Guidelines, the City of Tracy (City), as the lead agency, has evaluated the comments received on the Draft EIR for the Filios/Dobler Annexation and Development Project (Project) and has prepared written responses to the comments received.

All comments on the Draft EIR, and the responses thereto, are presented in this document. Section 10.4 (List of Commentors) provides a list of all those who submitted comments on the Draft EIR during the public review period. Section 10.5 (Responses to Individual Comments) contains all of the comments received on the Draft EIR along with responses to each. These responses include identifying text revisions in the Draft EIR. Text revisions resulting from comments on the Draft EIR, as well as staff-initiated text revisions, are presented in Chapter 11 (Revisions to Draft EIR). Revisions to the Draft EIR text are indicated by underline text (underline) for text additions and strike out (~~strike-out~~) for deleted text. Revised figures and tables are identified with the word “revised” in front of the figure or table number. It is important to note that none of the text revisions in Chapter 11 present significant new information that would result in new significant environmental impacts or a substantial increase in the severity of environmental impacts identified in the Draft EIR. Rather, they merely provide clarification or make minor modifications to an adequate EIR. Therefore, recirculation of the Draft EIR is not required pursuant to CEQA Guidelines Section 15088.5(b).

10.2 CONTENTS OF FINAL EIR

The Final EIR is composed of the following elements:

- Draft EIR and Appendices
- List of persons, organizations and public agencies that commented on the Draft EIR
- Copies of all comments received
- Written responses to those comments
- Revisions to Draft EIR resulting from comments



10.3 CERTIFICATION OF FINAL EIR AND APPROVAL PROCESS

For a period of at least ten days prior to any public hearing during which a lead agency will take action to certify an EIR, the Final EIR must be made available to, at a minimum, trustee and responsible agencies that provided written comments on the Draft EIR. Pursuant to Section 15090(a) of the CEQA Guidelines, the Final EIR must be certified before the lead agency can take action on the project.

Following Final EIR certification, but prior to taking action on a project, the lead agency must prepare a Mitigation Monitoring and Reporting Program (MMRP). Before approving (or conditionally approving) the project, the lead agency must also prepare written CEQA Findings for each significant impact identified for the project, accompanied by a brief explanation of the rationale for the finding, in accordance with Section 15091 of the CEQA Guidelines. If significant environmental impacts that cannot be reduced to a less than significant level are identified for the project, the lead agency must prepare a Statement of Overriding Considerations, pursuant to Section 15093 of the CEQA Guidelines. Seven significant and unavoidable impacts were identified for the Filios/Dobler Annexation and Development Project in the areas of agricultural resources, air quality and greenhouse gas emissions.

Certification of a Final EIR may occur at a public hearing independent of project approval or during the same hearing. Prior to approval of a project, the lead agency must adopt the CEQA Findings, Statement of Overriding Considerations, and MMRP. Certification of the Final EIR must be the first in this sequence of approvals.

10.4 LIST OF COMMENTORS

All commentors on the Draft EIR are listed below.

10.4.1 PUBLIC AGENCIES

- Comment Letter #1 Michael L. Woods, California Department of Conservation, Division of Oil, Gas and Geothermal Resources
- Comment Letter #2 Tom Dumas, California Department of Transportation
- Comment Letter #3 Genevieve Sparks, California Regional Water Quality Control Board, Central Valley Region
- Comment Letter #4 Laura Brunn, San Joaquin Council of Governments, Congestion Management Agency
- Comment Letter #5 Kimberly Juarez, San Joaquin Council of Governments, San Joaquin County Multi-Species Habitat Conservation and Open Space Plan
- Comment Letter #6 David Warner, San Joaquin Valley Air Pollution Control District
- Comment Letter #7 James E. Glaser, San Joaquin Local Agency Formation Commission
- Comment Letter #8 Mo Hatef, San Joaquin County Community Development Department
- Comment Letter #9 Mark Hopkins, San Joaquin County Public Works Department

10.4.2 GENERAL PUBLIC

- Comment Letter #10 Mike Oliphant, Chevron Environmental Management Company
- Comment Letter #11 Gary Dobler



10.5 RESPONSES TO INDIVIDUAL COMMENTS

Each of the comment letters submitted on the Draft EIR and responses to the comments in the letters are provided on the following pages. Each comment is identified with a two part numbering system. The first number corresponds to the number assigned to the comment letter. The second number corresponds to the order of the comment within the letter identified. For example, Comment 4-5 refers to the fourth comment letter received and the fifth comment identified in the letter.



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Comment Letter #1

NATURAL RESOURCES AGENCY

EDMUND G. BROWN, JR., GOVERNOR



DEPARTMENT OF CONSERVATION

Managing California's Working Lands

DIVISION OF OIL, GAS, & GEOTHERMAL RESOURCES

801 K STREET • MS 20-22 • SACRAMENTO, CALIFORNIA 95814

PHONE 916 / 322-1110 • FAX 916 / 322-01201 • TDD 916 / 324-2555 • WEB SITE www.conservation.ca.gov

June 27, 2011

RECEIVED

Mr. Alan Bell, Senior Planner
City of Tracy
333 Civic Center Plaza
Tracy, CA 95376

JUN 28 2011

CITY OF TRACY
D.E.S.

Re: **Filios/Dobler Annexation and Development Project**

Dear Mr. Bell:

The Division of Oil, Gas and Geothermal Resources (Division) is mandated by Section 3106 of the Public Resources Code (PRC) to supervise the drilling, operation, maintenance, and plugging and abandonment of oil and gas wells.

There do not appear to be any active or abandoned oil or gas wells within the boundaries of this project. However, if any abandoned or unrecorded wells are uncovered or damaged during any future excavation or grading, remedial plugging operations may be required. This office must be contacted to obtain information on the requirements for and approval to perform remedial operations. 1-1

If you have any questions, please contact the undersigned at (916) 322-1110 or at mwoods@consrv.ca.gov.

Sincerely,

Michael L. Woods
District Deputy

The Department of Conservation's mission is to balance today's needs with tomorrow's challenges and foster intelligent, sustainable, and efficient use of California's energy, land, and mineral resources.



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**Response to Comment Letter #1, Michael L. Woods, California Department of Conservation,
Division of Oil, Gas and Geothermal Resources**

1-1 This comment states that there does not appear to be any active or abandoned oil or gas wells within the boundaries of the Project site. It further states that if any abandoned or unrecorded wells are uncovered or damaged during future excavation or grading, remedial plugging may be required. This comment does not address the adequacy of the Draft EIR. However, it is noted and included in the record for consideration by the public and decisions makers.

As described on pages 4.10-2 and 4.10-3 in Section 4.10 (Hazards and Hazardous Materials) of the Draft EIR, there are two offsite oil pipelines adjacent to the southerly boundary of the Project site where there is reported residual crude oil and Bunker C oil in the soil. A discussion of potential impacts associated with the pipelines and mitigation measures to address impacts is provided in Section 4.10 beginning on page 4.10-12.



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Comment Letter # 2

STATE OF CALIFORNIA - BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
P.O. BOX 2048 STOCKTON, CA 95201
(1976 E. CHARTER WAY/1976 E. DR. MARTIN
LUTHER KING JR. BLVD. 95205)
TTY: California Relay Service (800) 735-2929
PHONE (209) 941-1921
FAX (209) 948-7194

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Flex your power!
Be energy efficient!

July 25, 2011

10-SJ-205, PM 5.1
Filios/Dobler Annexation &
Development
SCH #2010072043

Alan Bell
City of Tracy
333 Civic Center Plaza
Tracy, CA 95376

Dear Mr. Bell,

The California Department of Transportation (Department) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for **Filios/Dobler Annexation & Development**. The project, bounded by Grant Line Road to the north, Union Pacific Railroad lines and Byron Road to the southwest, and the Tracy Marketplace Shopping Center to the east, proposes to annex approximately 43 acres of unincorporated land to the City of Tracy with anticipation to develop up to 466,000 square feet of commercial/office uses on the project site.

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

Traffic Operations

- 1. The proposed project will create traffic impact at the intersection of westbound (WB) I-205 off-ramp/Pavilion Pkwy/Naglee Rd. Please include this intersection in the traffic analysis and submit for our review. | 2-1
- 2. Mitigation Measure 4.14-3 states "a second eastbound left-turn lane and widening of the eastbound on-ramp to two lanes shall be constructed at the intersection of I-205 Eastbound Off-ramp and Grant Line Road." Due to the constraint of the existing geometry of the eastbound (EB) on-ramp and the free right-turn lane from WB Grant Line Road onto EB on-ramp, this proposed mitigation measure is not feasible. Please provide alternative measures that appropriately mitigate the identified impact and submit for our review and comment. | 2-2
- 3. Merge analysis needs to be provided in order to determine if the additional traffic volumes of the proposed project will have traffic impact on merge area from EB on-ramp onto the mainline of EB I-205. | 2-3

"Caltrans improves mobility across California"



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Response to Comment Letter #2, Tom Dumas, California Department of Transportation

2-1 This comment states that the Project would create a traffic impact at the intersection of I-205 WB Off-Ramp/Pavilion Parkway/Naglee Road and requests traffic analysis of this intersection. In response to the comment, traffic analysis was conducted for Existing, Near Term Plus Project and Cumulative Plus Project Conditions during the AM, PM and Saturday peak hours. Based on this analysis, the intersection of I-205 WB Off-Ramp/Pavilion Parkway/Naglee Road would operate at acceptable levels of service (LOS) under all conditions. Only the worst case scenarios were evaluated in this analysis because non-project scenarios would have less traffic and would operate at even better LOS. Table 10.5-1 (I-205 WB Off-Ramp/Pavilion Parkway/Naglee Road Level of Service) provides the LOS results for the intersection. Detailed LOS analysis worksheets are included in Appendix H (Additional Traffic Data) of this Final EIR.

**Table 10.5-1
I-205 WB Off-Ramp/Pavilion Parkway/Naglee Road Level of Service**

Scenario	Control	Peak Hour	Delay in Sec	LOS
1. Existing Conditions	Signal	AM	10.8	B
		PM	16.0	B
		SAT	16.0	B
2. Near Term Plus Project Conditions	Signal	AM	19.4	B
		PM	21.3	C
		SAT	26.2	C
3. Cumulative Plus Project Conditions	Signal	AM	18.2	B
		PM	31.4	C
		SAT	29.0	C

Source: RBF Consulting 2011

2-2 This comment states that Mitigation Measure 4.14-3 for the intersection of I-205 EB Off-Ramp/Grant Line Road is not feasible due to the constraint of the exiting geometry of the eastbound on-ramp and the free right-turn lane from westbound Grant Line Road onto the eastbound on-ramp. The provision of a second eastbound left turn lane would mitigate the project's impact. To accommodate the second left turn lane and dual receiving lanes on the ramp, the westbound free right-turn lane would be modified to be part of the signal operation rather than a free right-turn lane. Mitigation Measure 4.14-3 has been revised to clarify this requirement. Refer to Chapter 11 (Revisions to Draft EIR) of this Final EIR.

2-3 This comment states that merge analysis is needed from the eastbound on-ramp (at Grant Line Road) onto the mainline of I-205. In response to this comment, a merge analysis for the PM peak hour (worst case scenario) was conducted and found that merge conditions would be LOS C for Existing Plus Project, LOS D for Cumulative Plus Project at the loop ramp merge and LOS C for Cumulative Plus Project at the diamond on-ramp (I-205 is planned to be eight lanes under Cumulative Conditions). The merge analysis LOS results would be acceptable and, thus, the Project would not result in an impact on merge conditions. Refer to Appendix H of this Final EIR for detailed merge analysis worksheets.

2-4 This comment states that there are several mathematical errors in calculating shopping center pass-by trips in Table 4.14-12 (Project Trip Generation) and Appendix A-8 (contained in



Appendix G of the Draft EIR). Table 4.14-12 has been revised to correct the calculation error and is provided in Chapter 11 of this Final EIR.

Based on the revised trip reduction for pass-by trips of 26 percent, it is estimated that the Project would generate a total of 20,423 Saturday trips, with 1,500 trips (791 inbound and 709 outbound) occurring during the mid-day peak hour. This resulted in an increase in mid-day peak hour traffic at the indicted study intersections. As shown in Table 10.5-2 (Saturday Peak Hour Level of Service), the study intersections would operate at acceptable LOS with the change in the pass-by reductions during Saturday peak hour conditions for Near Term Plus Project and Cumulative Plus Project Conditions. Since these scenarios present worst case conditions, Existing Plus Project would operate at improved LOS. Figure 4.14-16 (Existing & Near Term Project Trip Assignment), Figure 4.14-18 (Cumulative Project Trip Assignment – Saturday Mid-Day) and Figure 4.14-23 (Near Term + Project Saturday Mid-Day Traffic Volumes) have been revised to reflect the change in trip reduction for pass-by trips and are included in Chapter 11 of this Final EIR. Detailed LOS analysis worksheets are included in Appendix H of this Final EIR.

**Table 10.5-2
 Saturday Peak Hour Level of Service**

Intersection (Jurisdiction)	Control	Peak Hour	Near Term Plus Project		Cumulative Plus Project	
			Delay in Sec	LOS	Delay in Sec	LOS
4. I-205 WB On-Ramp/Naglee	Signal	SAT	16.0	B	16.0	B
5. I-205 EB Ramps/Grant Lane	Signal	SAT	29.0	C	29.0	C
14. I-205 EB Ramps and Lammers Road Extension	Signal	SAT	na	na	9.4	A
15. I-205 WB Ramps and Lammers Road Extension	Signal	SAT	na	na	7.9	A

Source: RBF Consulting 2011

- 2-5 The commentor asks why Peak Hour Factor (PHF) 1.00 was used in the Synchro analysis under all of the Cumulative Conditions 2030 and requests reanalysis using a different PHF. For Existing and Near Term Conditions, the measured PHF was utilized. With traffic growth occurring over a 20-25-year time frame, roadways will become more congested and the peak hour duration will increase resulting in a PHF that will be at or very close to one. Thus, using the 1.00 PHF is a reasonable assumption for long term future conditions.
- 2-6 This comment requests verification of the lane configuration at the intersection of I-205 EB Off-Ramp/Grant Line Road under Cumulative Conditions 2030 with Project, with mitigation shown in the appendix. For Cumulative Conditions, the mitigation includes the construction of a new I-205 eastbound loop on-ramp per the Project Study Report. With this improvement, the left turn movements would instead be altered to right turn movements onto the loop on-ramp from Grant Line Road.
- 2-7 This comment states that the LOS shown in several tables in the Draft EIR for signalized and unsignalized intersections are inaccurate and need to be corrected. The LOS tables have been updated in the Draft EIR to accurately reflect the delays and corresponding LOS. No new impacts have been identified. The following tables have been revised and are provided in Chapter 11 of this Final EIR:



- Table 4.14-4 (Existing Conditions Peak Hour Intersection Level of Service)
- Table 4.14-8 (Near Term Conditions Peak Hour Intersection Level of Service)
- Table 4.14-10 (Cumulative Conditions Peak Hour Intersection Level of Service)
- Table 4.14-13 (Existing Plus Project Conditions Peak Hour Intersection Level of Service)
- Table 4.14-15 (Existing Plus Project Conditions Peak Hour Intersection Level of Service with Mitigation)
- Table 4.14-16 (Near Term Plus Project Conditions Peak Hour Intersection Level of Service)
- Table 4.14-18 (Near Term Plus Project Conditions Peak Hour Intersection Level of Service with Mitigation)
- Table 4.14-19 (Cumulative Plus Project Conditions Peak Hour Intersection Level of Service)

2-8 This comment states that the LOS shown in several tables in the Draft EIR for freeway segments is inaccurate and need to be corrected. The density values in these tables have been revised to display the value to the first decimal and the corresponding LOS updated. The freeway segments would operate at acceptable LOS for all scenarios. The following tables have been revised and are provided in Chapter 11 of this Final EIR:

- Table 4.14-6 (Existing Conditions Freeway Segment Level of Service)
- Table 4.14-9 (Near Term Conditions Freeway Segment Level of Service)
- Table 4.14-11 (Cumulative Conditions Freeway Segment Level of Service)
- Table 4.14-14 (Existing Plus Project Conditions Freeway Segment Level of Service)
- Table 4.14-17 (Near Term Plus Project Conditions Freeway Segment Level of Service)
- Table 4.14-20 (Cumulative Plus Project Conditions Freeway Segment Level of Service)

2-9 This comment states that the traffic volumes for freeway segments shown in Tables 4.14-6, 4.14-9 and 4.14-11 are less than the volumes shown in the Caltrans 2009 Traffic Volume Book and requests that the difference be justified. In the vicinity of the Project site, the Traffic Volume Book does not provide traffic data. The closest traffic data is at post mile (PM) 3.369 on I-205 near Mountain House Parkway. The Caltrans traffic volumes at PM 3.369 show a 20 percent decrease in AADT volumes from 2007 to 2008 and an 11.25 percent decrease in peak hour volumes. There was also a decrease in AADT volumes from 2008 to 2009 but peak hour volumes remained the same. The decrease in traffic volumes since 2007 is due to adverse economic conditions in California and especially the Central Valley. The volumes used in the Travel Demand Model were validated for 2009, which supports the decrease in AADT.

2-10 This comment states that the Draft EIR did not include any mitigation measures requiring additional lanes on I-205. The Draft EIR did not identify impacts to I-205 requiring additional lanes. Under Cumulative Conditions, I-205 would be widened through Tracy to eight lanes, which was included in the cumulative impact analysis in the Draft EIR. There is currently no fee program in place that would require the Project applicant to make a fair share contribution toward the widening as suggested by the commentor.



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Comment Letter #3



Linda S. Adams
Acting Secretary for
Environmental Protection

California Regional Water Quality Control Board
Central Valley Region
Katherine Hart, Chair

11020 Sun Center Drive #200, Rancho Cordova, California 95670-6114
(916) 464-3291 • FAX (916) 464-4645
<http://www.waterboards.ca.gov/centralvalley>



Edmund G. Brown Jr.
Governor

13 July 2011

Alan Bell, Senior Planner
City of Tracy
333 Civic Center Plaza
Tracy, CA 95376

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CERTIFIED MAIL
7010 3090 0001 4843 3029

**COMMENTS TO DRAFT ENVIRONMENTAL IMPACT REPORT, FILIOS/DOBLER
ANNEXATION AND DEVELOPMENT PROJECT, SCH NO. 2010072043, SAN JOAQUIN
COUNTY**

Pursuant to the State Clearinghouse's 10 June 2011 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Draft Environmental Impact Report* for the Filios/Dobler Annexation and Development Project, located in San Joaquin County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

3-1

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the

3-2

¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

California Environmental Protection Agency





maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

3-2
Cont'd

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 97-03-DWQ.

3-3

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml.

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed for the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

3-4

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916)557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACOE permit, or any other federal permit, is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. Water Quality Certification must be obtained prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

3-5

Waste Discharge Requirements

If USACOE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project will require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

3-6

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/



Filios/Dobler Annexation and Development Project
SCH No. 2010072043
San Joaquin County

- 3 -

13 July 2011

If you have questions regarding these comments, please contact me at (916) 464-4745 or
gsparks@waterboards.ca.gov.

A handwritten signature in cursive script that reads "Genevieve Sparks".

Genevieve (Gen) Sparks
Environmental Scientist
401 Water Quality Certification Program

cc: State Clearinghouse Unit, Governor's Office of Planning and Research, Sacramento



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Response to Comment Letter #3, Genevieve Sparks, California Regional Water Quality Control Board, Central Valley Region

- 3-1 This general comment states that projects that disturb one or more acres of soils or where projects disturb less than one acre but are part of a larger common plan of development that in total would disturb one or more acres are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit). A discussion of the Construction General Permit is provided on pages 4.11-6 and 4.11-7 in Section 4.11 (Hydrology and Water Quality) of the Draft EIR. Page 4.11-12 acknowledges that the proposed Project would be required to comply with the requirements of the Construction General Permit. Furthermore, this comment does not address the adequacy of the Draft EIR. However, it is noted and included in the record for consideration by the public and decisions makers.
- 3-2 This general comment states that Phase I and II Municipal Separate Storm Sewer System (MS4) Permits require permittees to reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable. Pages 4.11-12, 4.11-14 and 4.11-15 in Section 4.11 of the Draft EIR acknowledge that the proposed Project would be subject to BMPs. Furthermore, this comment does not address the adequacy of the Draft EIR. However, it is noted and included in the record for consideration by the public and decisions makers.
- 3-3 This general comment states that storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 97-03-DWQ. The proposed Project would not include the development of industrial uses. Furthermore, this comment does not address the adequacy of the Draft EIR. However, it is noted and included in the record for consideration by the public and decisions makers.
- 3-4 This comment states that if the Project involves the discharge of dredged or fill material in navigable waters or wetlands, a permit from the Army Corps of Engineers (ACOE) pursuant to Section 404 of the Clean Water Act may be needed. As documented on page 4.7-22 in Section 4.7 (Biological Resources) of the Draft EIR, the Project site does not contain any navigable waters or wetlands. Furthermore, this comment does not address the adequacy of the Draft EIR. However, it is noted and included in the record for consideration by the public and decisions makers.
- 3-5 This comment states that if an ACOE permit or any other federal permit is required for the Project due to the disturbance of waters of the U.S., a Water Quality Certification from the Central Valley Regional Water Quality Control Board (RWQCB) pursuant to Section 401 of the Clean Water Act would be required. As documented on page 4.7-22 in Section 4.7 of the Draft EIR, the Project site does not contain any waters of the U.S. and, therefore, would not require a permit from the ACOE. Furthermore, this comment does not address the adequacy of the Draft EIR. However, it is noted and included in the record for consideration by the public and decisions makers.
- 3-6 This comment states that if ACOE determines that only non-jurisdictional waters of the State are present on the Project site, the Project would require a Waste Discharge Requirement permit to be issued by RWQCB. As documented on page 4.7-22 in Section 4.7 of the Draft EIR, the Project site does not contain any waters of the State and, therefore, the Project would not require a permit. Furthermore, this comment does not address the adequacy of the Draft EIR. However, it is noted and included in the record for consideration by the public and decisions makers.



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Comment Letter #4



SAN JOAQUIN COUNCIL OF GOVERNMENTS

555 E. Weber Avenue • Stockton, California 95202

209.235.0600 • 209.235.0438 (fax)

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AND
THE COUNTY OF
SAN JOAQUIN

June 21, 2011

Mr. Alan Bell
Development and Engineering Services Dept.
City of Tracy
333 Civic Center Plaza, Tracy CA 95376

Re: CMA Review - City of Tracy Draft EIR
FILLIOS/DOBLER ANNEXATION AND DEVELOPMENT PROJECT

Dear Mr. Bell:

Thank you for the opportunity to comment on the DEIR for the Fillios/Dobler commercial development project. As the County's designated Regional Transportation Planning Agency (RTPA), the Congestion Management Agency (CMA), and the Metropolitan Planning Organization (MPO), the San Joaquin Council of Governments (SJCOCG) has reviewed the above-referenced document with respect to transportation and circulation impacts pursuant to the California Environmental Quality Act (CEQA).

On August 17, 2010 SJCOCG send comments to the City of Tracy in response to the project's Notice of Preparation. The comment letter gave some background information and also had some specific comments regarding compliance with the RCMP and CEQA Thresholds. This letter is attached for your reference.

For this project, the significance thresholds within the 2010 CEQA Guidelines, Appendix G, with a direct relation to CMA, MPO, and RTPA authority are:

XVI. TRANSPORTATION/TRAFFIC – Would the project:

- a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

4-1

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SJCOG Comments_Fillios/Dobler Annexation Project
June 21, 2011

- b) *Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*

The DEIR failed to incorporate these thresholds of significance or offer any type of discussion/analysis to identify potential impacts, project conditions, and/or mitigation measures, if necessary. A major implementation action of the RCMP is the CMA's requirement to and comment on future land uses that may impact roadways located within the RCMP network. The *Land Use Analysis Process* was adopted as part of the 2007 Regional Congestion Management Plan and is also a requirement of state and federal CMP statutes as well as the Measure K Renewal Ordinance. These congestion management directives also require an increased multi-modal TDM and system management emphasis at both the local and regional level.

4-1
Cont'd

Within the NOP comment letter dated August 17, 2010, SJCOG requested that:

1. The potential impacts to the RCMP roadways be analyzed within the Traffic Impact Analysis (TIA). This will require segment analysis not intersection.
2. The findings summarized within the DEIR within a section that specifically addresses requirements and standards of the Regional Congestion Management Program.
3. If the project trips results in a conflict with the level of service standards, the identification and implementation of mitigation measures to resolve or mitigate the identified impact(s), including an estimate of the costs associated with the mitigation is required per state CMP statute.
4. The project conditions provide an avenue for compliance with the Regional Travel Demand Management Action Plan, adopted by the SJCOG Board in August 2010.

4-2

Refer to the attached comment letter provided by SJCOG in response to the NOP in August 2010 for more specific information regarding the above items.

SJCOG requests that the City revise the significance thresholds and carry out the appropriate analysis to determine the level of significance related to the CMA's Regional Congestion Management Program.

4-3

If you have any questions please call Laura Brunn, at (209) 235-0579. We would be pleased to meet with the city and provide any necessary information and guidance relative to these comments and the



SJCOG Comments_Fillios/Dobler Annexation Project
June 21, 2011

Regional Congestion Management Program.

Sincerely,

LAURA BRUNN
SJCOG Associate Regional Planner

Cc: Dana Cowell, SJCOG Deputy Director
Mike Swearingen, SJCOG Senior Regional Planner



SAN JOAQUIN COUNCIL OF GOVERNMENTS

555 E. Weber Avenue • Stockton, California 95202

209.235.0600 • 209.235.0438 (fax)
www.sjog.org

August 17, 2010

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STOCKTON,
TRACY,
AND
THE COUNTY OF
SAN JOAQUIN

Ms. Victoria Lombardo
Development and Engineering Services Dept.
City of Tracy
333 Civic Center Plaza, Tracy CA 95376

**Re: CMA Review - City of Tracy Notice of Preparation (NOP)
FILLIOS/DOBLER ANNEXATION AND DEVELOPMENT PROJECT**

Dear Ms. Lombardo:

Thank you for the opportunity to comment on the NOP for the Filios/Dobler commercial development project. As the County's designated Regional Transportation Planning Agency (RTPA), the Congestion Management Agency (CMA), and the Metropolitan Planning Organization (MPO), the San Joaquin Council of Governments (SJCOC) has reviewed the above-referenced document with respect to transportation and circulation impacts pursuant to the California Environmental Quality Act (CEQA).

Establishing and maintaining a Regional Congestion Management Program (RCMP) is required by State Govt. Code, Section 65088 -- 65089.10 and the County's Measure K Renewal Ordinance. The purpose of the RCMP is to monitor the cumulative transportation impacts of growth of the regional roadway system (the Network), establish a level of service standard, identify deficient regional roadways and develop plans to mitigate the deficiencies, and facilitate travel demand management and operational preservation strategies for existing and planned development. The attached exhibit shows the roadways within the project area that are currently monitored as part of the adopted Network.

One of the major implementation actions of the RCMP is to establish and monitor Level of Service (LOS) conditions on the Network and to assess where any deficiencies exist. A roadway segment is considered deficient if operating at a LOS of "E" or "F" (as calculated per the RCMP's adopted methodology). Once a roadway segment is identified as deficient, the agency where the majority of a segment physically lies will have twelve



SJCOG Comments_Fillios/Dobler Annexation Project
August 17, 2010

months to prepare a Deficiency Plan. Government Code Section 65089.4 details the required analysis and components of a Deficiency Plan.

A second major implementation action of the CMP is the CMA's requirement to analyze and comment on future land uses (threshold criteria are projects that may generate 125 or greater peak hour trips) that may impact roadways located within the RCMP network. The *Land Use Analysis Process* was adopted as part of the 2007 Regional Congestion Management Plan and is also a requirement of state CMP statute and the Measure K Renewal Ordinance.

The significance thresholds within the 2010 CEQA Guidelines, Appendix G, with a direct relation to CMA, MPO, and RTPA authority are:

XVI. TRANSPORTATION/TRAFFIC – Would the project:

- a) *Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?*
- b) *Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*

The land uses proposed with this project will generate 125 or more peak hour trips. SJCOG, in implementing the RCMP, requires that the potential impacts to roadways be analyzed within the project's Traffic Impact Analysis (TIA) and the findings summarized within the DEIR. The DEIR should contain a section that specifically addresses requirements and standards of the Regional Congestion Management Program. If the project trips result in a degradation of LOS conditions, the identification and implementation of mitigation measures to resolve or mitigate the identified impact(s), including an estimate of the costs associated with the mitigation is required per state CMP statute.

In determining a significant impact (roadway deficiency), state CMP statute mandates that the following trips are excluded from the volumes used in determining the impact:

- 1) Interregional travel (trips that originate outside the county's boundary);
- 2) Traffic generated by the provision of low-income and very low income housing;
- 3) Traffic generated by high-density residential development located within one-fourth mile of a fixed rail passenger station; and,
- 4) Traffic generated by any mixed use development located within one-fourth mile of a fixed rail passenger station, if more than half of the land area, or floor area, of the mixed



SICOG Comments Fillios/Dobler Annexation Project
 August 17, 2010

use development is used for high density residential housing, as determined by the agency.

If after the trip exemptions are applied, the analysis shows that the project will have significant impacts to the Network, the EIR will need to fully disclose, mitigate to the extent possible, and make Overriding Considerations, if necessary. Of important note is that in the event that the impact is significant and unmitigable and Overriding Considerations are adopted does not exempt the requirements of preparing a Deficiency Plan (DP). As these are deficiencies that are "planned", the best way to justify them is to have a pro-active DP as part of the mitigation measures. State Statute allows for two types of deficiency plans, one being a Direct-fix DP and the other a System-wide DP. If the roadway cannot, or if the jurisdiction deems it impractical, to directly fix the deficient road to meet the CMP LOS Standard, then a System-wide Plan would be appropriate. A System-wide deficiency plan is a mitigation plan for the allowance of a roadway to become deficient or remain deficient by promoting alternative improvements that will measurably improve multi-modal performance, and contribute to significant improvements in air quality (as detailed in Govt. Code 65089.4).

If a proactive plan is not prepared as part of this project's mitigation, the jurisdiction in which the deficient segment lies will have full responsibility to take the lead in preparing either a Direct-fix or System-wide DP. This will be required when the CMA, as part of its biennial update, determines that the roadway does not meet the LOS standard. As a reminder, the trip exemptions listed above will be deducted from the volumes as part of the analysis. Once a roadway segment is identified as deficient, the agency where the majority of a segment physically lies will have twelve months to prepare a DP. Government Code Section 65089.4 details the required analysis and components of a DP.

It should also be noted that certain roadways were allowed to be "grandfathered" at their existing LOS at the time of program inception in the early 1990s. Within your project area, the following segments fall into this category:

Roadway	From	To	Jurisdiction	G.F. LOS
205	MacArthur Dr.	I-5	County Tracy	E
205	Alameda Co. Line	Tracy Blvd.	County Tracy	F

Travel Demand Management

Travel demand management is an integral part of San Joaquin's congestion management program. Not only is this a mandated component of the state's CMP legislation (Section 65089(5)), it is also required by the voter approved Measure K Referendum. Additionally, the federal Congestion Management Process (mandated through SAFETEA-LU) stipulates that



SJCOG Comments_Fillios/Dobler Annexation Project
August 17, 2010

federal funds will not be advanced for any capacity increasing projects unless travel demand reduction and operational strategies have been implemented, to the extent possible, on the roadway.

Although roadway segments operating at LOS "D" are not considered deficient, this standard does trigger a requirement. Roadway segments operating at LOS "D" are subject to the preparation of a plan that analyzes specific strategies for operational preservation and transportation demand management. These strategies include ensuring that new development projects provide provisions that will promote alternative travel. SJCOG is currently preparing a Regional Travel Demand Management Action Plan that will provide further guidance to the local jurisdictions, as well as land developers. This Plan is anticipated to be approved late-summer 2010.

SJCOG requests that the Fillios/Dobler project EIR look at options that will provide support for travel by bicyclists, pedestrians, transit passengers, and carpools. These provisions can include on-site construction, roadway design, off-street parking areas, designation of park-and-ride spaces within the business park, and participation in San Joaquin COG's Commute Connection (www.commuteconnection.com).

Commute Connection is the regional rideshare program operated by the San Joaquin Council of Governments whose mission is to reduce traffic congestion and improve air quality. The program is designed to help commuters make the transition from driving alone to a convenient ridesharing option such as carpooling, vanpooling, bicycling/walking or riding transit. The program serves San Joaquin County and through a special agreement with the Stanislaus Council of Governments, also serves Stanislaus County. The program includes free services such as commuter ride-matching, Guaranteed Ride Home and Employer Services.

Coordination with Commute Connection services/programs is required for the following development types:

- All business or industrial parks
- All event centers or stadiums
- Schools with greater than 150 students
- All commercial, industrial, and retail offices with greater than 50 full-time equivalent employees

Therefore, as a means of mitigating any potential significant effect regarding a conflict with adopted policies, plans, or programs supporting alternative transportation SJCOG requests that measures be added that will ensure that future development per the approved Plan will include



SJCOG Comments_Fillios/Dobler Annexation Project
August 17, 2010

provisions for alternative travel, as discussed above, and that the land uses listed above will coordinate with SJCOG's Commute Connection Program.

Surface Transportation Assistance Act (STAA) terminal access routes

The proposed project may include non-residential development that depends on large trucks for the movement of goods. If these operations will depend on STAA rated trucks to serve their needs, the roadways supporting these non-residential operations must be designed and built to safely accommodate the larger STAA rated trucks.

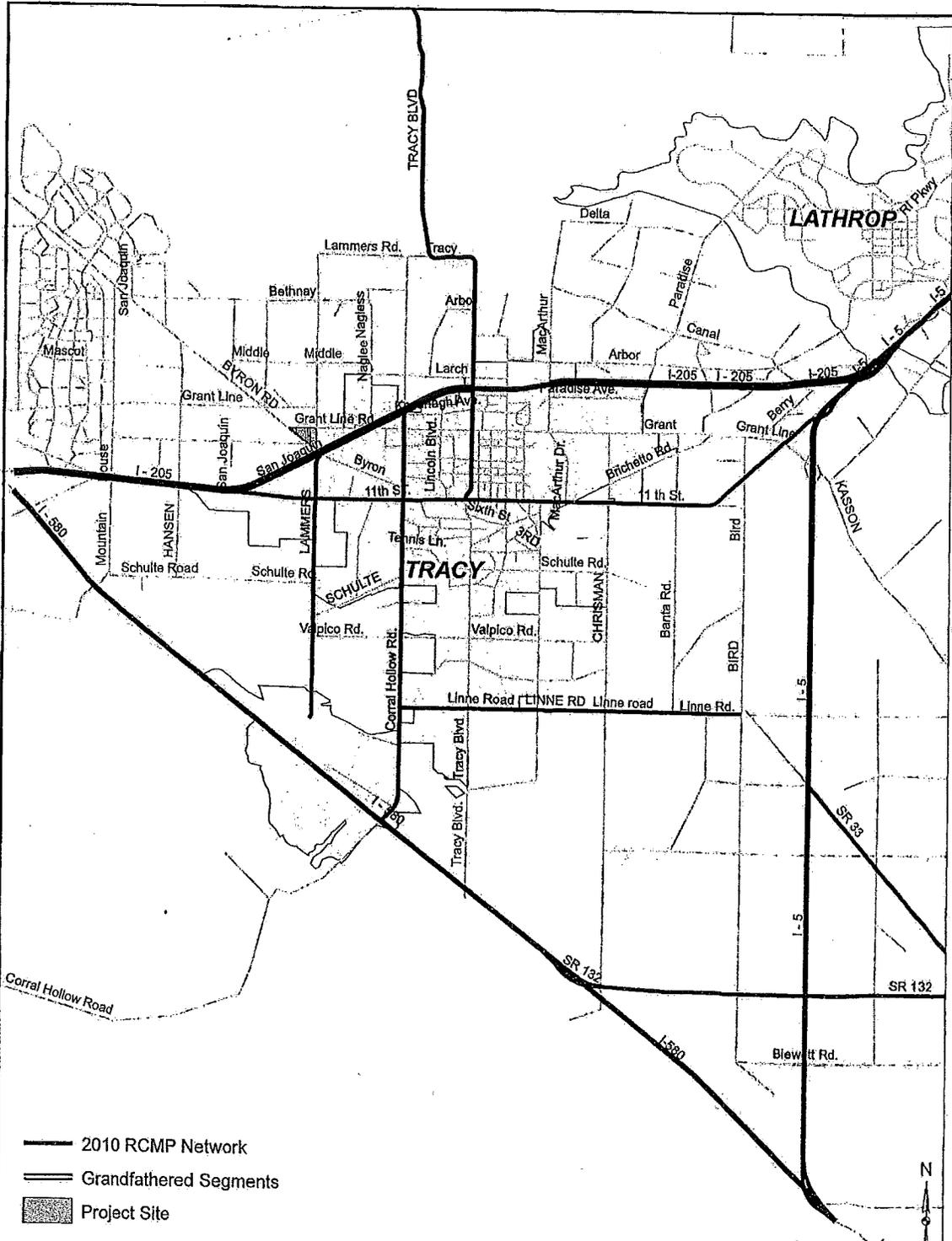
Thank you for the opportunity to review and comment on this project. If you have any questions please call the RCMP's lead planner, Laura Brunn, at (209) 235-0579. We would be pleased to meet with the city and provide any necessary information and guidance relative to these comments and the Regional Congestion Management Program, if that would be helpful.

Sincerely,

A handwritten signature in black ink that reads "Laura Brunn".

LAURA BRUNN
SJCOG Associate Regional Planner

Cc: Dana Cowell, SJCOG Deputy Director
Mike Swearingen, SJCOG Senior Regional Planner





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Response to Comment Letter #4, Laura Brunn, San Joaquin Council of Governments, Congestion Management Agency

4-1 This comment states that the Draft EIR fails to incorporate the CEQA thresholds of significance with direct relation to the Congestion Management Agency (CMA), Metropolitan Planning Organization (MPO) and the San Joaquin Council of Governments (SJCOG). The thresholds referenced by the commentor relate to public transit and non-motorized modes of transportation. As a condition of approval, the Project would be required to provide sidewalks and a Class 2 bicycle lane along the Project frontage per the City's current Roadway Master Plan and draft Transportation Master Plan. Transit service is currently provided to the Walmart site on Grant Line Road, approximately a quarter mile east of the Project site, which would be accessible to future employees, patrons and other users at the site. The provision of these transportation demand management (TDM) measures follow the 2007 Regional Congestion Management Program (RCMP) requirements for trip reductions. Additional trip reductions were not taken for TDM measures in the Draft EIR and, thus, the impact analysis is conservative.

4-2 This comments states that SJCOG requested in their comments on the Notice of Preparation that: 1) potential impacts to Regional Congestion Management Program (RCMP) roadways be analyzed in the Draft EIR; 2) the Draft EIR specifically address the requirements and standards of the RCMP; 3) the Draft EIR include the identification and implementation of mitigation measures to resolve or mitigate identified impacts, including estimated cost; and 4) project conditions provide an avenue for compliance with the Regional Travel Demand Management Action Plan.

Segment analysis of the RCMP roadways was conducted for Existing Plus Project and Cumulative Plus Project Conditions, with implementation of the identified intersection mitigations. As shown in Table 10.5-3 (Regional Congestion Management Program Level of Service), all the RCMP roadways studied would operate at acceptable LOS D or better. No mitigation is required. Detailed LOS analysis worksheets are included in Appendix H (Additional Traffic Data) of this Final EIR.

**Table 10.5-3
Regional Congestion Management Program Level of Service**

Intersection (Jurisdiction)	Peak Hour	Existing Plus Project		Cumulative Plus Project	
		Arterial Speed NB/SB or EB/WB (mph)	LOS	Arterial Speed NB/SB or EB/WB (mph)	LOS
6. Corral Hollow Road between 11 th Street and Grant Line Road (Class IV)	AM	20/20.9	B/B	19.6/21.0	B/B
	PM	19.1/20.6	B/B	18.4/19.3	C/B
	SAT	22.5/24.1	B/B	22.5/24.4	B/B
7. Eleventh Street between Lammers Road and Corral Hollow Road (Class II)	AM	37.6/39.6	A/A	33.8/39.6	B/A
	PM	37.9/40.2	A/A	32.0/39.5	B/A
	SAT	41.2/42.2	A/A	38.1/42.1	A/A



With regard to the Regional Travel Demand Management Action Plan, the City would require as a condition of approval that future developers of the Project site provide the following:

- Preferential carpool and vanpool parking spaces close to the front doors of the buildings
- Bicycle parking close to the front doors of the facilities.
- Preferential electric and hybrid vehicle parking spaces close to the front door.
- Encourage employers to provide incentives to employees and visitors for utilizing the transit services, carpooling and van pooling.
- Sidewalk and bicycle lanes along the Project frontage, which comply with SJCOG and City policies on Complete Streets.
- Contribution to the City's Traffic Impact Fee (TIF) program that will include the extensive use of ITS deployment.

4-3 This comment states that the City should revise the significance thresholds and carry out appropriate analysis to determine the level of significance related to CMA's RCMP. Responses 4-1 and 4-2 indicate that the Project would not have any additional impacts beyond those identified in the Draft EIR.



Comment Letter #5



S J C O G, Inc.

555 East Weber Avenue • Stockton, CA 95202 • (209) 235-0600 • FAX (209) 235-0438

San Joaquin County Multi-Species Habitat Conservation & Open Space Plan (SJMSCP)

SJMSCP RESPONSE TO LOCAL JURISDICTION (RTLJ)
ADVISORY AGENCY NOTICE TO SJCOG, Inc.

