Amendment to the Draft EIR

SCH# 1992 122 069

City of Tracy General Plan

Amendment to the Draft Environmental Impact Report

The City of Tracy | March 16, 2006

DESIGN, COMMUNITY & ENVIRONMENT

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DESIGN, COMMUNITY & ENVIRONMENT

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FOREWORD

This Amendment to the General Plan Draft EIR, in combination with the previous Draft EIR issued on October 4, 2005, constitute the Draft CEQA document for the proposed City of Tracy General Plan, which was released for public review on June 30, 2005.

A. Organization of this Document

The Draft EIR released on October 4, 2005 was organized into seven chapters. Chapter 4: Environmental Evaluation, consists of 15 sections, numbered Section 4.1 through Section 4.15, which evaluate the environmental impacts of the proposed General Plan. The chapters and sections of the Draft EIR consist of various "subsections."

This document contains amendments to the Draft EIR, which are referenced by the "chapter" or "section", and "subsection(s)" to which they correspond. In most chapters, changes are made to only some subsections. Each changed section is reprinted in its entirety with changes shown in underline and ~~strikethrough~~ text. One chapter (Chapter 5) has been changed in its entirety, so it is reprinted completely, without underline or ~~strikethrough~~ text.

B. Summary of Changes

The following is a summary of changes included in this Amendment to the General Plan Draft EIR.

- **Chapter 1 Introduction.** Subsection B of this chapter is modified to include a clarification of the impact analysis of the proposed project which addresses projected development at total buildout of the City limits and the Sphere of Influence (SOI), as well as during the 20-year planning horizon of the proposed General Plan when it is relevant. The revised text also includes additional explanation as to why the impact analysis of three sections—traffic and circulation, noise and air quality—are based only on the 20-year development projection.

- **Chapter 2 Report Summary.** Subsection C of this Chapter is changed to reflect revisions to the significant environmental impacts expected to result from the proposed project and to the mitigation measures to address these impacts, described in Chapters 4 and 6. Subsection F is changed to reflect revisions made to the alternatives analysis to the proposed Plan.
- **Chapter 3 Project Description.** Subsection K of this Chapter is modified to include a detailed description of the projected residential and non-residential development at total buildout within the City limits and SOI. Additional information is also provided to show projected development over the next 20 years in each of the seventeen Urban Reserve Areas.
- **Section 4.1 Land Use.** Subsection C is modified to include a detailed discussion of impacts to land use that would result from total buildout of the City limits and SOI under the proposed General Plan, in addition to the discussion of impacts during the initial 20-year planning horizon.
- **Section 4.2 Population, Employment and Housing.** Subsections C and D are revised to incorporate a detailed description of the projected population, employment and housing in the City of Tracy at total buildout of the City limits and SOI, including the finding of a significant and unavoidable impact with regards to these factors under the total buildout scenario.
- **Section 4.3 Visual Quality.** Subsections A, C, and D are modified to reflect a discussion of the impacts to the quality of visual resources and community identity around Tracy at total buildout of the proposed Plan. The revised sections also reflect that the adoption process of the Tracy Hills Specific Plan and EIR included a resolution passed by the City Council to amend the City's engineering design guidelines, which resulted in mitigating impacts to visual resources from development on hillsides in the area to a less-than-significant level. An additional significant and unavoidable impact to scenic roadways is also identified.
- **Section 4.6 Biological Resources.** Subsections C and D are revised to reflect that the San Joaquin Council of Governments formally adopted a

modification to the SJMSCP to include the Cordes Ranch project on April 22, 2004; consequently the significant impact associated with development of the Cordes Ranch area would not occur. Thus, the significant impact and mitigation measure identified in the Section 4.6 was deleted.