To: Alan Bell, Senior Planner, City of Tracy Development and Engineering services Department
From: Kimberly Juarez, SJCOG, Inc.
Date: June 17, 2011 Local Jurisdiction Project Title: Filius/Dobler Development Project
Assessor Parcel Number(s): 209-270-10, -11, -26, -30, -31
Total Acres to be converted from Open Space Use: 43 acres
Habitat Types to be Disturbed: Agriculture Habitat Land
Species Impact Findings: Findings to be determined by SJMSCP biologist.

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Dear Mr. Alan Bell:

SJCOG, Inc. has reviewed Notice of Completion and Availability of Draft Environmental Impact Report for the Filius/Dobler Development Project. This project proposes to annex approximately 43 acres of unincorporated land to the City; amend the City General Plan land use designation of the Project site from Urban Reserve (UR 2) to Commercial; amend the J-205 Corridor Specific Plan to add the Project site to the Specific Plan area, designate it General Commercial (GC) and amend the freeway sign height and size standards; and Prezone the Project site Planned Unit Development. In addition, although no specific onsite improvements are proposed at this time, the Project anticipates up to 466,000 square feet of commercial/office uses to be built on the Project site. The project is bounded by Grant Line Road to the north, Union Pacific RR lines and Byron Road to the southwest, and the Tracy Marketplace Shopping Center to the east.

The City of Tracy is a signatory to San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). Participation in the SJMSCP satisfies requirements of both the state and federal endangered species acts, and ensures that the impacts are mitigated below a level of significance in compliance with the California Environmental Quality Act (CEQA). The LOCAL JURISDICTION retains responsibility for ensuring that the appropriate Incidental Take Minimization Measure are properly implemented and monitored and that appropriate fees are paid in compliance with the SJMSCP. Although participation in the SJMSCP is voluntary, Local Jurisdiction/Lead Agencies should be aware that if project applicants choose against participating in the SJMSCP, they will be required to provide alternative mitigation in an amount and kind equal to that provided in the SJMSCP.

This Project is subject to the SJMSCP. This can be up to a 45 day process and it is recommended that the project applicant contact SJMSCP staff as early as possible. It is also recommended that the project applicant obtain an information package. <http://www.sjco.org>

Please contact SJMSCP staff regarding completing the following steps to satisfy SJMSCP requirements:

- Schedule a SJMSCP Biologist to perform a pre-construction survey **prior to any ground disturbance**
- Sign and Return Incidental Take Minimization Measures to SJMSCP staff (given to project applicant after pre-construction survey is completed)
- Pay appropriate fee based on SJMSCP findings. Fees shall be paid in the amount in effect at the time of issuance of Building Permit
- Receive your Certificate of Payment and release the required permit

5-1

It should be noted that if this project has any potential impacts to waters of the United States (pursuant to Section 404 Clean Water Act), it would require the project to seek voluntary coverage through the unmapped process under the SJMSCP which could take up to 90 days. It may be prudent to obtain a preliminary wetlands map from a qualified consultant. If waters of the United States are confirmed on the project site, the Corps and the Regional Water Quality Control Board (RWQCB) would have regulatory authority over those mapped areas (pursuant to Section 404 and 401 of the Clean Water Act respectively) and permits would be required from each of these resource agencies prior to grading the project site.

If you have any questions, please call (209) 235-0600.



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San Joaquin County Multi-Species Habitat Conservation & Open Space Plan

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SJMSCP HOLD

TO: Local Jurisdiction: Community Development Department, Planning Department, Building Department, Engineering Department, Survey Department, Transportation Department,
Other: _____

FROM: Kimberly Juarez, SJCOG, Inc.

**DO NOT AUTHORIZE SITE DISTURBANCE
DO NOT ISSUE A BUILDING PERMIT
DO NOT ISSUE _____ FOR THIS PROJECT**

The landowner/developer for this site has requested coverage pursuant to the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). In accordance with that agreement, the Applicant has agreed to:

- 1) Implement Incidental Take Minimization Measures (ITMMs) PRIOR to site disturbance. Do not authorize site disturbance until receipt of a signed Agreement to Incidental Take Minimization Measures (ITMMs) AND verification that all applicable ITMMs have been implemented.
- 2) Pay SJMSCP fees. Fees shall be paid in the amount in effect at the time of issuance of Building Permit (see also Appendix). Do not issue a Use Permit until receipt of a Certificate of Payment or Verification of Payment to the Local Jurisdiction (e.g., Receipt) AND verification that all applicable ITMMs have been implemented prior to ground disturbance.

Project Title: Filios/Dobler Development Project

Landowner: _____

Applicant: _____

Assessor Parcel #: 209-270-10, -11, -26, -30, -31

T _____, R _____, Section(s): _____

Local Jurisdiction Contact: Alan Bell

The LOCAL JURISDICTION retains responsibility for ensuring that the appropriate Incidental Take Minimization Measures are properly implemented and monitored and that appropriate fees are paid in compliance with the SJMSCP.



Response to Comment Letter #5, Kimberly Juarez, San Joaquin Council of Governments, San Joaquin County Multi-Species Habitat Conservation and Open Space Plan

- 5-1 This comment states that the proposed Project is subject to the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP) and provides the steps to satisfy SJMSCP requirements. Sections 4.2 (Land Use and Planning) and 4.7 (Biological Resources) of the Draft EIR acknowledge that the Project site is within the coverage area of the SJMSCP and include mitigation to ensure compliance with the plan (Mitigation Measures 4.2-1 and 4.7-1).



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Comment Letter #6



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



July 22, 2011

Alan Bell
City of Tracy
Development and Engineering Services Department
333 Civic Center Plaza
Tracy, California 95376

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D.E.S.

**Project: Draft Environmental Impact Report (DEIR) for the Filios/Dobler
Annexation and Development Project**

District CEQA Reference No: 20100586

Dear Mr. Bell:

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the Draft Environmental Impact Report (DEIR) for the Filios/Dobler Annexation and Development Project, which includes: annexation of approximately 43 acres of unincorporated land to the City and anticipation of up to 466,000 square feet of commercial/office uses to be built on the Project site. The District offers the following comments:

District Comments

- 1) The DEIR (page 4.5-10) states "temporary air emissions would result from exhaust emissions from construction equipment and motor vehicles of the construction crew." The DEIR recognizes construction related emission impacts to be potentially significant. As such, the District recommends additional mitigation to ensure the projects construction emission air impacts are reduced to less than significant. Feasible mitigation of construction exhaust emissions include use of construction equipment powered by engines meeting, at a minimum, Tier II emission standards, as set forth in §2423 of Title 13 of the California Code of Regulations, and Part 89 of Title 40 Code of Federal Regulations. The District recommends incorporating, as a condition of project approval, a requirement that off-road construction equipment used on site achieve fleet average emissions equal to or less than the Tier II emissions standard of 4.8 g/hp-hr NOx. This can be achieved through any combination of uncontrolled engines and engines complying with Tier II and above engine standards.

6-1

Seyoum Sadretdin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95360-8718
Tel: (209) 567-6400. FAX: (209) 567-6176

Central Region (Main Office)
1990 E. Gottsburg Avenue
Fresno, CA 93720-0244
Tel: (559) 230-6000 FAX: (559) 230-5061

Southern Region
3484G Flyover Court
Bakersfield, CA 93309-9726
Tel: 661-392-5590 FAX: 661-392-5586

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- 2) The DEIR identifies potential sensitive receptors to the project (page 4.5-5). However, it does not characterize risk from the proposed project and does not include a health risk assessment (HRA). The project includes a 466,000 square foot commercial/office project, and development of this project could include sources of toxic air contaminants that could cause risk to sensitive receptors identified in the DEIR. Potential sources of TACs include delivery truck travel, idling, transportation refrigeration units, emergency generators, restaurants, dry cleaning, gasoline dispensing facilities, etc..

6-2

For any portion of the project in which this constitutes a final discretionary approval, the District recommends the DEIR include an HRA that assesses risk from all potential sources that might be included in the project. Reasonable assumptions should be made for the individual sources and TAC emissions for use in the HRA. Specific guidance from the District for performing HRAs should be followed and the analysis should be a worst-case analysis to preclude the need to perform HRAs for specific development projects in the future.

- 3) Based on information provided to the District, the proposed project would equal or exceed 39,000 square feet of general office space. Therefore, the District concludes that the proposed project is subject to District Rule 9510 (Indirect Source Review).

District Rule 9510 is intended to mitigate a project's impact on air quality through project design elements or by payment of applicable off-site mitigation fees. Any applicant subject to District Rule 9510 is required to submit an Air Impact Assessment (AIA) application to the District no later than applying for final discretionary approval, and to pay any applicable off-site mitigation fees before issuance of the first building permit. If approval of the subject project constitutes the last discretionary approval by your agency, the District recommends that demonstration of compliance with District Rule 9510, including payment of all applicable fees before issuance of the first building permit, be made a condition of project approval. Information about how to comply with District Rule 9510 can be found online at: <http://www.valleyair.org/ISR/ISRHome.htm>.

6-3

- 4) The proposed project may require District permits. Prior to the start of construction the project proponent should contact the District's Small Business Assistance Office at (559) 230-5888 to determine if an Authority to Construct (ATC) is required.

6-4

- 5) The proposed project may be subject to the following District rules: Regulation VIII (Fugitive PM10 Prohibitions), Rule 4102 (Nuisance), Rule 4601 (Architectural Coatings), and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations). In the event an existing building will be renovated, partially demolished or removed, the project may be subject to District Rule 4002 (National Emission Standards for Hazardous Air Pollutants).

6-5



District CEQA Reference No: 20100586

Page 3 of 3

- 6) The District recommends that a copy of the District's comments be provided to the project proponent. 6-6

The above list of rules is neither exhaustive nor exclusive. To identify other District rules or regulations that apply to this project or to obtain information about District permit requirements, the applicant is strongly encouraged to contact the District's Small Business Assistance Office at (559) 230-5888. Current District rules can be found online at: www.valleyair.org/rules/1ruleslist.htm. 6-7

District staff is available to meet with you and/or the applicant to further discuss the regulatory requirements that are associated with this project. If you have any questions or require further information, please call Mark Montelongo at (559) 230-5905.

Sincerely,

David Warner
Director of Permit Services

for: Arnaud Marjollet
Permit Services Manager

DW: mm

cc: File



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4



Response to Comment Letter #6, David Warner, San Joaquin Valley Air Pollution Control District

- 6-1 This comment recommends additional mitigation to ensure that construction emission air quality impacts are reduced to less than significant. Although the Draft EIR states that temporary air emissions would result from construction equipment and motor vehicles of the construction crew, impacts associated with construction activities were found to be less than significant with the implementation of recommended mitigation measures. Mitigation Measures 4.5-1a and 4.5-1b contained in Section 4.5 (Air Quality) of the Draft EIR are based on guidance within the San Joaquin Valley Air Pollution Control District's (SJVAPCD) *Guide for Assessing and Mitigating Air Quality Impacts* (GAMAQI) and compliance with SJVAPCD Regulation VIII. Additionally, it should be noted that as the Project consists of the annexation of land into the City, specific construction activities are not anticipated at this time. Future construction activities would be required to comply with the applicable emissions standards noted in the comment (Title 13 of the California Code of Regulations, and Part 89 of Title 40 Code of Federal Regulations) depending on the timing and intensity of future construction activities on the Project site and specific Project-related emissions.
- 6-2 This comment recommends that the Draft EIR include a Health Risk Assessment (HRA). As noted in Response 6-1 above, the Draft EIR analyzes the annexation of the Project site into the City. Although the Project site would be zoned for office and commercial retail uses, the end users are not yet known. As a result, the nature and quantity of Toxic Air Contaminants (TAC) emissions could vary widely. The need for an HRA would be determined at the time specific development proposals are submitted to the City and would be reviewed as part of future discretionary actions.
- 6-3 This comment states that the proposed Project is subject to the SJVAPCD Rule 9510 (Indirect Source Review), which requires preparation of an Air Impact Assessment (AIA). The Draft EIR found that long-term operational Project emissions would exceed SJVAPCD thresholds and would result in a significant impact. As a result, the Draft EIR included Mitigation Measure 4.5-2, which requires the Project applicant to comply with SJVAPCD Rule 9510 prior to the issuance of building permits. As noted in the comment, compliance with Rule 9510 entails submission of an AIA and payment of any applicable offsite mitigation fees as determined in the AIA.
- 6-4 This comment states that the proposed Project may require permits from SJVAPCD. Chapter 3 (Project Description) of the Draft EIR acknowledges that SJVAPCD is a responsible agency with jurisdiction or permitting authority over the Project. Thus, the EIR is available for use by SJVAPCD for any future permits required for the Project.
- 6-5 This comment states that the proposed Project may be subject to the following SJVAPCD: Regulation VIII (Fugitive PM₁₀ Prohibitions), Rule 4102 (Nuisance), Rule 4601 (Architectural Coatings), and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations). If an existing building is renovated, partially demolished or removed, the Project may be subject to Rule 4002 (National Emission Standards for Hazardous Air Pollutants). Mitigation Measures 4.5-1a and 4.5-1b on pages 4.5-11, 4.5-12 and 4.5-13 require conformance with Regulation III and Rule 4641. In general, this comment does not address the adequacy of the Draft EIR. However, it is noted and included in the record for consideration by the public and decisions makers.
- 6-6 This comment recommends that the Project applicant be provided a copy of SJVAPCD comments in the Draft EIR. The City has provided the Project applicant with a copy of the comments.



- 6-7 This comment states that the list of rules provided in the comment letter is neither exhaustive nor exclusive. This comment does not address the adequacy of the Draft EIR. However, it is noted and included in the record for consideration by the public and decisions makers.



Comment Letter #7

**SAN JOAQUIN
LOCAL AGENCY FORMATION COMMISSION**

LAFCo

509 W. WEBER AVENUE SUITE 420 □ STOCKTON, CA 95203

CHAIR
KEN VOGEL
COUNTY BOARD
OF SUPERVISORS

VICE CHAIR
ELDEN "RED" NUTT
RIPON CITY COUNCIL

MEMBERS
LARRY RÜHSTALLER
COUNTY BOARD OF
SUPERVISORS

SONNY DHALIWAL
LATHROP CITY COUNCIL

STEVEN NILSSEN
PUBLIC MEMBER

ALTERNATE MEMBERS

BRENT H. IVES
TRACY CITY COUNCIL

LEROY ORNELLAS
COUNTY BOARD
OF SUPERVISORS

PATRICK STOCKAR
PUBLIC MEMBER

EXECUTIVE OFFICER
JAMES E. GLASER

COUNSEL
THOMAS SHEPARD SR.

ANALYST
ELIZABETH
CONTRERAS

COMMISSION CLERK
LINDA LUND

July 25, 2011

City of Tracy
Development and Engineering Services Department
333 Civic Center Plaza
Tracy, CA 95376
Attention: Alan Bell, Senior Planner

Dear Mr. Bell,

San Joaquin Local Agency Formation Commission (LAFCo) has reviewed the Filios/Dobler Annexation and Development Project Draft EIR and has the following comments to offer:

- On page 4.13-12, the report indicates that the proposed Project would result in potentially significant impacts on fire protection services requiring mitigation and references Mitigation Measure 4.13-1. The report does not include this mitigation measure. 7-1
- The report seems to indicate (p. 4.13-1) that Tracy City Fire Department will be responsible for fire services to the project site. It is our understanding that the City will not be requesting detachment from Tracy Rural Fire Protection District and thus the City will not be responsible for fire service. Presently, the delivery of service is provided by the South County Fire Authority. The report should address this issue. 7-2
- The report does not provide any information as to the distance to the closest fire station nor the response time to the site. The EIR does seem to indicate that established response time cannot be achieved until Station 96 is relocated. Will this occur prior to development of the site? More detail is needed to demonstrate that completion of the new station will occur in fiscal year 2012/2013 and that funding for adequate staffing is also available. 7-3
- The Performance Objectives outlined on page 4.13-2 for Tracy Rural Fire Protection District indicates a response time of 10 minutes from the time the call is received at the primary Public Safety Answering Point (PSAP) 90 percent of the time and 6.5 7-4

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minutes for the City of Tracy. Given that our Municipal Service Review for Rural Fire Protection Districts (May, 2011) found that dispatch time for just the secondary PSAP is 4:07 minutes 90 percent of the time, it is difficult to expect that these times can be achieved. This matter should be further explored particularly as it applies to fire protection services to the subject site.

7-4
Cont'd

- The EIR should, on page 4.4-4, address prime agricultural land as defined by § 56064 of the California Government Code. LAFCo must use this definition in its proceedings.
- Since this project will request an annexation, the EIR should discuss the consistency of the project with adopted LAFCo policies.
- The EIR should acknowledge that a Municipal Service Review and Sphere Update have not yet been adopted by LAFCo. These documents must be in place prior to consideration of an annexation request.

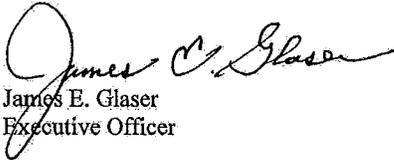
7-5

7-6

7-7

Thank you for the opportunity to comment on this project. Please call if you have any questions.

Sincerely,


James E. Glaser
Executive Officer

Response to Comment Letter #7, James E. Glaser, San Joaquin Local Agency Formation Commission

- 7-1 This comment states that the Draft EIR references Mitigation Measure 4.13-1 on page 4.13-12 but does not include such a measure. The Draft EIR incorrectly references Mitigation Measure 4.13-1. Impacts associated with fire protection services would be less than significant and, therefore, no mitigation is required. Page 4.13-12 of the Draft EIR has been revised to provide clarification. Refer to Chapter 11 (Revisions to Draft EIR) of this Final EIR.
- 7-2 This comment states that the Draft EIR indicates that the Project would be served by the Tracy Fire Department. However, the commentor states that detachment from the Rural Tracy Fire District is not being requested and asks that this issue be addressed. Fire protection services in the Tracy area are unique. The City and Tracy Rural Fire Protection District, through a Joint Powers Authority (JPA), have formed the South County Fire Authority. Thus, the City and Tracy Rural Fire Protection District are linked and all financial, management and technical components of fire protection in the geographical area are handled under the South County Fire Authority as the official provider of fire protection services. The City will soon be initiating a process to analyze and, if appropriate, reorganize the structure of fire protection services in the Tracy area. However, for the time being, fire protection services for the Project site would be provided by the South County Fire Authority, which is effectively both the City and Tracy Rural Fire Protection District. The unique structure of fire protection services does not effect the analysis provided in the Draft EIR or the conclusion that the proposed Project would not result in substantial adverse impacts associated with the provision of, or need for, new or physically altered fire protection facilities, the construction of which would cause significant environmental impacts.
- 7-3 This comment states that the Draft EIR does not provide the distance or response time from the closest fire station. In addition, the comment asks if the relocation of Station 96 would occur prior to Project development and requests more detail to demonstrate that completion of the new station would occur in fiscal year 2012/2013 and that funding for adequate staffing is also available. The new location of Station 96 is 1800 W. Grant Line Road, which is approximately 1.5 miles east of the Project site with a travel component of the total response time of four minutes. The City owns the land and has identified the relocated fire station as a Capital Improvement Project (CIP 71061). The contract to begin improvements on the site was approved by the Tracy City Council on August 2, 2011. The relocated Station 96 will be operated by the same staff as the existing Station 96 and is scheduled to be operating in 2013. The relocated station will be approximately 1.5 miles closer to the Project site than its current location.
- 7-4 This comment states that the Municipal Service Review (MSR) for Rural Fire Protection Districts (May 2011) found that dispatch time for the secondary Public Safety Answering Point (PSAP) is 4:07 minutes 90 percent of the time and that it would be difficult to achieve the response times for the Tracy Rural Fire Protection District and Tracy Fire Department included on page 4.13-2 in Section 4.13 (Public Services, Utilities and Service Systems) of the Draft EIR. The commentor requests that this matter be explored further.

The Tracy Fire Department has performance objectives related to response time that include call processing, turnout time and travel time. Performance objectives outlined on page 4.13-2 for the Tracy Rural Fire Protection District indicate a response time of 10 minutes from the time the call is received at the primary PSAP 90 percent of the time and 6.5 minutes for the City. The placement of fire stations is based upon a travel time objective of four minutes consistent with National Fire Protection Association (NFPA) 1710 standards. As described above in Response 7-



3, the station that would serve the Project site (Station 96) is scheduled to be relocated to a site at 1800 W. Grant Line Road, which is within the four-minute travel time component of response time.

The Tracy Fire Department receives dispatching services from American Medical Response via their regional dispatch center LifeCom. The dispatch time indicated in Table V-4a of the MSR prepared by the Local Agency Formation Commission (LAFCo) for Rural Fire Protection Districts for the secondary PSAP is 3:42 minutes for Tracy. The Tracy Fire Department recognizes that call processing times are presently in excess of the goal of 1:00 minute and continually strives to improve call processing times through the San Joaquin County Joint Radio User's Group (JRUG). It is anticipated through oversight and a commitment to continuous quality improvement, call processing times will improve. However, this excess in call processing times does not effect the analysis provided in the Draft EIR or the conclusion that the proposed Project would not result in substantial adverse impacts associated with the provision of, or need for, new or physically altered fire protection facilities, the construction of which would cause significant environmental impacts.

- 7-5 This comment states that the Draft EIR should address prime agricultural land as defined by §56064 of the California Government Code. Pages 4.4-3 and 4.4-4 in Section 4.5 (Agricultural Resources) of the Draft EIR have been revised to include reference to this definition. Refer to Chapter 11 of this Final EIR.
- 7-6 The commentor requests that the Draft EIR include a discussion of Project consistency with adopted LAFCo policies. The requested discussion has been added on pages 4.2-1 through 4.2-3 and on pages 4.2-7 and 4.2-8 in Section 4.2 (Land Use and Planning) of the Draft EIR. Refer to Chapter 11 of this Final EIR.
- 7-7 The commentor requests that the Draft EIR acknowledge that an MSR and Sphere of Influence Plan Update for the City have not yet been adopted by LAFCo. Section 4.2 of the Draft EIR has been revised to provide this acknowledgement on page 4.2-7. Refer to Chapter 11 of this Final EIR.



Comment Letter #8



**SAN JOAQUIN COUNTY
COMMUNITY DEVELOPMENT DEPARTMENT**

1810 E. HAZELTON AVE., STOCKTON, CA 95205-6232
PHONE: 209/468-3121 FAX: 209/468-3163

July 18, 2011

Alan Bell- Senior Planner
City of Tracy-Department of Development and Engineering Services
333 Civic Center Plaza
Tracy, CA 95376

RE: Draft Environmental Impact Report-Filios/Dobler Annexation and Development Project

Dear Mr. Bell:

Thank you for sending the Draft Environmental Impact Report for the Filios/Dobler project. The San Joaquin County Community Development Department has reviewed the report and offers the following comments:

The approximately 43-acre project site is currently in agricultural production. The project site has a zoning designation of General Agriculture- 40 acre minimum lot size (AG-40) and a General Plan designation of General Agriculture (A/G). The County is concerned about the loss of agricultural land from converting the agricultural use to a nonagricultural use and amending the designation from General Agriculture to Commercial.

8-1

The project site is surrounded by agricultural property located on unincorporated land to the north, west, and south. San Joaquin County recognizes and supports the right to farm agricultural lands. Pursuant to the Right-To-Farm Ordinance Section 6-9004(e), residents of property on or near agricultural land should be prepared to accept the inconveniences or discomforts associated with agricultural operations or activities, such as noise, odors, insects, dust or fumes. San Joaquin County has determined that such inconveniences or discomforts shall not be considered to be a nuisance.

8-2

We appreciate the opportunity to comment on this application. Please add our agency to the notification list. If you have any questions, please free to contact me at 209-468-8477.

Sincerely,

Mo Hatef
Associate Planner



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Response to Comment Letter #8, Mo Hatef, San Joaquin County Community Development Department

- 8-1 This comment states that San Joaquin County is concerned with the loss of agricultural land. Section 4.4 (Agricultural Resources) of the Draft EIR identifies the Project site as Prime Farmland and concludes that its conversion to non-agricultural use would be a potentially significant impact. Although mitigation requiring the payment of an agricultural mitigation fee is included in the Draft EIR, the impact would be significant and unavoidable.
- 8-2 This comment states that the Project site is surrounded by agricultural property located within unincorporated land to the north, west and south. It further states that San Joaquin County recognizes and supports the right to farm agricultural lands. This comment does not address the adequacy of the Draft EIR. However, it is noted and included in the record for consideration by the public and decisions makers.



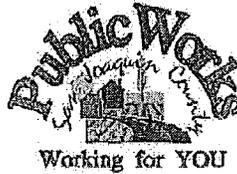
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Comment Letter #9



THOMAS M. GAU
DIRECTOR



P. O. BOX 1810 - 1810 E. HAZELTON AVENUE
STOCKTON, CALIFORNIA 95201
(209) 468-3000 FAX (209) 468-2993
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MICHAEL SELLING
DEPUTY DIRECTOR

STEVEN WINKLER
DEPUTY DIRECTOR

ROBER JAMES
BUSINESS ADMINISTRATOR

Alan Bell
City of Tracy
Development and Engineering Services Department
333 Civic Center Plaza
Tracy, CA 95376

July 25, 2011

SUBJECT: Draft Environmental Impact Report for Filios/Dobler Annexation and Development Project

The San Joaquin County (County) Department of Public Works has reviewed the above referenced document and has the following concerns:

This is a general comment for the Annexation of Grant Line Road.

- Page 4.15-25: The Draft Environmental Impact Report is correct for the intersection of Byron Road and Grant Line Road in that the intersection improvements are planned and funded (construction funding); however, the earliest potential construction date is late 2012, if the UPRR, PUC, and Caltrans approve the project this year. The County is anticipating the likelihood of a 2013 construction date. However, the anticipated construction date for the Byron Road and Grant Line Road Intersection Improvement Project maybe even further out due to the railroad scheduling. 9-1
- The City of Tracy and the County will need a maintenance agreement, as one third of the intersection will be within the City limits. 9-2

Thank you for the opportunity to be heard. Should you have questions or need additional information regarding the above comments, please contact me at (209) 468-3085.

Sincerely,

Mark Hopkins
Senior Planner

cc: Alex Cheffey, Senior Civil Engineer (Public Services)
Firoz Vohra, Senior Traffic Engineer (Transportation Planning/ Traffic Engineering)
Pete Martin, Engineering Services Manager (Design Engineering)



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Response to Comment Letter #9, Mark Hopkins, San Joaquin County Public Works Department

- 9-1 This comment states that the earliest construction date for planned and funded improvements at the intersection of Byron Road/Grant Line Road is late 2012, if the Union Pacific Railroad, California Public Utilities Commission and California Department of Transportation approve the project this year. The comment further states that the County anticipates the likelihood of a 2013 construction date. Page 4.14-25 in Section 4.14 (Transportation/Traffic) of the Draft EIR has been revised to provide this clarification. Refer to Chapter 11 (Revisions to Draft EIR) of this Final EIR.
- 9-2 This comment states that the City and County will need a maintenance agreement for the intersection of Byron Road/Grant Line Road. This comment does not address the adequacy of the Draft EIR. However, it is noted and included in the record for consideration by the public and decisions makers.



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Comment Letter #10



Mike N. Oliphant
Environmental Project
Manager

Chevron Environmental
Management Company
P.O. Box 6012
San Ramon, CA 94583
Tel (925) 790-6431
Fax (925) 790-6772
mike.oliphant@chevron.com

June 23, 2011

Stakeholder Correspondence--City of Tracy

Mr. Alan Bell
City of Tracy
333 Civic Center Plaza
Tracy, California 95376

Subject: Comments for the Filius/Dobler Annexation Draft Environmental Impact Report
Chevron Environmental Management Company
Historical Pipeline Portfolio--Bakersfield to Richmond

Dear Mr. Bell:

Chevron Environmental Management Company (CEMC) recently received the Notice of Completion and Availability of the Draft Environmental Impact Report for the Filius/Dobler Annexation and Development Project. The purpose of this letter is to notify the City of Tracy and project stakeholders as to the location of formerly active crude-oil pipelines in the proposed annexation area (Figure 1), and to provide background information about the former pipelines. The intent is that information regarding the location and construction of these pipelines will be incorporated into future project engineering and environmental plans.

10-1

Portions of former Old Valley Pipeline (OVP) and Tidewater Associated Oil Company (TAOC) pipelines existed in the vicinity of the proposed annexation area. The historic pipelines were constructed in the early 1900s and carried crude oil from the southern San Joaquin Valley to the Bay Area. Operations for the OVP ceased in the 1940s, and in the 1970s for the TAOC pipelines.

The pipelines were originally installed at depths ranging from 18 inches to 10 feet below ground surface. The steel pipelines were typically encased in a protective coating composed of coal tar and asbestos-containing felt material (ACM). When pipeline operations ceased, the pipelines were taken out of commission. The degree and method of decommission varied; in some instances the pipelines were removed, while in others they remain in place.

10-2

Evidence of historical releases associated with the former OVP and TAOC pipelines is sometimes identified during the course of underground utility work and other subsurface construction activities near the former pipeline rights of way (ROWs). Residual weathered crude oil associated with former OVP and TAOC pipeline operations can usually be observed visually; however, analytical testing is necessary to confirm the identity of the affected material. Analytical results from risk assessments performed by CEMC at numerous historical pipeline release sites confirm that soil affected by the historical release of crude oil from the pipelines is non-hazardous, and does not pose significant risks to human health.

Figure 1 illustrates the location of the former OVP and TAOC ROWs with respect to the proposed annexation area.



Mr. Alan Bell – City of Tracy
June 23, 2011
Page 2 of 2

The proposed annexation area coincides with, or is in proximity to, several former CEMC sites where releases related to the former OVP and TAOC pipelines have been documented. Please visit the California State Water Resources Control Board Geotracker website at <http://geotracker.swrcb.ca.gov/> for more information regarding the following sites:

- Filius-Mansfield (site ID # SL186202978)
- Dividend Property (site ID # SL205343005)
- Tracy Byron Road (site ID #SL0607749525)
- Catellus (site ID #SL0607736148)

10-3

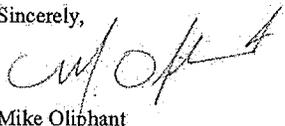
For more information regarding the Dobler investigation area, please contact the San Joaquin County Environmental Health Department at (209) 468-3420.

CEMC recommends that the City of Tracy and project development proponents be prepared to potentially address residual weathered crude oil, pipelines, and ACM from the former OVP and/or TAOC pipelines during subsurface construction activities. This potentiality is easily managed with some advanced planning. CEMC would appreciate being informed of progress regarding the proposed annexation; any encountered petroleum, pipelines, and pipeline-related ACM; and any other planned construction and land development projects in the vicinity of the former OVP and TAOC ROWs.

10-4

For more information regarding these historic pipelines, please visit <http://www.hppinfo.com/>. If you have any questions, require additional information, or would like to request more detailed maps, please contact SAIC consultant Tom Burns (thomas.a.burns@saic.com) at (916) 979-3748.

Sincerely,



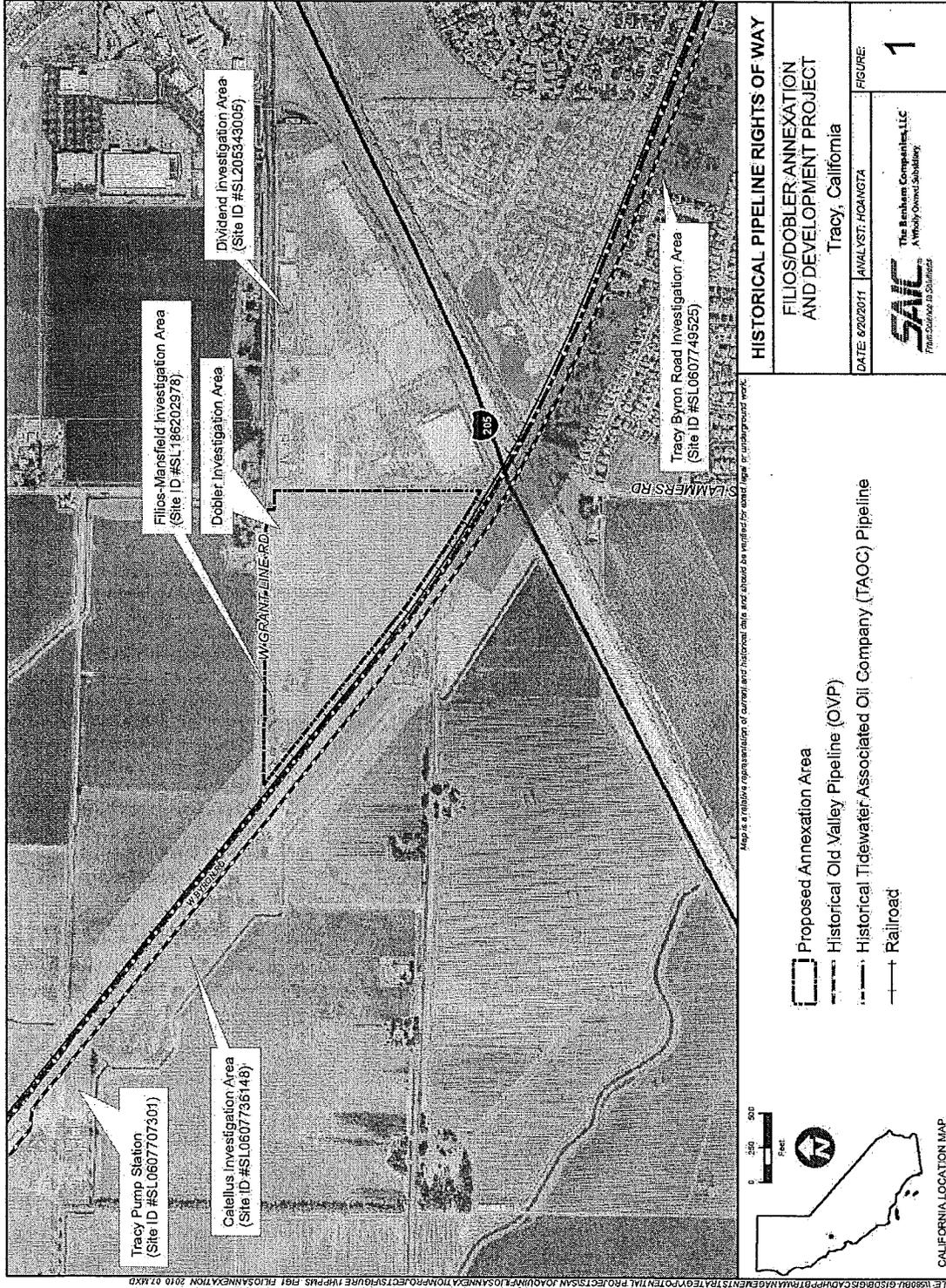
Mike Oliphant

MO/klg

Enclosures:

Figure 1. Historical Pipeline Rights of Way – Filius/Dobler Annexation and Development Project

cc: Mr. Tom Burns – SAIC
3800 Watt Avenue, Suite 210, Sacramento, California 95821
Mr. Mike Hurd – SAIC (letter only)
1000 Broadway, Suite 675, Oakland, California 94607



HISTORICAL PIPELINE RIGHTS OF WAY	
FILIOS/DOBLER ANNEXATION AND DEVELOPMENT PROJECT Tracy, California	
DATE: 6/20/2011	ANALYST: HCA/NGTA
 The Benham Companies, LLC A Wholly Owned Subsidiary P.O. Box 10000, St. Louis, MO 63143	
FIGURE	1

Map is a relative representation of current and historical data and should be verified for exact legal or topographic work.

Proposed Annexation Area
 Historical Old Valley Pipeline (OVP)
 Historical Tidewater Associated Oil Company (TAOC) Pipeline
 Railroad

0 250 500
Feet

CALIFORNIA LOCATION MAP



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Response to Comment Letter #10, Mike Oliphant, Chevron Environmental Management Company

- 10-1 This comment states that the purpose of the letter is to notify the City and Project stakeholders about the location of formerly active crude-oil pipelines and provide background information about the pipelines. Section 4.10 (Hazards and Hazardous Materials) of the Draft EIR includes a discussion of the pipelines and identifies potential impacts and mitigation measures for residual crude oil and Bunker C oil in the soil along the southern portion of the Project site. Refer to pages 4.10-2 and 4.10-3 and pages 4.10-12 through 4.10-15.
- 10-2 This comment states that portions of the former Old Valley Pipeline (OVP) and Tidewater Associated Oil Company (TAOC) pipelines exist in the vicinity of the Project site and provides information about the pipelines. Refer to Response 10-1.
- 10-3 This comment states that several former Chevron Environmental Management Company (CEMC) sites where releases related to the former OVP and TAOC pipelines have been documented are located in proximity to the Project site. The comment also suggests that the California Water Resources Control Board Geotracker website be consulted and the San Joaquin County Environmental Health Department (EHD) be contacted for more information. As documented in Section 4.10 of Draft EIR and the Existing Hazardous Materials Conditions Assessment prepared for the Project (contained in Appendix E of the Draft EIR), Geotracker and EHD were consulted during preparation of both documents.
- 10-4 This comment recommends that the City and Project proponents be prepared to potentially address residual weathered crude oil, pipelines and asbestos containing materials (ACM) from the former OVP and/or TAOC pipelines during subsurface construction activities. Implementation of Mitigation Measures 4.10-1d and 4.10-1e on page 4.10-15 would mitigate potential impacts associated with contaminated soils from the former pipelines to less than significant.



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Comment Letter #11

Page 1 of 2

Alan Bell

From: GaryDobler@comcast.net
Sent: Monday, July 25, 2011 11:01 AM
To: Alan Bell
Subject: Fwd: Dobler / Filios EIR EIR comments and corrections
Dobler / Filios EIR

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JUL 25 2011

CITY OF TRACY
D.I.S.

From: GaryDobler@comcast.net
To: kwheeler@rbf.com
Sent: Monday, July 25, 2011 10:50:08 AM
Subject: Dobler / Filios EIR

Kristie Wheeler

As a project sponsor, the following corrections shall take place in our EIR.

All references to the Lammers Road extension shall be removed from our EIR. We have stated from day one, almost two years ago, that we will not pay any costs associated with the Lammers Road Extension, going through our land. There is no legal way to cross the rail line, now or in the future. This is simply a extortion plan, to extract 5,431 million dollars, for a ROAD TO NO WHERE's. We have never agreed to forward funds for any such extortion and or ponzi plan system, to fund the City's General Fund. It is simply not necessary and has no public benefit. All references to any such road way shall be removed from the EIR. The fact is that the City Transportation Master Plan is NOT approved, nor is the County's General Plan. Neither, has had a public process completed, and neither has had a final approval, pending any litigation that may or may not ac-cure. Neither, can be used as basis of fact, at this time. They are purely assumptions of unapproved plans. Furthermore, many people acting on the committees's and other positions hold a conflict of interest and are self dealing, for self benefiting. That is a legal fact.

11-1

Page 4.14-3 remove all references to the proposed ROAD TO NO WHERE / Lammers Road Extension on our parcel. (2nd paragraph and last paragraph)
Page 4.14-75 remove the whole paragraph named TMP 2035 Conditions With Planned ROAD TO NO WHERE / Lammers Road Extension / Bryon Road connector. This TMP is NOT a approved plan, nor have we agreed to any such work ever. This has been crystal clear for 13 years now. We simply do not participate in a extortion plot.

11-2

The entry way to our parcel, is named Dobler Way. The Way will extend back to the fire store location, in the Tracy Market Place. It will not, nor cannot, extend over the rail line. There will be only a 26 foot emergency road and truck access beyond that point. This has been crystal clear for 13 years now.

11-3

Please go back and remove all references to the Road to No Where / Lammers road

11-4

7/25/2011



extension through our EIR. This has been a mandatory requirement since day one. As you are aware that , this was added in late in the process for numerous self dealing interests. Page 74 and page 75 of the pending TMP clearly shows the facts again, which RBF produced. Furthermore, any far reaching attempts to claim that a dedication and or easement is in place for the Proposed Lammers Road Extension is legally incorrect and is clouding our title.

11-4
Cont'd

At the start of this EIR we all agreed on the Road ways. Now , special interests whom hold conflicts of Interest have entered the process, late in the process. Grantline Road was agreed to continue over Byron Road , just west of the annexation, and connect with the future Interchange. There was no relocating associated with the plan, nor have we approved to pay any costs associated with such relocation's. this EIR has to comply with the current TMP that is active and not a proposed one , that is unapproved. Unapproved plans are not a basis of fact for any EIR, only approved current plans can be used as factual basis's.

11-5

We highly suggest that all references on page 77 number 25 and number 26, page 84 Lammers Byron Connector, page 85, page 161 number 24 and page 162 number 24 of the unapproved TMP be corrected and removed from that pending unapproved document. Furthermore, concept plans 1-4 shall need correction, as conflicts do exist, for many people in that process. Page 1 clearly shows further clouding of titles and has not considered all environmental hazards that exist past that parcel of land. relocation will be necessary. Shared burden has been shifted to a full burden by people whom hold a conflict of interest. the Environmental hazards run north on other parcels , not only in one location. Private discovery has been completed and will require real life adjustments to the unapproved pending TMP.

11-6

If you have any questions, please contact us.

We are looking forwards to the completion of our EIR , after 13 years, in this process.

Sincerely,

Dobler Family Trust - project sponsor

Gary Dobler

7/25/2011



Response to Comment Letter #11, Gary Dobler

- 11-1 This comment requests that all references to the Lammers Road Extension into or through the subject property be removed from the Draft EIR. The comment also states that the City's proposed Transportation Master Plan (TMP) and the County General Plan cannot be used in the Draft EIR analysis because they have not been adopted. This comment does not address the adequacy of the Draft EIR. However, it is noted and included in the record for consideration by the public and decisions makers.

The proposed TMP would provide the Citywide "blueprint" for future roadways to ensure that development proposals within the City contribute to efficient movement of goods and people. Work on the TMP has resulted in a draft roadway system that proposes reconfiguration of roadways in the vicinity of Grant Line Road, Byron Road and Lammers Road. This proposed configuration offers opportunities for improved safety, connectivity and efficiency given the planned growth in the area. While the TMP is still in draft form and ultimate adoption of the TMP and implementation of improvements recommended in the TMP are yet to be determined, it is germane to the Draft EIR and is included to provide background on existing and future planned improvements in the area. Thus, references to the Lammers Road Extension and the TMP, although the commentor objects to them, remain in the Draft EIR. The Draft EIR is an informational document and does not recommend approval or denial of the aforementioned roadway improvements or TMP. No final decision regarding the potential extension of Lammers Road into or through the subject property has been made by the City.

- 11-2 This comment requests that the reference to the Lammers Road Extension be removed on page 4.14-3 of the Draft EIR. The comment also requests that the paragraph on page 4.14-75 of the Draft EIR that discusses TMP 2035 cumulative conditions with the planned Lammers Road/Byron Road connector be removed. Refer to Response 11-1.
- 11-3 This comment states that the entry way to the commentor's parcel would extend to the tire store within the adjacent Tracy Market Place and cannot extend over the railroad tracks. This comment does not address the adequacy of the Draft EIR. However, it is noted and included in the record for consideration by the public and decisions makers. Response 11-1 addresses how the City is evaluating a road in this location.
- 11-4 This comment requests that all references to the Lammers Road Extension be removed from the Draft EIR. Refer to Response 11-1.
- 11-5 This comment states that the Draft EIR must comply with the current TMP not the proposed TMP. Refer to Response 11-1.
- 11-6 This comment states again that all references to the Lammers Road Extension should be removed from the Draft EIR and proposed TMP. Refer to Response 11-1.



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11.0 REVISIONS TO DRAFT EIR

Subsequent to the public release of the Draft EIR, revisions have been made to the EIR as a result of comments received and/or staff initiated changes. Those pages with revisions are identified below and follow the list of errata pages. It is important to note that none of the text revisions present significant new information that would result in new significant environmental impacts or a substantial increase in the severity of environmental impacts identified in the Draft EIR. Rather, they merely provide clarification or make minor modifications to an adequate EIR. Therefore, recirculation of the Draft EIR is not required pursuant to CEQA Guidelines Section 15088.5(b).

11.1 LIST OF ERRATA PAGES

Page 1-1	Text amended to delete reference to proposed amendments to the freeway sign standards contained in the I-205 Corridor Specific Plan.
Pages 2-1 & 2-6	Text amended to delete reference to proposed amendments to the freeway sign standards contained in the I-205 Corridor Specific Plan.
Pages 2-9 - 2-29	Table 2-1 (Summary of Impacts and Mitigation Measures) amended to reflect revisions to mitigation measures resulting comments received and/or staff initiated changes.
Pages 3-1, 3-12 & 3-13	Text amended to delete reference to proposed amendments to the freeway sign standards contained in the I-205 Corridor Specific Plan.
Pages 4.2-1 - 4.2-3	Text amended to include applicable Local Agency Formation Commission (LAFCo) policies that would govern annexation of the Project site.
Pages 4.2-7 & 4.2-8	Text amended to include discussion of Project consistency with LAFCo policies governing annexations.
Pages 4.3-9, 4.3-12 & 4.3-13	Text amended to delete reference to proposed amendments to the freeway sign standards contained in the I-205 Corridor Specific Plan.
Page 4.4-2	Text amended to clarify the location of a City storm drainage easement along the east boundary of the Project site.
Pages 4.4-3 & 4.4-4	Text amended to include the definition of prime agricultural land pursuant to §56064 of the California Government Code.
Page 4.10-13	Text amended to clarify mitigation requirements.
Page 4.10-15	Mitigation Measures 4.10-1b, 4.10-1d and 4.10-1e amended to clarify requirements.
Page 4.11-2	Text amended to describe the location of a storm drainage easement along the east side of the Project site.
Page 4.11-13	Text amended to indicate that project landscaping would irrigated using recycled water or other City water supply.



- Pages 4.11-14 - 4.11-16 Text amended to indicate that impacts associated with on or offsite flooding from drainage alteration and storm drainage system capacity would be less than significant and delete Mitigation Measure 4.11-4.
- Page 4.13-12 Text amended to delete reference to Mitigation Measure 4.13-1.
- Page 4.14-19 Text amended to correct level of service standards.
- Page 4.14-22 Table 4.14-4 (Existing Conditions Peak Hour Intersection Level of Service) amended to correct delays and corresponding level of service (LOS).
- Page 4.14-25 Text amended to indicate that the anticipated construction date for planned and funded improvements at the intersection of Byron Road/Grant Line Road. Table 4.14-6 (Existing Conditions Freeway Segment Level of Service) amended to display density value to first decimal place and update LOS.
- Page 4.14-26 Text amended to correct typographical error. Lammers Road should be Byron Road.
- Page 4.14-29 Table 4.14-8 (Near Term Conditions Peak Hour Intersection Level of Service) amended to correct delays and corresponding LOS.
- Page 4.14-30 Table 4.14-9 (Near Term Conditions Freeway Segment Level of Service) amended to display density value to first decimal place and update LOS.
- Page 4.14-32 Table 4.14-10 (Cumulative Conditions Peak Hour Intersection Level of Service) amended to correct delays and corresponding LOS.
- Page 4.14-35 Table 4.14-11 (Cumulative Conditions Freeway Segment Level of Service) amended to display density value to first decimal place and update LOS.
- Page 4.14-38 Table 4.14-12 (Project Trip Generation) amended to reflect correct calculation for pass-by trip reduction.
- Page 4.14-42 Figure 4.14-16 (Existing & Near Term Project Trip Assignment) amended to reflect correct calculation for pass-by trip reduction.
- Page 4.14-44 Figure 4.14-18 (Cumulative Project Trip Assignment – Saturday Mid-Day) amended to reflect correct calculation for pass-by trip reduction.
- Page 4.14-45 Table 4.14-13 (Existing Plus Project Conditions Peak Hour Intersection Level of Service) amended to correct delays and corresponding LOS.
- Page 4.14-49 Table 4.14-14 (Existing Plus Project Conditions Freeway Segment Level of Service) amended to display density value to first decimal place and update LOS.
- Page 4.14-51 Text and Mitigation Measure 4.14-3 amended to refer to the I-205 Eastbound Off-Ramp as I-205 Eastbound Ramps. Mitigation Measure also amended to clarify that the existing westbound free right-turn would be modified to be part of signal operation.



- Page 4.14-53 Mitigation Measure 4.14-5 amended to clarify timing of required improvement. Table 4.14-15 (Existing Plus Project Conditions Peak Hour Intersection Level of Service with Mitigation) amended to correct delays and corresponding LOS.
- Page 4.14-57 Table 4.14-16 (Near Term Plus Project Conditions Peak Hour Intersection Level of Service) amended to correct delays and corresponding LOS.
- Page 4.14-58 Table 4.14-17 (Near Term Plus Project Conditions Freeway Segment Level of Service) amended to display density value to first decimal place and update LOS.
- Page 4.14-60 Figure 4.14-23 (Near Term + Project Saturday Mid-Day Traffic Volumes) amended to reflect correct calculation for pass-by trip reduction.
- Page 4.14-61 Text amended to delete reference to impacts at the intersections of Corral Hollow/Byron Road and Corral Hollow Road/Eleventh Street.
- Page 4.14-62 Table 4.14-18 (Near Term Plus Project Conditions Peak Hour Intersection Level of Service with Mitigation) amended to correct delays and corresponding LOS.
- Page 4.14-65 Table 4.14-19 (Cumulative Plus Project Conditions Peak Hour Intersection Level of Service) amended to correct delays and corresponding LOS.
- Pages 4.14-69 Table 4.14-20 (Cumulative Plus Project Conditions Freeway Segment Level of Service) amended to display density value to first decimal place and update LOS. Text amended to correct the number of intersections with impacts and delete reference to impacts at the intersection of Corral Hollow Road/ Byron Road.
- Page 4.14-70 Mitigation Measure 4.14-8c amended to clarify that mitigation is for the intersection of Access Road-2/Grant Line Road and correct reference to a related mitigation measure.
- Pages 6-1, 6-2, 6-10, 6-11, 6-14, 6-15 & 6-17 Text amended to delete reference to proposed amendments to the freeway sign standards contained in the I-205 Corridor Specific Plan.



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1.0 INTRODUCTION

1.1 BACKGROUND

This Draft Environmental Impact Report (EIR) has been prepared to analyze the potential environmental effects that may result from the proposed Filios/Dobler Annexation and Development Project (Project) in the City of Tracy, San Joaquin County, California, pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.), and the *CEQA Guidelines* (California Code of Regulations [CCR] Title 14, Section 15000 et seq.).

CEQA requires California public agencies to consider the environmental consequences of projects for which they have discretionary authority. The public agency with the principal responsibility for carrying out or approving a project is the "lead agency." CEQA requires the lead agency to prepare an EIR if there is substantial evidence, in light of the whole record, that a project may have a significant effect on the environment. A significant effect is defined in CEQA as a substantial adverse physical change in the environment. The City of Tracy (City) is the lead agency for the proposed Project.

The Project proposes to annex approximately 43 acres of unincorporated land to the City; amend the City General Plan land use designation of the Project site from Urban Reserve 2 (UR 2) to Commercial; amend the I-205 Corridor Specific Plan to add the Project site to the Specific Plan area, designate it General Commercial (GC) and amend the freeway sign height and size standards; and Prezone the Project site Planned Unit Development (PUD). In addition, the Project includes a maximum of 466,000 square feet of commercial/office uses to be built on the Project site.

The Project site is located within San Joaquin County (County), immediately adjacent to the northwestern boundary of the City. The City is located at the northwestern edge of the San Joaquin Valley, 60 miles east of San Francisco and 68 miles south of Sacramento. The triangular shaped site is bounded by Grant Line Road to the north, the Union Pacific Railroad (UPRR) line and Byron Road to the southwest, and the Tracy Marketplace Shopping Center to the east. Refer to Chapter 3 (Project Description) for additional detail regarding the proposed Project.

1.2 PURPOSE OF THE EIR

An EIR is an informational document that is written to inform public agency decision-makers and the public of the significant environmental effects of a proposed project. The purpose of an EIR is to:

- Analyze the environmental effects of a proposed project
- Indicate mitigation measures to avoid or minimize the potentially significant environmental effects of a proposed project
- Identify alternatives to the project that would avoid or substantially lessen the significant effects of the project

Environmental effects that are addressed in an EIR consist of potentially significant, adverse effects of the project across a full spectrum of environmental topics; growth-inducing effects of the project; and significant cumulative effects of past, present and reasonably anticipated future projects.

It is not the purpose of an EIR to recommend either approval or denial of a project. Rather, EIRs provide relevant information that will assist decision-makers in their decision to approve or deny a project. The lead agency may choose to approve a project that would result in significant environmental effects that

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100



2.0 EXECUTIVE SUMMARY

2.1 PROJECT UNDER REVIEW

The Project proposes to annex approximately 43 acres of unincorporated land to the City; amend the City General Plan land use designation of the Project site from Urban Reserve 2 (UR 2) to Commercial; amend the I-205 Corridor Specific Plan to add the Project site to the Specific Plan area, designate it General Commercial (GC) and amend the freeway sign height and size standards; and Prezone the Project site Planned Unit Development (PUD). In addition, the Project includes a maximum of 466,000 square feet of commercial/office uses to be built on the Project site.

The Project site is located within San Joaquin County (County), immediately adjacent to the northwestern boundary of the City. The City is located at the northwestern edge of the San Joaquin Valley, 60 miles east of San Francisco and 68 miles south of Sacramento. The triangular shaped site is bounded by Grant Line Road to the north, the Union Pacific Railroad (UPRR) line and Byron Road to the southwest, and the Tracy Marketplace Shopping Center to the east. Refer to Chapter 3 (Project Description) for additional detail regarding the proposed Project.

2.2 SUMMARY OF POTENTIAL IMPACTS

Under the California Environmental Quality Act (CEQA), a significant impact on the environment is defined as a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise and objects of historic and aesthetic significance. As identified in Chapter 4 (Environmental Analysis) of this Draft Environmental Impact Report (Draft EIR), the proposed Project has the potential to result in significant environmental impacts as summarized below.

2.2.1 LAND USE AND PLANNING

The proposed Project could conflict with the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP) resulting in a potentially significant impact. Mitigation identified in Section 4.1 (Land Use and Planning) requiring compensation for the loss of habitat and its conversion to urban use, would fulfill the mitigation requirements of the SJMSCP and reduce impacts to less than significant.

2.2.2 AESTHETICS

Project construction would create temporary views of construction debris and construction-related activities, which may result in the degradation of character of the Project area and affect the view of the site from nearby residences and passing motorists. This routine impact from typical, temporary construction activities would be short-term in duration and, therefore, result in a less than significant impact. With implementation of the standards and regulations required by the I-205 Corridor Specific Plan and the City's process for review of development applications, future development at the Project site would be consistent with the existing commercial land uses in the area. Thus, impacts in this regard would be less than significant. In addition, the Project would introduce new temporary construction-related and permanent sources of light and glare from street lights, building lights, security lights and parking lot lights. Mitigation identified in Section 4.3 (Aesthetics) would reduce this impact to less than significant.





Based on this, Alternative 2 would include 16 acres of residential uses at a density of 18 units per gross acre (288 multi-family units), 17 acres of commercial uses at an FAR of 0.3 (222,156 square feet) and seven acres of office uses at an FAR of 0.3 (91,476 square feet). Alternative 2 would allow multiple combinations of uses and building types, which would allow for flexibility of uses within the site. As a result, uses could be mixed in varying combinations or not mixed at all (e.g., a building could contain first floor retail with residential above, or only residential). ~~Because this alternative represents a mixed-use development with less emphasis on commercial land use, Alternative 2 would not include the proposed freestanding freeway sign and related proposal to amend freeway sign height and sign standards of the I-205 Corridor Specific Plan.~~ The purpose of this alternative is to provide a comparison between the Project's impacts and those that may occur from a similar, but slightly different development scenario that would be allowed by the General Plan that includes residential development.

2.4.3 INDUSTRIAL DEVELOPMENT

The Industrial Development Alternative (Alternative 3) assumes that the Project site would be developed with industrial uses such as warehouse, distribution and mini storage. This alternative would require annexation of the Project site to the City; a General Plan amendment to re-designate the Project site from UR 2 to Industrial; an amendment to the I-205 Corridor Specific Plan to add the Project site to the Specific Plan and designate it Light Industrial; and Prezoning the site PUD. ~~Alternative 3 would not include the proposed freestanding freeway sign and related proposal to amend freeway sign height and sign standards of the I-205 Corridor Specific Plan.~~ The purpose of this alternative is to provide a comparison between the Project's impacts with those that may occur from other potentially lower impact uses allowed on the site by the I-205 Corridor Specific Plan. Similar to the proposed Project and Alternative 2, the net size of the site may be at or near 40 acres due to dedication of land for the Grant Line Road right-of-way. Under this alternative, 33 acres of the site would develop with warehouse and distribution uses and the remaining seven acres with mini storage. Based on the I-205 Corridor Specific Plan's FAR of up to 0.5 for warehouse/distribution uses (and applying this same maximum FAR to mini storage uses), 33 acres of warehouse/distribution could accommodate a maximum of 718,740 square feet of floor area and seven acres of mini storage could include up to 152,460 square feet.

2.4.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of the environmentally superior alternative in an EIR, which is an alternative that would result in the fewest or least significant environmental impacts. If the "No Project" Alternative is the environmentally superior alternative, *CEQA Guidelines* Section 15126.6 (e)(2) requires that another alternative that could feasibly attain most of the project's basic objectives be chosen as the environmentally superior alternative. Based on analysis in Chapter 6, the environmentally superior alternative is Alternative 3. Although impacts associated with land use and planning, hydrology and water quality and noise would be slightly greater, the majority of impacts would be the same or reduced compared to those identified for the proposed Project. Specifically, impacts associated with agricultural resources, biological resources, cultural resources and transportation/traffic would be equivalent under Alternative 2 and the proposed Project. However, Alternative 2 would result in reduced impacts compared to the proposed Project in the following areas: aesthetics; geology and soils; GHG emissions; hazards and hazardous materials; and public services, utilities and service systems. Some impacts associated with air quality would be reduced and some would be greater.

2.5 OTHER CEQA CONSIDERATIONS

Chapter 7 (Other CEQA Considerations) of this Draft EIR provides a discussion of the significant and unavoidable impacts and the significant irreversible changes of the proposed Project. As described in this



Revised Table 2-1
Summary of Impacts and Mitigation

Environmental Impacts	Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Land Use			
4.2-1 - The proposed Project could conflict with the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan.	Potentially Significant Impact	4.2-1 - Prior to the issuance of grading or building permits, the Project applicant shall either pay the appropriate fee or dedicate, as conservation easements or fee title, habitat lands as prescribed by the San Joaquin County Council of Governments to compensate for the loss of Agricultural Habitat Land and its conversion to urban use.	Less Than Significant Impact
Aesthetics			
4.3-1 - Implementation of the proposed Project could result in the degradation of the visual character/quality of the site and its surroundings.	Less Than Significant Impact	No mitigation is required.	Not applicable
4.3-2 - Implementation of the proposed Project may generate additional light and glare beyond existing conditions.	Potentially Significant Impact	4.3-2a - All construction-related lighting shall be located and aimed away from adjacent residential areas and consist of the minimal wattage necessary to provide safety at the construction site. 4.3-2b - The Project applicant shall ensure that any exterior lighting does not spill over onto the adjacent uses in accordance with Tracy Municipal Code Section 10.08. Adequate lighting in accordance with City of Tracy Standard Plan 154 shall be provided to ensure the safety and security of pedestrians and vehicular movements.	Less Than Significant Impact
4.3-3 - The proposed Project would result in a cumulatively considerable impact to the visual character/quality of the site and surrounding area.	Potentially Significant Impact	4.3-3 - Implement Mitigation Measures 4.3-12a and 4.3-2b.	Less Than Significant Impact
Agricultural Resources			
4.4-1 - The proposed Project would convert prime farmland to non-agricultural use.	Potentially Significant Impact	4.4-1 - Prior to the issuance of building permits, the Project applicant shall pay the appropriate Agricultural Mitigation Fee to the City of Tracy, in	Significant and Unavoidable Impact



Revised Table 2-1
Summary of Impacts and Mitigation

Environmental Impacts	Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
4.4-2 - The proposed Project could conflict with agricultural zoning or otherwise result in land use conflicts with adjacent agricultural lands, which may lead to the indirect conversion of agricultural lands to non-agricultural uses.	Less Than Significant Impact	accordance with Chapter 13.28 of the Tracy Municipal Code. No mitigation is required.	Not applicable
4.4-3 - The proposed Project would result in cumulatively considerable impacts to agricultural resources.	Potentially Significant Impact	No feasible mitigation is available beyond the payment of fees described in Mitigation Measure 4.4-1.	Significant and Unavoidable Impact
Air Quality			
4.5-1 - Implementation of the Project would result in temporary construction-related dust and vehicle emissions within the Project site.	Potentially Significant Impact	<p>4.5-1a - Prior to the issuance of any grading, building, or other construction permit, the Project applicant shall demonstrate conformance with SJVAPCD Rule VIII to the satisfaction of the SJVAPCD. The Development and Engineering Services Department shall require that the grading plans, building plans, and specifications stipulate compliance with the control measures in SJVAPCD Regulation VIII. The mitigation could include the following or may include other measures as determined by the SJVAPCD:</p> <ul style="list-style-type: none"> • Properly and routinely maintain all construction equipment, as recommended by manufacturer's manuals, to control exhaust emissions. • Shut down equipment when not in use for extended periods of time, to reduce exhaust emissions associated with idling engines. • Encourage ride-sharing and use of transit transportation for construction employees commuting to the project site. • Use electric equipment for construction whenever possible in lieu of fossil fuel-fired 	Less Than Significant Impact



**Revised Table 2-1
Summary of Impacts and Mitigation**

Environmental Impacts	Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>equipment.</p> <ul style="list-style-type: none"> • Curtail construction during periods of high ambient pollutant concentrations. • Construction equipment shall operate no longer than eight cumulative hours per day. • All construction vehicles shall be equipped with proper emission control equipment and kept in good and proper running order to reduce NOX emissions. • All construction activities within the project site shall be discontinued during the first stage smog alerts. • Construction and grading activities shall not be allowed during first stage ozone alerts. (First stage ozone alerts are declared when ozone levels exceed 0.20 ppm for the 1-hour average.) <p>4.5-1b - Prior to the issuance of any grading, building, or other construction permit, the Project applicant shall demonstrate conformance with SJVAPCD Rule VIII to the satisfaction of the SJVAPCD. The Development and Engineering Services Department shall require that the grading plans, building plans, and specifications stipulate that, in compliance with the fugitive dust control measures in SJVAPCD Regulation VIII. The mitigation could include the following or may include other measures as determined by the SJVAPCD:</p> <ul style="list-style-type: none"> • Water previously disturbed exposed surfaces (soil) a minimum of three-times/day or whenever visible dust is capable of drifting from the site or approaches 20 percent opacity. 	



Revised Table 2-1
Summary of Impacts and Mitigation

Environmental Impacts	Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<ul style="list-style-type: none"> Water all haul roads (unpaved) a minimum of three-times/day or whenever visible dust from such roads is capable of drifting from the site or approaches 20 percent opacity. All access roads and parking areas shall be covered with asphalt-concrete paving or water sprayed regularly. Dust from all onsite and offsite unpaved access roads shall be effectively stabilized by applying water or using a chemical stabilizer or suppressant. Reduce speed on unpaved roads to less than 15 miles per hour. Install and maintain a trackout control device that meets the specifications of SJVAPCD Rule 8041 if the site exceeds 150 vehicle trips per day or more than 20 vehicle trips per day by vehicle with three or more axles. Stabilize all disturbed areas, including storage piles, which are not being actively utilized for construction purposes using water, chemical stabilizers or by covering with a tarp, other suitable cover or vegetative ground cover. Control fugitive dust emissions during land clearing, grubbing, scraping, excavation, leveling, grading or cut and fill operations with application of water or by presoaking. When transporting materials offsite, maintain a freeboard limit of at least six inches and cover or effectively wet to limit visible dust emissions. Limit and remove the accumulation of mud and/or dirt from adjacent public roadways at the end of each workday. (Use of dry rotary 	



**Revised Table 2-1
Summary of Impacts and Mitigation**

Environmental Impacts	Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<p>4.5-2 - The proposed Project would result in an overall increase in the local and regional pollutant load due to direct impacts from vehicle emissions and indirect impacts from electricity and natural gas consumption.</p>	<p>Potentially Significant Impact</p>	<p>brushes is prohibited except when preceded or accompanied by sufficient wetting to limit visible dust emissions and use of blowers is expressly forbidden).</p> <ul style="list-style-type: none"> • Stabilize the surface of storage piles following the addition or removal of materials using water or chemical stabilizer/suppressants. • Remove visible track-out from the site at the end of each workday. • Cease grading activities during periods of high winds (greater than 20 miles per hour [mph] over a one-hour period). • Asphalt-concrete paving shall comply with SJVAPCD Rule 4641 and restrict use of cutback, slow-cure, and emulsified asphalt paving materials. • Grading should be conducted in phases. • The Project site shall not be cleared of existing vegetation cover for the preparation of construction until the issuance of grading permits required by construction. • The Project applicant shall revegetate graded areas as soon as it is feasible after construction is completed. 	<p>Significant and Unavoidable Impact</p>
<p>4.5-2 - The proposed Project would result in an overall increase in the local and regional pollutant load due to direct impacts from vehicle emissions and indirect impacts from electricity and natural gas consumption.</p>	<p>Potentially Significant Impact</p>	<p>4.5-2 - Prior to issuance of building permits, the Development and Engineering Services Department shall verify that the Project has demonstrated compliance with SJVAPCD Rule 9510, Indirect Source Review (ISR) to the satisfaction of the SJVAPCD. The Project applicant shall coordinate with the SJVAPCD to ensure that the Project meets the requirements of SJVAPCD Rule 9510, which requires the following reductions:</p>	<p>Significant and Unavoidable Impact</p>



Revised Table 2-1
Summary of Impacts and Mitigation

Environmental Impacts	Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<ul style="list-style-type: none"> • 20 percent of construction-exhaust NOx • 45 percent of construction-exhaust PM₁₀ • 33 percent of operational NOx over 10 years • 50 percent of operational PM₁₀ over 10 years <p>The SJVAPCD provides numerous measures to attain the emissions reductions targets above, which are available on their website (http://www.valleyair.org/SR/ISRONSiteMeasures.htm). The SJVAPCD allows project applicants to choose to implement the SJVAPCD-approved emissions reduction measures, or pay an emission based fee to fund off-site emissions reduction projects. If in-lieu fees are required, the Project applicant shall coordinate with the SJVAPCD to calculate the amount of the fees required to off-set Project impacts.</p>	
4.5-3 - Implementation of the proposed Project could conflict with the most recent air quality management plan.	Potentially Significant Impact	Implement Mitigation Measure 4.5-2. No other feasible mitigation measures are available.	Significant and Unavoidable Impact
4.5-4 - Implementation of the proposed Project could impact regional air quality levels on a cumulatively considerable basis.	Potentially Significant Impact	Implement Mitigation Measures 4.5-1a, 4.5-1b and 4.5-2. No other feasible mitigation measures are available.	Significant and Unavoidable Impact
Greenhouse Gas Emissions			
4.6-1 - Greenhouse gas emissions generated by the proposed Project would have a significant impact on the environment.	Potentially Significant Impact	No feasible mitigation beyond measures included in the General Plan and Sustainability Action Plan are available.	Significant and Unavoidable Impact
4.6-2 - Implementation of the proposed Project could conflict with an applicable greenhouse gas reduction plan, policy or regulation.	Less Than Significant Impact	No mitigation is required	Not applicable



**Revised Table 2-1
Summary of Impacts and Mitigation**

Environmental Impacts	Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
4.6-3 - Greenhouse gas emissions resulting from development associated with implementation of the proposed Project would impact greenhouse gas levels on a cumulatively considerable basis.	Potentially Significant Impact	No feasible mitigation beyond measures included in the General Plan and Sustainability Action Plan are available.	Significant and Unavoidable Impact
Biological Resources			
4.7-1 - Construction in the Project area could disturb nesting Swainson's hawk and result in the loss of foraging habitat.	Potentially Significant Impact	4.7-1 - Prior to the issuance of grading or building permits, the Project applicant shall either pay the appropriate fee or dedicate, as conservation easements or fee title, habitat lands as prescribed by the San Joaquin County Council of Governments to compensate for the loss of habitat and its conversion to urban use.	Less Than Significant Impact
4.7-2 - The proposed Project could disturb nesting burrowing owls and result in the loss of occupied burrowing owl habitat.	Potentially Significant Impact	Implement Mitigation Measure 4.7-1.	Less Than Significant Impact
4.7-3 - The proposed Project could disturb nesting white-tailed kites and result in injury or mortality to individuals.	Potentially Significant Impact	Implement Mitigation Measure 4.7-1.	Less Than Significant Impact
4.7-4 - The proposed Project could disturb nesting loggerhead shrikes and result in injury or mortality to individuals.	Potentially Significant Impact	Implement Mitigation Measure 4.7-1.	Less Than Significant Impact
4.7-5 - The proposed Project could disturb nesting California horned larks and result in injury or mortality to individuals.	Potentially Significant Impact	Implement Mitigation Measure 4.7-1.	Less Than Significant Impact
4.7-6 - The proposed Project could result in injury or mortality to, and loss of foraging and refuge habitat for, San Joaquin kit foxes	Potentially Significant Impact	Implement Mitigation Measure 4.7-1.	Less Than Significant Impact
4.7-7 - The proposed Project could result in the injury or mortality and the disturbance of maternity colonies of pallid bat and SJMSCP-covered bat species	Potentially Significant Impact	4.7-7 - The Project applicant shall implement take minimization measures, adopted in the SJMSCP to avoid take of other bat species, to minimize take of pallid bats during the breeding season (April – September).	Less Than Significant Impact



Revised Table 2-1
Summary of Impacts and Mitigation

Environmental Impacts	Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
4.7-8 - Grading and construction within the Project area would result in temporary noise impacts to nearby Swainson's hawks and burrowing owls.	Potentially Significant Impact	Implement Mitigation Measure 4.7-1.	Less Than Significant Impact
4.7-9 - The proposed Project would result in impacts to regionally abundant vegetation types, including agriculture (hay field), ruderal habitat, and developed areas, and the common wildlife species associated with these habitats.	Less Than Significant Impact	No mitigation is required	Not applicable
4.7-10 - The proposed Project could result in a potential impact from the spread or introduction of invasive plant and animal species.	Less Than Significant Impact	No mitigation is required	Not applicable
Cultural Resources			
4.8-1 - Project implementation may cause a substantial adverse change to an unknown historical or archaeological resource, or result in the damage or destruction of unknown paleontological resources or human remains.	Potentially Significant Impact	4.8-1 - If subsurface deposits believed to be cultural or human in origin are discovered during the construction of the Project, then all work shall halt within a 200-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeologist, shall be retained at the Project sponsor's expense to evaluate the significance of the find. Work shall not continue at the discovery site until the archaeologist conducts sufficient research and data collection to make a determination that the resource is either: 1) not cultural in origin; or 2) not potentially significant or eligible for listing on the National Register of Historic Places or the California Register of Historical Resources. If a potentially-eligible resource is encountered, then the archaeologist, lead agency and Project sponsor shall arrange for either: 1) total avoidance of the resource, if possible; or 2) test	Less Than Significant Impact



**Revised Table 2-1
Summary of Impacts and Mitigation**

Environmental Impacts	Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>excavations to evaluate eligibility and, if eligible, data recovery as mitigation. The determination shall be formally documented in writing and submitted to the lead agency and filed with the North Central Information Center as verification that the provisions in this mitigation measure have been met.</p> <p>If human remains of any kind are found during construction activities, all activities shall cease immediately and the San Joaquin County Coroner be notified as required by state law (Section 7050.5 of the Health and Safety Code). If the coroner determines the remains to be of Native American origin, he or she shall notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the most likely descendant(s) (MLD) to be consulted regarding treatment and/or reburial of the remains (Section 5097.98 of the Public Resources Code). If an MLD cannot be identified, or the MLD fails to make a recommendation regarding the treatment of the remains within 48 hours after gaining access to the remains, the City shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance. Work can continue once the MLD's recommendations have been implemented or the remains have been reburied if no agreement can be reached with the MLD (Section 5097.98 of the Public Resources Code).</p> <p>If any fossils are encountered, there shall be no further disturbance of the area surrounding this find until the materials have been evaluated by a qualified paleontologist, and appropriate treatment measures have been identified.</p>	



Revised Table 2-1
Summary of Impacts and Mitigation

Environmental Impacts	Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Geology and Soils			
4.9-1 - The proposed Project could expose people or structures to potentially substantial adverse effects including the risk of loss, injury, or death as a result of seismic-related ground shaking or liquefaction.	Less Than Significant Impact	No mitigation is required	Not applicable
4.9-2 - The proposed Project could result in substantial soil erosion or the loss of topsoil.	Potentially Significant Impact	4.9-2 - In accordance with CBC (Title 24, Part 2) Section 1804A.3 and A.5, and the requirements of Tracy General Plan Objective SA-1.1, Policy 1, liquefaction and seismic settlement potential shall be addressed in design-level geotechnical engineering investigations. The City's Building Division of the Development and Engineering Services Department shall ensure that all the pertinent sections of the CBC shall be adhered to in the construction of buildings on the Project site, and that all appropriate measures are implemented in order to reduce the risk of liquefaction and seismic settlement prior to the issuance of a building permit.	Less Than Significant Impact
4.9-3 - The proposed Project could be located on a geologic formation unit or soil that is unstable, or that would become unstable as a result of construction and potentially result in liquefaction.	Potentially Significant Impact	Implement Mitigation Measure 4.9-2.	Less Than Significant Impact
4.9-4 - The proposed Project could be located on expansive soil, as defined in Table 18-1-b of the California Building Code (1994), creating substantial risks to life or property	Potentially Significant Impact	Implement Mitigation Measure 4.9-2.	Less Than Significant Impact
Hazards and Hazardous Materials			
4.10-1 - Short-term construction activities and long-term operations at the Project site may create a significant hazard to the public or environment through accident conditions involving the release of hazardous materials.	Potentially Significant Impact	4.10-1a - Prior to demolition and/or rehabilitation activities, an asbestos survey shall be conducted by an Asbestos Hazard Emergency Response Act (AHERA) and California Division of Occupational Safety and Health (Cal/OSHA)	Less Than Significant Impact



**Revised Table 2-1
Summary of Impacts and Mitigation**

Environmental Impacts	Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>certified building inspector to determine the presence or absence of asbestos-containing materials (ACMs). If ACMs are located, abatement of asbestos shall be completed prior to any activities that would disturb ACMs or create an airborne asbestos hazard. Asbestos removal shall be performed by a State certified asbestos containment contractor in accordance with the San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 4002.</p> <p>4.10-1b - If paint is separated from building materials (chemically or physically) during demolition of the structures, the paint waste shall be evaluated independently from the building material for lead by a qualified Environmental Professional. If lead-based paint is found, abatement shall be completed by a qualified Lead Specialist prior to any activities that would create lead dust or fume hazard. Lead-based paint removal and disposal shall be performed in accordance with California Code of Regulation Title 8, Section 1532.1, which specifies exposure limits, exposure monitoring and respiratory protection, and mandates good worker practices by workers exposed to lead. Contractors performing lead-based paint removal shall provide evidence of abatement activities to notify the City when abatement activities have been completed in accordance with state requirements.</p> <p>4.10-1c - Prior to issuance of a grading permit, soil sampling shall occur within the portions of the Project site that have historically been utilized for agricultural purposes and may contain pesticide residues in the soil, as determined by a qualified Phase II Site Characterization specialist. The sampling, conducted in consultation with the San</p>	



Revised Table 2-1
Summary of Impacts and Mitigation

Environmental Impacts	Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>Joaquin County Environmental Health Department (EHD), shall determine if pesticide concentrations exceed established regulatory requirements and shall identify further site characterization and remedial activities, if necessary. Should further site characterization/remedial activities be required, these activities shall be conducted per the applicable regulatory agency requirements, as directed by the EHD.</p> <p>4.10-1d - Prior to issuance of building permits, a qualified Site Characterization specialist shall review existing Site Characterization documents with regard to onsite contaminated soils associated with adjacent pipeline leaks. If such review identifies significant data gaps and, if required by the Central Valley Regional Water Quality Control Board (RWQCB), the Site Characterization specialist, in consultation with Chevron and RWQCB, shall conduct updated site Site characterization Characterization at the Project site; if required by the San Joaquin County Environmental Health Department (EHD), prior to issuance of building permits, in consultation with Chevron and EHD, with regard to onsite contaminated soils associated with adjacent pipeline leaks. Upon completion of the review (and updated Site Characterization activities, if needed) site characterization activities, the Site Characterization specialist shall recommend remedial activities, if necessary, in consultation with EHD/RWQCB.</p> <p>4.10-1e - Prior to issuance of building permits, a vapor intrusion screening evaluation vapor intrusion investigations shall be conducted by a qualified Environmental Professional, in</p>	



Revised Table 2-1
Summary of Impacts and Mitigation

Environmental Impacts	Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>consultation with the Central Valley Regional Water Quality Control Board (RWQCB) San Joaquin County Environmental Health Department (EHD). Should the screening evaluation indicate that there is a reasonable potential that proposed building(s) Environmental Professional determine that proposed buildings could be impacted by vapor intrusion, the Environmental Professional, in consultation with Chevron and EHRWQCB, shall conduct targeted soil vapor/vapor intrusion investigation(s). Should the investigation(s) determine that proposed building(s) could be impacted by indoor air vapor concentrations above regulatory thresholds, the Environmental Professional, in consultation with RWQCB, shall recommend specific design measures to be incorporated into the building(s) design that would reduce these indoor air quality concentrations to below regulatory thresholds, as directed by the EHD.</p> <p>4.10-1f - Prior to issuance of a grading permit, the Project applicant(s) shall submit a Worker Safety Plan for site disturbance/construction activities, in consultation with California Division of Occupational Safety and Health (Cal/OSHA) and the San Joaquin County Environmental Health Department (EHD). The Worker Safety Plan shall include safety precautions (e.g., personal protective equipment or other precautions to be taken to minimize exposure to hazardous materials) to be taken by personnel when encountering potential hazardous materials, including potential contaminated groundwater.</p> <p>4.10-1g - If unknown wastes or suspect materials are discovered during construction by</p>	



Revised Table 2-1
Summary of Impacts and Mitigation

Environmental Impacts	Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
4.10-2 - Operations of the Project could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Less Than Significant Impact	<p>the contractor that are believed to involve hazardous waste or materials, the contractor shall comply with the following:</p> <ul style="list-style-type: none"> • Immediately stop work in the vicinity of the suspected contaminant, removing workers and the public from the area • Notify the City Building Official • Secure the areas as directed by the City Building Official • Notify the San Joaquin County Environmental Health Department's (EHD's) Hazardous Waste/Materials Coordinator. 	Not applicable
4.10-3 - The Project site is located on a site that is included on a list of hazardous materials sites compiled pursuant to government code section 65962.5 and, as a result, could create a significant hazard to the public or the environment.	Potentially Significant Impact	Implement Mitigation Measures 4.10-1d and 4.10-1e.	Less Than Significant
4.10-4 - Development of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Less Than Significant Impact	No mitigation is required	Not applicable
4.10-5 - Project implementation may expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.	Potentially Significant Impact	4.10-5 - Prior to issuance of building permits, all development at the Project site shall satisfy fire flow and hydrant requirements, street widths and design requirements, as established by the City.	Less Than Significant Impact



Revised Table 2-1
Summary of Impacts and Mitigation

Environmental Impacts	Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Hydrology and Water Quality			
4.11-1 - The proposed Project could violate water quality standards or waste discharge requirements.	Less Than Significant Impact	No mitigation is required	Not applicable
4.11-2 - The proposed Project could substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.	Less Than Significant Impact	No mitigation is required	Not applicable
4.11-3 - The proposed Project could substantially alter the existing drainage pattern of the site or area, which could result in substantial erosion or siltation on or offsite.	Less Than Significant Impact	No mitigation is required	Not applicable
4.11-4 - The proposed Project could substantially alter the existing drainage pattern of the site or area, which could substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or offsite.	Potentially Less Than Significant Impact	No mitigation is required 4.11-4 - Plans submitted for a grading permit shall include a detailed hydrology report. The report shall include calculations regarding the anticipated volume of stormwater runoff generated by the Project, and shall demonstrate that adequate stormwater conveyance and capacity is available in the existing Westside Channel system. Calculations shall be consistent with the current version of the City's Manual of Stormwater Quality Control Standards for New Development and Redevelopment. The hydrology report shall be subject to review and approval by the City Engineer. If the hydrology report determines that the existing Westside Channel system does not have adequate stormwater conveyance and capacity to serve the Project site, then the Project applicant shall develop a detailed stormwater detention plan for the retention/detention of stormwater	Less Than Significant Impact/Not applicable



Revised Table 2-1
Summary of Impacts and Mitigation

Environmental Impacts	Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>runoff on the Project site. The stormwater detention facilities shall be designed with adequate capacity to ensure that stormwater generated on the Project site during a peak storm event is retained at a rate that would ensure that discharges from the site do not exceed pre-construction levels. All detention facilities shall be developed in conformance with the City's standards, including those identified in the City's Manual of Stormwater Quality Control Standards for New Development and Redevelopment. The plans and specifications of the proposed detention facilities shall meet the standards of the City of Tracy Development and Engineering Services Department as an adequate engineering product. The construction of stormwater detention facilities may be phased to correspond with development of the Project site over time, provided that adequate detention is provided at all times to ensure that runoff from the site does not exceed pre-construction levels.</p>	
<p>4.11-5 - The proposed Project could create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.</p>	<p>Potentially Less Than Significant Impact</p>	<p>Implement Mitigation Measure 4.11-4. No mitigation is required</p>	<p>Less Than Significant Impact Not applicable</p>
Noise			
<p>4.12-1 - Grading and construction within the Project site could result in temporary noise impacts to nearby noise sensitive receivers.</p>	<p>Less Than Significant Impact</p>	<p>No mitigation is required</p>	<p>Not applicable</p>
<p>4.12-2 - Development associated with implementation of the proposed Project could result in temporary vibration impacts to nearby sensitive receptors during grading and construction activities.</p>	<p>Less Than Significant Impact</p>	<p>No mitigation is required</p>	<p>Not applicable</p>



**Revised Table 2-1
Summary of Impacts and Mitigation**

Environmental Impacts	Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
4.12-3 - Implementation of the proposed Project could result in an increase in ambient noise levels due to operational noise impacts.	Potentially Significant Impact	4.12-3a - Prior to issuance of a building permit, the Project applicant shall demonstrate, to the satisfaction of the Development and Engineering Services Department, that site placement of stationary noise sources would not exceed the City's noise standard of 60 dBA at any adjacent residential district property line inside the City limits, or 65 dBA at an adjacent commercial property line.	Less Than Significant Impact
4.12-4 - Traffic generated by the proposed Project could significantly contribute to existing traffic noise in the area or exceed the City's established standards.	Less Than Significant Impact	No mitigation is required	Not applicable
Public Services, Utilities and Service Systems			
4.13-1 - The public service needs of the proposed Project could result in substantial adverse impacts.	Less Than Significant Impact	No mitigation is required	Not applicable
4.13-2 - The proposed Project would generate wastewater that could impact the City's wastewater treatment plant.	Less Than Significant Impact	No mitigation is required	Not applicable
4.13-3 - The proposed Project would construct sewer lines, the construction of which could cause significant environmental effects.	Potentially Significant Impact	4.13-3 - Prior to issuance of grading or building permits, whichever occurs first, sewer design calculations shall be prepared for review and approval by the City Engineer to ensure proper sizing of sewer lines and lift stations to meet sewer flow requirements.	Less Than Significant Impact
Transportation/Traffic			
4.14-1 - The proposed Project would increase traffic at study area intersections and roadway segments. Eleven study intersections and all study freeway mainline segments would continue to operate at acceptable levels of service in accordance with the City of Tracy, San Joaquin County and Caltrans significance criteria during	Less Than Significant Impact	No mitigation is required	Not applicable