- **Section 4.7 Agricultural Resources.** Subsections C and D are modified to include discussion of the significant and unavoidable impact that would occur with regards to Williamson Act land as a result of development projected to occur at total buildout of the proposed General Plan.
- **Section 4.9 Community Services.** Subsections A through E, addressing police, fire, schools, solid waste, and parks and recreation, are amended to include a discussion of impacts that could occur for each community service for both the 20-year planning horizon and at total buildout of the proposed General Plan.
- **Section 4.10 Infrastructure.** Subsections A through C, relating to water, wastewater, stormwater infrastructure, are amended to include an analysis of potential impacts that would result during both at total buildout and during the 20-year planning horizon of the proposed General Plan. In particular, Subsection A4 is revised to reflect that a significant and unavoidable impact would occur with regards to water supply needed for growth projected at total buildout of the proposed General Plan.
- **Section 4.12 Hydrology and Flooding.** Subsection C is revised to include a discussion of potential impacts of total buildout of the City limits and SOI with respect to hydrology and flooding , in addition to impacts that would occur during the 20-year planning horizon.
- **Chapter 5 Alternatives to the Project.** As noted above, this chapter is amended in its entirety so that it has been reprinted completely without underline or ~~strikeout~~ text. This chapter compares the proposed Plan to four alternatives against the impact factors considered for the proposed General Plan at total buildout with a statement as to whether the alternative would create greater or lesser impacts than the proposed Plan. An

analysis of projected development through the 20-year planning horizon is also provided where it is relevant.

- **Chapter 6 CEQA Required Assessment Conclusions.** Subsections A through C of this Chapter are amended to reflect revisions to both the cumulative significant impacts as well as the Plan-specific significant and unavoidable impacts that would occur as result of total buildout of the proposed Plan. Specifically, two additional cumulative, significant and unavoidable impacts to population, employment and housing, and to infrastructure as it relates to water supply that would result from total buildout of the proposed Plan are identified.

C. Chapters That Have Not Been Changed

The following chapters and sections have not been changed from the Draft EIR published on October 4, 2005:

- Section 4.4 Traffic and Circulation
- Section 4.5 Cultural Resources
- Section 4.8 Mineral Resources
- Section 4.11 Geology, Soils and Seismic Hazards
- Section 4.13 Hazardous Materials and Other Hazards
- Section 4.14 Noise
- Section 4.15 Air Quality
- Chapter 7 Report Preparers

Sections 4.5, 4.8, 4.11, and 4.13 remain unchanged because the information and analysis provided already addresses projected development of total buildout of the proposed Plan.

As discussed in Chapter 1, the detailed, quantitative analysis of potential impacts to traffic, noise and air quality in Sections 4.4, 4.14 and 4.15 is based on

the development projections for a 20-year period. The traffic analysis was limited to the 20-year planning horizon in part because significant speculation regarding regional growth and funding for transportation improvements would be required to model the total buildout year under the proposed General Plan, which is estimated to occur from 2071 for residential growth or as far into the future as 2140 for non-residential growth. Instead, the traffic analysis was based on a 20-year time frame, in order to be consistent with regional growth projections forecasted by the San Joaquin Council of Government's (SJCOG), and land use and roadway improvements in SJCOG's Regional Transportation Plan (RTP). Since CEQA guidelines require the use of either a list-based approach or an adopted planning document as the basis for a cumulative analysis,[1] the traffic analysis uses SJCOG's RTP document as the basis for the cumulative analysis. The noise and air quality analysis is also limited to the 20-year planning horizon because they are based on the results of the traffic analysis.

Thus, the three corresponding sections discussing these three environmental areas, Sections 4.4 Traffic and Circulation, 4.14 Noise and 4.15 Air Quality remain unchanged.

Chapter 7 Report Preparers also remains unchanged.

D. Review Process

As required by CEQA, this document is being circulated for review and comment for a 45-day review period extending from March 16, 2006 to April 29, 2006.

At the close of the comment period, the City will prepare a Final EIR responding to substantive comments on the Draft CEQA document. Please

[1] CEQA Guidelines, sec, 15130.

limit your comments only to the revised portions of the Draft EIR that are published in the Amendment to the Draft EIR.

1 INTRODUCTION

Subsection B of this Chapter is amended as follows. Changes in text are shown in underline and ~~strikethrough~~.

B. EIR Scope, Issues and Concerns

This document is a Program EIR that analyzes the proposed adoption and implementation of the City of Tracy General Plan. As a Program EIR, the EIR is not project-specific and does not evaluate the impacts of specific projects that may be proposed under the General Plan. Such projects will require separate environmental review to secure the necessary discretionary development permits. While subsequent environmental review may be tiered off this EIR, this EIR is not intended to address impacts of individual projects.