Revised Table 2-1
Summary of Impacts and Mitigation

Environmental Impacts	Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<p>the weekday am and pm peak hour and the Saturday mid-day peak hour as indicated.</p> <p>4.14-2 - The proposed Project would add traffic to the unsignalized County (City of Tracy with Project annexation) intersection of Lammers Road and Grant Line Road (Intersection #2). This intersection is projected to operate at an overall LOS F (unacceptable) in the AM and PM peak hour.</p>	<p>Potentially Significant Impact</p>	<p>4.14-2 - A traffic signal shall be installed at the intersection of Lammers Road and Grant Line Road (Intersection #2). In conjunction with the proposed traffic signal installation, the following geometric improvements shall be constructed:</p> <ul style="list-style-type: none"> • Westbound approach – Reconstruct the approach to include one through lane and one through/right turn lane and a separate left-turn lane. • Eastbound approach – Reconstruct the approach to include one through lane and one shared through/right-turn lane. Provide an acceleration lane east of Lammers Road. • Northbound approach – Reconstruct the approach to include a shared left-turn/through lane and a right-turn lane. The existing truck exit from Costco would be reconstructed to be part of the intersection and the current truck movements incorporated in the northbound right-turn movement. <p>The Project applicant shall be responsible for implementation of the above improvements prior to Project occupancy or at a time determined by the City Engineer based on the City's ability to meet City vehicle and pedestrian standards. If all or a portion of this traffic signal improvement is otherwise scheduled by the City to be financed as a Program improvement, the Project applicant may be eligible for reimbursements from future benefiting development in excess of the Project's</p>	<p>Less Than Significant Impact</p>



Revised Table 2-1
Summary of Impacts and Mitigation

Environmental Impacts	Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<p>4.14-3 - The proposed Project would add traffic to the Caltrans intersection of I-205 eastbound ramps and Grant Line Road (Intersection #6). This intersection is projected to operate at an LOS E (unacceptable) during the PM and Saturday peak hours.</p>	<p>Potentially Significant Impact</p>	<p>fair share costs. 4.14-3 - A second eastbound left-turn lane and widening of the eastbound on-ramp to two lanes shall be constructed at the intersection of I-205 Eastbound Off-ramp/Ramps and Grant Line Road (Intersection #6). To accommodate the second left turn lane and widening of the ramp, the westbound free right-turn lane shall be modified to be part of the signal operation. The proposed improvement may require a design exemption from Caltrans. This improvement is included in the City's TIF program (Project 72PP-084). The Project applicant shall make a fair share contribution toward implementation of this improvement through the payment of City of Tracy traffic impact fees.</p>	<p>Less Than Significant Impact</p>
<p>4.14-4 - The proposed Project would add a driveway and traffic at Project Access Road-2 and Grant Line Road (Intersection #17). This intersection is projected to operate at LOS F (unacceptable) in the PM peak hour.</p>	<p>Potentially Significant Impact</p>	<p>4.14-4 - A traffic signal shall be installed at the intersection of Access Road-2 and Grant Line Road (Intersection #17). In conjunction with the traffic signal installation, the following geometric improvements shall be constructed:</p> <ul style="list-style-type: none"> • Westbound approach – Provide two through lanes and a left-turn lane. • Eastbound approach – Provide one through lane and one shared through/right-turn lane. • Northbound approach – Provide a separate left-turn and right-turn lane. <p>The four lane improvement along Grant Line Road would continue along the Project frontage to accommodate traffic flow demand. SimTraffic analysis indicates that four lanes are required to avoid queue overflow between the Project driveways. The Project applicant shall be</p>	<p>Less Than Significant Impact</p>



**Revised Table 2-1
Summary of Impacts and Mitigation**

Environmental Impacts	Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
4.14-5 - The proposed Project would add a driveway and traffic at Project Access Road-3 and Grant Line Road (intersection #19) that could result in unsafe conditions.	Potentially Significant Impact	<p>responsible for implementation of the above improvements prior to project occupancy or at a time determined by the City Engineer based on the City's ability to meet City vehicle and pedestrian standards.</p> <p>4.14-5 - A westbound left-turn lane for inbound Project traffic shall be provided at the intersection of Access Road-3 and Grant Line Road (Intersection #19). The Project applicant shall be responsible for implementation of the left-turn lane prior to Project occupancy, or at a time determined by the City Engineer based on the City's ability to meet vehicle and pedestrian standards.</p>	Less Than Significant Impact
4.14-6 - The proposed Project, along with near term growth, would result in unacceptable traffic operations at four intersections.	Potentially Significant Impact	Implement Mitigation Measures 4.14-2 through 4.14-5.	Less Than Significant Impact
4.14-7 - The proposed Project would add traffic to I-205 freeway segments under near-term conditions.	Less Than Significant Impact	No mitigation is required	Not applicable
4.14-8 - The proposed Project, along with cumulative growth, would result in unacceptable operations at four intersections.	Potentially Significant Impact	<p>4.14-8a - To provide acceptable (LOS D or better) operations at the intersection of Lammers Road/Grant Line Road, a westbound left-turn lane and conversion of one eastbound through lane into a shared through/right-turn lane shall be constructed. These improvements are similar to those recommended in Mitigation Measure 4.14-2. In addition, the northbound approach shall be modified to provide a separate left-turn lane and a shared through/right-turn lane. The Project applicant shall be responsible for implementation of the above improvements prior to occupancy or at a time determined by the City Engineer based on the City's ability to meet City vehicle and pedestrian standards.</p>	Less Than Significant Impact



Revised Table 2-1
Summary of Impacts and Mitigation

Environmental Impacts	Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
4.14-9 - The proposed Project would add traffic to I-205 freeway segments under cumulative conditions.	Less Than Significant Impact	<p>4.14-8b - The Project applicant shall make a fair share contribution toward implementation of improvements at the intersection of I-205 Eastbound Off-Ramp/Ramps/Grant Line Road including the construction of an eastbound loop on-ramp through payment of City traffic impact fees.</p> <p>4.14-8c - The addition of a traffic signal, westbound left-turn lane (Mitigation Measure 4.14-54), and separate left-turn and right-turn lanes on the northbound approach shall be required at the intersection of Access Road-2/Grant Line Road.</p>	Not applicable





3.0 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Filios/Dobler Annexation and Development Project (Project) proposes to annex approximately 43 acres of unincorporated land to the City of Tracy (City); amend the City General Plan land use designation of the Project site from Urban Reserve 2 (UR 2) to Commercial; amend the I-205 Corridor Specific Plan to add the Project site to the Specific Plan area, designate it General Commercial (GC) and amend the freeway sign height and size standards; and Prezone the Project site Planned Unit Development (PUD). In addition, the Project includes a maximum of 466,000 square feet of commercial/office uses to be built on the Project site. The analysis of 466,000 square feet is consistent with the General Plan UR 2 statistical profile in terms of the percentage of land assumed for commercial/retail use (83 percent) and for office use (17 percent). After dedication of land for the Grant Line Road right-of-way, the net size of the site may be at or near 40 acres. The I-205 Corridor Specific Plan allows a floor area ratio (FAR) of up to 0.25 for retail land uses and 0.35 for one-story office uses. Applying the 0.25 FAR to 83 percent of the site (approximately 33 acres) and 0.35 to 17 percent of the site (approximately seven acres) yields approximately 466,000 square feet of floor area. This amount of floor area will be the assumed buildout for the Project. The inclusion of this scenario is necessary in order to evaluate the potential environmental consequences of the Project, since the City has not received an application for specific improvements to the Project site. Additional building area or more intense development would require additional analysis pursuant to the California Environmental Quality Act (CEQA).

3.2 PROJECT LOCATION

The Project site is located within San Joaquin County (County), immediately adjacent to the northwestern boundary of the City. The City occupies a central location in the San Joaquin Valley, 60 miles east of San Francisco and 68 miles south of Sacramento. Figure 3-1 (Regional Location Map) illustrates the regional location of the Project site. As shown in Figure 3-2 (Project Location), the triangular shaped site is bounded by Grant Line Road to the north, the Union Pacific Railroad (UPRR) line and Byron Road to the southwest, and the Tracy Marketplace Shopping Center to the east.

3.3 SURROUNDING LAND USES

The Project site is primarily surrounded by agricultural land and commercial uses with some rural residential development sparsely scattered throughout the surrounding agricultural area. Agricultural land is located north of the Project site, across Grant Line Road, and southwest of the site, across Byron Road. Vacant land lies between Bryon Road and the agricultural land further to the southwest. Three residences are located northeast of Grant Line Road, at the intersection of Grant Line Road and Lammers Road, one residence is located southwest of Byron Road (northwest of the intersection of Byron Road and Von Sosten Road) and another residence is located west of the Project site, west of the intersection of Grant Line Road and Byron Road. Commercial uses that are part of the Tracy Marketplace Shopping Center border the Project site to the east. These uses include retail stores, such as WalMart and Costco and restaurants, such as the Golden Corral Buffet & Grill. The Tracy Pavilion Shopping Center, another retail center, is located north of the Tracy Marketplace Shopping Center. The Tracy Pavilion Shopping Center contains several retail stores, including Home Depot and Marshalls. An auto mall is located north of the Tracy Pavilion Shopping Center and the West Valley Mall, a regional shopping center, is located just east of the auto mall. Other surrounding uses include Interstate 205 (I-205), which is generally south of the





office square footage assumed for the Project site is 466,000 square feet. The future development of retail/office uses on the Project site would provide the opportunity to continue to attract regional commercial uses consistent and compatible with the adjacent shopping centers located within the I-205 Corridor Specific Plan area and the goals and objectives of the I-205 Corridor Specific Plan.

The Project also proposes an amendment to the freeway sign height and size standards specified in the I-205 Corridor Specific Plan to allow an 85-foot tall freeway sign with two 1,200-square-foot sign faces. According to the General Commercial and Industrial Standards identified in the I-205 Corridor Specific Plan, each commercial center may have one freeway identification sign. The sign may identify tenant(s) located within 700 feet of the freeway on any parcel within the center. The maximum allowable height is 15 feet above crown of the nearest freeway, not to exceed 45 feet above finished site grade. The maximum allowable sign area is 300 feet per sign face with a maximum of two sign faces.

3.5.4 PREZONING TO PLANNED UNIT DEVELOPMENT

The Project proposes Prezoning the site PUD consistent with Article 13 of Chapter 10.08 of the Tracy Municipal Code. According to the Tracy Municipal Code, the PUD Zone is “designed to allow flexibility and creativity in site planning for residential, commercial, or industrial uses to achieve greater efficiency in land use by maximizing open space, preserving natural amenities and creating additional amenities.” The PUD Zone essentially allows for any and all uses, provided they conform to the City General Plan and the I-205 Corridor Specific Plan, and are indicated upon an approved development plan. In accordance with the City’s PUD Ordinance (Section 10.08.1830 of the Tracy Municipal Code), all future development projects on the Project site would require the review and approval of Preliminary and Final Development Plans by the City’s Planning Commission and City Council to evaluate and ensure compliance with site design, architecture, parking, land use and other City standards. As indicated in the I-205 Corridor Specific Plan, adding the Project site to the I-205 Corridor Specific Plan area would constitute Prezoning the site. Upon annexation of the Project site to the City, the land use designations of the I-205 Corridor Specific Plan would become the land use designations of the PUD Zone.

3.5.5 BUILDOUT SCENARIO FOR THE PROJECT SITE

As described above, under the proposed City General Plan Commercial land use designation and the I-205 Corridor Specific Plan GC designation, the Project site could accommodate a variety of commercial and office uses. At this time, the exact type of uses and their development intensity is unknown, as the City has not received a specific development application for the Project site. For the purposes of analysis in this Draft Environmental Impact Report (EIR), the development scenario assumed for the Project site is 466,000 square feet of commercial/office uses based on the assumptions of the City General Plan.

INFRASTRUCTURE AND SERVICES

The City would provide water, sanitary and storm sewer service to future development facilitated by the Project. Future development would connect to existing City water and sanitary sewer systems. A sewer line would be provided to convey wastewater from the site into the City’s wastewater treatment facilities. A storm drain system would be constructed to convey surface water runoff to onsite catch basins or curb inlets and then to the existing storm drain system. Solid waste and recycling collection service would be provided by a private hauler (Tracy Delta Disposal Services) established through the City’s franchise agreement. Other service providers would include SBC for telephone service; Pacific Gas & Electric for gas and electric service; and Comcast for cable television service.



3.6 PROJECT OBJECTIVES

Following are the Project objectives:

- Implement the City of Tracy General Plan
- Provide for the expansion of the City's regional commercial corridor
- Develop a Commercial Center of adequate size with reasonable freeway exposure (including a freestanding freeway sign) and access to attract new anchor tenants
- Remain consistent with the principles and objectives of the I-205 Corridor Specific Plan.
- Provide and maintain connectivity with the existing shopping areas of the I-205 Corridor Specific Plan and increase opportunities for connectivity to residential areas south of the Project site
- Construct commercial and office buildings consistent with the development potential anticipated for the Project site by the City General Plan

3.7 INTENDED USES OF THIS EIR

The analysis in this EIR has been prepared at a project-level for the proposed annexation of the Project site to the City, amendments to the General Plan and I-205 Specific Plan, and Prezoning the Project site. Development proposals that require discretionary review (i.e., projects subject to the approval of a Preliminary and Final Development Plan) will be examined in light of this EIR to determine if any additional environmental documentation is required, pursuant to CEQA Guidelines Section 15168(c).

This EIR is intended to cover the approvals that have been requested, and is also intended to cover those required to construct or implement the Project, whether or not they are explicitly listed below. The City is the lead agency for the Project and has the principal discretionary authority over the review of Project applications and consideration of Project approvals. As described below, these include:

- Annexation of the Project site to the City
- A General Plan Amendment to re-designate the Project site from UR 2 to Commercial to facilitate the future development of commercial and office uses on the Project site
- An amendment to the I-205 Corridor Specific Plan to add the 43-acre Project site to the I-205 Corridor Specific Plan area, designate the site GC and amend the freeway sign standards
- A Prezoning to designate the site PUD
- Project construction and related improvements

This EIR is also available for use by responsible and trustee agencies or other agencies that may have jurisdiction or approval authority for the Project. These agencies may include:

- California Department of Fish and Game
- U.S. Fish and Wildlife Service
- U.S. Army Corps of Engineers
- California Regional Water Quality Control Board
- San Joaquin Air Pollution Control District
- Department of Toxic Substances Control
- San Joaquin County LAFCO



4.2 LAND USE AND PLANNING

This section evaluates the proposed Project's compatibility with existing land uses and its consistency with relevant planning policies, which were adopted for the purpose of avoiding or mitigating an environmental effect. For the most part, direct and indirect physical impacts resulting from Project implementation are not addressed in this section, but rather in their appropriate technical sections of the EIR. For example, direct impacts such as dust and noise from Project construction are addressed in Section 4.5 (Air Quality) and Section 4.12 (Noise), respectively.

4.2.1 ENVIRONMENTAL SETTING

SITE CHARACTERISTICS

The approximately 43-acre Project site is located in unincorporated San Joaquin County (County), immediately adjacent to the northwestern boundary of the City of Tracy (City). The triangular shaped site is bounded by Grant Line Road to the north, the Union Pacific Railroad (UPRR) line and Byron Road to the southwest and the Tracy Marketplace Shopping Center to the east. The majority of the Project site consists of predominantly flat land that is actively in agricultural production for hay. There are three single-family residences and their associated accessory structures, as well as a welding shop located along the Grant Line Road frontage. Various ornamental landscaping surrounds the residences and welding shop. A Pacific Gas and Electric (PG&E) easement containing two power transmission lines and an underground natural gas pipeline are located in the southeastern portion of the Project site. The Hansen Sewer easement, containing a 30-inch diameter vylon close profile sewer pipe, is located along the PG&E easement in the southeast portion of the Project site. In addition, a City storm drainage easement exists along the east boundary of the site, adjacent to the Tracy Marketplace Shopping Center, containing two parallel concrete pipes and reinforced concrete junction boxes.

SURROUNDING LAND USES

Agricultural land with sparsely scattered rural residential development and commercial uses surround the Project site. The agricultural/rural residential uses are located to the north and southwest. Commercial uses that are part of the Tracy Marketplace Shopping Center border the Project site to the east. The Tracy Pavilion Shopping Center, another retail center, is located north of the Tracy Marketplace Shopping Center. An auto mall is located north of the Tracy Pavilion Shopping Center and the West Valley Mall, a regional shopping center, is located just east of the auto mall. Other surrounding uses include Interstate 205 (I-205), which is generally south of the Project site and the previously noted UPRR line that forms the southwestern site border.

4.2.2 REGULATORY SETTING

LOCAL FRAMEWORK

The Project site is currently under the jurisdiction of the County and within the City's Sphere of Influence (SOI) and Planning Area.

Local Agency Formation Commission

The following policies govern Local Agency Formation Commission (LAFCo) determinations regarding annexations. In some cases, these policies are summarized.



1. Spheres and Municipal Service Reviews

The annexation or detachment must be consistent with the internal planning horizon of the Sphere of Influence. The land subject to the annexation shall normally lie within the first planning increment (5-10 year) boundary. The annexation must also consider the applicable Municipal Service Review. An annexation shall be approved only if the Municipal Service Review and the Sphere of Influence Plan demonstrate that adequate services can be provided within the timeframe needed by the inhabitants of the annexed area.

2. Plan for Services

Every proposal must include a Plan for Services that addresses the items identified in Section 56653 of the Government Code. The Plan for Services must be consistent with the Municipal Service Review of the agency.

3. Contiguity

Territory proposed to be annexed to a city must be contiguous to the annexing city or district unless specifically allowed by statute. Territory is not contiguous if the only connection is a strip of land more than 300 feet long and less than 200 feet wide, that width to be exclusive of highways. The boundaries of the proposed annexation or reorganization must not create or result in areas that are difficult to serve.

4. Development Within Jurisdiction

Development of existing vacant or non-prime agricultural lands for urban uses within the existing jurisdiction or within the Sphere of Influence should be encouraged before any proposal is approved which would allow for or lead to the development of existing open space for non-open space uses which are outside of the existing jurisdiction of the local agency or outside the Sphere of Influence of the local agency.

5. Progressive Urban Pattern

Annexation to agencies providing urban services shall be progressive steps toward filling in the territory designated by the affected agency's adopted Sphere of Influence. Proposed growth shall be from inner toward outer areas.

6. Piecemeal Annexations Prohibited

LAFCo requires annexations and detachments to be consistent with the schedule for annexation that is contained in the agency's Sphere of Influence Plan.

7. Annexation to Eliminate Islands

This policy is not applicable because the proposed Project would not involve annexation of an island of unincorporated land.

8. Annexation that Create Islands

This policy is not applicable because the proposed Project would not create an island of unincorporated land.

9. Substantially Surrounded

This policy is not applicable to the proposed Project because it pertains to island annexations.

10. Definite and Certain Boundaries

All boundaries shall be definite and certain and conform to lines of assessment or ownership.



11. Service Requirements

This policy is not applicable to the proposed Project because it pertains to annexations to provide services.

12. Adverse Impact of Annexation on the Other Agencies

LAFCo will consider any significant adverse effects upon other service recipients or other agencies serving the area and may condition any approval to mitigate such impacts.

13. District's Proposal to Provide New, Different, or Divestiture of a Particular Function or Class of Services

This policy is not applicable to the proposed Project because it pertains to districts that provide services.

San Joaquin County General Plan and Zoning

The San Joaquin County General Plan (County General Plan) is the long term policy guide for physical development of the County. The County General Plan consists of goals, objectives, policies and implementation programs that help direct and shape the growth of the County. The County General Plan designates the Project site General Agriculture (A/G). The A/G land use designation applies to areas suitable for agriculture outside areas planned for urban development where the soils are capable of producing a wide variety of crops and/or supporting grazing; parcel sizes are generally large enough to support commercial agricultural activities; and there exists a commitment to commercial agriculture in the form of Williamson Act contracts and/or capital investments. Typical uses include crop production, feed and grain storage and sales, crop spraying, and animal raising and sales. A maximum of one primary residence is allowed per 20 acres.

The County Zoning designation is General Agriculture (AG-40). The purpose of the AG Zone is to preserve agricultural lands for the continuation of commercial agriculture enterprises. Minimum parcel sizes within the AG Zone are 20, 40, 80 or 160 acres, as specified by the precise zoning.

The Project includes a request to annex the Project site into the City.

City of Tracy Sphere of Influence and Planning Area

The City's SOI is the area that lies directly outside the City limits that the City expects to annex, grow into and provide urban services to in the future. A Local Agency Formation Commission (LAFCO) of a county determines a city's SOI at the request of the city. LAFCOs are responsible for coordinating logical and timely changes in local government boundaries.

The City Planning Area is the portion of County land outside the City's SOI where development could have an impact on the City's planning efforts. The City's Planning Area is larger than its SOI, as it extends well beyond the area that the City expects to grow into in the future. The County is responsible for planning the anticipated growth and development patterns of the lands that are outside of City's SOI, but inside the City's Planning Area.

City of Tracy General Plan

The City of Tracy General Plan (City General Plan) is a long-range "blueprint" for the City. It defines the framework by which the City's physical and economic resources are to be managed and used in the future. The City General Plan is a comprehensive document that includes seven mandatory elements in





Participation in the SJMSCP is voluntary for both local jurisdictions and project applicants. Only agencies that adopted the SJMSCP would be covered by the SJMSCP. The City adopted the SJMSCP on November 6, 2001. Individual project applicants have two options if their project is located in a jurisdiction participating in the SJMSCP: mitigating under the SJMSCP or negotiating directly with the state and/or federal permitting agencies. If a project applicant opts for SJMSCP coverage in a jurisdiction that is participating under the SJMSCP, the following options are available, unless their activities are otherwise exempted: pay the appropriate fee; dedicate, as conservation easements or fee title, habitat lands; purchase approved mitigation bank credits; or propose an alternative mitigation plan.

4.2.3 ENVIRONMENTAL ANALYSIS

THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the *CEQA Guidelines*, the proposed Project would have a significant impact on land use and planning if it would:

- Physically divide an established community
- Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect
- Conflict with any applicable habitat conservation plan or natural community plan

AREAS OF NO PROJECT IMPACT

The following impacts are either not applicable to the project or not reasonably foreseeable:

- Physically divide an established community

The Project site is surrounded by agricultural/rural residential uses to the north and southwest and commercial uses to the east. These surrounding land uses do not form an established community. Therefore, the future commercial and office development facilitated by the proposed Project would not physically divide an established community. Thus, no impact would result.

- Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect

The proposed Project would not conflict with any applicable plan, policy or regulations as further described below. Thus, no impact would result.

San Joaquin Local Agency Formation Commission

The Project proposes to annex the Project site into the City. At the time LAFCo considers the annexation application, it must be consistent with LAFCo policies. The proposed Project would be consistent with Policy 1, which requires annexations to be within the internal planning horizon of the Sphere of Influence. It also stipulates that approval of the annexation is dependent on demonstration in the Municipal Service Review (MSR) and Sphere of Influence (SOI) Plan that adequate services can be provided to the annexed area. The Project site is within the first planning increment boundary of the City's existing Sphere of Influence. LAFCo is currently in receipt and is reviewing but has not yet adopted the City's MSR or SOI Update. However, these documents would be in place prior to consideration of the annexation request and would demonstrate that adequate services would be provided. Policy 2 requires annexation proposals



to include a Plan for Services. When the application for annexation is submitted to LAFCo, it would include a Plan for Services that addresses the items identified in Section 56653 of the California Government Code.

The proposed Project would also be consistent with Policy 3, which requires the annexation to be contiguous to the City. The Project site is immediately contiguous to the City of Tracy along its easterly property boundary. Policy 4 requires development of urban uses within the existing jurisdiction or Sphere of Influence before development of existing open space for non-open space uses is allowed outside the jurisdiction or existing Sphere of Influence. The proposed Project would develop land that is contiguous to the City and within the City's Sphere of Influence.

The Project would result in progressive steps toward filling in the territory designated by the City's Sphere of Influence for future development and would not represent piece meal annexation consistent with Policies 5 and 6. The proposed annexation would also conform to the lines of assessment and property ownership consistent with Policy 10. Finally, pursuant to Policy 12, the proposed annexation would not result in impacts on other service recipients or agencies serving the area that cannot be mitigated.

San Joaquin County General Plan and Zoning Ordinance

The Project proposes to annex the Project site into the City. After that occurs, the County General Plan and Zoning Ordinance would no longer govern the Project site, as it would then be governed by the City General Plan and Municipal Code. Therefore, the proposed Project was not reviewed for consistency with the policies and objectives of the San Joaquin County General Plan and Zoning Ordinance.

City of Tracy General Plan

As described above, the Project proposes the annexation of the Project site into the City and after which, the City General Plan would govern the site. The City General Plan designates the Project site UR 2 and envisions 367,000 square feet of commercial use and 78,000 square feet of office use on the Project site for a total of 445,000 square feet. According to the General Plan, the purpose of the UR designation is to provide guidance regarding the vision and types of land uses allowed while allowing flexibility in the location of these uses therefore, the overall distribution and mixture of uses may change. The Project proposes an amendment to the City General Plan to re-designate the Project site from UR 2 to Commercial. The Commercial designation allows for a relatively wide range of uses but focuses primarily on retail and consumer service activities that meet the needs of Tracy residents and employees, as well as pass through travelers. Office uses are allowed in commercially designated areas. The adjacent I-205 regional commercial area contains a major concentration of land designated Commercial. The re-designation of the Project site from UR 2 to Commercial would facilitate the future development of a mix of retail/office uses on the Project site, consistent with the existing development in the area and the assumptions in the City General Plan. It would also include an estimated 466,000 square feet of commercial and office development, which is within the range allowed by the City General Plan Commercial land use designation.

The Project proposes annexation of the Project site to the City; an amendment to the City General Plan land use designation from UR 2 to Commercial; an amendment to the I-205 Corridor Specific Plan to add the Project site to the Specific Plan area and designate it General Commercial (GC); and Rezoning the Project site Planned Unit Development (PUD). These actions would collectively ensure balanced and orderly growth within the City through comprehensive planning for UR 2 that would establish a clearly defined urban form that is part of the I-205 Regional Commercial Area, consistent with relevant goals,



Building Architecture

The I-205 Corridor Specific Plan encourages new commercial buildings to have a contemporary architectural style that utilizes elements that complement the existing character of the City. This includes a relatively small scale of adjacent structures and the incorporation of elements such as variation in textures and materials in the building façade design. The Specific Plan further discusses that large buildings should have facades that include variations in massing, form and texture. Building height requirements may be exceeded by significant architectural features that do not exceed 15 percent of the building footprint area in plan. The purpose of these features is to strengthen the identity of development, to avoid a succession of “boxy” structures, and to add diversity to the streetscape.

Landscaping

Landscaping and hard pedestrian surfacing is required in the 15-foot minimum setback zone between office buildings (or the office portions of a commercial building) and parking along street frontages. A minimum of forty percent of the zone is required to be landscaped. The Specific Plan also requires that onsite landscaping between the property line and the building, parking lot, or vehicular maneuvering or circulation improvements be installed by the property owner. These improvements are required to be designed as an extension of the adjacent public arterial landscaping. A mixture of trees, shrubs and groundcover would be required for any landscape area. At least one tree must be provided for every 2,000 square feet of landscaped area between buildings and street property lines. Both perimeter and interior landscaping would include canopy-type trees. Landscape amenities (e.g., walls, pots, etc.) are encouraged to be incorporated in the design. Further, the use of water conserving plantings, such as California natives and drought tolerant trees, shrubs and turf is encouraged. The Specific Plan identifies off-street parking landscaping requirements (requiring 40 percent shading of parking areas at full tree maturity and one tree for every five parking spaces).

Freeway Signage

~~According to the General Commercial and Industrial Standards identified in the I-205 Corridor Specific Plan Design Standards and Guidelines, each commercial center may have one freeway identification sign. The sign may identify tenant(s) located within 700 feet of the freeway on any parcel within the center. The maximum allowable height is 15 feet above crown of the nearest freeway, not to exceed 45 feet above finished site grade. The maximum allowable surface area is 300 square feet per sign face with a maximum of two sign faces.~~

City of Tracy Municipal Code

The City Municipal Code carries out the policies of the City General Plan by classifying and regulating the uses of land and structures within the City, consistent with the City General Plan. The purpose of the Municipal Code is to protect and promote the public health, safety, comfort, convenience, prosperity and general welfare of residents and businesses in the City.

The Project proposes Rezoning the site PUD consistent with Article 13 of Chapter 10.08 of the Tracy Municipal Code. According to the Tracy Municipal Code, the PUD Zone is “designed to allow flexibility and creativity in site planning for residential, commercial, or industrial uses to achieve greater efficiency in land use by maximizing open space, preserving natural amenities and creating additional amenities.” The PUD Zone essentially allows for any and all uses, provided they conform to the City General Plan and the I-205 Corridor Specific Plan, and are indicated upon an approved development plan.





Project site consists of a more rural residential, grazing and agricultural character. The proposed Project would appear to be an extension of the existing commercial development associated with the I-205 Corridor Specific Plan.

As proposed by the Project, the future onsite development would be subject to the standards and regulations required by the General Commercial land use designation of the I-205 Corridor Specific Plan. The proposed structures would range in height from 25 to 55 feet. Buildings would be set back 25 feet from any adjoining properties and roadway right-of-way. Further, the proposed architectural style of new buildings would have a small scale, consistent with the goals and policies of the General Plan, and would include variation in textures and materials in order to break up the visible building massing and create greater visual variety.

Onsite landscaping would be required to be installed between the property line and the buildings, parking areas, and vehicular maneuvering or circulation improvement areas. Landscaping treatments would be required to be a mixture of trees, shrubs, and groundcover. At least one tree must be provided for every 2,000 square feet of landscaped area between buildings and street property lines. Both perimeter and interior landscaping would include canopy-type trees. Landscape amenities (e.g., walls, pots, etc.) and water conserving plantings would also be encouraged to be incorporated in the design. Parking lot areas would be required to include 40 percent shading at full tree maturity and one tree for every five parking spaces.

Through the City's Planned Unit Development Preliminary and Final Development Plan requirements, future development would undergo site and architectural plan review. The purpose of the site plan and architectural review is to recognize the interdependence of land values and aesthetics. Such discretionary review would ensure that the design of the proposed buildings would maintain and enhance the character/quality of the Project area and maintain the "small town" character of the City. With implementation of the standards and regulations required by the I-205 Corridor Specific Plan and the City's review process, future development at the Project site would be consistent with the existing commercial land uses in the area. Thus, impacts in this regard would be less than significant.

Freeway Signage

~~According to the I-205 Corridor Specific Plan Design Standards and Guidelines, each commercial center may have one freeway identification sign. The sign may identify tenant(s) located within 700 feet of the freeway on any parcel within the center. The maximum allowable height is 15 feet above crown of the nearest freeway, not to exceed 45 feet above finished site grade. The maximum allowable surface area is 300 square feet per sign face with a maximum of two sign faces (for a total of 600 square feet).~~

~~The Project proposes an amendment to the freeway sign height and size standards specified in the I-205 Corridor Specific Plan to allow an 85-foot tall freeway sign with two 1,200-square-foot sign faces (for a total of 2,400 square feet). Thus, the proposed amendment would allow a freeway sign that would be an additional 40 feet in height and four times the sign area than would otherwise be allowed. In addition, based on the elevation of the Project site near the edge of the site of approximately 27 feet and the freeway crown elevation of approximately 61 feet, the proposed freeway sign would be 51 feet above the freeway crown, where 15 feet would otherwise be allowed.~~

~~The proposed amendment could result in the degradation of visual character/quality, particularly for freeway motorists traveling along I-205. The additional 40 foot sign height, and 1,200 total square foot sign face would create visible signage in the Project area that would not be consistent with other freeway signage to the east of the Project site or elsewhere within the City. Compliance with the standards and~~



regulations required by the I-205 Corridor Specific Plan and the City's process for review of development applications would ensure that impacts would be less than significant.

Mitigation Measures: No mitigation is required.

Level of Significance After Mitigation: Not applicable.

4.3-2 IMPLEMENTATION OF THE PROPOSED PROJECT MAY GENERATE ADDITIONAL LIGHT AND GLARE BEYOND EXISTING CONDITIONS.

Level of Significance Before Mitigation: Potentially Significant Impact.

Impact Analysis:

Short-Term (Construction) Impacts

Short-term light and glare impacts associated with construction activities would likely be limited to nighttime lighting (for safety and security purposes) in the evening hours. In accordance with Section 4.12.820 (Specific Noises Prohibited) of the City's Municipal Code, construction or repair work (i.e., pile drivers, hammers, etc.) of any pneumatic or air hammer, pile driver, steam shovel, derrick, steam, or electric hoist, parking lot cleaning equipment or other appliance, the use of which is attended by loud or unusual noise, is prohibited between the hours of 10:00 PM and 7:00 AM. Thus, it is anticipated that site disturbance/construction activities would cease by 10:00 PM and resume at 7:00 AM. With implementation of Mitigation Measure 4.3-2a, all construction-related nighttime security lighting would be located and aimed away from adjacent residential areas and public rights-of-way. Implementation of Mitigation Measure 4.3-2a would reduce short-term (construction) light and glare impacts to a less than significant level.

Long-Term (Operational) Impacts

Light sources associated with the Project would include new street lights, security lights, interior lights, and parking lot lights, which may create light spillover and glare impacts on surrounding land uses in the absence of mitigation. Mitigation Measure 4.3-2b would ensure that all street lighting would utilize directional lighting techniques (without compromising site safety or security) that direct light downwards and minimize light spillover onto adjacent light sensitive receptors. Implementation of Mitigation Measure 4.3-2b would reduce long-term (operational) light and glare impacts to a less than significant level.

Mitigation Measures:

- 4.3-2a All construction-related lighting shall be located and aimed away from adjacent residential areas and consist of the minimal wattage necessary to provide safety at the construction site.
- 4.3-2b The Project applicant shall ensure that any exterior lighting does not spill over onto the adjacent uses in accordance with Tracy Municipal Code Section 10.08. Adequate lighting in accordance with City of Tracy Standard Plan 154 shall be provided to ensure the safety and security of pedestrians and vehicular movements.

Level of Significance After Mitigation: Less Than Significant Impact.



olives, clingstone peaches, pistachios, dried plums, pomegranates, raisins, sweet rice, seed (ladino clover) and walnuts.

SAN JOAQUIN COUNTY

San Joaquin County (County) is among the top ten agricultural counties in the state. According to the Summary of California County Agricultural Commissioners' Reports, 2007-2008, San Joaquin County ranked number seven in the state in both 2007 and 2008 with a reported gross production value of \$2 billion in 2007 and \$2.1 billion in 2008. The 2009 San Joaquin County Annual Crop Report estimated that the total gross value of agricultural production for the County was approximately \$2 billion in 2009 (a 6.49 percent decrease from 2008's all time production high). This figure includes field crops, seed crops, fruit and nut crops, vegetable crops, nursery products, apiary products, livestock and poultry products. According to the 2009 San Joaquin County Annual Crop Report, San Joaquin County's top ten leading crops for 2009 were grapes, milk, cherries, tomatoes, walnuts, almonds, hay, cattle and calves, apples and asparagus. In addition, according to the report, in 2007, the County had 737,503 acres of land in farms, 492,032 total acres of cropland, 453,980 acres of irrigated cropland, 3,624 farms, an average farm size of 204 acres and a monthly average agricultural workforce of 23,037.

CITY OF TRACY

Although the City of Tracy (City) has grown and become increasingly developed with urban uses during the past twenty years, agriculture continues to remain an important activity in the City vicinity. Agricultural uses within the Tracy area include field crops, tree crops, nurseries, greenhouses, agricultural related residences and structures, livestock ranges, animal husbandry, public parks and recreation areas, farm employee residences, agricultural offices, truck farming and roadside produce stands.

PROJECT SITE

The majority of the Project site consists of predominantly flat land that is actively in agricultural production for hay. There are three single-family residences and their associated outbuildings, as well as a welding shop located along the Grant Line Road frontage. Various ornamental landscaping surrounds the residences and welding shop. A Pacific Gas and Electric (PG&E) easement containing two power transmission lines and an underground natural gas pipeline are located in the southeastern portion of the Project site. In addition, the Hansen Sewer pipeline easement is located along the PG&E easement in the southeast portion of the Project site and a City water line and storm drainage easement exists along the east boundary of the site, adjacent to the Tracy Marketplace Shopping Center.

4.4.2 REGULATORY SETTING

FEDERAL FRAMEWORK

Farm and Ranch Land Protection Program

The Natural Resource Conservation Service (NRCS) of the USDA administers the Farm and Ranch Land Protection Program (FRPP). The FRPP provides matching funds to help purchase development rights to keep productive farm and rangeland in agricultural uses. Working through existing programs, the NRCS partners with state, tribal or local governments and non-governmental organizations to acquire conservation easements or other interests in land from landowners. The NRCS provides up to 50 percent of the fair market easement value of the conservation easement.



To qualify, farmland must: be part of a pending offer from a state, tribe or local farmland protection program; be privately owned; have a conservation plan for highly erodible land; be large enough to sustain agricultural production; be accessible to markets for what the land produces; have adequate infrastructure and agricultural support services; and have surrounding parcels of land that can support long-term agricultural production. None of the parcels that make up the Project site have a conservation easement administered through the FRPP.

STATE FRAMEWORK

California Land Conservation Act

The State of California adopted the California Land Conservation Act (LCA), also known as the Williamson Act, in 1965 with the basic intent of encouraging the preservation of the state's agricultural lands in view of the increasing trend toward their urbanization. The LCA established a land contract procedure whereby a county could stabilize (i.e., not increase) taxes on certain qualifying lands in return for an owner's guarantee to keep the lands in agricultural preserve status for a ten-year period. A Williamson Act contract is automatically renewed each year for an additional year, unless a notice of non-renewal is initiated by the land owner or the county. Once a notice of non-renewal is given, the contract remains in place on the land for the remaining nine-year term. Once the nine-year term expires, the land is no longer restricted to agricultural or open space uses. None of the parcels that make up the Project site are currently under a Williamson Act contract.

Farmland Security Zones

In 1998, the State legislature amended the Williamson Act to allow the creation of Farmland Security Zones. A Farmland Security Zone is an area created within an agricultural preserve by a county board of supervisors upon request by a landowner or group of landowners. An agricultural preserve defines the boundary of an area within which a city or county will enter into contracts with landowners. The boundary is designated by resolution of the county board of supervisors or city council having jurisdiction. Agricultural preserves must generally be at least 100 acres in size. A Farmland Security Zone contract is similar to a Williamson Act contract in that it is a voluntary contract between a private landowner and a county that enforceably restricts land to agricultural or open space use and the contract automatically renews annually unless either party files a notice of nonrenewal. However, the minimum initial term is 20 years and the subject land must be designated as important farmland by the state (refer to discussion below under Farmland Mapping and Monitoring Program for definitions of important farmland). In addition, a Farmland Security Zone contract offers a landowner a greater property tax reduction than a Williamson Act contract. None of the Project site parcels are currently within a Farmland Security Zone.

California Government Code Section 56064

California Government Code Section 56064 defines prime agricultural land as an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications:

- (a) Land that qualifies, if irrigated, for rating as class I or class II in the USDA Natural Resources Conservation Service land use capability classification, whether or not land is actually irrigated, provided that irrigation is feasible.
- (b) Land that qualifies for rating 80 through 100 Storie Index Rating.



- (c) Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture in the National Range and Pasture Handbook, Revision 1, December 2003.
- (d) Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than four hundred dollars (\$400) per acre.
- (e) Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than four hundred dollars (\$400) per acre for three of the five previous calendar years.

Public Resources Code Section 21060.1

Public Resources Code Section 21060.1 defines agricultural land for the purposes of assessing environmental impacts using the Farmland Mapping and Monitoring Program (FMMP).

Farmland Mapping and Monitoring Program

The FMMP was established in 1982 to assess the location, quality and quantity of agricultural lands and the conversion of these lands over time. The FMMP is a non-regulatory program that analyzes agricultural land use and land use changes throughout California. The FMMP maps important farmlands throughout California and produces Important Farmland Maps. The FMMP also produces a biannual report (California Farmland Conversion Report) on the amount of land converted from agricultural to non-agricultural use.

Important Farmland Categories

The FMMP divides important farmlands into the following five categories based on their suitability for agriculture: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land. Any conversion of land within the Prime Farmland, Farmland of Statewide Importance, or Unique Farmland categories to non-agricultural use is typically considered an adverse impact.

Prime Farmland/Farmland of Statewide Importance

Prime Farmland is land with the best combination of physical and chemical features able to sustain long term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Farmland of Statewide Importance is similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date to be considered Prime Farmland or Farmland of Statewide Importance.

Unique Farmland

Unique Farmland is farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date to be considered Unique Farmland.





investigations, Geomatrix Consultants, Inc. prepared two soil management plans, in December and August of 1999, for portions of the Project site as part of a previous development project proposed.

According to letters issued by the DTSC, RWQCB and the EHD, no further investigation was required for these onsite properties, at that time, as a result of pipeline impacted soils. However, these agencies have noted that any changes in the present or proposed use of the site may require further site characterization and mitigation activity. Per an interview conducted with Mr. Michael Infurna of the EHD, the soil management plans previously prepared for the Project site do not consider vapor intrusion impacts. Due to the known level of past contamination at the Project site, Mr. Infurna advised that the site characterization and extent of contamination at the Project site be updated for present day conditions. Mr. Infurna also recommended further vapor intrusion investigations for the Project site, as it applies to onsite contaminated soils.