The scope of this EIR was established by the City of Tracy through the General Plan update process. Issues addressed in this EIR are the following:

1. Land Use
2. Population, Employment and Housing
3. Visual Quality
4. Traffic and Circulation
5. Cultural Resources
6. Biological Resources
7. Agricultural Resources
8. Mineral Resources
9. Community Services
10. Infrastructure
11. Geology, Soils and Seismic Hazards
12. Hydrology and Flooding
13. Hazardous Materials
14. Noise
15. Air Quality

In general, this Draft EIR addresses potential impacts that would occur under the proposed General Plan through 2025, the intended 20-year planning horizon of the proposed General Plan, and at total buildout of the City limits and SOI, which is expected to occur much further into the future. As discussed in detail in Chapter 3, total buildout under the proposed General Plan of residential growth is expected to occur in approximately 69 years given the current policy framework; and total build out of commercial, office and industrial growth would not occur until 107, 137 and 159 years, respectively, given current projection assumptions.

The majority of the impact sections discuss both the 2025 and total buildout scenarios. Analysis of three sections—traffic and circulation, noise and air quality—is only based on the 20-year development projection. The traffic analysis was limited to the 20-year planning horizon in part because significant speculation regarding regional growth and funding for transportation improvements would be required to model the total buildout year under the proposed General Plan, which could range from 2071 for residential growth or as far into the future as 2140 for non-residential growth.

Specifically, modeling traffic for the City of Tracy requires land use data and information about proposed roadway improvements for San Joaquin County and the Bay Area, since growth in adjacent cities, as well as in the Bay Area, has a significant effect on traffic volumes on the adjacent regional roadways, and even major roadways within Tracy. At the time the City of Tracy traffic model was prepared in 2003 and 2004, the San Joaquin Council of Goverments' (SJCOG) model had land use and roadway network information for 2025 only.[1] SJCOG's Regional Transportation Plan (RTP), including projections for growth, proposed funding sources and recommended improvements, was based on this information. In 2005, SJCOG updated their RTP with 2030 projections, however this information only became available after release of the Notice of Preparation for the General Plan EIR on June 30, 2004.

[1] SJCOG's model includes data on both areas to effectively address interregional travel.

Based on data now available, growth could be forecasted to 2030, but there is limited data available beyond that. The use of a 2025 planning horizon is essentially consistent with the regional growth projections and the SJCOG RTP. There are no major roadway improvements assumed to occur by 2030 within the vicinity of Tracy and limited additional development outside of the City of Tracy in the recently adopted SJCOG RTP, as documented in the land use forecasts used in the plan. Thus, it can be inferred that an analysis using the 2030 land use and roadway network data will identify similar impacts to the local and regional roadway network.

The use of a 20- to 25-year planning horizon for traffic forecasting is consistent throughout the state of California, where major regional transportation planning agencies in Los Angeles, Fresno, San Francisco, and Sacramento all have 20- to 25-year regional transportation plans. The use of a 20- to 25-year planning horizon also is consistent with federal Guidelines which govern the long-range transportation planning process.

Additionally, the use of a 20- to 25-year buildout for the transportation analysis is consistent with the CEQA guidelines, which require the use of either a list-based approach or an adopted planning document as the basis for a cumulative analysis.[2] In the case of the transportation study, the analysis uses SJCOG's RTP document as the basis for the cumulative analysis.

As noted, the total buildout year under the proposed General Plan could range from 2074 for residential growth or as far into the future as 2164 for non-residential growth. There is no published RTP which covers that horizon, nor are there any adopted land use forecasts that indicate the level of land use growth in adjacent cities that would be likely to occur within those time frames. Additionally, there are no published lists of roadway improvements for a 50- to 100-year horizon. Development of land use and roadway network data for a 50- to 100-year analysis would require significant speculation and extrapolation using existing data. The noise and air quality analysis is

[2] CEQA Guidelines, sec, 15130.

also limited to the 20-year planning horizon because they are based on the results of the traffic analysis.

2 REPORT SUMMARY

Subsections C through F of this Chapter are amended as follows. Changes in text are shown in underline and ~~strikethrough~~.

C. Significant Impacts

Under 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.

Implementation of the proposed General Plan has the potential to generate ~~18~~ 23 environmental impacts in a number of areas, including both plan level and cumulative impacts. These topic areas are listed below.

- Population, Employment and Housing
- Visual Quality
- Traffic and Circulation
- Cultural Resources
- ~~Biological Resources~~
- Agricultural Resources
- Infrastructure
- Noise
- Air Quality

Some of the impacts can be reduced to a less-than-significant level with mitigation measures, while others are significant unavoidable impacts. Each are discussed in the following two sections and summarized in Table 2-1.

D. Mitigation Measures

This Draft EIR suggests specific mitigation measures that would reduce ~~seven~~ six of the impacts in the topic areas identified above to a less-than-significant level. Topic areas where impacts are mitigated to a less than significant level area:

- Visual Quality
- Cultural Resources
- ~~Biological Resources~~
- Noise
- Air Quality

The mitigation measures in this DEIR will form the basis of a Mitigation Monitoring Program to be implemented in accordance with State law.

E. Significant Unavoidable Impacts

The proposed General Plan would have ~~eleven~~ seventeen significant and unavoidable impacts, as follows. These impacts are discussed further in Sections 4.2, 4.3, 4.4, 4.7, 4.10, 4.14 and 4.15 and in Chapter 6, which addresses cumulative impacts.

1. Population, Employment and Housing

There would be two significant and unavoidable impacts to population and housing growth as a result of the proposed Plan. Despite policies and regulations designed to reduce impacts to future population and housing growth development under the proposed General Plan at total buildout would result in significant increases in residential and employee populations, relative to existing conditions, which would result in a project-level and a cumulative impact.

~~1.~~2. Visual Quality

There would be ~~two~~ three significant unavoidable visual quality impacts under the proposed General Plan for the Tracy Planning Area and under cumulative conditions in the region as a whole. Despite policies in the proposed General Plan policies to preserve open space and agricultural lands, scenic resources and community character, policies in the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP) and the City's Agricultural Mitigation Fee Ordinance, development occurring within the City and its Sphere of Influence would result in a change in visual character from an agricultural appearance to a more urban appearance and a deterioration of views from scenic roadways.

~~2.~~3. Traffic and Circulation

The increase in population and employment under the proposed General Plan would result in two significant unavoidable impact~~s~~ on the regional roadway system, as is discussed in Section 4.4 and Chapter 6. The six regional roadways that will be impacted are: I-205, I-580, I-5, Altamont Pass Road, Patterson Pass Road and Tesla Road.

~~3.~~4. Agricultural Resources

Three significant and unavoidable impacts to agricultural resources would occur under the proposed General Plan. Development under the General Plan would result in conversion of Prime and Unique Farmland, and Farmland of Statewide importance to urban uses. Buildout of the proposed plan may also result in the conversion of land under active Williamson Act contracts to urban uses. Finally, ~~T~~the proposed General Plan could also result in the development of incompatible urban uses adjacent to agricultural uses, which could result in the conversion of these lands from farmland. Finally, there would be a cumulative significant unavoidable impact associated with the proposed General Plan, which would contribute to the on-going loss of agricultural lands in the region as a whole. The permanent loss of farmland is considered, in each of these cases, to be a significant and unavoidable impact.

5. Infrastructure

Two significant and unavoidable impact to infrastructure would result under the proposed General Plan. While the project would not contribute to significant project-level or cumulative impacts associated with water services during the 20-year planning horizon, it would contribute to a project-level and a cumulative significant and unavoidable at total buildout. Despite policies included in the proposed Plan calling for the acquisition of reliable, additional sources of water, current supplies are insufficient for the projected development at total buildout of the proposed General Plan; regional water supplies are also not ensured into the future beyond a 20-year planning horizon.

~~4.~~6. Noise

There would be two significant and unavoidable noise impact~~s~~ under the proposed General Plan. As discussed in detail in Section 4.14, future noise level increases (3 dBA L_{dn} or greater) associated with increase~~s~~d traffic associated with new roadways facilitated by the proposed General Plan would occur adjacent to existing noise sensitive uses. This would result in a significant impact at the project and cumulative level.