With implementation of Mitigation Measures 4.10-1d, a qualified Site Characterization specialist would be required to review existing site characterization documents and, if necessary, conduct updated site characterization at the Project site prior to issuance of building permits, in consultation with Chevron and EHDRWQCB, with regard to onsite contaminated soils associated with adjacent pipeline leaks. Upon completion of site review/characterization activities, remedial activities, if necessary, would be recommended in consultation with EHDRWQCB. Also, prior to issuance of building permits, a vapor intrusion screening evaluation and, if necessary, vapor intrusion investigations would be required to be conducted by a qualified Environmental Professional, in consultation with the EHD-RWQCB (Mitigation Measure 4.10-1e). Should the Environmental Professional determine that proposed buildings could be impacted by vapor intrusion, the Environmental Professional, in consultation with EHDRWQCB, would recommend specific design measures to be incorporated into the buildings' design that would reduce these indoor air quality concentrations to below regulatory thresholds, as directed by EHDRWQCB. With implementation of Mitigation Measures 4.10-1d and 4.10-1e, impacts to persons at the Project site as a result of offsite pipeline leaks would be reduced to less than significant levels.

Based on the EHMCA, a known third-party diesel spill occurred at APN 209-27-014 (immediately adjacent to the Project site) in March 2008. The diesel spill occurred when a big-rig truck traveling in dense fog on West Grant Line Road crossed West Byron Road and crashed. A purported 140 gallons of diesel leaked from the ruptured fuel tank onto surface soil. To address the diesel spill, 130 cubic yards of affected soil were reportedly excavated by a third party to approximately 10 to 12 feet bgs. Groundwater was encountered at the bottom of the excavation, but a grab groundwater sample was not collected prior to backfill. Although approximately 130 cubic yards of affected soil were reportedly excavated to approximately 10 to 12 feet bgs, the adjoining up-gradient offsite property to the south reported concentrations in the groundwater as a result of this spill. Thus, this offsite spill has potentially resulted in groundwater contamination to the Project area. With implementation of Mitigation Measure 4.10-1e, vapor intrusion investigations would be required to consider potential impacts as a result of contaminated groundwater. Also, with implementation of Mitigation Measure 4.10-1f, construction worker safety would be minimized through implementation of a Worker Safety Plan that would outline specific measures that would be taken by personnel in the event that potentially contaminated groundwater is encountered.

According to the 2005 UWMP¹, Tracy provides water services to all of its residents within the City limits. Surface water has historically comprised between 50 to 60 percent of the City's total water supply. The City's two wholesale surface water supply suppliers are the U.S. Bureau of Reclamation (USBR) and the South San Joaquin Irrigation District (SSJID). Additional water comes from the Delta-Mendota Canal the Stanislaus River and the Tracy Groundwater Sub-basin. It is anticipated that potable water for the project

¹ 2005 City of Tracy Urban Water Management Plan, dated December 2005

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100



mandates good worker practices by workers exposed to lead. Contractors performing lead-based paint removal shall notify provide evidence of abatement activities to the City when abatement activities have been completed in accordance with state requirements.

- 4.10-1c Prior to issuance of a grading permit, soil sampling shall occur within the portions of the Project site that have historically been utilized for agricultural purposes and may contain pesticide residues in the soil, as determined by a qualified Phase II/Site Characterization specialist. The sampling, conducted in consultation with the San Joaquin County Environmental Health Department (EHD), shall determine if pesticide concentrations exceed established regulatory requirements and shall identify further site characterization and remedial activities, if necessary. Should further site characterization/remedial activities be required, these activities shall be conducted per the applicable regulatory agency requirements, as directed by the EHD.
- 4.10-1d Prior to issuance of building permits, aA qualified Site Characterization specialist shall review existing Site Characterization documents with regard to onsite contaminated soils associated with adjacent pipeline leaks. If such review identifies significant data gaps and, if required by the Central Valley Regional Water Quality Control Board (RWQCB), the Site Characterization specialist, in consultation with Chevron and RWQCB, shall conduct updated site-Site characterization-Characterization at the Project site, prior to issuance of building permits, if required by the San Joaquin County Environmental Health Department (EHD), in consultation with Chevron and EHD, with regard to onsite contaminated soils associated with adjacent pipeline leaks. Upon completion of the review (and updated Site Characterization activities, if needed)site characterization activities, the Site Characterization specialist shall recommend remedial activities, if necessary, in consultation with EHD RWQCB.
- 4.10-1e Prior to issuance of building permits, a vapor intrusion screening evaluation vapor intrusion investigations shall be conducted by a qualified Environmental Professional, in consultation with the Central Valley Regional Water Quality Control Board (RWQCB)San Joaquin County Environmental Health Department (EHD). Should the screening evaluation indicate that there is a reasonable potential that proposed building(s) Environmental Professional determine that proposed buildings could be impacted by vapor intrusion, the Environmental Professional, in consultation with Chevron and EHD RWQCB, shall conduct targeted soil vapor/vapor intrusion investigation(s). Should the investigation(s) determine that proposed building(s) could be impacted by indoor air vapor concentrations above regulatory thresholds, the Environmental Professional, in consultation with RWQCB, shall recommend specific design measures to be incorporated into the building(s) design that would reduce these indoor air quality concentrations to below regulatory thresholds, as directed by the EHD.
- 4.10-1f Prior to issuance of a grading permit, the Project applicant(s) shall submit a Worker Safety Plan for site disturbance/construction activities, in consultation with California Division of Occupational Safety and Health (Cal/OSHA) and the San Joaquin County Environmental Health Department (EHD). The Worker Safety Plan shall include safety precautions (e.g., personal protective equipment or other precautions to be taken to minimize exposure to hazardous materials) to be taken by personnel when encountering potential hazardous materials, including potential contaminated groundwater.

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100



have been constructed and are operational. The primary elements of the system consist of channel parkways, open channels, detention basins and large closed conduits that all have capacity to accommodate a 100-year 24-hour storm. However, there are no City or County maintained drainage features on the Project site. Part of the storm drainage infrastructure includes subsurface conduits located in a 30-foot wide easement along the east side of the Project site. Storm water travels south to north through the conduits in the easement on its way to DET 10/11. The Project site and surrounding area are generally flat, and water drains through natural sheetflow to the north.

WATER QUALITY

Surface Water Quality

There are no surface water features on or near the Project site and no site-specific data regarding stormwater runoff quality from the Project site exist. However, several pollutants could be present in the stormwater runoff from the Project site, such as sediment, nutrients, oxygen-demanding substances, heavy metals, petroleum hydrocarbons, pathogenic bacteria and viruses. Agricultural activities are a major source of sediment erosion and nutrients. Petroleum hydrocarbons result mostly from vehicles. Nutrient and bacterial sources include fertilizers, pet wastes and faulty septic tanks. The closest drainage to the Project site, the Old River, has impaired water quality between the San Joaquin River and the Delta Mendota Canal due to low dissolved oxygen.

Groundwater Quality

The City's existing groundwater water supply is heavily mineralized and the surface water portion occasionally has taste and odor problems resulting from algae blooms in the Delta. The City Utilities Division of the Public Works Department has a regular program of water quality monitoring, system flushing and system inspection to monitor these potential issues.

GROUNDWATER

The City pumps groundwater from a 950-square mile portion of the larger San Joaquin Valley groundwater basin. The City operates eight groundwater wells, with a total extraction capacity of 15 million gallons per day (mgd). According to a groundwater study completed by the City, the estimated sustainable operational yield from these wells is approximately 9,000 acre-feet (af) annually and as a result, the City's Groundwater Management Policy prohibits groundwater extraction to exceed this amount. Historically, groundwater has accounted for approximately 40 to 50 percent of the City's annual water supply. However, this percentage has been decreasing over the last few years with approximately seven percent of the City's total water supply coming from groundwater in 2009 (approximately 0.4 billion gallons, which is equivalent to approximately 123 acre-feet per year [af/y])¹. (An acre-foot [af] is the volume of water used to cover one acre of land with one foot of water [325,850 gallons]. A single-family home uses approximately 0.5 af per year.) This reduction in groundwater pumping is consistent with the City's long-term objectives of utilizing groundwater for emergency and peak demand needs and utilizing the aquifer for water storage to improve water quality and increase water system reliability for the City's water customers.

¹ Steve Bayley, Personal Communication, 2011.





Mitigation Measures: No mitigation is required.

Level of Significance After Mitigation: Not applicable.

Ground Water Supply/Recharge

4.11-2 THE PROPOSED PROJECT COULD SUBSTANTIALLY DEplete GROUNDWATER SUPPLIES OR INTERFERE SUBSTANTIALLY WITH GROUNDWATER RECHARGE SUCH THAT THERE WOULD BE A NET DEFICIT IN AQUIFER VOLUME OR A LOWERING OF THE LOCAL GROUNDWATER TABLE LEVEL.

Level of Significance Before Mitigation: Less Than Significant Impact.

Impact Analysis:

The proposed Project anticipates the construction of a maximum of 359,300 square feet of commercial (retail) uses on 33 net acres and 106,700 square feet of office uses on seven net acres. The City uses a standard water consumption rate of 1,785 gallons per acre per day (gpad) for commercial (retail) uses and 1,339 gpad for office uses. Thus, the commercial and office uses proposed by the Project would be expected to use 68,278 gallons per day of water. Tertiary-treated recycled water delivered from the City's wastewater treatment plant or other City water supply would be used to meet the Project's landscape irrigation needs. As such, the Project's landscape irrigation needs would not increase groundwater pumping or extraction. Potable water supplies from the City's water system (which include groundwater) would be used to meet the potable water demand of the Project's proposed commercial and office uses. The City's existing and additional (future, not yet firmly assured) potable water supplies are sufficient to meet the City's existing and projected future potable water demands, including the potable water demands associated with the proposed Project, to the year 2030 under all hydrologic conditions. Therefore, while the proposed Project would increase water demand, including demand for groundwater, it would not substantially deplete groundwater supplies, as the City has sufficient water supplies, including groundwater supplies, to serve the Project and the City's other existing and projected future water demands.

Groundwater recharge occurs primarily through percolation of surface waters through the soil and into the groundwater basin. The addition of significant areas of impervious surfaces can interfere with this natural groundwater recharge process. Upon Project buildout, the majority of the Project site would be covered with impervious surfaces, such as buildings, parking lots, sidewalks, driveways, etc. However, given the relatively large size of the groundwater basin in the Tracy area, the impervious surface area added as a result of the Project would not adversely affect the recharge capabilities of the local groundwater basin. Moreover, as identified under Impact 4.11-1, the Project would be required to implement LID features in compliance with the City's SWQC Manual, which would help reduce the amount of runoff from the Project site and aid in recharging ground water. Therefore, potential impacts on groundwater supply and recharge would be less than significant.

Mitigation Measures: No mitigation is required.

Level of Significance After Mitigation: Not applicable.



Erosion/Siltation from Drainage Alteration

4.11-3 THE PROPOSED PROJECT COULD SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, WHICH COULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON OR OFFSITE.

Level of Significance Before Mitigation: Less Than Significant Impact.

Impact Analysis:

Future development would involve vegetation removal, grading, earth excavation and the construction of buildings, parking lots, sidewalks and driveways. These activities would alter existing drainage patterns and increase the potential for erosion and/or siltation. As previously discussed under Impact 4.11-1, standard erosion control measures (SWPPP) would be implemented to minimize the risk during construction. In addition, implementation of LID features and site-specific source and treatment control measures would reduce potential erosion and siltation impacts associated with altering existing drainage patterns during the life of the Project to a less than significant level.

Mitigation Measures: No mitigation is required.

Level of Significance After Mitigation: Not applicable.

On or Offsite Flooding Impacts from Drainage Alteration

4.11-4 THE PROPOSED PROJECT COULD SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, WHICH COULD SUBSTANTIALLY INCREASE THE RATE OR AMOUNT OF SURFACE RUNOFF IN A MANNER THAT WOULD RESULT IN FLOODING ON OR OFFSITE.

Level of Significance Before Mitigation: ~~Potentially Less Than Significant Impact.~~

Impact Analysis:

Future development facilitated by the proposed Project would increase the amount of impervious surfaces onsite through the construction of new building pads, parking lots, sidewalks and structures, which would result in changes to the absorption rates, drainage patterns and the corresponding rate and amount of surface runoff. Such changes could potentially result in on or offsite flooding.

An onsite storm drain system, consisting of catch basins or curb inlets would need to be constructed to convey onsite surface water runoff to existing storm drainage infrastructure in the portion of the Westside Channel Watershed that serves the Project site. The primary elements of the existing storm drainage infrastructure consist of channel parkways, open channels, detention basins and large closed conduits. DET 10/11 would be the outfall for storm water runoff generated within the Project site. Although the City's updated SDMP has not been officially adopted by the City yet, it should be noted that the plan does not identify any master plan infrastructure improvements necessary to serve the buildout of the Project site with the exception of storm drains that would connect with existing or proposed major elements of the Westside Channel system. Regardless, BMPs and LID features, which would be required by the City's SWMP and SWQC Manual, would help reduce the velocity of flows and encourage infiltration before runoff enters the Westside Channel system. The City has determined that the Westside Channel system has adequate capacity to serve the proposed Project. Thus, impacts would be less than



~~significant. However, to further ensure that the increased stormwater runoff from the Project site does not exceed the conveyance and capacity of existing storm drainage infrastructure in the Westside Channel system, the proposed Project would be required to implement Mitigation Measure 4.11-4, which requires the preparation of a hydrology report that demonstrates adequate conveyance and capacity for surface runoff and if adequate capacity is not available, a detailed stormwater detention plan for the retention/detention of stormwater runoff on the Project site. Implementation of Mitigation Measure 4.11-4, in addition to compliance with the requirements of the City's SWMP and SWQC Manual and other City policies and regulations would reduce potential impacts on flooding from site alteration to less than significant.~~

Mitigation Measures: No mitigation is required.

~~4.11-4 — Plans submitted for a grading permit shall include a detailed hydrology report. The report shall include calculations regarding the anticipated volume of stormwater runoff generated by the Project, and shall demonstrate that adequate stormwater conveyance and capacity is available in the existing Westside Channel system. Calculations shall be consistent with the current version of the City's Manual of Stormwater Quality Control Standards for New Development and Redevelopment. The hydrology report shall be subject to review and approval by the City Engineer.~~

~~————— If the hydrology report determines that the existing Westside Channel system does not have adequate stormwater conveyance and capacity to serve the Project site, then the Project applicant shall develop a detailed stormwater detention plan for the retention/detention of stormwater runoff on the Project site. The stormwater detention facilities shall be designed with adequate capacity to ensure that that stormwater generated on the Project site during a peak storm event is retained at a rate that would ensure that discharges from the site do not exceed pre-construction levels. All detention facilities shall be developed in conformance with the City's standards, including those identified in the City's Manual of Stormwater Quality Control Standards for New Development and Redevelopment. The plans and specifications of the proposed detention facilities shall meet the standards of the City of Tracy Development and Engineering Services Department as an adequate engineering product. The construction of stormwater detention facilities may be phased to correspond with development of the Project site over time, provided that adequate detention is provided at all times to ensure that runoff from the site does not exceed pre-construction levels.~~

Level of Significance After Mitigation: Less Than Significant Impact ~~Not applicable.~~

Storm Drainage System Capacity

4.11-5 THE PROPOSED PROJECT COULD CREATE OR CONTRIBUTE RUNOFF WATER THAT WOULD EXCEED THE CAPACITY OF EXISTING OR PLANNED STORMWATER DRAINAGE SYSTEMS OR PROVIDE SUBSTANTIAL ADDITIONAL SOURCES OF POLLUTED RUNOFF.

Level of Significance Before Mitigation: Potentially Less Than Significant Impact.



Impact Analysis:

As stated in the impact discussions above, the proposed Project would result in changes to absorption rates, drainage patterns and the corresponding rate and amount of surface runoff within the Project site. An onsite storm drain system would need to be constructed to convey onsite surface water runoff to the City's existing storm drainage system. The onsite system would be designed to carry stormwater at buildout of the Project site, and would be subject to City review to verify that it is designed to accommodate increased flows on the site, which would therefore reduce this potential impact to less than significant.

As described in previous impact analyses, with implementation of BMPs and LID features, which would be required by the City's SWMP and SWQC Manual; ~~the preparation of a hydrology report that demonstrates adequate conveyance and capacity for surface runoff and if adequate capacity is not available the preparation of a detailed stormwater detention plan for the retention/detention of stormwater runoff on the Project site (required by Mitigation Measure 4.11-4);~~ as well as compliance with the requirements of the General Permit and other City policies and regulations, the proposed Project would not result in on or offsite flooding or increased amounts of polluted runoff. Therefore, impacts would be less than significant.

Mitigation Measures: ~~Implement Mitigation Measure 4.11-4~~ No mitigation is required.

Level of Significance After Mitigation: ~~Less Than Significant Impact~~ Not applicable.

4.11.4 ANALYSIS OF CUMULATIVE IMPACTS

The analysis of cumulative hydrology and water quality impacts considers the larger context of future development of the City as envisioned by the City General Plan and relies upon the projections of the City General Plan and City General Plan Environmental Impact Report (EIR). Cumulative impacts on hydrology and water quality would result from incremental changes that degrade water quality or contribute to drainage and flooding problems within and immediately adjacent to the Project area and downstream of the Project area within the Sacramento/San Joaquin Delta. As discussed above, future development of the Project site would not result in any significant impacts with the implementation of mitigation measures. In addition, future development within the Project vicinity would be guided by the City General Plan, and associated planning and environmental documents. Each project would be subject to the City planning process. Impacts on hydrology and water quality would not be cumulatively considerable.



resources from another area, thus creating a void in the service delivery system and potentially creating a delay in response. For fiscal year 2009/2010, the queuing at Station 96 was eight percent.

Depending on the exact land use developed on the Project site, there is the risk of hazardous materials incidents. For commercial and office uses, hazardous material incidents typically are minor and handled only by the Fire Department. However, the risk for a more significant hazardous materials incident requiring specially trained personnel to enter an exclusion zone is more likely because the proposed Project site contains a natural gas pipeline and is adjacent to petroleum pipelines, a natural gas pipeline, a railroad and a freeway. Hazardous material incidents requiring an entry into an exclusion zone usually require a response from other agencies who are members of the San Joaquin County Hazardous Materials Team.

Therefore, the proposed Project would result in ~~potentially significant impacts~~ a less than significant impact on fire protection services ~~requiring mitigation~~. Implementation of Mitigation Measure 4.13-1, which would require measures to provide adequate response times, would reduce impacts to a less than significant level.

Police Protection

The proposed Project would result in the development of a maximum of 466,000 square feet of commercial and office uses. The number of traffic accidents, auto thefts, burglaries, police reports and similar incidents increases when new development occurs, resulting in greater demands on police protection and other services. According to the Tracy Police Department, by the end of 2010, approximately 240 calls-for-service are estimated for the area immediately surrounding the Project site.⁶ This represents less than 0.5 percent of service requests for 2009.

The Police Department estimates that the proposed Project would result in the need for approximately 0.5 full time equivalent (FTE) of an additional police officer.⁷ The Project would pay development impact fees, including public facilities fees, to offset the Project's proportional impacts on Police Department facilities. In addition, the approximately 0.5 FTE police officer would not result in the need for new or physically altered facilities, the construction of which could cause significant environmental impacts. Thus, impacts would be less than significant in this regard.

Schools

If future employees of the commercial and office uses proposed by the Project chose to live in the TUSD boundary, their children could potentially attend TUSD schools. The proposed Project would be subject to school impact fees in accordance with the provisions of SB 50. Pursuant to Section 65995(3)(h) of the California Government Code (SB 50), "the payment of statutory fees is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use or development of real property. . . ." Therefore, with payment of statutory fees, school impacts would be considered less than significant.

Parks and Recreational Facilities

The Project represents 466,000 square feet of commercial and office uses. The City General Plan Environmental Impact Report (EIR) assumes that within the City, commercial uses would have two

⁶ Wade Harper, Lieutenant, Tracy Police Department, Personal Communication, August 6, 2010.

⁷ John Espinoza, Police Captain, Tracy Police Department, Memorandum to Alan Bell, May 4, 2011





FREEWAY SEGMENTS

For the freeway mainline segments, the LOS methodology in the Highway Capacity Manual-2000 (HCM-2000) uses density of vehicles expressed in passenger cars per mile per lane. This methodology is based on calculating density for each direction of travel, wherein the traffic volume for each segment per lane is divided by the speed of the segment. Table 4.14-3 (HCM Level of Service Criteria for Freeways) presents the densities for each level of service rating based upon a free flow speed (FFS) of 65 mph (posted speed limit).

**Table 4.14-3
HCM Level of Service Criteria for Freeways (FFS = 65mph)**

Level of Service	Description	Density (pc/mi/ln)
A	Free-flow operations in which vehicles are almost completely unimpeded in their ability to maneuver the traffic stream. The effects of incidents are easily absorbed at this level.	0 to 11
B	This represents reasonably free flow, and free-flow speeds are maintained. The ability to maneuver within the traffic stream is only slightly restricted. The effects of minor incidents are still easily absorbed.	≥11 to 18
C	Freedom to maneuver within the traffic stream is noticeably restricted, and lane changes require vigilance. Minor incidents may still be absorbed. Queues may be expected to form behind any significant blockage.	≥18 to 26
D	Speeds begin to decline slightly with increasing flows and density begins to increase somewhat more quickly. Freedom to maneuver within the traffic stream is more noticeably limited. Minor incidents can be expected to create queuing.	≥26 to 35
E	Operation near or at capacity. Vehicles are closely spaced and maneuverability within the traffic stream is extremely limited. Operations extremely volatile. Any disruption causes extensive queuing.	≥35 to 45
F	Breakdown in flow. Queues form behind breakdown points. Demand exceeds capacity.	> 45

Source: Highway Capacity Manual (2000), Chapter 23, Exhibit 23-2.

LEVEL OF SERVICE STANDARDS

City of Tracy

The City has established LOS D, where feasible, as the minimum acceptable LOS for roadway and overall intersection operations. However, there are certain locations where this standard does not apply. The following provides a list and description of exceptions to the LOS standard of LOS D.

- Within ¼ mile of any freeway, LOS D-E or lower shall be allowed on roadways and at intersections to discourage inter-regional traffic from using City streets
- In the Downtown and Bowtie area of Tracy, LOS E or lower shall be allowed
- At intersections where construction of improvements is not feasible, the LOS may fall below the City's LOS D standard
- During construction of intersection improvements, the LOS may temporarily fall below the City's LOS D standard





unacceptable LOS D, which could, however, be acceptable on a case-by-case basis. All other existing study intersections operate at an acceptable LOS C or better. Appendix G presents the LOS calculation worksheets for the existing conditions.

**Table 4.14-4
Existing Conditions Peak Hour Intersection Level of Service**

Intersection (Jurisdiction)	Control ¹	Peak Hour	Delay in Sec ²	LOS
1. Byron Road/Grant Line Road (County)	SSS	AM	>50 (>50)	F(F)
		PM	>50 (>50)	F(F)
2. Lammers Road/Grant Line Road (County/City-With Project Annexation)	SSS	AM	0.9 (17.1)	A(C)
		PM	1.1 (>50)	B(A) (F)
3. Costco Driveway/Grant Line Road (City)	Signal	AM	18.1	B
		PM	17.4	B
4. Wal-Mart Driveway/Grant Line Road (City)	Signal	AM	23.0	C
		PM	18.3	B
5. Naglee Road/I-205 WB On-Ramp/Grant Line Road (City/Caltrans)	Signal	AM	14.0	B
		PM	19.5	C(B)
		SAT	22.7	C
6. I-205 EB Off-Ramp/Grant Line Road (City/Caltrans)	Signal	AM	14.3	B
		PM	38.6	D
		SAT	24.5	C
7. Corral Hollow Road/Grant Line Road (City)	Signal	AM	17.2	B
		PM	22.7	C
8. Lammers Road/Byron Road (City)	AWS	AM	11.3	B
		PM	15.1	C
9. Corral Hollow Road/Byron Road (City)	Signal	AM	25.6	C
		PM	15.9	B
10. Lammers Road/Eleventh Street (City)	Signal	AM	25.8	C
		PM	15.5	B
11. Corral Hollow Road/Eleventh Street (City)	Signal	AM	27.6	C
		PM	28.0	C
Note: 1. Signal = signalized intersection, SSS = side street stop intersection (Existing control is SSS and a Signal with Improvement) 2. For side-street stop-controlled intersections, delay is reported as: Intersection average (worst case approach) • Bold indicates deficient LOS per jurisdiction's criteria Source: RBF Consulting 2011.				





**EXISTING CONDITIONS INTERSECTION TRAFFIC OPERATIONS WITHOUT PROJECT
(WITH PLANNED AND FUNDED IMPROVEMENTS)**

As noted above, the Existing Conditions Without Project LOS results indicates that the unsignalized intersection of Byron Road/Grant Line Road and Lammers Road/Grant Line Road operate at an unacceptable LOS F. No improvements are planned by the City at the intersection of Lammers Road/Grant Line Road. The intersection of Byron Road/Grant Line Road is within the County and there is a planned and funded improvements to install a traffic signal and add a westbound right turn lane (refer to Appendix G). The County anticipates a 2013 construction date for these improvements. Table 4.14-5 (Existing Conditions Peak Hour Intersection Level of Service with Improvement) shows the LOS results with this planned improvement included. For all future conditions analysis, this improvement is assumed to be in place. Appendix G presents the LOS calculation worksheets for the existing conditions with improvement.

**Table 4.14-5
Existing Conditions Peak Hour Intersection Level of Service with Planned Improvement**

Intersection	Control ¹	Peak Hour	Existing		Existing With Signalization	
			Delay in Sec ²	LOS	Delay in Sec ²	LOS
1. Byron Road/Grant Line Road	SSS / Signal	AM	>50 (>50)	F(F)	15.2	B
		PM	>50 (>50)	F(F)	20.3	C
Note: 1. Signal = signalized intersection, SSS = side street stop intersection (Existing control is SSS and a Signal with Improvement) 2. For side-street stop-controlled intersections, delay is reported as: Intersection average (worst case approach) • Bold indicates deficient LOS per jurisdiction's criteria Source: RBF Consulting 2011.						

EXISTING CONDITIONS FREEWAY SEGMENT CAPACITY ANALYSIS

Freeway operations were calculated based on freeway densities (passenger cars/mile/lane) previously discussed. Table 4.14-6 (Existing Conditions Freeway Segment Level of Service) summarizes existing conditions on I-205 based on freeway volumes obtained from the TDM. TDM plots are included in Appendix G. Based on these volumes, density and LOS were calculated per HCM methodology. The results for the weekday AM and PM peak hour along the study segments indicate that all study segments operate acceptably at LOS D or better.

**Table 4.14-6
Existing Conditions Freeway Segment Level of Service**

I-205 Freeway Segment Between	Peak Hour	Direction	Number of Lanes	Volume	Density (pc/mi/ln)	LOS
A. Mountain House Parkway and Eleventh Street	AM	WB	3	5353	2727.5	D
		EB	3	2058	410.6	BA
	PM	WB	3	2395	4212.3	B
		EB	3	4954	2525.4	C
B. Eleventh Street and Grant Line Road	AM	WB	3	3500	4817.9	B
		EB	3	1694	98.7	A
	PM	WB	3	1967	1010.1	A
		EB	3	3552	4818.2	BC
C. Grant Line Road and Tracy Boulevard	AM	WB	3	3497	4817.9	B
		EB	3	1845	99.5	A



I-205 Freeway Segment Between	Peak Hour	Direction	Number of Lanes	Volume	Density (pc/mi/ln)	LOS
	PM	WB	3	1989	4010.2	A
		EB	3	3413	4817.5	B

Source: RBF Consulting 2011

4.14.4 NEAR TERM CONDITIONS (2015)

This section presents a description of traffic volumes, roadway network and intersection, and roadway segment LOS within the study area at the time of anticipated Project buildout. The roadway network for this scenario includes the existing roadway network discussed in Existing Conditions plus planned funded improvements at any of the study intersections and/or along freeway segments. As discussed in the Existing Conditions, the County has a planned and funded improvement to install a traffic signal and add a westbound right turn lane at the intersection of Lammers-Byron Road /Grant Line Road. In addition, the City has a planned and funded improvement to install a traffic signal at the intersection of Byron Road/Lammers Road. These improvements are planned to occur within the next two years and, thus, are included in the Near Term 2015 scenario. All other study intersections and roadway networks were evaluated with the same lane configurations.

NEAR TERM CONDITIONS TRAFFIC VOLUMES AND OPERATIONS

Buildout of the proposed Project is expected to occur by the end of 2015. To assess likely future traffic conditions regardless of the proposed Project, increases in traffic due to general growth and other proposed developments near the site were estimated. In discussions with the City staff, no other significant approved/proposed developments were identified that should be considered individually. To determine an appropriate growth to account for an increase in traffic over the next five years (Project buildout year-2015), traffic volumes from the regional TDM were reviewed. Table 4.14-7 (Near Term Conditions Growth Estimate) shows 2010 and 2030 AM and PM traffic volumes and a “straight line” percent growth estimate of traffic. The growth indicates an approximate annual increase of three percent during both the AM and PM peak hour.

**Table 4.14-7
 Near Term Conditions Growth Estimate**

Tracy Model Trips	2010	2030	Growth Factor	Per Year	5 Year Growth
Weekday AM	270,662	426,385	58%	2.9%	14.5%
Weekday PM	399,967	640,979	60%	3.0%	15%
Saturday Mid-day ¹					15%

Note:
 1. Saturday growth factor is assumed to be the same as the weekday

This average annual growth rate was applied to the existing 2010 counts to estimate Near Term 2015 traffic volumes. The City’s TDM is calibrated for weekday AM, PM and daily forecasts, but not for a Saturday forecast. Thus, to be conservative, the same weekday growth factor was applied to the existing Saturday 2010 counts to estimate Near Term 2015 Saturday traffic volumes. Consequently, existing volumes in Figure 4.14-7 and Figure 4.14-8 were increased by 15 percent (5 years x 3 percent per year = 15 percent). Figure 4.14-9 (Near Term Weekday Peak Hour Traffic Volumes) and Figure 4.14-10 (Near Term Saturday Mid-Day Traffic Volumes) show the resulting estimated weekday and Saturday future peak hour traffic volumes, with the analysis results shown in Table 4.14-8 (Near Term Conditions Peak Hour Intersection Level of Service). Appendix G presents the LOS calculation worksheets for the Near



Term Conditions. The analysis results indicate that all study signalized intersections would operate at LOS D or better except I-205 EB Off-Ramp/Grant Line Road, Corral Hollow Road/Byron Road and Corral Hollow Road/Eleventh Street intersections, which are estimated to operate at LOS E or better during one or both peak hours analyzed. The worst movement at the unsignalized intersection of Lammers Road/Grant Line Road is projected to operate at LOS F during the PM peak hour.

**Table 4.14-8
Near Term Conditions Peak Hour Intersection Level of Service**

Intersection (Jurisdiction)	Control ¹	Peak Hour	Delay in Sec ²	LOS
1. Byron Road/Grant Line Road (County)	Signal	AM	17.6	B
		PM	29.9	C
2. Lammers Road/Grant Line Road (County/City-With Project Annexation)	SSS	AM	1.1 (21.1)	A(C)
		PM	2.2 (>50)	GA(F)
3. Costco Driveway/Grant Line Road (City)	Signal	AM	18.7	B
		PM	17.2	B
4. Wal-Mart Driveway/Grant Line Road (City)	Signal	AM	23.4	C
		PM	18.1	B
5. Naglee Road/I-205 WB On-Ramp/Grant Line Road (City/Caltrans)	Signal	AM	15.5	B
		PM	21.1	C
		SAT	27.1	C
6. I-205 EB Off-Ramp/Grant Line Road (City/Caltrans)	Signal	AM	15.5	B
		PM	66.0	E
		SAT	51.9	D
7. Corral Hollow Road/Grant Line Road (City)	Signal	AM	18.7	B
		PM	28.6	C
8. Lammers Road/Byron Road (City)	Signal	AM	11.6	B
		PM	14.5	B
9. Corral Hollow Road/Byron Road (City)	Signal	AM	41.0	D
		PM	20.6	C
10. Lammers Road/Eleventh Street (City)	Signal	AM	24.7	C
		PM	18.8	B
11. Corral Hollow Road/Eleventh Street (City)	Signal	AM	32.7	C
		PM	37.0	D
Note: 1. Signal = signalized intersection, SSS = side street stop intersection 2. For side-street stop-controlled intersections, delay is reported as: Intersection average (worst case approach) • Bold indicates deficient LOS per jurisdiction's criteria Source: RBF Consulting 2011.				

NEAR TERM CONDITIONS FREEWAY SEGMENT CAPACITY ANALYSIS

Table 4.14-9 (Near Term Conditions Freeway Segment Level of Service) summarizes the Near Term Conditions I-205 freeway segment volumes. Similar to the intersection counts estimate, freeway volumes were also estimated by applying an annual increase of three percent growth during both weekday AM and PM peak hour and Saturday Mid-day peak hour. This approach is valid and conservative as the TDM



indicated freeway segment traffic to increase by approximately two percent per year. Based on these estimated volumes, density and LOS were calculated per the HCM methodology. The results of the analysis indicate that all study segments would operate acceptably at LOS D or better.

**Table 4.14-9
 Near Term Conditions Freeway Segment Level of Service**

I-205 Freeway Segment Between	Peak Hour	Direction	Volume	Density (pc/mil/ln)	LOS
A. Mountain House Parkway and Eleventh Street	AM	WB	6156	3231.6	D
		EB	2367	4212.12	B
	PM	WB	2754	1414.1	B
		EB	5697	2929.2	D
B. Eleventh Street and Grant Line Road	AM	WB	4025	2420.6	C
		EB	1948	4010.0	A
	PM	WB	2262	1211.6	B
		EB	4085	2420.9	C
C. Grant Line Road and Tracy Boulevard	AM	WB	4022	2420.6	C
		EB	2122	4410.9	A
	PM	WB	2287	1211.7	B
		EB	3925	2020.1	BC

Source: RBF Consulting 2011.

4.14.5 CUMULATIVE CONDITIONS (2030)

Cumulative Conditions 2030 represent buildout of City General Plan conditions without the proposed Project. This section presents the 2030 roadway network as identified in the General Plan. The required roadway network for 2030 without Project will form the basis for evaluating Project’s impact.

GENERAL PLAN 2030 TRANSPORTATION SYSTEM IMPROVEMENTS

Roadway improvements consistent with the City General Plan are included in the Cumulative roadway network. These improvements were identified as mitigation for General Plan buildout, including the Project. The Cumulative roadway network is shown on Figure 4.14-3. New planned widening/new roadways identified in the City General Plan within the study area are listed below.

Planned Roadway Widening:

- Lammers Road (between Eleventh Street and Linne Road) - Widening from two to six lanes.
- Lammers Road (between Grant Line Road and Middle Road) - Widening from two to four lanes. Signalization of the Lammers Road/Grant Line Road intersection is assumed with the planned widening.
- Corral Hollow Road (between W Schulte Road and Kavanagh Avenue) - Widening from two to six lanes.
- Grant Line Road (between Byron Road and Lammers Road) - Widening from two to six lanes.
- Grant Line Road (between Lammers Road and Tracy Boulevard) - Widening from four to six lanes.



**Table 4.14-10
Cumulative Conditions Peak Hour Intersection Level of Service**

Intersection	Control ¹	Peak Hour	Delay in Sec ²	LOS
1. Byron Road/Grant Line Road (County)	Signal	AM	26.1	C
		PM	27.3	C
2. Lammers Road/Grant Line Road (County/City-With Project Annexation)	Signal	AM	9.7	A
		PM	17.5	B
3. Costco Driveway/Grant Line Road (City) (Main entrance driveway) ³	Signal	AM	16.7	B
		PM	19.0	B
4. Wal-Mart Driveway/Grant Line Road (City)	Signal	AM	32.5	C
		PM	30.1	C
5. Naglee Road/I-205 WB On-Ramp/Grant Line Road (City/Caltrans)	Signal	AM	18.0	B
		PM	18.0	B
		SAT	24.3	C
6. I-205 EB Off-Ramp/Grant Line Road (City/Caltrans)	Signal	AM	23.4	C
		PM	>80	F
		SAT	>80	F
7. Corral Hollow Road/Grant Line Road (City)	Signal	AM	18.8	B
		PM	33.1	C
8. Lammers Road/Byron Road (City)	Signal	AM	40.010.1	B
		PM	11.4	B
9. Corral Hollow Road/Byron Road (City)	Signal	AM	27.6	C
		PM	35.8	D
10. Lammers Road/Eleventh Street (City)	Signal	AM	25.9	C
		PM	27.0	C
11. Corral Hollow Road/Eleventh Street (City)	Signal	AM	22.6	C
		PM	27.4	C
12. Grant Line Road Extension/Pavilion Parkway (City)	Signal	AM	8.8	A
		PM	18.4	B
13.		Intentionally Left Blank		
14. Lammers Road Extension/I-205 EB On & Off Ramps (City)	Signal	AM	6.5	A
		PM	8.5	A
		SAT	9.4	A
15. Lammers Road Extension/I-205 WB On & Off Ramps (City)	Signal	AM	7.6	A
		PM	7.2	A
		SAT	8.8	A
16. Lammers Road Extension/Commerce Way (City)	Signal	AM	7.7	A
		PM	19.9	B
Note: 1. Signal = signalized intersection, SSS = side street stop intersection 2. For side-street stop-controlled intersections, delay is reported as: Intersection average (worst case approach) 3. Not truck entrance • Bold indicates deficient LOS per jurisdiction's criteria Source: RBF Consulting 2011.				





CUMULATIVE CONDITIONS FREEWAY SEGMENT CAPACITY ANALYSIS

Cumulative Conditions freeway traffic volumes were obtained using the City TDM. The I-205 TDM plots are attached in Appendix G. Table 4.14-11 (Cumulative Conditions Freeway Segment Level of Service) summarizes the Cumulative Conditions I-205 freeway segment traffic volumes, which would be widened to four lanes per direction with buildout of the City General Plan. Density and LOS were calculated per HCM methodology. The results of the analysis indicate that all study segments would operate acceptably at LOS C or better.

**Table 4.14-11
Cumulative Conditions Freeway Segment Level of Service**

I-205 Freeway Segment Between	Peak Hour	Direction	Volume	Density (pc/mi/ln)	LOS
A. Mountain House Parkway and Lammers Extension	AM	WB	6860	2626.4	CD
		EB	2718	4010.5	A
	PM	WB	3554	1413.7	B
		EB	6577	2525.3	C
B. Lammers Extension and Grant Line Road	AM	WB	5982	2323.0	C
		EB	2517	409.7	A
	PM	WB	4051	1615.6	B
		EB	6472	2524.9	C
C. Grant Line Road and Tracy Boulevard	AM	WB	6756	2626.0	CD
		EB	3003	4211.6	B
	PM	WB	3650	1414.0	B
		EB	6859	2626.4	CD

Source: RBF Consulting 2011.

4.14.6 PROJECT TRAFFIC CHARACTERISTICS

Determining the Project traffic characteristics is a multi-step process. The first step is trip generation, which estimates the net new and pass-by trips arriving and departing during a peak hour and on a daily basis. The second step is traffic distribution, which identifies origins and destinations of arriving and departing traffic, and is based on area demographics and existing/expected future travel patterns in the study area. The third step is traffic assignment, which involves the allocation of traffic to study area streets and intersections. Traffic assignment is typically based on minimization of travel time, which may or may not involve the shortest route, depending on prevailing operating conditions and travel speeds.

With the forecasting process complete and Project traffic assignments developed, the impact of the Project is isolated by comparing operational (LOS) conditions at selected study intersections using calculated future traffic volumes with and without Project traffic. If necessary, the need for site-specific and/or cumulative local area traffic improvements can then be evaluated.

PROJECT TRIP GENERATION

The number of vehicle trips that would be generated by the proposed Project were estimated using the appropriate trip generation rate/equation in the Institute of Transportation Engineer (ITE) Trip Generation, Eighth Edition, 2008. The data contained in this report is provided through empirical research. Thus, for the most common land uses there are standard trip generation rates that can be applied to estimate project traffic during both weekdays and Saturday peak hours.