~~5.~~7. Air Quality

There would be two significant and unavoidable air quality impact~~s~~ as a result of the project. ~~Firstly, t~~The proposed General Plan would be inconsistent with applicable air quality plans of the San Joaquin Valley Air Pollution Control District (SJVAPCD), since it results in a higher level of vehicle miles traveled than accounted for in the District's clean air planning efforts. The proposed General Plan would also contribute cumulatively to on-going air quality issues in the San Joaquin Valley, to an extent that cannot be mitigated by policies and programs to reduce pollutant emissions.

F. Alternatives to the Project

This Draft EIR analyzes alternatives to the proposed General Plan. The following ~~three~~ four alternatives to the proposed project are considered and described in detail in Chapter 5:

- No Project Alternative
- Concentrated Growth Alternative
- City Limits Alternative
- Existing SOI Alternative

As is discussed in Chapter 5, the Concentrated Growth Alternative is environmentally superior to both the proposed General Plan and the other alternatives. This alternative would offer a substantial improvement with respect to visual quality and community character, and agriculture, although it would not avoid the significant and unavoidable impacts associated with those areas for the proposed Plan. The Concentrated Growth Alternative would also offer an insubstantial improvement with respect to land use, population, employment and housing, traffic and circulation, biology, infrastructure, hydrology and flooding, hazardous materials and other hazards, and air quality.

The City Limits Alternative is also environmentally superior to the proposed Plan, but on balance it is marginally inferior to the Concentrated Growth Alternative. As shown in Table 5-1, the City Limits does not offer as much of an improvement as the Concentrated Growth Alternative with respect to visual quality and it also does not offer improvements with respect to land use, hazardous materials and hazards, and air quality. The Existing SOI Alternative is also environmentally superior to the proposed Plan, but it is slightly inferior to the Concentrated Growth Alternative since it does not offer similar improvements with respect to land use, traffic and circulation, infrastructure, hazardous materials and hazards and air quality.

The City of Tracy has developed the proposed Plan to represent the best possible balance between on-going residential growth, development of employment areas, and open space and agricultural preservation. Although two of

the alternatives each have the potential of substantially reducing two of the significant impacts that have been identified in this EIR, overall, the alternatives analysis shows that none of the alternatives would result in a level of improvement that would completely avoid a significant impact that is associated with the proposed Plan.

Furthermore, all of the alternatives are infeasible because they are undesirable and impractical from a policy standpoint.

An important goal of the General Plan is to balance the development of new retail and job-creating commercial, office and industrial development with the development of new housing so that residents have the opportunity to work in Tracy. This is underscored a number of times throughout the proposed Plan, including in its opening Vision Statement (General Plan, p.1-2), as well as in the Land Use Element, Goal LU-2 and in the Economic Development Element, Goal ED-4. None of the alternatives would meet the City's goal to increase its land supply for industrial, office and employment-generating uses and balancing this with the development of new housing, as effectively as the proposed Plan. The Concentrated Growth, City Limits and Existing SOI Alternatives would exclude considerable amounts of area that are envisioned in the General Plan to promote economic development in the City as put forth in the proposed Economic Development Element, Goal ED-6 to have "healthy, key economic activity centers", which includes Objective ED-6.7 to "develop higher-end office an office-flex uses, particularly along entryways to the City along I-205 and I-580." The No Project Alternative would not include the specific policy guidance that is included in the proposed General Plan Economic Development Element which was based on the City's adopted Economic Development Strategy (Resolution #2003-094, adopted April 2003).

Overall, the incremental improvements offered by the alternatives do not outweigh the benefits offered by the increase in land for economic development, which will ultimately provide additional jobs for Tracy residents, improve jobs-housing balance and reduce regional commuting. In addition, the No Project Alternative was not selected because the proposed General Plan

includes more comprehensive policy direction in many areas, including land use and orderly growth management, energy, community character, noise and air quality. ~~the Concentrated Growth Alternative has the least environmental impact and is therefore the environmentally superior alternative. However, the Concentrated Growth Alternative would not satisfy numerous of the City's overall goals of the General Plan. First, since the majority of the new residential growth would be multi family housing, it would not achieve a diversity of housing types. Second, the multi family housing would result in a deterioration of the hometown feel due to the higher densities even though it could slightly improve the visual quality due to the reduced amount of undeveloped land converted to urban uses. Third, because growth would be concentrated, the Concentrated Development Alternative would not satisfy the City's desire to have a large land supply for industrial and commercial uses. This could harm the City's economic development goals. Finally, the Concentrated Development Alternative does not mitigate any of the significant and unavoidable impacts of the proposed General Plan to a less than significant level. For these reasons, the City of Tracy is moving forward with the proposed General Plan.~~