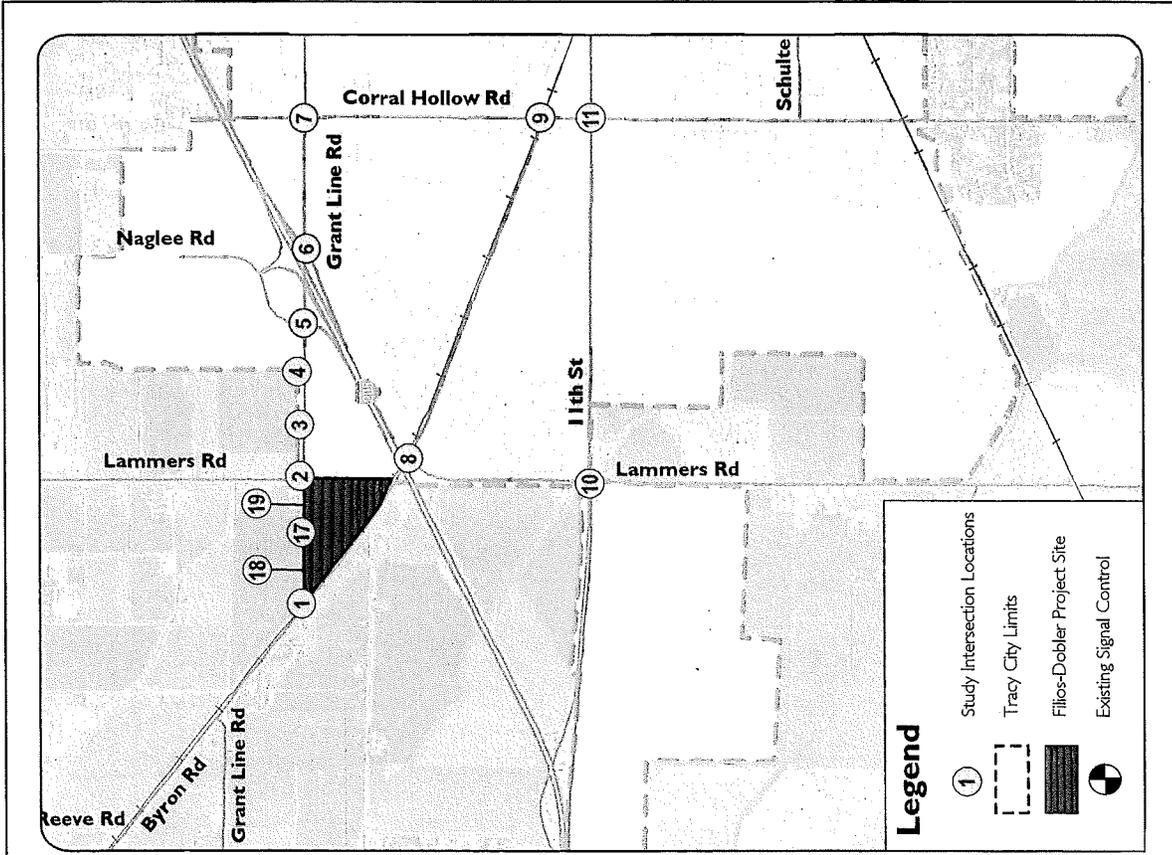
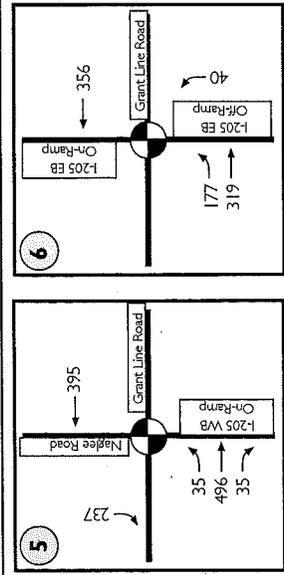
**Table 4.14-12
Project Trip Generation**

Land Use	ITE Code	Size (Sq ft)	Daily Trips			AM Peak Hour			PM Peak Hour			Saturday Trips			Mid-Day Peak Hour		
			In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total
Option I (General Office - 17% and Shopping Center - 83%)																	
A) General Office	710	106,700	701	701	1,402	174	24	198	34	164	198	253	24	20	44		
Internal Reduction*			105	154	259	n/a	n/a	n/a	11	15	25		n/a	n/a	n/a		
Net Office/External Trips			596	547	1,143	174	24	198	23	149	173	253	24	20	44		
B) Shopping Center	820	359,300	7,797	7,798	15,595	200	128	328	735	764	1,499	20,682	1,023	945	1,968		
Internal Reduction*			154	105	259	n/a	n/a	n/a	15	11	25		n/a	n/a	n/a		
Net Shopping Center/External Trips			7,643	7,693	15,336	200	128	328	720	753	1,474	20,682	1,023	945	1,968		
Shopping Center Pass-By Trips	-34%		(251)	(251)	(501)	n/a	n/a	n/a	(251)	(251)	(501)	(26%)	(256)	(256)	(512)		
Shopping Center Net New Trips	66%		7,392	7,442	14,835	200	128	328	470	503	973	74%	20,170	767	1,456		
Total Filios-Dobler Trips		466,000	7,988	7,989	15,977	374	152	526	493	652	1,145	20,423	791	709	1,500		

* Internal Reduction - See Internal Capture Worksheet

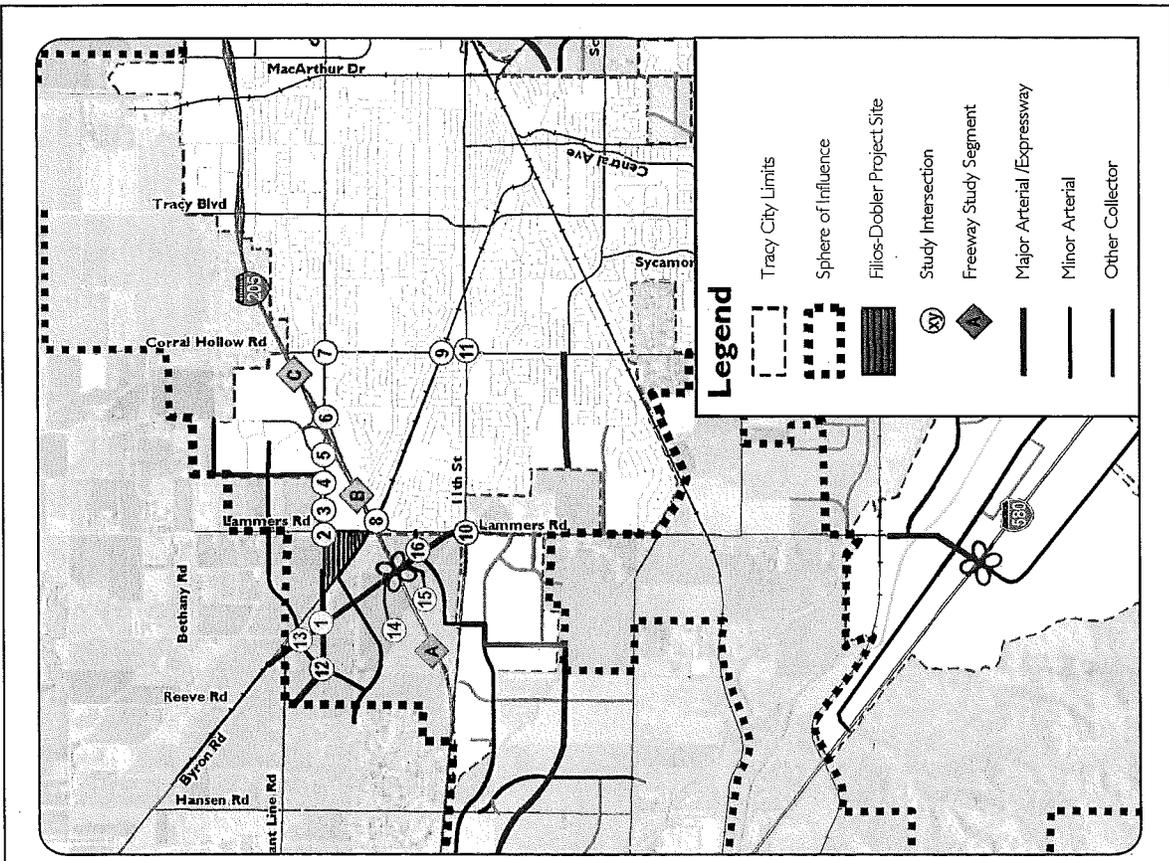
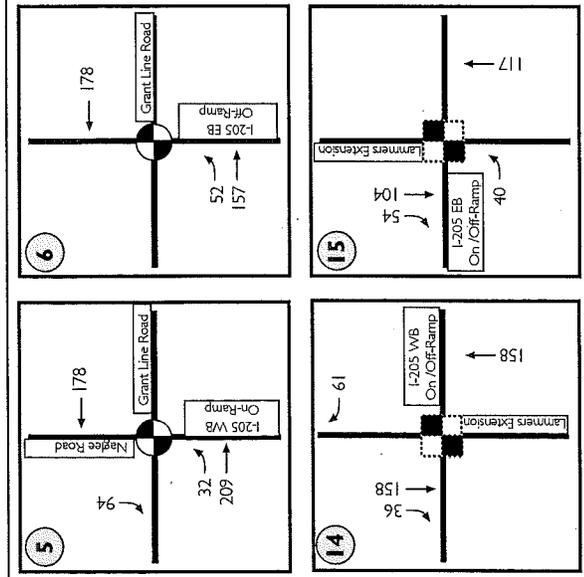
Note: ITE average trip generation rates and ITE fitted curve equations were utilized to calculate daily and PM peak hour trips. The trips are representative of the project and present a realistic worst case trip generation scenario. Trip reductions were calculated utilizing the ITE trip Generation Handbook methodologies (calculation are included in the Appendix G).





Filios/Dobler Annexation EIR
Existing & Near Term Project Trip Assignment (Saturday Mid-Day)
 Revised Figure 4.14-16





Filios/Dobler Annexation EIR
Cumulative Project Trip Assignment (Saturday Mid-Day)
 Revised Figure 4.14-18





4.14.7 EXISTING PLUS PROJECT CONDITIONS

This section evaluates the addition of Project trips to Existing Conditions Without Project. The roadway system in this scenario would be the same as Existing Conditions Without Project except the proposed Project improvements. No other pending projects are assumed to be in place under this scenario. This scenario serves to isolate Project-related traffic impacts.

EXISTING PLUS PROJECT CONDITIONS TRAFFIC VOLUMES

Project trips were added to Existing Conditions Without Project to obtain Existing Conditions With Project traffic volumes. Figure 4.14-19 (Existing Plus Project Weekday Peak Hour Traffic Volumes) and Figure 4.14-20 (Existing Plus Project Saturday Mid-Day Traffic Volumes) show Existing Plus Project Conditions for weekday AM and PM peak hour volumes and Saturday Mid-Day peak hour volumes, respectively.

EXISTING PLUS PROJECT CONDITIONS INTERSECTION TRAFFIC OPERATIONS

Project accesses will be located along Grant Line Road via two full access intersections and two partial access driveways. Of the two full access intersections, one is an existing intersection (#2) and the other is a proposed intersection. Of the two partial access driveways, one will be restricted to right-in and right-out only, and the other will restrict left-out movement. Table 4.14-13 (Existing Plus Project Conditions Peak Hour Intersection Level of Service) summarizes Existing Conditions With and Without Project for weekday AM and PM peak hour LOS of the study intersections. The results were measured against the respective jurisdiction standards and indicate that the addition of the Project trips would result in a significant impact to three of the 11 study intersections, and a full access project driveway. Detailed LOS analysis sheets are included in Appendix G.

Table 4.14-13
Existing Plus Project Conditions Peak Hour Intersection Level of Service

Intersection	Control ¹	Peak Hour	Existing		Existing + Project	
			Delay in Sec ²	LOS	Delay in Sec ²	LOS
1. Byron Road/Grant Line Road (County)	Signal	AM	15.2	B	16.6	B
		PM	20.3	C	26.0	C
2. Lammers Road/Grant Line Road (County/City-With Project Annexation)	SSS	AM	0.9 (17.1)	A(C)	8.8 (>50)	A(F)
		PM	1.1 (>50)	BA(F)	>50 (>50)	F(F)
3. Costco Driveway/Grant Line Road (City)	Signal	AM	18.1	B	18.3	B
		PM	17.4	B	21.4	C
4. Wal-Mart Driveway/Grant Line Road (City)	Signal	AM	23.0	C	21.7	C
		PM	18.3	B	23.3	C
5. Naglee Road/I-205 WB On-Ramp/Grant Line Road (City/Caltrans)	Signal	AM	14.0	B	16.5	B
		PM	19.5	C	21.2	C
		SAT	22.7	C	34.8	C
6. I-205 EB Off-Ramp/Grant Line Road (City/Caltrans)	Signal	AM	14.3	B	15.8	B
		PM	38.6	D	78.9	E
		SAT	24.5	C	65.9	E
7. Corral Hollow Road/Grant Line Road	Signal	AM	17.2	B	18.3	B





EXISTING PLUS PROJECT CONDITIONS FREEWAY SEGMENT CAPACITY ANALYSIS

Table 4.14-14 (Existing Plus Project Conditions Freeway Segment Level of Service) summarizes the Existing Conditions With Project freeway densities (vehicles /lane /mile) and LOS results during the weekday AM and PM peak hours along the freeway study segments. The LOS results indicate that all freeway segments would continue to operate acceptably similar to Existing Conditions Without Project. Even though the Project generates more trips in the Saturday peak hour than on the weekdays, Saturday peak hour volumes along the freeway segment would be lower due to non-commute traffic, and the difference in Project trips would not be great enough to cause an impact not identified for a weekday peak hour.

**Table 4.14-14
Existing Plus Project Conditions Freeway Segment Level of Service**

I-205 Freeway Segment Between	Peak Hour	Direction	Existing			Project Trips	Existing + Project		
			Volume	Density (pc/mil/ln)	LOS		Volume	Density (pc/mil/ln)	LOS
A. Mountain House Parkway and Eleventh Street	AM	WB	5353	27	D	8	5361	2727.5	D
		EB	2058	11	B	19	2077	4110.7	BA
	PM	WB	2395	12	B	33	2428	1212.5	B
		EB	4954	25	C	25	4979	2625.5	C
B. Eleventh Street and Grant Line Road	AM	WB	3500	18	B	8	3508	1818.0	BC
		EB	1694	9	A	19	1713	98.8	A
	PM	WB	1967	10	A	33	2000	1010.3	A
		EB	3552	18	B	25	3577	1818.3	BC
C. Grant Line Road and Tracy Boulevard	AM	WB	3497	18	B	94	3591	1818.4	BC
		EB	1845	9	A	38	1883	109.7	A
	PM	WB	1989	10	A	123	2112	1110.8	A
		EB	3413	18	B	163	3576	1818.3	BC

Source: RBF Consulting 2011.

POTENTIAL IMPACTS AND MITIGATION MEASURES – EXISTING PLUS PROJECT

4.14-1 THE PROPOSED PROJECT WOULD INCREASE TRAFFIC AT STUDY AREA INTERSECTIONS AND ROADWAY SEGMENTS. ELEVEN STUDY INTERSECTIONS AND ALL STUDY FREEWAY MAINLINE SEGMENTS WOULD CONTINUE TO OPERATE AT ACCEPTABLE LEVELS OF SERVICE IN ACCORDANCE WITH THE CITY OF TRACY, SAN JOAQUIN COUNTY AND CALTRANS SIGNIFICANCE CRITERIA DURING THE WEEKDAY AM AND PM PEAK HOUR AND THE SATURDAY MID-DAY PEAK HOUR AS INDICATED.

Level of Significance Before Mitigation: Less Than Significant Impact.

Impact Analysis:

The LOS for the following intersections would remain acceptable in accordance with City significance criteria and Caltrans standards as shown in Table 4.14-13.

- Intersection #1 Byron Road/Grant Line Road





Mitigation Measure 4.14-2 requiring installation of a traffic signal would reduce this impact to less than significant.

Mitigation Measure:

4.14-2 A traffic signal shall be installed at the intersection of Lammers Road and Grant Line Road (Intersection #2). In conjunction with the proposed traffic signal installation, the following geometric improvements shall be constructed:

- Westbound approach – Reconstruct the approach to include one through lane and one through/right turn lane and a separate left-turn lane.
- Eastbound approach – Reconstruct the approach to include one through lane and one shared through/right-turn lane. Provide an acceleration lane east of Lammers Road.
- Northbound approach – Reconstruct the approach to include a shared left-turn/through lane and a right-turn lane. The existing truck exit from Costco would be reconstructed to be part of the intersection and the current truck movements incorporated in the northbound right-turn movement.

The Project applicant shall be responsible for implementation of the above improvements prior to Project occupancy or at a time determined by the City Engineer based on the City's ability to meet City vehicle and pedestrian standards. If all or a portion of this traffic signal improvement is otherwise scheduled by the City to be financed as a Program improvement, the Project applicant may be eligible for reimbursements from future benefiting development in excess of the Project's fair share costs.

Level of Significance After Mitigation: Less Than Significant Impact.

4.14-3 ***THE PROPOSED PROJECT WOULD ADD TRAFFIC TO THE CALTRANS INTERSECTION OF I-205 EASTBOUND RAMPS AND GRANT LINE ROAD (INTERSECTION #6). THIS INTERSECTION IS PROJECTED TO OPERATE AT AN LOS E (UNACCEPTABLE) DURING THE PM AND SATURDAY PEAK HOURS.***

Level of Significance Before Mitigation: Potentially Significant Impact.

Impact Analysis:

The intersection of I-205 Eastbound ~~Off-ramp~~Ramps and Grant Line Road (Intersection #6) is a Caltrans intersection that is operating at an acceptable level of service (LOS D or better) under Existing Conditions. The proposed Project would degrade operations to an unacceptable LOS E during the PM peak hour and Saturday peak hour. Implementation of Mitigation Measure 4.14-3 would reduce this impact to less than significant.

Mitigation Measure:

4.14-3 A second eastbound left-turn lane and widening of the eastbound on-ramp to two lanes shall be constructed at the intersection of I-205 Eastbound ~~Off-ramp~~Ramps and Grant Line Road (Intersection #6). To accommodate the second left turn lane and widening of the ramp, the westbound free right-turn lane shall be modified to be part of the signal operation. The proposed improvement may require a design exemption from Caltrans. This improvement is included in the City's TIF program (Project 72PP-084). The Project





Mitigation Measure:

- 4.14-5 A westbound left-turn lane for inbound Project traffic shall be provided at the intersection of Access Road-3 and Grant Line Road (Intersection #19). The Project applicant shall be responsible for implementation of the left-turn lane prior to Project occupancy- or at a time determined by the City Engineer based on the City's ability to meet vehicle and pedestrian standards.

Level of Significance After Mitigation: Less Than Significant Impact.

EXISTING PLUS PROJECT CONDITIONS INTERSECTION TRAFFIC OPERATIONS (WITH MITIGATION)

Table 4.14-15 (Existing Plus Project Conditions Peak Hour Intersection Level of Service with Mitigation) shows the LOS results with mitigation. Figure 4.14-21 (Existing Plus Project Mitigated Intersection Lane Configuration) shows the intersection lane configuration with proposed mitigation for Existing Plus Project. The LOS results measured against the respective jurisdiction standards indicate that the study intersections traffic operations would operate at acceptable LOS. Detailed LOS analysis sheets are included in Appendix G.

**Table 4.14-15
Existing Plus Project Conditions Peak Hour Intersection Level of Service with Mitigation**

Intersection	Control ¹	Peak Hour	Existing + Project		Existing + Project+ Mitigation	
			Delay in Sec ²	LOS	Delay in Sec ²	LOS
2. Lammers Road/Grant Line Road (County/City-With Project Annexation)	SSS / Signal	AM	278.8 (>5035.3)	A(EF)	18.0	B
		PM	>50 (>50)	F(F)	17.4	B
6. I-205 EB Off-Ramp/Grant Line Road (City/Caltrans)	Signal	AM	15.8	B	12.5	B
		PM	78.9	E	30.1	C
		SAT	65.9	E	35.2	D
17. Access-2/Grant Line Road	SSS / Signal	AM	482.8 (15.419.6)	A(C)	17.5	B
		PM	>50 (>50)	F(F)	26.3	C

Note:
 1. Signal = signalized intersection, SSS = side street stop intersection (Existing control is SSS and a Signal with Improvement)
 2. For side-street stop-controlled intersections, delay is reported as: Intersection average (worst case approach)
 • Bold indicates deficient LOS per jurisdiction's criteria
 Source: RBF Consulting 2011.

4.14.8 NEAR TERM PLUS PROJECT CONDITIONS

This section evaluates the addition of Project trips to the Near Term Without Project. The roadway system in this scenario would be the same as Near Term Without Project plus the improvements/mitigation identified in the Existing Conditions With Project. No other pending projects are assumed to be in place under this scenario.





NEAR TERM PLUS PROJECT CONDITONS TRAFFIC VOLUMES

Project trips were added to Near Term Conditions Without Project to obtain Near Term Conditions With Project traffic volumes. Figure 4.14-22 (Near Term Plus Project Peak Hour Traffic Volumes) and Figure 4.14-23 (Near Term Plus Project Saturday Mid-Day Traffic Volumes) show Near Term Conditions With Project for weekday AM and PM peak hour volumes and Saturday mid-day peak hour volumes, respectively.

NEAR TERM PLUS PROJECT CONDITIONS INTERSECTION TRAFFIC OPERATIONS

Table 4.14-16 (Near Term Plus Project Conditions Peak Hour Intersection Level of Service) summarizes Near Term Conditions With and Without Project for weekday AM and PM peak hour LOS of the study intersections. The results were measured against the respective jurisdiction standards and indicate that the addition of the Project trips would result in a significant impact to three study intersections, and a full access project driveway. All of these were identified for mitigation in the Existing Plus Project Conditions. In addition, it should be noted that even though the intersection of Corral Hollow Road /Byron Road would operate at deficient LOS D, the Project would not significantly impact the intersection (less than four seconds delay added). Detailed LOS analysis sheets are attached to this report in Appendix G.

**Table 4.14-16
Near Term Plus Project Conditions Peak Hour Intersection Level of Service**

Intersection	Control ¹	Peak Hour	Near Term		Near Term + Project	
			Delay in Sec ²	LOS	Delay in Sec ²	LOS
1. Byron Road/Grant Line Road (County)	Signal	AM	17.6	B	19.6	B
		PM	29.9	C	44.2	D
2. Lammers Road/Grant Line Road (County/City-With Project Annexation)	SSS	AM	1.1 (21.1)	A(C)	18.9 (>50)	BC(F)
		PM	2.2 (>50)	CA(F)	>50(>50)	F(F)
3. Costco Driveway/Grant Line Road (City)	Signal	AM	18.7	B	16.7	B
		PM	17.2	B	21.7	C
4. Wal-Mart Driveway/Grant Line Road (City)	Signal	AM	23.4	C	21.0	C
		PM	18.1	B	22.7	C
5. Naglee Road/I-205 WB On-Ramp / Grant Line Road (City / Caltrans)	Signal	AM	15.5	B	19.0	B
		PM	21.1	C	24.8	C
		SAT	27.1	C	28.0 30.4	C
6. I-205 EB Off-Ramp/Grant Line Road (City/ Caltrans)	Signal	AM	15.5	B	16.9	B
		PM	66.0	E	>80	F
		SAT	51.9	D	>80	F
7. Corral Hollow Road/Grant Line Road (City)	Signal	AM	18.7	B	20.7	C
		PM	28.6	C	30.8	C
8. Lammers Road/Byron Road (City)	Signal	AM	11.6	B	13.5	B
		PM	14.5	B	16.0	B
9. Corral Hollow Road/Byron Road (City)	Signal	AM	41.0	D	44.0	D
		PM	20.6	C	22.9	C
10. Lammers Road/	Signal	AM	24.7	C	25.0	C



Intersection	Control ¹	Peak Hour	Near Term		Near Term + Project	
			Delay in Sec ²	LOS	Delay in Sec ²	LOS
Eleventh Street (City)		PM	18.8	B	18.9	B
11. Corral Hollow Road/ Eleventh Street (City)	Signal	AM	32.7	C	33.3	C
		PM	37.0	D	42.3	D
17. Access-2/Grant Line Road	SSS	AM	-	-	3.0(23.1)	A(D)
		PM	-	-	>50(>50)	F(F)
18. Access-1Grant Line Road	SSS	AM	-	-	0.2 (12.9)	A(B)
		PM	-	-	0.5 (22.2)	A(C)
19. Access-3/Grant Line Road	SSS	AM	-	-	0.9 (13.2)	A(B)
		PM	-	-	5.2 (>50)	A(F)

Note:
 1. Signal = signalized intersection, SSS = side street stop intersection (Existing control is SSS and a Signal with Improvement)
 2. For side-street stop-controlled intersections, delay is reported as: Intersection average (worst case approach)
 • Bold indicates deficient LOS per jurisdiction's criteria
 Source: RBF Consulting 2011.

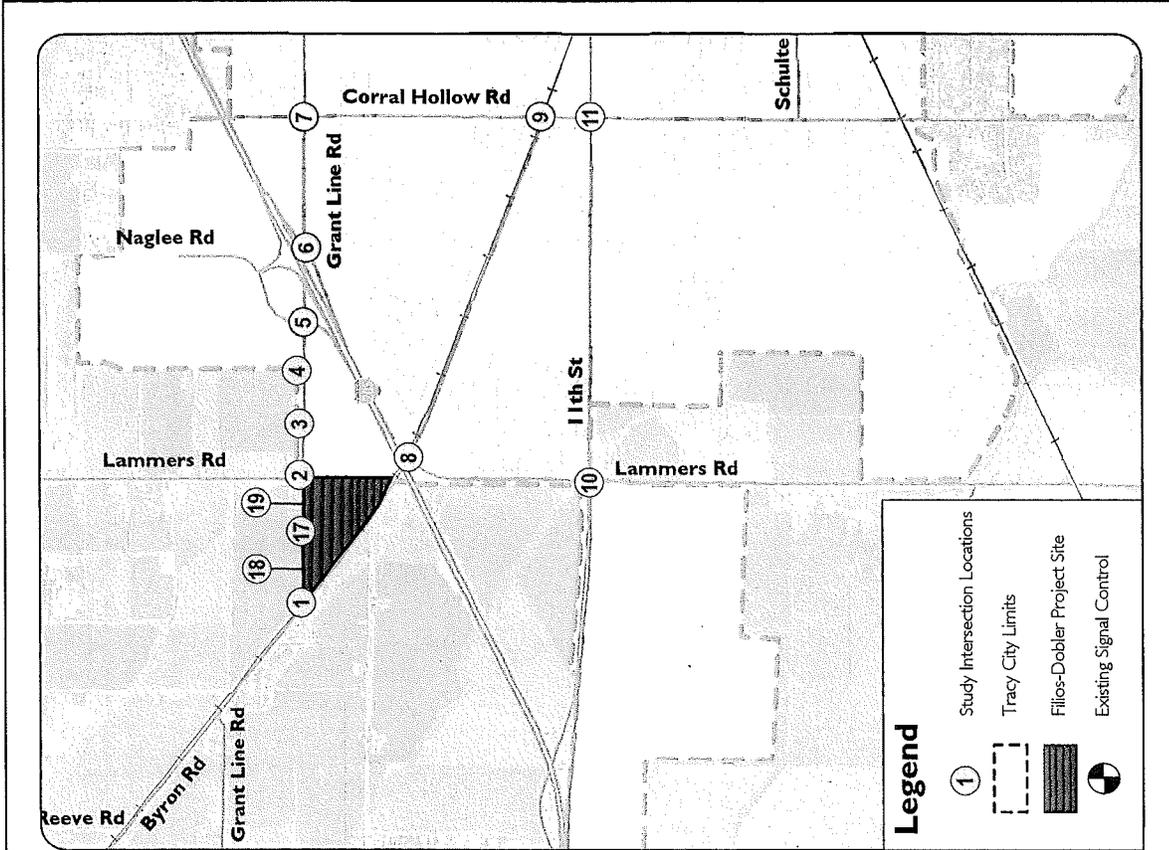
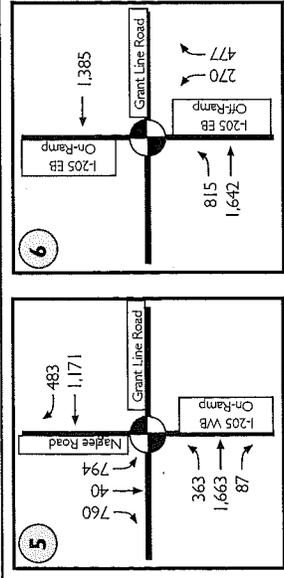
NEAR TERM PLUS PROJECT CONDITIONS FREEWAY SEGMENT CAPACITY ANALYSIS

Table 4.14-17 (Near Term Plus Project Conditions Freeway Segment Level of Service) summarizes the Near Term Conditions With Project freeway densities (vehicles /lane /mile) and the LOS results during the weekday AM and PM peak hours along the freeway study segments. All freeway segments would continue to operate acceptably similar to the Near Term Conditions Without Project.

**Table 4.14-17
Near Term Plus Project Conditions Freeway Segment Level of Service**

I-205 Freeway Segment Between	Peak Hour	Direction	Near Term			Project Trips	Near Term + Project		
			Volume	Density (pc/mil/ln)	LOS		Volume	Density (pc/mil/ln)	LOS
A. Mountain House Parkway and Eleventh Street	AM	WB	6156	3231.6	D	8	6164	3231.6	D
		EB	2367	4212.1	B	19	2386	4212.2	B
	PM	WB	2754	4414.1	B	33	2787	4414.3	B
		EB	5697	2929.2	D	25	5722	2929.3	D
B. Eleventh Street and Grant Line Road	AM	WB	4025	2420.6	C	8	4033	2420.7	C
		EB	1948	4010.0	A	19	1967	4010.1	A
	PM	WB	2262	4211.6	B	33	2295	4211.8	B
		EB	4085	2420.9	C	25	4110	2421.1	C
C. Grant Line Road and Tracy Boulevard	AM	WB	4022	2420.6	C	94	4116	2421.1	C
		EB	2122	4110.9	A	38	2160	4111.1	AB
	PM	WB	2287	4211.7	B	123	2410	4212.4	B
		EB	3925	2920.1	C	163	4088	2421.0	C

Source: RBF Consulting 2011.



Legend

- ① Study Intersection Locations
- - - Tracy City Limits
- ▨ Filios-Dobler Project Site
- ⊙ Existing Signal Control



Filios/Dobler Annexation EIR
Near Term + Project Saturday Mid-Day Traffic Volumes
 Revised Figure 4.14-23





POTENTIAL IMPACTS AND MITIGATION MEASURES – NEAR TERM PLUS PROJECT

4.14-6 THE PROPOSED PROJECT, ALONG WITH NEAR TERM GROWTH, WOULD RESULT IN UNACCEPTABLE TRAFFIC OPERATIONS AT FOUR INTERSECTIONS.

Level of Significance Before Mitigation: Potentially Significant Impact.

Impact Analysis:

The following intersections would operate at a deficient LOS according under Near Term Plus Project Conditions:

- Intersection #2: Lammers Road/Grant Line Road
- Intersection #6: I-205 EB Off-Ramp/Grant Line Road
- Intersection #17: Access-2/Grant Line Road
- Intersection #19: Access-3/Grant Line Road

~~With the exception of the intersections of Corral Hollow Road/Byron Road (#9) and Corral Hollow Road/Eleventh Street (#11), the~~ The above locations were also projected to operate at an unacceptable LOS under Existing Plus Project Conditions. Implementation of Mitigation Measures 4.14-2 through 4.14-5 would reduce impacts at four of the intersections to less than significant. ~~Impacts at the other two deficient intersections (Corral Hollow Road/Byron Road and Corral Hollow Road/Eleventh Street) are discussed below.~~

Mitigation Measure: Implement Mitigation Measures 4.14-2 through 4.14-5.

Level of Significance After Mitigation: Less Than Significant Impact.

4.14-7 THE PROPOSED PROJECT WOULD ADD TRAFFIC TO I-205 FREEWAY SEGMENTS UNDER NEAR-TERM CONDITIONS.

Level of Significance Before Mitigation: Less Than Significant Impact

Impact Analysis:

The proposed Project would add traffic to freeway segments on I-205 from Mountain House Parkway to Tracy Boulevard. These freeway segments are still projected to operate at an acceptable level, LOS D or better. The addition of Project traffic is not anticipated to degrade the freeway segment to an unacceptable level.

Mitigation Measure: No mitigation is required.

Level of Significance: Not applicable.

NEAR TERM PLUS PROJECT CONDITIONS INTERSECTION TRAFFIC OPERATIONS (WITH MITIGATION)

Table 4.14-18 (Near Term Plus Project Conditions Peak Hour Intersection Level of Service with Mitigation) show LOS results with the proposed mitigation measures. Figure 4.14-24 (Near Term Plus Project Mitigated Intersection Lane Configuration) shows the intersection lane configuration with



proposed mitigation for Near Term Plus Project. The LOS results measured against the respective jurisdiction standards indicate that the study intersections traffic operations would operate at acceptable LOS. Detailed LOS analysis sheets are included in Appendix G.

**Table 4.14-18
 Near Term Plus Project Conditions Peak Hour Intersection Level of Service with Mitigation**

Intersection	Control ¹	Peak Hour	Near Term + Project		Near Term + Project + Mitigation	
			Delay in Sec ²	LOS	Delay in Sec ²	LOS
2. Lammers Road/Grant Line Road (County/City-With Project Annexation)	SSS / Signal	AM	18.9 (>50)	B(F)	17.7	B
		PM	>50(>50)	F(F)	19.4	B
6. I-205 EB Off-Ramp/Grant Line Road (City / Caltrans)	Signal	AM	16.9	B	13.1	B
		PM	>80	F	47.5	D
		SAT	>80	F	44.448.1	D
17. Access-2/Grant Line Road	SSS / Signal	AM	3.0(23.1)	A(D)	17.3	B
		PM	>50(>50)	F(F)	21.0	C
19. Access-3/Grant Line Road	SSS	AM	0.9 (13.2)	A(B)	0.4 (9.0)	A(A)
		PM	5.2 (>50)	A(F)	0.3 (9.9)	A(A)

Note:
 1. Signal = signalized intersection, SSS = side street stop intersection (Existing control is SSS and a Signal with Improvement)
 2. For side-street stop-controlled intersections, delay is reported as: Intersection average (worst case approach)
 • Bold indicates deficient LOS per jurisdiction's criteria
 Source: RBF Consulting 2011.

CUMULATIVE PLUS PROJECT CONDITIONS

This section presents a description of traffic volumes and LOS within the study area under Cumulative Conditions 2030 with the proposed Project. The roadway network would remain consistent with Cumulative Conditions except what is proposed by the Project.

CUMULATIVE PLUS PROJECT CONDITIONS TRAFFIC VOLUMES

Project trips were added to Cumulative Conditions Without Project to obtain Cumulative Conditions With Project traffic volumes. Figure 4.14-25 (Cumulative Plus Project Peak Hour Traffic Volumes) and Figure 4.14-26 (Cumulative Plus Project Saturday Mid-Day Traffic Volumes) show Cumulative Conditions With Project for weekday AM and PM peak hour volumes and Saturday mid-day peak hour volumes, respectively.



CUMULATIVE PLUS PROJECT CONDITIONS INTERSECTION TRAFFIC OPERATIONS WITH FUTURE LANE CONFIGURATION

Table 4.14-19 (Cumulative Plus Project Conditions Peak Hour Intersection Level of Service) summarizes Cumulative Conditions With and Without Project for weekday AM and PM peak hour LOS for the study intersections. The results were measured against the respective jurisdiction standards and indicate that the addition of the Project trips would result in a significant impact to three of the 15 study intersections, and a full access project driveway. All of these were identified for mitigation in the Existing Plus Project Conditions. In addition, it should be noted that even though the intersection of Corral Hollow Road /Eleventh Street would operate at deficient LOS D, the Project would not significantly impact the intersection (less than would second delay added). Detailed LOS analysis sheets are included in Appendix G.

**Table 4.14-19
Cumulative Plus Project Conditions Peak Hour Intersection Level of Service**

Intersection	Control ¹	Peak Hour	Cumulative		Cumulative + Project	
			Delay in Sec ²	LOS	Delay in Sec ²	LOS
1. Byron Road/Grant Line Road (County)	Signal	AM	26.1	C	26.4	C
		PM	27.3	C	37.1	D
2. Lammers Road/Grant Line Road (County/City-With Project Annexation)	Signal	AM	9.7	A	>80	F
		PM	17.5	B	>80	F
3. Costco Driveway/Grant Line Road (City)	Signal	AM	16.7	B	15.6	B
		PM	19.0	B	18.4	B
4. Wal-Mart Driveway/Grant Line Road (City)	Signal	AM	32.5	C	31.4	C
		PM	30.1	C	28.9	C
5. Naglee Road/I-205 WB On-Ramp / Grant Line Road (City/Caltrans)	Signal	AM	18.0	B	21.4	C
		PM	18.0	B	19.1	B
		SAT	24.3	C	31.732.7	C
6. I-205 EB Off-Ramp/Grant Line Road (City/Caltrans)	Signal	AM	23.4	C	23.1	C
		PM	>80	F	>80	F
		SAT	>80	F	>80	F
7. Corral Hollow Road/Grant Line Road (City)	Signal	AM	18.8	B	19.3	B
		PM	33.1	C	34.8	C
8. Lammers Road/Byron Road (City)	Signal	AM	40.010.1	B	10.1	B
		PM	11.4	B	11.7	B
9. Corral Hollow Road/Byron Road (City)	Signal	AM	27.6	C	27.8	C
		PM	35.8	D	39.7	D
10. Lammers Road/Eleventh Street (City)	Signal	AM	25.9	C	26.4	C
		PM	27.0	C	28.1	C
11. Corral Hollow Road/Eleventh Street (City)	Signal	AM	22.6	C	23.1	C
		PM	27.4	C	28.5	C
12. Grant Line Road Extension/ Pavilion Parkway (City)	Signal	AM	8.8	A	8.9	A
		PM	18.4	B	18.5	B
13. Intentionally Left Blank						

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100



CUMULATIVE CONDITIONS FREEWAY SEGMENT CAPACITY ANALYSIS

Table 4.14-20 (Cumulative Plus Project Conditions Freeway Segment Level of Service) summarizes the Cumulative Conditions With Project freeway densities (vehicles /lane /mile) and the LOS results during the weekday AM and PM peak hours along the freeway study segments. All freeway segments would continue to operate acceptably without the Project. This includes the planned widening of the I-205 freeway to eight lanes per the SJCOG Regional Transportation Plan and the City of Tracy General Plan.

**Table 4.14-20
Cumulative Plus Project Conditions Freeway Segment Level of Service**

I-205 Freeway Segment Between	Peak Hour	Direction	Cumulative			Project Trips	Cumulative + Project		
			Volume	Density (pc/mil/ln)	LOS		Volume	Density (pc/mil/ln)	LOS
A. Mountain House Parkway and Lammers Extension	AM	WB	6860	2626.4	GD	8	6868	2626.4	GD
		EB	2718	4910.5	A	19	2737	4410.5	A
	PM	WB	3554	4413.7	B	33	3587	4413.8	B
		EB	6577	2525.3	C	25	6602	2525.4	C
B. Lammers Extension and Grant Line Road	AM	WB	5982	2323.0	C	16	5998	2323.1	C
		EB	2517	409.7	A	10	2527	409.7	A
	PM	WB	4051	4615.6	B	38	4089	4615.7	B
		EB	6472	2524.9	C	40	6512	2525.0	C
C. Grant Line Road and Tracy Boulevard	AM	WB	6756	2626.0	GD	60	6816	2626.2	GD
		EB	3003	4211.6	B	24	3027	4211.6	B
	PM	WB	3650	4414.0	B	79	3729	4414.3	B
		EB	6859	2626.4	GD	104	6963	2726.8	D

Source: RBF Consulting 2011.

POTENTIAL IMPACTS AND MITIGATION MEASURES – CUMULATIVE PLUS PROJECT

4.14-8 THE PROPOSED PROJECT, ALONG WITH CUMULATIVE GROWTH, WOULD RESULT IN UNACCEPTABLE OPERATIONS AT FOUR-THREE INTERSECTIONS.

Level of Significance Before Mitigation: Potentially Significant Impact.

Impact Analysis:

Project traffic would result in unacceptable traffic operations at the intersections of Lammers Road/Grant Line Road, I-205 Eastbound Off-Ramp/Grant Line Road, ~~Corral Hollow Road/Byron Road~~ and Access-2/Grant Line Road. These ~~four~~-three deficient locations were also projected to operate at deficient LOS under Near Term Plus Project Conditions.

With the planned widening of Grant Line Road to six lanes, a traffic signal is assumed at the intersection of Lammers Road/Grant Line Road under Cumulative Conditions. The intersection is projected to operate at LOS B or better without Project traffic and intersection operations would degrade to LOS F during both the AM and PM peak hours with Project traffic. Implementation of Mitigation Measure 4.14-8a would reduce this impact to less than significant.

The intersection of I-205 Eastbound Off-Ramp/Grant Line Road is a Caltrans intersection that is operating at an unacceptable LOS F with and without the Project traffic and the Project would add more



than four seconds of delay. A Project Study Report has been completed for the intersection and a eastbound loop on-ramp identified as future improvement. The reconfiguration of the interchange eastbound ramps and the ramp terminal would improve the operating conditions to acceptable LOS B during the PM peak hour. The project is not currently included in the City's TIF program. The City does, however, plan to update the TIF to include the improvements as part of the 2035 Transportation Master Plan project and the improvement would then be funded. Implementation of Mitigation Measure 4.14-8b requiring the Project applicant to make a fair share contribution toward this improvement would reduce the impact to less than significant.

The Project is estimated to increase the delay at the intersection of Corral Hollow Road/Byron Road intersection by 3.9 seconds from Near Term without the Project. An increase of four or more seconds is the City threshold used to identify a significant impact. Thus, the project would not result in a significant impact at this intersection.

With the addition of Project traffic, the intersection of Access-2/Grant Line Road would operate at an unacceptable LOS F during the AM and PM peak hours. This is considered a potentially significant impact.

Mitigation Measures:

- 4.14-8a To provide acceptable (LOS D or better) operations at the intersection of Lammers Road/Grant Line Road, a westbound left-turn lane and conversion of one eastbound through lane into a shared through/right-turn lane shall be constructed. These improvements are similar to those recommended in Mitigation Measure 4.14-2. In addition, the northbound approach shall be modified to provide a separate left-turn lane and a shared through/right-turn lane. The Project applicant shall be responsible for implementation of the above improvements prior to occupancy or at a time determined by the City Engineer based on the City's ability to meet City vehicle and pedestrian standards.
- 4.14-8b The Project applicant shall make a fair share contribution toward implementation of improvements at the intersection of I-205 Eastbound ~~Off-Ramp~~Ramps/Grant Line Road including the construction of an eastbound loop on-ramp through payment of City traffic impact fees.
- 4.14-8c The addition of a traffic signal, westbound left-turn lane (Mitigation Measure 4.14-54), and separate left-turn and right-turn lanes on the northbound approach shall be required at the intersection of Access Road-2/Grant Line Road.

Level of Significance After Mitigation: Less Than Significant Impact.

4.14-9 THE PROPOSED PROJECT WOULD ADD TRAFFIC TO I-205 FREEWAY SEGMENTS UNDER CUMULATIVE CONDITIONS.

Level of Significance Before Mitigation: Less Than Significant Impact

Impact Analysis:

The proposed Project would add traffic to freeway segments of I-205 from Mountain House Parkway to Tracy Boulevard. These freeway segments are still projected to operate at an acceptable level, LOS D or



6.0 ALTERNATIVES

6.1 INTRODUCTION

Section 15126.6 of the California Environmental Quality Act Guidelines (*CEQA Guidelines*) requires an Environmental Impact Report (EIR) to describe and evaluate a reasonable range of alternatives to a proposed project. The purpose of the evaluation is to identify ways to mitigate or avoid the significant effects that a project may have on the environment. The range of alternatives required in an EIR is governed by a “rule of reason” that requires an EIR to select and evaluate only those alternatives necessary to permit a reasoned choice (*CEQA Guidelines* Section 15126.6[f]). An EIR does not need to consider every conceivable alternative to a proposed project, nor is it required that an EIR consider alternatives that are infeasible. Rather, it must consider alternatives that could feasibly attain most of the project’s basic objectives, while avoiding or substantially lessening any significant adverse environmental effects of the project. The EIR must evaluate the comparative merits of the alternatives and provide sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project to foster informed decision-making and public participation. In addition, *CEQA Guidelines* Section 15126.6(e) requires that an EIR specifically evaluate the impacts associated with the alternative of “no project” to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.

This chapter provides a brief description of the proposed Project, Project goals and objectives and potentially significant Project impacts, followed by a description and evaluation of each alternative selected for inclusion in the EIR. Finally, this chapter concludes with a comparison of the alternatives and identification of the environmentally superior alternative.

6.2 PROJECT SUMMARY

6.2.1 PROJECT CHARACTERISTICS

As described in Chapter 3 (Project Description), the Filios/Dobler Annexation Project (Project) proposes to annex approximately 43 acres of unincorporated land to the City of Tracy (City); amend the City General Plan land use designation of the Project site from Urban Reserve 2 (UR 2) to Commercial; amend the I-205 Corridor Specific Plan to add the Project site to the Specific Plan area, designate it General Commercial (GC) and amend the freeway sign height and size standards; and Prezone the Project site Planned Unit Development (PUD). In addition, the Project includes a maximum of 466,000 square feet of commercial/office uses to be built on the Project site. The analysis of 466,000 square feet is consistent with the General Plan UR 2 statistical profile in terms of the percentage of land assumed for commercial/retail use (83 percent) and for office use (17 percent). After dedication of land for the Grant Line Road right-of-way, the net size of the site may be at or near 40 acres. The I-205 Corridor Specific Plan allows a floor area ratio (FAR) of up to 0.25 for retail land uses and 0.35 for one-story office uses. Applying the 0.25 FAR to 83 percent of the site (approximately 33 acres) and 0.35 to 17 percent of the site (approximately seven acres) yields approximately 466,000 square feet of floor area. This amount of floor area will be the assumed buildout for the Project. The inclusion of this scenario is necessary in order to evaluate the potential environmental consequences of the Project, since the City has not received an application for specific improvements to the Project site. Additional building area or more intense development would require additional analysis pursuant to CEQA.



6.2.2 PROJECT OBJECTIVES

The following are the Project objectives:

- Implement the City of Tracy General Plan
- Provide for the expansion of the City's regional commercial corridor
- Develop a Commercial Center of adequate size with reasonable freeway exposure (including a freestanding freeway sign) and access to attract new anchor tenants
- Remain consistent with the principles and objectives of the I-205 Corridor Specific Plan
- Provide and maintain connectivity with the existing shopping areas of the I-205 Corridor Specific Plan and increase opportunities for connectivity to residential areas south of the Project site
- Construct commercial and office buildings consistent with the development potential anticipated for the Project site by the City General Plan

6.2.3 POTENTIALLY SIGNIFICANT PROJECT IMPACTS

Chapter 4 (Environmental Analysis) of this EIR describes the potential impacts of the proposed Project. As identified in that chapter, the Project would result in a number of potentially significant environmental impacts, some of which could be mitigated to less than significant levels. The following summarizes the proposed Project's impacts:

- Land Use and Planning – The proposed Project could conflict with the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP) resulting in a potentially significant impact. Mitigation identified in Section 4.1 (Land Use and Planning) requiring compensation for the loss of habitat and its conversion to urban use, would fulfill the mitigation requirements of the SJMSCP and reduce impacts to less than significant.
- Aesthetics – Project construction would create temporary views of construction debris and construction-related activities, which may result in the degradation of character of the Project area and affect the view of the site from nearby residences and passing motorists. This routine impact from typical, temporary construction activities would be short-term in duration and, therefore, result in a less than significant impact. With implementation of the standards and regulations required by the I-205 Corridor Specific Plan and the City's process for review of development applications, future development at the Project site would be consistent with the existing commercial land uses in the area. Thus, impacts in this regard would be less than significant. In addition, the Project would introduce new temporary construction-related and permanent sources of light and glare from street lights, building lights, security lights and parking lot lights. Mitigation identified in Section 4.3 (Aesthetics) would reduce this impact to less than significant.
- Agricultural Resources – The Project would result in the conversion of approximately 43 acres of land designated Prime Farmland to non-agricultural use, which would be a significant and unavoidable impact. In addition, the proposed Project would result in a significant and unavoidable cumulative impact from the loss of agricultural land within San Joaquin County and the state. Proposed mitigation would not reduce impacts to less than significant. Future development of commercial and office uses on the Project site could conflict with adjacent agricultural land uses, leading to their indirect conversion to non-agricultural use. However, buffers created by Grant Line Road, the Union Pacific Railroad (UPRR) line and Byron Road would prevent any potential for the Project to indirectly convert adjacent agricultural land to non-agricultural use, resulting in a less than significant impact.



(approximately 16 acres) would be developed with residential uses, since the Commercial land use designation allows appropriately scaled and designed residential development in the density ranges permitted in the Residential High (RH) designation (12.1 to 25 units per gross acre). The City General Plan statistical profile for the Project site applies a floor area ratio (FAR) of 0.3 for the commercial and office uses envisioned for the Project site. This alternative is similar to a previous development application processed for the site by the City in 1999.

Based on this, Alternative 2 would include 16 acres of residential uses at a density of 18 units per gross acre (288 multi-family units), 17 acres of commercial uses at an FAR of 0.3 (222,156 square feet) and seven acres of office uses at an FAR of 0.3 (91,476 square feet). Alternative 2 would allow multiple combinations of uses and building types, which would allow for flexibility of uses within the site. As a result, uses could be mixed in varying combinations or not mixed at all (e.g., a building could contain first floor retail with residential above, or only residential). ~~Because this alternative represents a mixed-use development with less emphasis on commercial land use, Alternative 2 would not include the proposed freestanding freeway sign and related proposal to amend the freeway sign height and sign standards of the I-205 Corridor Specific Plan.~~ The purpose of this alternative is to provide a comparison between the Project's impacts and those that may occur from a similar, but slightly different development scenario that would be allowed by the General Plan that includes residential development. Table 6-1 (Comparison of Alternative 2 and the Proposed Project) shows a comparison between buildout of Alternative 2 and buildout of the proposed Project.

**Table 6-1
 Comparison of Alternative 2 and the Proposed Project**

Topic	Residential	Commercial	Office
Proposed Project	0 units	33 acres (359,300 square feet)	7 acres (106,700 square feet)
Alternative 2	16 acres (288 units)	17 acres (222,156 square feet)	7 acres (91,476 square feet)
Difference	+288 units	-137,144 square feet	-15,224 square feet

Environmental Impacts Compared to the Project

Land Use and Planning

The mix of uses under Alternative 2 would be similar to those proposed by the Project. However, Alternative 2 would allow residential uses, while the Project would not. In addition, there would be less commercial and office development under Alternative 2 compared to the Project. As such, this alternative would not be consistent with the City General Plan statistical profile or vision for the Project site. Similar to the proposed Project, this alternative could conflict with the SJMSCP resulting in a potentially significant impact. Regardless, impacts could be mitigated by the same measures identified for the Project, which would fulfill the mitigation requirements of the SJMSCP. Therefore, under Alternative 2, impacts with respect to land use would be greater than the proposed Project.



Aesthetics

Construction of Alternative 2 would result in temporary views of construction debris and construction-related activities and require temporary nighttime security lighting for construction materials similar to the Project. In addition, Alternative 2 would introduce a similar amount of new permanent sources of light and glare as the Project. All these impacts could be reduced by the same mitigation measures identified for the Project. Alternative 2 would be subject to the City's development review process, which would ensure its consistency with existing land uses in the Project area. ~~However, unlike the Project, Alternative 2 would not create visible signage in the Project area that would be inconsistent with other freeway signage to the east of the Project site. Thus, Alternative 2 would have less of an~~ the same impact on aesthetics ~~than as~~ the proposed Project.

Agricultural Resources

The development footprint of Alternative 2 would be similar to that proposed by the Project. Therefore, Alternative 2 would result in the same significant and unavoidable impact associated with the conversion of Prime Farmland to non-agricultural use as the Project. Accordingly, Alternative 2 would also result in a significant and unavoidable cumulative impact from the loss of agricultural land within San Joaquin County and the State of California. Therefore, Alternative 2 would have the same impacts on agricultural resources as the proposed Project.

Air Quality

Alternative 2 would result in less commercial/office development than the proposed Project, although it would allow approximately 288 residential units. The reduction in commercial/office development would result in fewer vehicle trips than the proposed Project, but the addition of residential units would offset this reduction. However, because Alternative 2 would place housing next to retail and job opportunities, it has the potential to reduce vehicle trips. Therefore, air pollutant emissions during operation of Alternative 2 would slightly decrease compared to the proposed Project, but would remain significant and unavoidable like the proposed Project. Because Alternative 2 would have a similar development footprint as the Project and would result in a relatively comparable intensity/density of development, its construction impacts would be expected to be the same as those under the proposed Project and could be mitigated to less than significant with the same mitigation measures identified for the proposed Project. Like the proposed Project, Alternative 2 would exceed established thresholds for criteria pollutants, resulting in a significant and unavoidable impact due to a conflict with the applicable air quality attainment plan and a significant and unavoidable cumulative impact due increases in criteria air pollutants. Because Alternative 2 would include residential land use and the potential to reduce vehicle trips, Alternative 2 would result in slightly reduced air quality impacts compared to the proposed Project.

Greenhouse Gas Emissions

Alternative 2 would result in less GHG emissions than the proposed Project due to a reduction in vehicle trips that could be achieved by placing housing next to employment opportunities and shopping. However, Alternative 2 would need to be consistent with the City's General Plan and Sustainability Action Plan and incorporate similar GHG reduction measures and design features. Although Alternative 2 would reduce GHG emissions, it would have the same significant and unavoidable impacts. Alternative 2 would, however, result in reduced impacts associated with GHG emissions compared to the Project.



Specific Plan and designate it Light Industrial; and Prezoning the site PUD. ~~Alternative 3 would not include the proposed freestanding freeway sign and related proposal to amend the freeway sign height and sign standards of the I-205 Corridor Specific Plan.~~ The purpose of this alternative is to provide a comparison between the Project's impacts with those that may occur from other potentially lower impact uses allowed on the site by the I-205 Corridor Specific Plan. Similar to the proposed Project and Alternative 2, the net size of the site may be at or near 40 acres due to dedication of land for the Grant Line Road right-of-way. Under this alternative, 33 acres of the site would develop with warehouse and distribution uses and the remaining seven acres with mini storage. Based on the I-205 Corridor Specific Plan's FAR of up to 0.5 for warehouse/distribution uses (and applying this same maximum FAR to mini storage uses), 33 acres of warehouse/distribution could accommodate a maximum of 718,740 square feet of floor area and seven acres of mini storage could include up to 152,460 square feet. Table 6-2 (Comparison of Alternative 3 and the Proposed Project) shows a comparison between buildout of Alternative 3 and buildout of the proposed Project.

**Table 6-2
 Comparison of Alternative 3 and the Proposed Project**

Topic	Warehouse/ Distribution	Mini Storage	Commercial	Office
Proposed Project	0 acres	0 acres	33 acres (359,300 square feet)	7 acres (106,700 square feet)
Alternative 3	33 acres (718,740 square feet)	7 acres (152,460 square feet)	0 acres (0 square feet)	0 acres (0 square feet)
Difference	+718,740 square feet	+152,460 square feet	-359,300 square feet	-106,700 square feet

Environmental Impacts Compared to the Project

Land Use and Planning

The mix of uses proposed under Alternative 3 would be different than those proposed by the Project and envisioned for the site by the City General Plan. Thus, this alternative would not be consistent with the City General Plan statistical profile or vision for the Project site. Similar to the proposed Project, this alternative could conflict with the SJMSCP resulting in a potentially significant impact. Regardless, impacts could be mitigated by the same measures identified for the Project, which would fulfill the mitigation requirements of the SJMSCP. Therefore, Alternative 3 would result in greater land use impacts than the proposed Project because it would be inconsistent with the General Plan vision for the site.

Aesthetics

As with the proposed Project, construction of Alternative 3 would result in temporary views of construction debris and construction-related activities and require temporary nighttime security lighting for construction materials. Additionally, Alternative 3 would introduce a similar amount of new permanent sources of light and glare as the Project. However, all these impacts could be reduced to less than significant by the same mitigation measures identified for the Project. In addition, Alternative 3 would be subject to the standards and regulations required by the I-205 Corridor Specific Plan and the City's development review process, which would ensure its consistency with existing land uses in the Project area. ~~However, unlike the Project, Alternative 3 would not create visible signage in the Project~~



area that would be inconsistent with other freeway signage to the east of the Project site. Thus, Alternative 3 would have a reduced the same impact on aesthetics compared to the proposed Project.

Agricultural Resources

Like the proposed Project, Alternative 3 would develop the entire site, resulting in a significant and unavoidable impact from the conversion of approximately 43 acres of land designated as Prime Farmland to non-agricultural use. Alternative 3 would also contribute to a significant and unavoidable cumulative impact due to the loss of agricultural land within San Joaquin County and the state. Therefore, compared to the Project, Alternative 3 would have the same impacts on agricultural resources.

Air Quality

Under Alternative 3, the Project site would develop with industrial uses such as warehouse, distribution and mini storage, as opposed to the commercial and office uses that would develop under the proposed Project. The industrial uses allowed under Alternative 3 would result in fewer vehicle trips than the proposed Project, although the decrease would not be substantial. Therefore, impacts associated with air pollutant emissions during operation of Alternative 3 would slightly decrease compared to the proposed Project, but would remain significant and unavoidable. Alternative 3 would have a similar development footprint as the Project; however, it would result in greater development intensity in terms of building square footage. Consequently the construction impacts associated with Alternative 3 would be slightly greater than those under the proposed Project, but nonetheless could be mitigated to less than significant with the same mitigation measures identified for the Project. Like the proposed Project, Alternative 3 would exceed established thresholds for criteria pollutants, resulting in a significant and unavoidable impact due to a conflict with the applicable air quality attainment plan and a significant and unavoidable cumulative impact due to increases in criteria air pollutants. Therefore, some air quality impacts would be reduced compared to the proposed Project and some would be greater.

Biological Resources

Both Alternative 3 and the proposed Project would have the same development footprint, resulting in the same impacts on biological resources. The mitigation required for the proposed Project to reduce impacts to biological resources to less than significant would also be required under Alternative 3. For these reasons, Alternative 3 would have the same impacts when compared to the proposed Project.

Greenhouse Gas Emissions

Alternative 3 would produce less GHG emissions than the proposed Project as it would have fewer vehicle trips and less heating and electricity needs overall. However, it would nonetheless need to be consistent with the City's General Plan and Sustainability Action Plan and incorporate similar GHG reduction measures and design features. Although Alternative 3 would reduce GHG emissions, it would have the same significant and unavoidable impacts. Alternative 3 would, however, result in reduced impacts associated with GHG emissions compared to the Project.

Cultural Resources

Although the proposed land uses differ from the proposed Project under Alternative 3, the entire site would nonetheless be developed. Potential impacts on cultural resources would be the same regardless of whether the site is developed with commercial/office or industrial uses. Thus, Alternative 3 could disturb or destroy potentially significant unrecorded cultural resources in a manner comparable to the proposed



measures to reduce potential public service and utility impacts associated with the demand increases. Thus, Alternative 3 would result in reduced impacts on public services and utilities when compared to the proposed Project.

Transportation/Traffic

The industrial uses proposed by Alternative 3 would result in fewer vehicle trips than the proposed Project, although the decrease would not be substantial. Regardless, the vehicle trips associated with Alternative 3 would result in similar potentially significant, but mitigable impacts as the proposed Project, and similar mitigation would reduce the impacts to less than significant. Therefore, Alternative 3 would have equivalent traffic impacts compared to the proposed Project.

6.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 6-3 (Comparison of Alternative Project Impacts to the Proposed Project) presents a comparison of the impacts associated with the alternatives with those of the proposed Project for each of the environmental resource areas analyzed above.

**Table 6-3
Comparison of Alternative Project Impacts to the Proposed Project**

Topic	Alternative 1 No Project/ No Build (Status Quo)	Alternative 2 Mixed-Use Development	Alternative 3 Industrial Development
Land Use and Planning	+/-	+	+
Aesthetics	-	-NC	-NC
Agricultural Resources	-	NC	NC
Air Quality	-	-	+/-
Biological Resources	-	NC	NC
Cultural Resources	-	NC	NC
Geology and Soils	-	+	-
Greenhouse Gas Emissions	-	-	-
Hazards and Hazardous Materials	+/-	+	-
Hydrology and Water Quality	-	NC	+
Noise	-	+	+
Public Services, Utilities and Service Systems	-	+	-
Transportation/Traffic	-	NC	NC

Notes:
 + Greater impact than that of the proposed Project
 - Decreased impact from that of the proposed Project
 +/- Greater impact with regard to some aspects of impact and decreased impact in other aspects
 NC No substantial change in impact from that of the proposed Project

CEQA requires the identification of the environmentally superior alternative in an EIR, which is an alternative that would result in the fewest or least number of significant environmental impacts. If the "No



Appendix H

Additional Traffic Data



Traffic Data for Response 2-1

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

20: NAGLEE ROAD & PAVILION PKWY @ I-205

EXISTING FILIOS-DOBLER - AM



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations	↖↖	↗↗	↗	↖	↖↖↖		↖↖	↗↗	↗	↖	↗	↖
Volume (vph)	26	139	192	16	53	1	429	63	75	3	3	17
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	3.8	4.0	3.1	3.3	4.0		3.4	4.0	2.7	3.8	4.0	2.7
Lane Util. Factor	0.97	0.95	1.00	1.00	0.91		0.97	0.95	1.00	1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00		1.00	1.00	0.85	1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (prot)	3335	3438	1538	1719	4927		3335	3438	1538	1719	1810	1538
Flt Permitted	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (perm)	3335	3438	1538	1719	4927		3335	3438	1538	1719	1810	1538
Peak-hour factor, PHF	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Adj. Flow (vph)	27	146	202	17	56	1	452	66	79	3	3	18
RTOR Reduction (vph)	0	0	95	0	1	0	0	0	47	0	0	16
Lane Group Flow (vph)	27	146	107	17	56	0	452	66	32	3	3	2
Turn Type	Prot		pm+ov	Prot			Prot		pm+ov	Prot		pm+ov
Protected Phases	5	2	3	1	6		3	8	1	7	4	5
Permitted Phases			2						8			4
Actuated Green, G (s)	1.3	8.3	19.8	2.1	9.1		11.5	11.8	13.9	0.5	0.8	2.1
Effective Green, g (s)	1.5	9.2	21.6	2.8	10.0		12.1	13.1	16.5	0.7	2.1	4.7
Actuated g/C Ratio	0.04	0.22	0.53	0.07	0.24		0.30	0.32	0.40	0.02	0.05	0.11
Clearance Time (s)	4.0	4.9	4.0	4.0	4.9		4.0	5.3	4.0	4.0	5.3	4.0
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	3.0
Lane Grp Cap (vph)	122	773	812	118	1205		987	1101	620	29	93	177
v/s Ratio Prot	0.01	c0.04	0.04	c0.01	0.01		c0.14	c0.02	0.00	0.00	0.00	0.00
v/s Ratio Perm			0.03						0.02			0.00
v/c Ratio	0.22	0.19	0.13	0.14	0.05		0.46	0.06	0.05	0.10	0.03	0.01
Uniform Delay, d1	19.1	12.8	4.9	17.9	11.8		11.7	9.6	7.4	19.8	18.4	16.0
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	1.00
Incremental Delay, d2	0.9	0.1	0.1	0.6	0.0		0.3	0.0	0.0	1.6	0.1	0.0
Delay (s)	20.1	12.9	5.0	18.5	11.8		12.1	9.7	7.5	21.4	18.6	16.1
Level of Service	C	B	A	B	B		B	A	A	C	B	B
Approach Delay (s)		9.2			13.4			11.2			17.0	
Approach LOS		A			B			B			B	

Intersection Summary

HCM Average Control Delay	10.8	HCM Level of Service	B
HCM Volume to Capacity ratio	0.26		
Actuated Cycle Length (s)	40.9	Sum of lost time (s)	10.7
Intersection Capacity Utilization	36.1%	ICU Level of Service	A
Analysis Period (min)	15		

c Critical Lane Group

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225: NAGLEE ROAD & PAVILION PKWY *a I - 205*

EXISTING FILIOS-DOBLER - PM



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations	↖↖	↗↗	↗	↖	↖↖↖		↖↖	↗↗	↗	↖	↖	↖
Volume (vph)	33	416	73	27	452	10	480	13	144	22	11	57
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total/Lost time (s)	3.8	4.0	4.0	3.3	4.0		3.4	4.0	2.7	3.8	4.0	2.7
Lane Util. Factor	0.97	0.95	1.00	1.00	0.91		0.97	0.95	1.00	1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00		1.00	1.00	0.85	1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (prot)	3335	3438	1538	1719	4924		3335	3438	1538	1719	1810	1538
Flt Permitted	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (perm)	3335	3438	1538	1719	4924		3335	3438	1538	1719	1810	1538
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	36	452	79	29	491	11	522	14	157	24	12	62
RTOR Reduction (vph)	0	0	57	0	3	0	0	0	92	0	0	55
Lane Group Flow (vph)	36	452	22	29	499	0	522	14	65	24	12	7
Turn Type	Prot		Perm	Prot			Prot		pm+ov	Prot		pm+ov
Protected Phases	5	2		1	6		3	8	1	7	4	5
Permitted Phases			2						8			4
Actuated Green, G (s)	2.3	13.6	13.6	4.1	15.4		14.1	14.4	18.5	0.7	1.0	3.3
Effective Green, g (s)	2.5	14.5	14.5	4.8	16.3		14.7	15.7	21.1	0.9	2.3	5.9
Actuated g/C Ratio	0.05	0.28	0.28	0.09	0.32		0.29	0.31	0.41	0.02	0.05	0.12
Clearance Time (s)	4.0	4.9	4.9	4.0	4.9		4.0	5.3	4.0	4.0	5.3	4.0
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	3.0
Lane Grp Cap (vph)	163	977	437	162	1574		961	1058	636	30	82	178
v/s Ratio Prot	0.01	c0.13		c0.02	0.10		c0.16	0.00	c0.01	0.01	0.01	0.00
v/s Ratio Perm			0.01						0.03			0.00
v/c Ratio	0.22	0.46	0.05	0.18	0.32		0.54	0.01	0.10	0.80	0.15	0.04
Uniform Delay, d1	23.3	15.0	13.3	21.3	13.1		15.3	12.3	9.2	25.0	23.4	20.0
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	1.00
Incremental Delay, d2	0.7	0.3	0.0	0.5	0.1		0.6	0.0	0.1	84.3	0.8	0.1
Delay (s)	24.0	15.4	13.3	21.8	13.3		15.9	12.3	9.2	109.2	24.2	20.1
Level of Service	C	B	B	C	B		B	B	A	F	C	C
Approach Delay (s)		15.6			13.7			14.3			42.5	
Approach LOS		B			B			B			D	

Intersection Summary		
HCM Average Control Delay	16.0	HCM Level of Service B
HCM Volume to Capacity ratio	0.39	
Actuated Cycle Length (s)	51.0	Sum of lost time (s) 10.7
Intersection Capacity Utilization	45.2%	ICU Level of Service A
Analysis Period (min)	15	
c Critical Lane Group		

Ext. SAT

HCM Signalized Intersection Capacity Analysis

20 225: NAGLEE ROAD & PAVILION PKWY

8/9/2011



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations	↖↗	↑↑	↗	↖	↑↑↑		↖↗	↑↑	↗	↖	↑	↗
Volume (vph)	72	534	132	55	620	20	475	40	233	38	5	104
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	3.8	4.0	3.1	4.0	4.0		3.4	4.0	3.4	3.8	4.0	2.7
Lane Util. Factor	0.97	0.95	1.00	1.00	0.91		0.97	0.95	1.00	1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00		1.00	1.00	0.85	1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (prot)	3335	3438	1538	1719	4917		3335	3438	1538	1719	1810	1538
Flt Permitted	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (perm)	3335	3438	1538	1719	4917		3335	3438	1538	1719	1810	1538
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	73	545	135	56	633	20	485	41	238	39	5	106
RTOR Reduction (vph)	0	0	58	0	4	0	0	0	128	0	0	91
Lane Group Flow (vph)	73	545	77	56	649	0	485	41	110	39	5	15
Turn Type	Prot		pm+ov	Prot			Prot		pm+ov	Prot		pm+ov
Protected Phases	5	2	3	1	6		3	8	1	7	4	5
Permitted Phases			2						8			4
Actuated Green, G (s)	4.0	14.0	28.8	5.2	15.9		14.8	14.0	19.2	1.8	1.0	5.0
Effective Green, g (s)	4.2	14.9	30.6	5.9	16.8		15.4	15.3	21.8	2.0	2.3	7.6
Actuated g/C Ratio	0.08	0.28	0.57	0.11	0.31		0.29	0.28	0.40	0.04	0.04	0.14
Clearance Time (s)	4.0	4.9	4.0	4.7	4.9		4.0	5.3	4.7	4.0	5.3	4.0
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	3.0
Lane Grp Cap (vph)	260	950	873	188	1533		953	976	622	64	77	217
v/s Ratio Prot	0.02	0.16	0.03	0.03	0.13		0.15	0.01	0.02	0.02	0.00	0.01
v/s Ratio Perm			0.02						0.05			0.00
v/c Ratio	0.28	0.57	0.09	0.30	0.42		0.51	0.04	0.18	0.61	0.06	0.07
Uniform Delay, d1	23.4	16.8	5.3	22.1	14.7		16.1	14.0	10.3	25.6	24.8	20.1
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	1.00
Incremental Delay, d2	0.6	0.8	0.0	0.9	0.2		0.4	0.0	0.1	15.3	0.4	0.1
Delay (s)	24.0	17.6	5.3	23.0	14.9		16.5	14.0	10.4	40.9	25.1	20.2
Level of Service	C	B	A	C	B		B	B	B	D	C	C
Approach Delay (s)		16.0			15.5			14.5			25.8	
Approach LOS		B			B			B			C	

Intersection Summary		
HCM Average Control Delay	16.0	HCM Level of Service B
HCM Volume to Capacity ratio	0.44	
Actuated Cycle Length (s)	53.9	Sum of lost time (s) 11.4
Intersection Capacity Utilization	48.3%	ICU Level of Service A
Analysis Period (min)	15	
c Critical Lane Group		



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations	↘	↗↗	↗	↘	↗↗↗		↗↗	↗↗	↗	↘	↗	↗
Volume (vph)	30	241	221	18	80	1	592	73	86	3	3	19
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	4.0
Lane Util. Factor	1.00	0.95	1.00	1.00	0.91		0.97	0.95	1.00	1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00		1.00	1.00	0.85	1.00	1.00	0.85
Frt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (prot)	1719	3438	1538	1719	4931		3335	3438	1538	1719	1810	1538
Frt Permitted	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (perm)	1719	3438	1538	1719	4931		3335	3438	1538	1719	1810	1538
Peak-hour factor, PHF	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Adj. Flow (vph)	32	254	233	19	84	1	623	77	91	3	3	20
RTOR Reduction (vph)	0	0	174	0	1	0	0	0	68	0	0	19
Lane Group Flow (vph)	32	254	59	19	84	0	623	77	23	3	3	1
Turn Type	Prot		Perm	Prot			Prot		Perm	Prot		Perm
Protected Phases	5	2		1	6		3	8		7	4	
Permitted Phases			2						8			4
Actuated Green, G (s)	0.6	8.4	8.4	0.6	8.9		7.2	7.8	7.8	0.6	0.8	0.8
Effective Green, g (s)	0.8	9.3	9.3	1.3	9.8		7.8	9.1	9.1	0.8	2.1	2.1
Actuated g/C Ratio	0.02	0.25	0.25	0.04	0.27		0.21	0.25	0.25	0.02	0.06	0.06
Clearance Time (s)	4.2	4.9	4.9	4.7	4.9		4.6	5.3	5.3	4.2	5.3	5.3
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	3.0
Lane Grp Cap (vph)	38	876	392	61	1324		713	857	383	38	104	88
v/s Ratio Prot	c0.02	c0.07		0.01	0.02		c0.19	c0.02		0.00	0.00	
v/s Ratio Perm			0.04						0.01			0.00
v/c Ratio	0.84	0.29	0.15	0.31	0.06		0.87	0.09	0.06	0.08	0.03	0.01
Uniform Delay, d1	17.8	10.9	10.5	17.2	9.9		13.9	10.5	10.4	17.5	16.2	16.2
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	1.00
Incremental Delay, d2	85.4	0.2	0.2	2.9	0.0		11.5	0.0	0.1	0.9	0.1	0.1
Delay (s)	103.2	11.1	10.7	20.1	10.0		25.4	10.6	10.5	18.4	16.4	16.3
Level of Service	F	B	B	C	A		C	B	B	B	B	B
Approach Delay (s)		16.6			11.8			22.2			16.5	
Approach LOS		B			B			C			B	

Intersection Summary		
HCM Average Control Delay	19.4	HCM Level of Service B
HCM Volume to Capacity ratio	0.43	
Actuated Cycle Length (s)	36.5	Sum of lost time (s) 12.0
Intersection Capacity Utilization	43.6%	ICU Level of Service A
Analysis Period (min)	15	

c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations	↙	↕	↘	↙	↕	↘	↙	↕	↘	↙	↕	↘
Volume (vph)	38	512	84	31	545	11	676	15	166	25	13	66
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	4.0
Lane Util. Factor	1.00	0.95	1.00	1.00	0.91		0.97	0.95	1.00	1.00	1.00	1.00
Fit	1.00	1.00	0.85	1.00	1.00		1.00	1.00	0.85	1.00	1.00	0.85
Fit Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (prot)	1719	3438	1538	1719	4925		3335	3438	1538	1719	1810	1538
Fit Permitted	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (perm)	1719	3438	1538	1719	4925		3335	3438	1538	1719	1810	1538
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	41	557	91	34	592	12	735	16	180	27	14	72
RTOR Reduction (vph)	0	0	66	0	2	0	0	0	104	0	0	64
Lane Group Flow (vph)	41	557	25	34	602	0	735	16	76	27	14	8
Turn Type	Prot		Perm	Prot			Prot		Perm	Prot		Perm
Protected Phases	5	2		1	6		3	8		7	4	
Permitted Phases			2						8			4
Actuated Green, G (s)	3.4	18.1	18.1	1.6	16.8		22.5	27.2	27.2	1.9	6.2	6.2
Effective Green, g (s)	3.6	19.0	19.0	2.3	17.7		23.1	28.5	28.5	2.1	7.5	7.5
Actuated g/C Ratio	0.05	0.28	0.28	0.03	0.26		0.34	0.42	0.42	0.03	0.11	0.11
Clearance Time (s)	4.2	4.9	4.9	4.7	4.9		4.6	5.3	5.3	4.2	5.3	5.3
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	3.0
Lane Grp Cap (vph)	91	962	430	58	1284		1135	1443	646	53	200	170
v/s Ratio Prot	c0.02	c0.16		0.02	0.12		c0.22	0.00		0.02	0.01	
v/s Ratio Perm			0.02						c0.05			0.01
v/c Ratio	0.45	0.58	0.06	0.59	0.47		0.65	0.01	0.12	0.51	0.07	0.05
Uniform Delay, d1	31.2	21.0	17.9	32.3	21.1		19.0	11.5	12.0	32.4	27.1	27.0
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	1.00
Incremental Delay, d2	3.5	0.9	0.1	14.2	0.3		1.3	0.0	0.1	7.5	0.1	0.1
Delay (s)	34.7	21.9	18.0	46.5	21.4		20.2	11.5	12.1	39.9	27.2	27.1
Level of Service	C	C	B	D	C		C	B	B	D	C	C
Approach Delay (s)		22.1			22.8			18.5			30.2	
Approach LOS		C			C			B			C	

Intersection Summary

HCM Average Control Delay	21.3	HCM Level of Service	C
HCM Volume to Capacity ratio	0.48		
Actuated Cycle Length (s)	67.9	Sum of lost time (s)	8.0
Intersection Capacity Utilization	53.4%	ICU Level of Service	A
Analysis Period (min)	15		

c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations:	↖	↗	↘	↖	↗		↖	↗	↘	↖	↗	↘
Volume (vph)	83	649	152	63	753	22	745	47	268	44	6	120
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	4.0
Lane Util. Factor	1.00	0.95	1.00	1.00	0.91		0.97	0.95	1.00	1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00		1.00	1.00	0.85	1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (prot)	1719	3438	1538	1719	4919		3335	3438	1538	1719	1810	1538
Flt Permitted	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (perm)	1719	3438	1538	1719	4919		3335	3438	1538	1719	1810	1538
Peak-hour factor, PHF	0.98	0.98	0.98	0.89	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	85	662	155	71	768	22	760	48	273	45	6	122
RTOR Reduction (vph)	0	0	111	0	3	0	0	0	151	0	0	106
Lane Group Flow (vph)	85	662	44	71	787	0	760	48	122	45	6	16
Turn Type	Prot		Perm	Prot			Prot		Perm	Prot		Perm
Protected Phases	5	2		1	6		3	8		7	4	
Permitted Phases			2						8			4
Actuated Green, G (s)	6.4	21.1	21.1	3.8	19.0		24.7	30.0	30.0	3.9	8.8	8.8
Effective Green, g (s)	6.6	22.0	22.0	4.5	19.9		25.3	31.3	31.3	4.1	10.1	10.1
Actuated g/C Ratio	0.08	0.28	0.28	0.06	0.26		0.32	0.40	0.40	0.05	0.13	0.13
Clearance Time (s)	4.2	4.9	4.9	4.7	4.9		4.6	5.3	5.3	4.2	5.3	5.3
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	3.0
Lane Grp Cap (vph)	146	971	434	99	1257		1083	1381	618	90	235	199
v/s Ratio Prot	c0.05	c0.19		0.04	0.16		c0.23	0.01		0.03	0.00	
v/s Ratio Perm			0.03						c0.08			0.01
v/c Ratio	0.58	0.68	0.10	0.72	0.63		0.70	0.03	0.20	0.50	0.03	0.08
Uniform Delay, d1	34.3	24.8	20.6	36.1	25.7		23.0	14.1	15.1	35.9	29.6	29.8
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	1.00
Incremental Delay, d2	5.8	2.0	0.1	21.8	1.0		2.1	0.0	0.2	4.3	0.0	0.2
Delay (s)	40.1	26.8	20.7	57.9	26.7		25.1	14.1	15.3	40.2	29.6	30.0
Level of Service	D	C	C	E	C		C	B	B	D	C	C
Approach Delay (s)		27.0			29.3			22.1			32.6	
Approach LOS		C			C			C			C	

Intersection Summary

HCM Average Control Delay	26.2	HCM Level of Service	C
HCM Volume to Capacity ratio	0.55		
Actuated Cycle Length (s)	77.9	Sum of lost time (s)	8.0
Intersection Capacity Utilization	59.4%	ICU Level of Service	B
Analysis Period (min)	15		
c Critical Lane Group			

CUMULATIVE CONDITIONS 2030 FILIOS-DOBLER - AM
 225: NAGLEE ROAD & PAVILION PKWY I-205 WITH PROJECT



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations	↖↖	↗↗	↗	↖	↖↖↖		↖↖	↗↗	↗	↖	↗	↖
Volume (vph)	36	87	102	58	23	2	734	205	146	11	44	55
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.4	5.8	5.8	5.4	5.8		5.2	4.0	4.0	4.4	4.0	4.0
Lane Util. Factor	0.97	0.95	1.00	1.00	0.91		0.97	0.95	1.00	1.00	1.00	1.00
Flt	1.00	1.00	0.85	1.00	0.99		1.00	1.00	0.85	1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (prot)	3433	3539	1583	1770	5024		3433	3539	1583	1770	1863	1583
Flt Permitted	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (perm)	3433	3539	1583	1770	5024		3433	3539	1583	1770	1863	1583
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	36	87	102	58	23	2	734	205	146	11	44	55
RTOR Reduction (vph)	0	0	89	0	2	0	0	0	74	0	0	47
Lane Group Flow (vph)	36	87	13	58	23	0	734	205	72	11	44	8
Turn Type	Prot		Perm	Prot			Prot		Perm	Prot		Perm
Protected Phases	5	2		1	6		3	8		7	4	
Permitted Phases			2						8			4
Actuated Green, G (s)	1.9	8.7	8.7	3.7	11.0		22.1	28.8	28.8	0.9	7.2	7.2
Effective Green, g (s)	1.7	7.8	7.8	3.0	10.1		21.5	30.1	30.1	0.7	8.5	8.5
Actuated g/C Ratio	0.03	0.13	0.13	0.05	0.17		0.35	0.49	0.49	0.01	0.14	0.14
Clearance Time (s)	4.2	4.9	4.9	4.7	4.9		4.6	5.3	5.3	4.2	5.3	5.3
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	3.0
Lane Grp Cap (vph)	95	451	202	87	829		1206	1741	779	20	259	220
v/s Ratio Prot	0.01	c0.02		c0.03	0.00		c0.21	0.06		0.01	c0.02	
v/s Ratio Perm			0.01						0.05			0.00
v/c Ratio	0.38	0.19	0.06	0.67	0.03		0.61	0.12	0.09	0.55	0.17	0.03
Uniform Delay, d1	29.2	23.9	23.5	28.6	21.4		16.4	8.4	8.3	30.1	23.2	22.8
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	1.00
Incremental Delay, d2	2.5	0.2	0.1	17.6	0.0		0.9	0.0	0.1	28.9	0.3	0.1
Delay (s)	31.8	24.1	23.6	46.2	21.4		17.3	8.4	8.3	59.0	23.6	22.9
Level of Service	C	C	C	D	C		B	A	A	E	C	C
Approach Delay (s)		25.1			38.8			14.4			26.8	
Approach LOS		C			D			B			C	

Intersection Summary		
HCM Average Control Delay	18.2	HCM Level of Service B
HCM Volume to Capacity ratio	0.44	
Actuated Cycle Length (s)	61.2	Sum of lost time (s) 20.4
Intersection Capacity Utilization	45.7%	ICU Level of Service A
Analysis Period (min)	15	

c Critical Lane Group

20

CUMULATIVE CONDITIONS 2030 FILIOS-DOBLER - PM

225: NAGLEE ROAD & PAVILION PKWY & I-205

WITH PROJECT



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations	↘	↗	↘	↘	↗	↘	↘	↗	↘	↘	↗	↘
Volume (vph)	52	396	78	224	220	2	685	101	124	52	77	146
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.4	5.8	5.8	5.4	5.8		5.2	4.0	4.0	4.4	4.0	4.0
Lane Util. Factor	1.00	0.95	1.00	1.00	0.91		0.97	0.95	1.00	1.00	1.00	1.00
Flt	1.00	1.00	0.85	1.00	1.00		1.00	1.00	0.85	1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (prot)	1770	3539	1583	1770	5078		3433	3539	1583	1770	1863	1583
Flt Permitted	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (perm)	1770	3539	1583	1770	5078		3433	3539	1583	1770	1863	1583
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	52	396	78	224	220	2	685	101	124	52	77	146
RTOR Reduction (vph)	0	0	64	0	1	0	0	0	79	0	0	126
Lane Group Flow (vph)	52	396	14	224	221	0	685	101	45	52	77	20
Turn Type	Prot		Perm	Prot			Prot		Perm	Prot		Perm
Protected Phases	5	2		1	6		3	8		7	4	
Permitted Phases			2						8			4
Actuated Green, G (s)	5.0	16.3	16.3	15.5	27.3		23.5	29.5	29.5	5.0	10.6	10.6
Effective Green, g (s)	4.8	15.4	15.4	14.8	26.4		22.9	30.8	30.8	4.8	11.9	11.9
Actuated g/C Ratio	0.06	0.18	0.18	0.17	0.31		0.27	0.36	0.36	0.06	0.14	0.14
Clearance Time (s)	4.2	4.9	4.9	4.7	4.9		4.6	5.3	5.3	4.2	5.3	5.3
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	3.0
Lane Grp Cap (vph)	99	638	285	307	1570		921	1276	571	99	260	221
v/s Ratio Prot	0.03	c0.11		c0.13	0.04		c0.20	0.03		0.03	c0.04	
v/s Ratio Perm			0.01						0.03			0.01
v/c Ratio	0.53	0.62	0.05	0.73	0.14		0.74	0.08	0.08	0.53	0.30	0.09
Uniform Delay, d1	39.2	32.3	28.9	33.4	21.3		28.6	18.0	18.0	39.2	33.0	32.0
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	1.00
Incremental Delay, d2	5.0	1.9	0.1	8.4	0.0		3.3	0.0	0.1	5.0	0.6	0.2
Delay (s)	44.1	34.2	29.0	41.8	21.4		31.9	18.0	18.0	44.1	33.6	32.2
Level of Service	D	C	C	D	C		C	B	B	D	C	C
Approach Delay (s)		34.4			31.6			28.4			34.9	
Approach LOS		C			C			C			C	