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TABLE 2-1 **SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
LAND USE			
There are no significant land use impacts, therefore, no mitigation measures are necessary.			
POPULATION, EMPLOYMENT AND HOUSING			
~~*There are no significant impacts to population, employment and housing, therefore, no mitigation measures are necessary.*~~			
Impact POP-1: As discussed on page 41, despite policies in the Community Character Element of the proposed General Plan to maintain and enhance quality of life as future growth occurs, development permitted under the proposed General Plan would result in approximately an additional 147,000 residents, 193,000 employees and 46,000 housing units for a total of 221,000 residents, 223,000 employees and 69,000 housing units at total buildout.	S	While policies and other regulations would reduce impacts to future population and housing growth to the extent feasible for development projected through 2025, a significant and unavoidable impact would occur with regards to overall future population and housing growth projected under total buildout of the proposed General Plan.	SU

LTS = Less-Than-Significant S = Significant SU = Significant Unavoidable Impact

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
VISUAL QUALITY			
Impact V-1: As discussed on pages 52 and 53, ~~4.3-10 through 4.3-11,~~ in addition to policies in the SJMSCP and the City's Agricultural Mitigation Fee Ordinance, the proposed General Plan contains policies to preserve open space and agricultural lands and community character. Despite such policies to enhance "hometown feel" and preserve open space, development permitted under the proposed General Plan for both the 2025 and total buildout of the City limits and SOI will result in a significant impact to the existing visual identity and character of the City ~~due to the amount of growth allowed~~.	S	No additional mitigation is available for this impact, since the permanent visual change from rural, agricultural lands to urban use is considered significant and unavoidable.	SU
Impact V-2: As discussed on page 53, despite policies in the proposed General Plan to protect scenic resources, including those along state designated scenic highways for development projected through 2025, a significant and unavoidable impact would occur with regards to scenic resources along the state designated scenic routes I-580 (between I-205 and I-5) and I-5 (south of I-205) at total buildout of the proposed General Plan.	S	This is a significant and unavoidable impact. No additional mitigation is available.	SU

LTS = Less-Than-Significant S = Significant SU = Significant Unavoidable Impact

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
~~**Impact V-2:** Despite policies and regulations to protect open space and agricultural areas under the proposed General Plan, some hillsides within the City limits in the Tracy Hills Specific Plan area would not remain in their natural state.~~	~~S~~	~~Mitigation Measure V-2: As part of the update to the Tracy Hills Specific Plan, the Plan shall provide guidelines to ensure the safe and sensitive treatment of hillsides, including the consideration of establishing a hillside ordinance that defines standards for mass grading, ridgeline protection, erosion control, viewshed analysis among other considerations.~~	~~LTS~~
Impact V-~~3~~2: Development permitted under the proposed General Plan ~~could~~ would increase levels of light and glare to a ~~level~~ significant level ~~enough to~~ resulting in adverse impacts to the visual quality of Tracy.	S	Mitigation Measure V-3: The City should include a policy under Objective CC-1.1 to require that lighting on private and public property should be designed to provide safe and adequate lighting while minimizing light spillage to adjacent properties.	LTS
TRAFFIC AND CIRCULATION			
Impact CIR-1: The proposed General Plan incorporates a range of features to help reduce the potential impact of future growth on regional roadways. However, traffic levels along regional roadways listed below will increase, creating a significant and unavoidable impact. ♦ I-205 ♦ I-580 ♦ I-5 ♦ Altamont Pass Road ♦ Patterson Pass Road ♦ Tesla Road	S	No mitigation is available for this impact. Therefore, traffic levels on regional roadways are considered a significant and unavoidable impact.	SU

LTS = Less-Than-Significant S = Significant SU = Significant Unavoidable Impact

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
CULTURAL RESOURCES			
Impact CUL-1: Undiscovered archaeological and paleontological sites in the Planning Area, including human burial sites that could be impacted from development activities involving soil removal or disturbance.	S	Mitigation Measure CUL-1a: The City shall include a policy under Objective CC-3.1 (Policy 4) to require, as part of the development review process, a standard condition of approval that if any resources are found during construction, all operations within the project area shall halt until an assessment can be made by appropriate professionals regarding the presence of archaeological and paleontological resources and the potential for adverse impacts on these resources. Mitigation Measure CUL-1b: The City shall include a policy under Objective CC-3.1 (Policy 5) to require that any archaeological or paleontological resources on private property be either preserved on their sites or adequately documented and conserved as a condition of removal. The policy shall further require that if any resources are found unexpectedly during development, then construction must cease immediately until accurate study and conservation measures are implemented. Mitigation Measure CUL-1c: The City shall include a policy under Objective CC-3.1 (Policy 6) requiring that if Native American artifacts are discovered on a site, the City shall consult representatives of the Native American community to ensure the respectful treatment of Native American sacred places.	LTS

LTS = Less-Than-Significant S = Significant SU = Significant Unavoidable Impact

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
BIOLOGICAL RESOURCES			
There are no significant biological impacts, therefore, no mitigation measures are necessary.			
~~**Impact BIO-1:** Sensitive species, associated habitats, wildlife movement and reproductive areas could be impacted by development in Urban Reserve 6, commonly known as Cordes Ranch, which falls outside of Tracy's SJMSCP compensation maps.~~	~~S~~	~~Mitigation Measure BIO-1: The City shall require property owners of Cordes Ranch to amend the SJMSCP such that the area is included in the SJMSCP or shall ensure that adequate site specific mitigation is undertaken to a level acceptable to meet State and federal requirements.~~	~~LTS~~
AGRICULTURAL RESOURCES			
Impact AG-1: As discussed in on pages ~~4.7-10 through 4.7-15~~ 67 through 71, the proposed General Plan contains policies to preserve agricultural lands, in addition to policies in the SJMSCP and the City's Agricultural Mitigation Fee Ordinance. Despite these policies and regulations, development permitted under the proposed General Plan would result in the conversion of Prime Farmland, Unique Farmland and Farmland of Statewide Importance to urban uses.	S	No additional mitigation is available, since the permanent loss of farmland is considered significant and unavoidable.	SU

LTS = Less-Than-Significant S = Significant SU = Significant Unavoidable Impact

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
Impact AG-2: Despite policies in the proposed General Plan to support and encourage preservation of Williamson Act lands and the voluntary nature of the Williamson Act program, total buildout of the City limits and SOI may result in the conversion of land under active contracts to urban uses.	S	No additional mitigation is available, since the permanent loss of farmland is considered significant and unavoidable.	SU
Impact AG-~~2~~3: The proposed General Plan contains several policies to mitigate impacts to agricultural resources due to the conversion of additional farmland to urban uses. However, implementation of the proposed General Plan would result in additional and incompatible urban development adjacent to agricultural uses.	S	No additional mitigation is available, since the permanent loss of farmland is considered significant and unavoidable.	SU
MINERAL RESOURCES			
There are no significant impacts on mineral resources; therefore, no mitigation measures are necessary.			

LTS = Less-Than-Significant S = Significant SU = Significant Unavoidable Impact

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
COMMUNITY SERVICES			
There are no significant impacts to community services, including police, fire, schools, solid waste collection and disposal, and parks and recreation facilities; therefore, no mitigation measures are necessary.			
INFRASTRUCTURE			
~~*There are no significant impacts to infrastructure (e.g. water service, wastewater, stormwater, energy use and conservation), therefore no mitigation measures are necessary.*~~			
Impact INF-1: As discussed on page 78, no significant water-related impacts have been identified for development projected through 2025. However, despite policies in the Land Use and Public Facilities Elements of the proposed General Plan directing the City to acquire reliable, additional sources of water supplies to meet the city's future demand as new development occurs, there is currently insufficient water supply secured to serve projected development under total buildout of the proposed General Plan.	S	No additional mitigation is available. Despite policies in the proposed General Plan to ensure infrastructure is in place or planned to support growth, current water supplies would be insufficient to accommodate projected development at total buildout. However, as noted on page 78, no significant impacts would occur related to development through 2025, since current water supply could accommodate projected development through this period.	SU
GEOLOGY, SOILS AND SEISMIC HAZARDS			
There are no significant impacts to geology, soils and seismic hazards; therefore, no mitigation measures are necessary.			