Intersection Summary		
HCM Average Control Delay	31.4	HCM Level of Service C
HCM Volume to Capacity ratio	0.63	
Actuated Cycle Length (s)	85.4	Sum of lost time (s) 20.4
Intersection Capacity Utilization	62.2%	ICU Level of Service B
Analysis Period (min)	15	
c Critical Lane Group		

20

CUMULATIVE CONDITIONS 2030 FILIOS-DOBLER - SAT
 225 NAGLEE ROAD & PAVILION PKWY \times I-205 WITH PROJECT



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations	↘	↗↗	↗	↘	↗↗↗		↗↗	↗↗	↗	↘	↗	↗
Volume (vph)	58	325	69	216	195	2	601	89	110	58	68	116
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.4	5.8	5.8	5.4	5.8		5.2	4.0	4.0	4.4	4.0	4.0
Lane Util. Factor	1.00	0.95	1.00	1.00	0.91		0.97	0.95	1.00	1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00		1.00	1.00	0.85	1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (prot)	1770	3539	1583	1770	5078		3433	3539	1583	1770	1863	1583
Flt Permitted	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (perm)	1770	3539	1583	1770	5078		3433	3539	1583	1770	1863	1583
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	58	325	69	216	195	2	601	89	110	58	68	116
RTOR Reduction (vph)	0	0	57	0	1	0	0	0	73	0	0	98
Lane Group Flow (vph)	58	325	12	216	196	0	601	89	37	58	68	18
Turn Type	Prot		Perm	Prot			Prot		Perm	Prot		Perm
Protected Phases	5	2		1	6		3	8		7	4	
Permitted Phases			2						8			4
Actuated Green, G (s)	4.9	13.2	13.2	11.3	20.1		15.4	21.7	21.7	3.8	9.7	9.7
Effective Green, g (s)	4.7	12.3	12.3	10.6	19.2		14.8	23.0	23.0	3.6	11.0	11.0
Actuated g/C Ratio	0.07	0.18	0.18	0.15	0.28		0.21	0.33	0.33	0.05	0.16	0.16
Clearance Time (s)	4.2	4.9	4.9	4.7	4.9		4.6	5.3	5.3	4.2	5.3	5.3
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	3.0
Lane Grp Cap (vph)	120	630	282	272	1411		735	1178	527	92	297	252
v/s Ratio Prot	0.03	c0.09		c0.12	0.04		c0.18	0.03		0.03	c0.04	
v/s Ratio Perm			0.01						0.02			0.01
v/c Ratio	0.48	0.52	0.04	0.79	0.14		0.82	0.08	0.07	0.63	0.23	0.07
Uniform Delay, d1	31.0	25.7	23.5	28.2	18.7		25.9	15.8	15.7	32.1	25.3	24.7
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	1.00
Incremental Delay, d2	3.0	0.7	0.1	14.7	0.0		7.0	0.0	0.1	13.2	0.4	0.1
Delay (s)	34.1	26.4	23.6	42.9	18.8		32.9	15.8	15.8	45.3	25.7	24.8
Level of Service	C	C	C	D	B		C	B	B	D	C	C
Approach Delay (s)		27.0			31.4			28.7			30.0	
Approach LOS		C			C			C			C	

Intersection Summary		
HCM Average Control Delay	29.0	HCM Level of Service C
HCM Volume to Capacity ratio	0.60	
Actuated Cycle Length (s)	69.1	Sum of lost time (s) 20.4
Intersection Capacity Utilization	57.4%	ICU Level of Service B
Analysis Period (min)	15	
c Critical Lane Group		



Traffic Data for Response 2-3



RAMPS AND RAMP JUNCTIONS WORKSHEET									
General Information					Site Information				
Analyst		N-Schmidt			Freeway/Dir of Travel		Eastbound		
Agency or Company		RBF Consulting			Junction		I-205 & Grant Line Road		
Date Performed		8/11/2011			Jurisdiction		City of Tracy		
Analysis Time Period		PM Peak Hour			Analysis Year		Cumulative + Project		
Project Description Eastbound On Ramp (Diagonal) at Grant Line Road and I-205									
Inputs									
Upstream Adj Ramp		Terrain: Level					Downstream Adj Ramp		
<input type="checkbox"/> Yes <input type="checkbox"/> On <input checked="" type="checkbox"/> No <input type="checkbox"/> Off							<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> On <input type="checkbox"/> No <input type="checkbox"/> Off		
L _{up} = ft		S _{FF} = 65.0 mph S _{FR} = 55.0 mph Sketch (show lanes, L _A , L _D , V _R , V _F)					L _{down} = 700 ft		
V _u = veh/h							V _d = 1374 veh/h		
Conversion to pc/h Under Base Conditions									
(pc/h)	V (Veh/hr)	PHF	Terrain	%Truck	%Rv	f _{HV}	f _p	v = V/PHF x f _{HV} x f _p	
Freeway	7378	0.89	Level	10	1	0.951	1.00	8721	
Ramp	274	0.89	Level	10	1	0.951	1.00	324	
UpStream									
DownStream	1374	0.90	Level	0	0	1.000	1.00	1527	
Merge Areas					Diverge Areas				
Estimation of v ₁₂					Estimation of v ₁₂				
$V_{12} = V_F (P_{FM})$ L _{EQ} = (Equation 25-2 or 25-3) P _{FM} = 0.380 using Equation (Exhibit 25-5) V ₁₂ = 3314 pc/h					$V_{12} = V_R + (V_F - V_R) P_{FD}$ L _{EQ} = (Equation 25-8 or 25-9) P _{FD} = using Equation (Exhibit 25-11) V ₁₂ = pc/h				
Capacity Checks					Capacity Checks				
	Actual	Maximum	LOS F?		Actual	Maximum	LOS F?		
V _{FO}	9045	See Exhibit 25-7	No	V _{F1} = V _F					
V _{R12}	3638	4600:All	No	V _{FO} = V _F - V _R					
				V _R					
Level of Service Determination (if not F)					Level of Service Determination (if not F)				
$D_R = 5.475 + 0.00734 V_R + 0.0078 V_{12} - 0.00627 L_A$ D _R = 27.4 (pc/mi/ln) LOS = C (Exhibit 25-4)					$D_R = 4.252 + 0.0086 V_{12} - 0.0009 L_D$ D _R = (pc/mi/ln) LOS = (Exhibit 25-4)				
Speed Estimation					Speed Estimation				
M _s = 0.359 (Exhibit 25-19) S _R = 56.7 mph (Exhibit 25-19) S ₀ = 56.1 mph (Exhibit 25-19) S = 56.3 mph (Exhibit 25-14)					D _s = (Exhibit 25-19) S _R = mph (Exhibit 25-19) S ₀ = mph (Exhibit 25-19) S = mph (Exhibit 25-15)				

RAMPS AND RAMP JUNCTIONS WORKSHEET									
General Information					Site Information				
Analyst		N Schmidt			Freeway/Dir. of Travel		Eastbound		
Agency or Company		RBF Consulting			Junction		I-205 & Grant Line Road		
Date Performed		8/11/2011			Jurisdiction		City of Tracy		
Analysis Time Period		PM Peak Hour			Analysis Year		Cumulative + Project		
Project Description Eastbound On Ramp (Loop) at Grant Line Road and I-205									
Inputs									
Upstream Adj Ramp		Terrain: Level					Downstream Adj Ramp		
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> On							<input type="checkbox"/> Yes <input type="checkbox"/> On		
<input type="checkbox"/> No <input type="checkbox"/> Off							<input checked="" type="checkbox"/> No <input type="checkbox"/> Off		
L _{up} = 700 ft							L _{down} = ft		
V _u = 274 veh/h		S _{FF} = 65.0 mph		S _{FR} = 35.0 mph		V _d = veh/h			
Sketch (show lanes, L _A , L _D , V _R , V _I)									
Conversion to pc/h Under Base Conditions									
(pc/h)	V (Veh/hr)	PHF	Terrain	%Truck	%Rv	f _{HV}	f _p	v = V/PHF x f _{HV} x f _p	
Freeway	6004	0.89	Level	10	1	0.951	1.00	7097	
Ramp	1374	0.89	Level	10	1	0.951	1.00	1624	
UpStream	274	0.90	Level	0	0	1.000	1.00	304	
DownStream									
Merge Areas					Diverge Areas				
Estimation of v ₁₂					Estimation of v ₁₂				
$V_{12} = V_F (P_{FM})$					$V_{12} = V_R + (V_F - V_R) P_{FD}$				
L _{EQ} = (Equation 25-2 or 25-3)					L _{EQ} = (Equation 25-8 or 25-9)				
P _{FM} = 0.365 using Equation (Exhibit 25-5)					P _{FD} = using Equation (Exhibit 25-11)				
V ₁₂ = 2592 pc/h					V ₁₂ = pc/h				
Capacity Checks					Capacity Checks				
	Actual	Maximum	LOS F?		Actual	Maximum	LOS F?		
V _{FO}	8721	See Exhibit 25-7	No	V _{F1} = V _F					
				V ₁₂					
V _{R12}	4216	4600; All	No	V _{FO} = V _F					
				V _R					
				V _R					
Level of Service Determination (if not F)					Level of Service Determination (if not F)				
$D_R = 5.475 + 0.00734 v_R + 0.0078 V_{12} - 0.00627 L_A$					$D_R = 4.252 + 0.0086 V_{12} - 0.0009 L_D$				
D _R = 30.7 (pc/mi/ln)					D _R = (pc/mi/ln)				
LOS = D (Exhibit 25-4)					LOS = (Exhibit 25-4)				
Speed Estimation					Speed Estimation				
M _S = 0.508 (Exhibit 25-19)					D _s = (Exhibit 25-19)				
S _R = 53.3 mph (Exhibit 25-19)					S _R = mph (Exhibit 25-19)				
S _O = 58.7 mph (Exhibit 25-19)					S _O = mph (Exhibit 25-19)				
S = 56.0 mph (Exhibit 25-14)					S = mph (Exhibit 25-15)				

RAMPS AND RAMP JUNCTIONS WORKSHEET								
General Information				Site Information				
Analyst		N Schmidt		Freeway/Dir of Travel		Eastbound		
Agency or Company		RBF Consulting		Junction		I-205 & Grant Line Road		
Date Performed		8/11/2011		Jurisdiction		City of Tracy		
Analysis Time Period		PM Peak Hour		Analysis Year		Existing + Project		
Project Description Eastbound On Ramp at Grant Line Road and I-205								
Inputs								
Upstream Adj Ramp		Terrain: Level				Downstream Adj Ramp		
<input type="checkbox"/> Yes <input type="checkbox"/> On						<input type="checkbox"/> Yes <input type="checkbox"/> On		
<input checked="" type="checkbox"/> No <input type="checkbox"/> Off						<input checked="" type="checkbox"/> No <input type="checkbox"/> Off		
L _{up} = ft						L _{down} = ft		
V _u = veh/h		S _{FF} = 65.0 mph		S _{FR} = 55.0 mph		V _d = veh/h		
Sketch (show lanes, L _A , L _D , V _R , V _f)								
Conversion to pc/h Under Base Conditions								
(pc/h)	V (Veh/hr)	PHF	Terrain	%Truck	%Rv	f _{HV}	f _p	v = V/PHF x f _{HV} x f _p
Freeway	2965	0.89	Level	10	1	0.951	1.00	3505
Ramp	1076	0.89	Level	10	1	0.951	1.00	1272
UpStream								
DownStream								
Merge Areas				Diverge Areas				
Estimation of v ₁₂				Estimation of v ₁₂				
$V_{12} = V_F (P_{FM})$				$V_{12} = V_R + (V_F - V_R) P_{FD}$				
L _{EQ} = (Equation 25-2 or 25-3)				L _{EQ} = (Equation 25-8 or 25-9)				
P _{FM} = 0.591 using Equation (Exhibit 25-5)				P _{FD} = using Equation (Exhibit 25-11)				
V ₁₂ = 2073 pc/h				V ₁₂ = pc/h				
Capacity Checks				Capacity Checks				
	Actual	Maximum	LOS F?		Actual	Maximum	LOS F?	
V _{FO}	4777	See Exhibit 25-7	No	V _{F1} = V _F				
				V ₁₂				
V _{R12}	3345	4600:All	No	V _{FO} = V _F				
				V _R				
				V _R				
Level of Service Determination (if not F)				Level of Service Determination (if not F)				
$D_R = 5.475 + 0.00734 v_R + 0.0078 V_{12} - 0.00627 L_A$				$D_R = 4.252 + 0.0086 V_{12} - 0.0009 L_D$				
D _R = 27.8 (pc/mi/ln)				D _R = (pc/mi/ln)				
LOS = C (Exhibit 25-4)				LOS = (Exhibit 25-4)				
Speed Estimation				Speed Estimation				
M _S = 0.377 (Exhibit 25-19)				D _s = (Exhibit 25-19)				
S _R = 56.3 mph (Exhibit 25-19)				S _R = mph (Exhibit 25-19)				
S _D = 61.6 mph (Exhibit 25-19)				S _D = mph (Exhibit 25-19)				
S = 57.8 mph (Exhibit 25-14)				S = mph (Exhibit 25-15)				

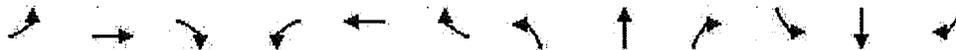
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

Traffic Data for Response 2-4



5: GRANT LINE RD & NAGLEE ROAD

WITH PROJECT



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations	↖↖	↗↗	↖		↗↗↗	↖				↖	↗	↖
Volume (vph)	363	1663	87	0	1171	483	0	0	0	794	40	760
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0		4.0	4.0				4.0	4.0	4.0
Lane Util. Factor	0.97	0.95	1.00		0.91	1.00				0.95	0.95	1.00
Frt	1.00	1.00	0.85		1.00	0.85				1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00		1.00	1.00				0.95	0.96	1.00
Satd. Flow (prot)	3335	3438	1538		4940	1538				1633	1645	1538
Flt Permitted	0.95	1.00	1.00		1.00	1.00				0.95	0.96	1.00
Satd. Flow (perm)	3335	3438	1538		4940	1538				1633	1645	1538
Peak-hour factor, PHF	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97
Adj. Flow (vph)	374	1714	90	0	1207	498	0	0	0	819	41	784
RTOR Reduction (vph)	0	0	20	0	0	0	0	0	0	0	0	231
Lane Group Flow (vph)	374	1714	70	0	1207	498	0	0	0	426	434	553
Turn Type	Prot		Perm			Free				Perm		Perm
Protected Phases	5	2			6						4	
Permitted Phases			2			Free				4		4
Actuated Green, G (s)	13.4	46.7	46.7		29.1	90.0				33.4	33.4	33.4
Effective Green, g (s)	13.6	48.0	48.0		30.4	90.0				34.0	34.0	34.0
Actuated g/C Ratio	0.15	0.53	0.53		0.34	1.00				0.38	0.38	0.38
Clearance Time (s)	4.2	5.3	5.3		5.3					4.6	4.6	4.6
Vehicle Extension (s)	3.0	3.0	3.0		3.0					3.0	3.0	3.0
Lane Grp Cap (vph)	504	1834	820		1669	1538				617	621	581
v/s Ratio Prot	0.11	c0.50			0.24							
v/s Ratio Perm			0.05			0.32				0.26	0.26	c0.36
v/c Ratio	0.74	0.93	0.09		0.72	0.32				0.69	0.70	0.95
Uniform Delay, d1	36.5	19.5	10.3		26.1	0.0				23.6	23.7	27.2
Progression Factor	1.00	1.00	1.00		1.00	1.00				1.00	1.00	1.00
Incremental Delay, d2	5.8	10.4	0.2		2.8	0.6				3.3	3.4	25.6
Delay (s)	42.4	29.9	10.5		28.9	0.6				26.9	27.1	52.8
Level of Service	D	C	B		C	A				C	C	D
Approach Delay (s)		31.2			20.6			0.0			39.3	
Approach LOS		C			C			A			D	

Intersection Summary		
HCM Average Control Delay	30.4	HCM Level of Service C
HCM Volume to Capacity ratio	0.94	
Actuated Cycle Length (s)	90.0	Sum of lost time (s) 8.0
Intersection Capacity Utilization	76.4%	ICU Level of Service D
Analysis Period (min)	15	
c Critical Lane Group		

NEAR TERM FILIOS-DOBLER - SAT

6: GRANT LINE RD & I-205 EAST

WITH PROJECT - WITH MITIGATION



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR	
Lane Configurations	↖↖	↗↗			↖↖↖		↖		↖				
Volume (vph)	815	1642	0	0	1385	0	270	0	477	0	0	0	
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	
Total Lost time (s)	4.0	4.0			4.0		4.0		4.0				
Lane Util. Factor	0.97	0.95			0.91		1.00		1.00				
Fr _t	1.00	1.00			1.00		1.00		0.85				
Fl _t Protected	0.95	1.00			1.00		0.95		1.00				
Satd. Flow (prot)	3335	3438			4940		1719		1538				
Fl _t Permitted	0.95	1.00			1.00		0.95		1.00				
Satd. Flow (perm)	3335	3438			4940		1719		1538				
Peak-hour factor, PHF	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	
Adj. Flow (vph)	858	1728	0	0	1458	0	284	0	502	0	0	0	
RTOR Reduction (vph)	0	0	0	0	0	0	0	0	11	0	0	0	
Lane Group Flow (vph)	858	1728	0	0	1458	0	284	0	491	0	0	0	
Turn Type	Prot						custom		custom				
Protected Phases	5	2					6						
Permitted Phases							8		8				
Actuated Green, G (s)	23.9	55.6					27.5		33.3				
Effective Green, g (s)	24.1	56.9					28.8		33.5				
Actuated g/C Ratio	0.24	0.58					0.29		0.34				
Clearance Time (s)	4.2	5.3					5.3		4.2				
Vehicle Extension (s)	3.0	3.0					3.0		3.0				
Lane Grp Cap (vph)	817	1988					1446		585				
v/s Ratio Prot	c0.26	0.50					c0.30						
v/s Ratio Perm							0.17		c0.32				
v/c Ratio	1.05	0.87					1.01		0.49				
Uniform Delay, d1	37.2	17.6					34.8		25.6				
Progression Factor	1.00	1.00					1.00		1.00				
Incremental Delay, d2	45.5	4.3					25.7		0.6				
Delay (s)	82.6	21.9					60.5		26.3				
Level of Service	F	C					E		C				
Approach Delay (s)							60.5		45.1				0.0
Approach LOS							E		D				A

Intersection Summary			
HCM Average Control Delay	48.1	HCM Level of Service	D
HCM Volume to Capacity ratio	0.99		
Actuated Cycle Length (s)	98.4	Sum of lost time (s)	12.0
Intersection Capacity Utilization	81.6%	ICU Level of Service	D
Analysis Period (min)	15		
c Critical Lane Group			

CUMULATIVE CONDITIONS 2030 FILIOS-DOBLER - SAT

5: GRANT LINE RD & NAGLEE ROAD

WITH PROJECT



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations	↖↗	↖↖↗	↗		↖↖↗	↗				↖	↖	↗
Volume (vph)	439	2243	848	0	1835	549	0	0	0	772	122	747
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.4	4.0	4.0		4.0	4.0				5.2	5.2	5.2
Lane Util. Factor	0.97	0.91	1.00		0.91	1.00				0.95	0.95	1.00
Frt	1.00	1.00	0.85		1.00	0.85				1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00		1.00	1.00				0.95	0.96	1.00
Satd. Flow (prot)	3433	5085	1583		5085	1583				1681	1708	1583
Flt Permitted	0.95	1.00	1.00		1.00	1.00				0.95	0.96	1.00
Satd. Flow (perm)	3433	5085	1583		5085	1583				1681	1708	1583
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	439	2243	848	0	1835	549	0	0	0	772	122	747
RTOR Reduction (vph)	0	0	206	0	0	0	0	0	0	0	0	196
Lane Group Flow (vph)	439	2243	642	0	1835	549	0	0	0	448	446	551
Turn Type	Prot		Perm			Free				Perm		Perm
Protected Phases	5	2			6						4	
Permitted Phases			2			Free				4		4
Actuated Green, G (s)	12.2	49.6	49.6		33.2	90.0				30.5	30.5	30.5
Effective Green, g (s)	12.0	50.9	50.9		34.5	90.0				29.9	29.9	29.9
Actuated g/C Ratio	0.13	0.57	0.57		0.38	1.00				0.33	0.33	0.33
Clearance Time (s)	4.2	5.3	5.3		5.3					4.6	4.6	4.6
Vehicle Extension (s)	3.0	3.0	3.0		3.0					3.0	3.0	3.0
Lane Grp Cap (vph)	458	2876	895		1949	1583				558	567	526
v/s Ratio Prot	c0.13	0.44			c0.36							
v/s Ratio Perm			0.41			0.35				0.27	0.26	c0.35
v/c Ratio	0.96	0.78	0.72		0.94	0.35				0.80	0.79	1.05
Uniform Delay, d1	38.8	15.2	14.3		26.8	0.0				27.4	27.2	30.1
Progression Factor	1.00	1.00	1.00		1.00	1.00				1.00	1.00	1.00
Incremental Delay, d2	31.2	2.2	4.9		10.6	0.6				8.2	7.1	52.1
Delay (s)	70.0	17.4	19.2		37.4	0.6				35.5	34.3	82.1
Level of Service	E	B	B		D	A				D	C	F
Approach Delay (s)		24.3			28.9			0.0			56.4	
Approach LOS		C			C			A			E	

Intersection Summary		
HCM Average Control Delay	32.7	HCM Level of Service C
HCM Volume to Capacity ratio	0.99	
Actuated Cycle Length (s)	90.0	Sum of lost time (s) 13.6
Intersection Capacity Utilization	89.4%	ICU Level of Service E
Analysis Period (min)	15	
c Critical Lane Group		

CUMULATIVE CONDITIONS 2030 FILIOS-DOBLER - SAT

6: GRANT LINE RD & I-205 EAST

WITH PROJECT-WITH MITIGATION



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↑↑	↗		↑↑↑		↖		↖			
Volume (vph)	0	1481	1211	0	1448	0	326	0	233	0	0	0
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)		4.0	4.0		4.0		4.4		4.4			
Lane Util. Factor		0.95	1.00		0.91		1.00		1.00			
Flt Protected		1.00	1.00		1.00		0.95		1.00			
Satd. Flow (prot)		3539	1583		5085		1770		1583			
Flt Permitted		1.00	1.00		1.00		0.95		1.00			
Satd. Flow (perm)		3539	1583		5085		1770		1583			
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	0	1481	1211	0	1448	0	326	0	233	0	0	0
RTOR Reduction (vph)	0	0	0	0	0	0	0	0	17	0	0	0
Lane Group Flow (vph)	0	1481	1211	0	1448	0	326	0	216	0	0	0
Turn Type			Free				custom		custom			
Protected Phases		2			6							
Permitted Phases			Free				8		8			
Actuated Green, G (s)		58.1	90.0		58.1		22.4		22.4			
Effective Green, g (s)		59.4	90.0		59.4		22.2		22.2			
Actuated g/C Ratio		0.66	1.00		0.66		0.25		0.25			
Clearance Time (s)		5.3			5.3		4.2		4.2			
Vehicle Extension (s)		3.0			3.0		3.0		3.0			
Lane Grp Cap (vph)		2336	1583		3356		437		390			
v/s Ratio Prot		0.42			0.28							
v/s Ratio Perm			0.76				0.18		0.14			
v/c Ratio		0.63	0.77		0.43		0.75		0.55			
Uniform Delay, d1		8.9	0.0		7.3		31.3		29.6			
Progression Factor		0.87	1.00		1.00		1.00		1.00			
Incremental Delay, d2		0.8	2.2		0.4		6.8		1.7			
Delay (s)		8.6	2.2		7.7		38.1		31.3			
Level of Service		A	A		A		D		C			
Approach Delay (s)		5.7			7.7			35.3			0.0	
Approach LOS		A			A			D			A	

Intersection Summary

HCM Average Control Delay	9.8	HCM Level of Service	A
HCM Volume to Capacity ratio	0.77		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	0.0
Intersection Capacity Utilization	65.7%	ICU Level of Service	C
Analysis Period (min)	15		
c Critical Lane Group			

CUMULATIVE CONDITIONS 2030 FILIOS-DOBLER - SAT

14: I-205 WB ON /OFF RAMP & LAMMERS EXTN

WITH PROJECT



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations				↖↖	↖	↗		↕↕	↗↗		↕↕↕	↗
Volume (vph)	0	0	0	740	0	291	0	1388	700	0	1533	136
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)				4.0	4.0	4.0		4.0	4.0		4.0	4.0
Lane Util. Factor				0.91	0.91	1.00		0.95	0.88		0.91	1.00
Frt				1.00	1.00	0.85		1.00	0.85		1.00	0.85
Flt Protected				0.95	0.95	1.00		1.00	1.00		1.00	1.00
Satd. Flow (prot)				3221	1610	1583		3539	2787		5085	1583
Flt Permitted				0.95	0.95	1.00		1.00	1.00		1.00	1.00
Satd. Flow (perm)				3221	1610	1583		3539	2787		5085	1583
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Growth Factor (vph)	110%	110%	110%	110%	110%	110%	110%	110%	110%	110%	110%	110%
Adj. Flow (vph)	0	0	0	814	0	320	0	1527	770	0	1686	150
RTOR Reduction (vph)	0	0	0	0	0	0	0	0	0	0	0	62
Lane Group Flow (vph)	0	0	0	545	269	320	0	1527	770	0	1686	88
Turn Type				Split		Free			pm+ov			Perm
Protected Phases				8	8			2	8		6	
Permitted Phases						Free			2			6
Actuated Green, G (s)				16.8	16.8	60.0		35.2	52.0		35.2	35.2
Effective Green, g (s)				16.8	16.8	60.0		35.2	52.0		35.2	35.2
Actuated g/C Ratio				0.28	0.28	1.00		0.59	0.87		0.59	0.59
Clearance Time (s)				4.0	4.0			4.0	4.0		4.0	4.0
Vehicle Extension (s)				3.0	3.0			3.0	3.0		3.0	3.0
Lane Grp Cap (vph)				902	451	1583		2076	2787		2983	929
v/s Ratio Prot				c0.17	0.17			c0.43	0.08		0.33	
v/s Ratio Perm						0.20			0.20			0.06
v/c Ratio				0.60	0.60	0.20		0.74	0.28		0.57	0.09
Uniform Delay, d1				18.7	18.7	0.0		9.0	0.7		7.7	5.4
Progression Factor				1.00	1.00	1.00		1.00	1.00		1.00	1.00
Incremental Delay, d2				1.2	2.1	0.3		2.4	0.1		0.8	0.2
Delay (s)				19.9	20.8	0.3		11.4	0.8		8.4	5.6
Level of Service				B	C	A		B	A		A	A
Approach Delay (s)		0.0			14.6			7.8			8.2	
Approach LOS		A			B			A			A	

Intersection Summary

HCM Average Control Delay	9.4	HCM Level of Service	A
HCM Volume to Capacity ratio	0.69		
Actuated Cycle Length (s)	60.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	64.4%	ICU Level of Service	C
Analysis Period (min)	15		

c Critical Lane Group

CUMULATIVE CONDITIONS 2030 FILIOS-DOBLER - SAT

15: I-205 EB OFF /ON-RAMP & LAMMERS EXTN

WITH PROJECT

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↔	↗					↑↑↑	↗↗		↑↑↑	↗
Volume (vph)	310	0	940	0	0	0	0	1778	450	0	1895	384
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)		4.0	4.0					4.0	4.0		4.0	4.0
Lane Util. Factor		1.00	1.00					0.91	0.88		0.91	1.00
Frt		1.00	0.85					1.00	0.85		1.00	0.85
Flt Protected		0.95	1.00					1.00	1.00		1.00	1.00
Satd. Flow (prot)		1770	1583					5085	2787		5085	1583
Flt Permitted		0.95	1.00					1.00	1.00		1.00	1.00
Satd. Flow (perm)		1770	1583					5085	2787		5085	1583
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Growth Factor (vph)	110%	110%	110%	110%	110%	110%	110%	110%	110%	110%	110%	110%
Adj. Flow (vph)	341	0	1034	0	0	0	0	1956	495	0	2084	422
RTOR Reduction (vph)	0	0	0	0	0	0	0	0	171	0	0	146
Lane Group Flow (vph)	0	341	1034	0	0	0	0	1956	324	0	2084	276
Turn Type	Prot		Free						Perm			Perm
Protected Phases	7	4						2			6	
Permitted Phases			Free						2			6
Actuated Green, G (s)		13.0	60.7					39.7	39.7		39.7	39.7
Effective Green, g (s)		13.0	60.7					39.7	39.7		39.7	39.7
Actuated g/C Ratio		0.21	1.00					0.65	0.65		0.65	0.65
Clearance Time (s)		4.0						4.0	4.0		4.0	4.0
Vehicle Extension (s)		3.0						3.0	3.0		3.0	3.0
Lane Grp. Cap (vph)		379	1583					3326	1823		3326	1035
v/s Ratio Prot		c0.19						0.38			0.41	
v/s Ratio Perm			c0.65						0.12			0.17
v/c Ratio		0.90	0.65					0.59	0.18		0.63	0.27
Uniform Delay, d1		23.2	0.0					5.9	4.1		6.2	4.4
Progression Factor		1.00	1.00					1.00	1.00		1.00	1.00
Incremental Delay, d2		23.2	2.1					0.8	0.2		0.9	0.6
Delay (s)		46.4	2.1					6.7	4.3		7.1	5.0
Level of Service		D	A					A	A		A	A
Approach Delay (s)		13.1			0.0			6.2			6.7	
Approach LOS		B			A			A			A	

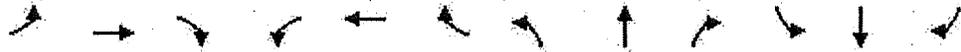
Intersection Summary

HCM Average Control Delay	7.9	HCM Level of Service	A
HCM Volume to Capacity ratio	0.71		
Actuated Cycle Length (s)	60.7	Sum of lost time (s)	4.0
Intersection Capacity Utilization	65.8%	ICU Level of Service	C
Analysis Period (min)	15		
c Critical Lane Group			

CUMULATIVE CONDITIONS 2030 FILIOS-DOBLER - SAT

225: NAGLEE ROAD & PAVILION PKWY

WITH PROJECT



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations	↘	↗↗	↗	↘	↗↗↗		↗↗	↗↗	↗	↘	↗	↗
Volume (vph)	58	325	69	216	195	2	601	89	110	58	68	116
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.4	5.8	5.8	5.4	5.8		5.2	4.0	4.0	4.4	4.0	4.0
Lane Util. Factor	1.00	0.95	1.00	1.00	0.91		0.97	0.95	1.00	1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00		1.00	1.00	0.85	1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (prot)	1770	3539	1583	1770	5078		3433	3539	1583	1770	1863	1583
Flt Permitted	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (perm)	1770	3539	1583	1770	5078		3433	3539	1583	1770	1863	1583
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	58	325	69	216	195	2	601	89	110	58	68	116
RTOR Reduction (vph)	0	0	57	0	1	0	0	0	73	0	0	98
Lane Group Flow (vph)	58	325	12	216	196	0	601	89	37	58	68	18
Turn Type	Prot		Perm	Prot			Prot		Perm	Prot		Perm
Protected Phases	5	2		1	6		3	8		7	4	
Permitted Phases			2						8			4
Actuated Green, G (s)	4.9	13.2	13.2	11.3	20.1		15.4	21.7	21.7	3.8	9.7	9.7
Effective Green, g (s)	4.7	12.3	12.3	10.6	19.2		14.8	23.0	23.0	3.6	11.0	11.0
Actuated g/C Ratio	0.07	0.18	0.18	0.15	0.28		0.21	0.33	0.33	0.05	0.16	0.16
Clearance Time (s)	4.2	4.9	4.9	4.7	4.9		4.6	5.3	5.3	4.2	5.3	5.3
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	3.0
Lane Grp Cap (vph)	120	630	282	272	1411		735	1178	527	92	297	252
v/s Ratio Prot	0.03	c0.09		c0.12	0.04		c0.18	0.03		0.03	c0.04	
v/s Ratio Perm			0.01						0.02			0.01
v/c Ratio	0.48	0.52	0.04	0.79	0.14		0.82	0.08	0.07	0.63	0.23	0.07
Uniform Delay, d1	31.0	25.7	23.5	28.2	18.7		25.9	15.8	15.7	32.1	25.3	24.7
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	1.00
Incremental Delay, d2	3.0	0.7	0.1	14.7	0.0		7.0	0.0	0.1	13.2	0.4	0.1
Delay (s)	34.1	26.4	23.6	42.9	18.8		32.9	15.8	15.8	45.3	25.7	24.8
Level of Service	C	C	C	D	B		C	B	B	D	C	C
Approach Delay (s)		27.0			31.4			28.7			30.0	
Approach LOS		C			C			C			C	

Intersection Summary		
HCM Average Control Delay	29.0	HCM Level of Service
HCM Volume to Capacity ratio	0.60	C
Actuated Cycle Length (s)	69.1	Sum of lost time (s)
Intersection Capacity Utilization	57.4%	20.4
Analysis Period (min)	15	ICU Level of Service
		B

c Critical Lane Group

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

Traffic Data for Response 4-2

Arterial Level of Service

7/1/2011

Arterial Level of Service: NB CORRAL HOLLOW RD

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
ELEVENTH ST.	IV	25	57.2	30.0	87.2	0.37	15.4	C
BYRON	IV	30	28.8	12.8	41.6	0.21	17.8	C
GRANT LINE RD	IV	25	150.5	13.7	164.2	1.04	22.9	B
Total	IV		236.5	56.5	293.0	1.62	20.0	B

Arterial Level of Service: SB CORRAL HOLLOW RD

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
GRANT LINE RD	IV	25	231.1	13.0	244.1	1.60	23.7	B
BYRON	IV	25	150.5	34.8	185.3	1.04	20.3	B
ELEVENTH ST.	IV	25	34.0	27.6	61.6	0.21	12.0	D
Total	IV		415.6	75.4	491.0	2.86	20.9	B

Arterial Level of Service: EB ELEVENTH ST.

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
LAMMERS RD	II	45	144.2	20.9	165.1	1.80	39.3	A
CORRAL HOLLOW RD	II	45	125.4	32.7	158.1	1.57	35.7	A
Total	II		269.6	53.6	323.2	3.37	37.6	A

Arterial Level of Service: WB ELEVENTH ST.

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
CORRAL HOLLOW RD	II	45	245.6	35.1	280.7	3.07	39.4	A
LAMMERS RD	II	45	125.4	15.0	140.4	1.57	40.2	A
Total	II		371.0	50.1	421.1	4.64	39.6	A

Arterial Level of Service

7/1/2011

Arterial Level of Service: NB CORRAL HOLLOW RD

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
ELEVENTH ST.	IV	25	57.2	30.2	87.4	0.37	15.4	C
BYRON	IV	25	34.0	8.5	42.5	0.21	17.5	C
GRANT LINE RD	IV	25	150.5	26.2	176.7	1.04	21.3	B
Total	IV		241.7	64.9	306.6	1.62	19.1	B

Arterial Level of Service: SB CORRAL HOLLOW RD

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
GRANT LINE RD	IV	25	231.1	22.8	253.7	1.60	22.8	B
BYRON	IV	25	150.5	29.4	179.9	1.04	20.9	B
ELEVENTH ST.	IV	25	34.0	30.8	64.6	0.21	11.5	D
Total	IV		415.6	82.6	498.2	2.86	20.6	B

Arterial Level of Service: EB ELEVENTH ST.

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
LAMMERS RD	II	45	144.2	17.8	162.0	1.80	40.1	A
CORRAL HOLLOW RD	II	45	125.4	32.5	157.9	1.57	35.7	A
Total	II		269.6	50.3	319.9	3.37	37.9	A

Arterial Level of Service: WB ELEVENTH ST.

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
CORRAL HOLLOW RD	II	45	245.6	29.9	275.5	3.07	40.1	A
LAMMERS RD	II	45	125.4	14.1	139.5	1.57	40.5	A
Total	II		371.0	44.0	415.0	4.64	40.2	A

Arterial Level of Service

7/1/2011

Arterial Level of Service: NB CORRAL HOLLOW RD

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
ELEVENTH ST.	IV	25	57.2	7.0	64.2	0.37	21.0	B
BYRON	IV	25	34.0	0.0	34.0	0.21	21.8	B
GRANT LINE RD	IV	25	150.5	11.0	161.5	1.04	23.3	B
Total	IV		241.7	18.0	259.7	1.62	22.5	B

Arterial Level of Service: SB CORRAL HOLLOW RD

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
GRANT LINE RD	IV	25	231.1	0.0	231.1	1.60	25.0	A
BYRON	IV	25	150.5	3.7	154.2	1.04	24.4	B
ELEVENTH ST.	IV	25	34.0	7.0	41.0	0.21	18.1	C
Total	IV		415.6	10.7	426.3	2.86	24.1	B

Arterial Level of Service: EB ELEVENTH ST.

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
LAMMERS RD	II	45	144.2	11.0	155.2	1.80	41.8	A
CORRAL HOLLOW RD	II	45	125.4	14.0	139.4	1.57	40.5	A
Total	II		269.6	25.0	294.6	3.37	41.2	A

Arterial Level of Service: WB ELEVENTH ST.

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
CORRAL HOLLOW RD	II	45	245.6	14.0	259.6	3.07	42.6	A
LAMMERS RD	II	45	125.4	11.0	136.4	1.57	41.4	A
Total	II		371.0	25.0	396.0	4.64	42.2	A

Arterial Level of Service

7/1/2011

Arterial Level of Service: NB CORRAL HOLLOW RD

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
ELEVENTH ST.	IV	25	57.2	25.3	82.5	0.37	16.3	C
BYRON	IV	25	34.0	14.6	48.6	0.21	15.3	C
GRANT LINE RD	IV	25	150.5	16.6	167.1	1.04	22.5	B
Total	IV		241.7	56.5	298.2	1.62	19.6	B

Arterial Level of Service: SB CORRAL HOLLOW RD

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
GRANT LINE RD	IV	25	231.1	15.7	246.8	1.60	23.4	B
BYRON	IV	25	150.5	31.4	181.9	1.04	20.7	B
ELEVENTH ST.	IV	25	34.0	27.0	61.0	0.21	12.2	D
Total	IV		415.6	74.1	489.7	2.86	21.0	B

Arterial Level of Service: EB ELEVENTH ST.

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
LAMMERS RD	II	45	45.2	26.7	71.9	0.51	25.7	C
CORRAL HOLLOW RD	II	45	125.4	24.6	150.0	1.57	37.6	A
Total	II		170.6	51.3	221.9	2.08	33.8	B

Arterial Level of Service: WB ELEVENTH ST.

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
CORRAL HOLLOW RD	II	45	245.6	27.3	272.9	3.07	40.5	A
LAMMERS RD	II	45	125.4	23.2	148.6	1.57	38.0	A
Total	II		371.0	50.5	421.5	4.64	39.6	A

Arterial Level of Service: NB CORRAL HOLLOW RD

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
ELEVENTH ST.	IV	25	57.2	28.4	85.6	0.37	15.7	C
BYRON	IV	25	34.0	16.1	50.1	0.21	14.8	C
GRANT LINE RD	IV	25	150.5	32.0	182.5	1.04	20.6	B
Total	IV		241.7	76.5	318.2	1.62	18.4	C

Arterial Level of Service: SB CORRAL HOLLOW RD

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
GRANT LINE RD	IV	25	231.1	36.7	287.8	1.60	21.6	B
BYRON	IV	25	150.5	48.6	199.1	1.04	18.9	C
ELEVENTH ST.	IV	25	34.0	31.9	65.9	0.21	11.3	D
Total	IV		415.6	117.2	532.8	2.86	19.3	B

Arterial Level of Service: EB ELEVENTH ST.

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
LAMMERS RD	II	45	45.2	30.5	75.7	0.51	24.4	C
CORRAL HOLLOW RD	II	45	125.4	33.1	158.5	1.57	35.6	A
Total	II		170.6	63.6	234.2	2.08	32.0	B

Arterial Level of Service: WB ELEVENTH ST.

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
CORRAL HOLLOW RD	II	45	245.6	28.4	274.0	3.07	40.3	A
LAMMERS RD	II	45	125.4	23.1	148.5	1.57	38.0	A
Total	II		371.0	51.5	422.5	4.64	39.5	A

Arterial Level of Service

7/1/2011

Arterial Level of Service: NB CORRAL HOLLOW RD

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
ELEVENTH ST.	IV	25	57.2	6.0	63.2	0.37	21.3	B
BYRON	IV	25	34.0	0.0	34.0	0.21	21.8	B
GRANT LINE RD	IV	25	150.5	12.0	162.5	1.04	23.1	B
Total	IV		241.7	18.0	259.7	1.62	22.5	B

Arterial Level of Service: SB CORRAL HOLLOW RD

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
GRANT LINE RD	IV	25	231.1	0.0	231.1	1.60	25.0	A
BYRON	IV	25	150.5	0.0	150.5	1.04	25.0	B
ELEVENTH ST.	IV	25	34.0	6.0	40.0	0.21	18.5	C
Total	IV		415.6	6.0	421.6	2.86	24.4	B

Arterial Level of Service: EB ELEVENTH ST.

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
LAMMERS RD	II	45	45.2	12.0	57.2	0.51	32.3	B
CORRAL HOLLOW RD	II	45	125.4	14.0	139.4	1.57	40.5	A
Total	II		170.6	26.0	196.6	2.08	38.1	A

Arterial Level of Service: WB ELEVENTH ST.

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
CORRAL HOLLOW RD	II	45	245.6	14.0	259.6	3.07	42.6	A
LAMMERS RD	II	45	125.4	12.0	137.4	1.57	41.1	A
Total	II		371.0	26.0	397.0	4.64	42.1	A