LTS = Less-Than-Significant S = Significant SU = Significant Unavoidable Impact

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
NOISE			
Impact NOI-1: As discussed on page 4.14-22, the City's Noise Ordinance and policies in the proposed General Plan serve to control excessive sources of noise in the ~~city~~ City and ensure that noise impacts from new projects are evaluated when they are reviewed. Despite these policies and regulations, significant noise levels increases (3 dBA Ldn or greater) associated with increased traffic would occur adjacent to existing noise sensitive uses along portions of Interstate 205, Grant Line Road, Schulte Road, Linne Road, Lammers Road, Corral Hollow Road, Tracy Boulevard, and MacArthur Drive. New roadways facilitated by the General Plan would also increase existing noise levels at receivers in Tracy.	S	This is a significant and unavoidable impact. No additional mitigation is available.	SU
Impact NOI-2: New development proposed along existing railroad lines could expose residents to vibration levels in excess of Federal standards. The proposed General Plan does not address potential groundborne vibration impacts.	S	Mitigation Measure NOI-2: A policy should be added to the proposed General Plan under Objective N-1.3 that states that the City will seek to reduce impacts from groundborne vibration associated with rail operations by requiring that vibration-sensitive buildings (e.g., residences) are sited at least 100-feet from the centerline of the railroad tracks whenever feasible. The policy should further state that development of vibration-sensitive buildings within 100-feet from the centerline of the railroad tracks would require a study demonstrating that ground borne vibration issues associated with rail operations have been adequately addressed (i.e., through building siting or construction techniques).	LTS

LTS = Less-Than-Significant S = Significant SU = Significant Unavoidable Impact

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
Impact NOI-3: Construction associated with development projected during the planning horizon of the proposed General Plan would temporarily elevate noise levels at adjacent land uses by 15 to 20 dBA or more.	S	Mitigation Measure NOI -3: In addition to the time-of-day restriction in Objective N-1.2, P4, the following standard construction noise control measures should be included as requirements at construction sites to minimize construction noise impacts: ♦ Equip all internal combustion engine driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment. ♦ Locate stationary noise generating equipment as far as possible from sensitive receptors when sensitive receptors adjoin or are near a construction area. ♦ Utilize "quiet" air compressors and other stationery noise sources where technology exists. ♦ When necessary, temporary noise control blanket barriers shall shroud pile drivers or be erected in a manner to shield the adjacent land uses. Such noise control blanket barriers can be rented and quickly erected. ♦ Foundation pile holes shall be pre-drilled to minimize the number of impacts required to seat the pile. The pre-drilling of foundation pile holes is a standard construction noise control technique. Pre-drilling reduces the number of blows required to seat the pile. ♦ The project sponsor shall designate a "disturbance coordinator" who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise com plaint (e.g., starting too early, bad muffler, etc.) and will require that reason able measures warranted to correct the problem be implemented. The project sponsor shall also post a telephone number for excessive noise complaints in conspicuous locations in the vicinity of the project site. Additionally, the project sponsor shall send a notice to neighbors in the project vicinity with information on the construction schedule and the telephone number for noise complaints.	LTS

LTS = Less-Than-Significant S = Significant SU = Significant Unavoidable Impact

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
AIR QUALITY			
Impact AIR-1: The General Plan would not be consistent with applicable clean air planning efforts of the SJVAPCD, since vehicle miles traveled that could occur under the General Plan would exceed that projected by SJCOG, which are used in projections for air quality planning. The projected growth could lead to an increase in the region's VMT, beyond that anticipated in the SJCOG and SJVAPCD's clean air planning efforts. Development in Tracy and the SOI would contribute to the on-going air quality issues in the San Joaquin Valley Air Basin.	S	Mitigation Measure AIR-1: The City of Tracy should study adopting an air quality impact mitigation fee program, which would provide for partial mitigation of adverse environmental effects associated with new development and establish a formalized process for air quality standards as growth and development requires. Fees collected could be used to fund transit, rideshare programs, pedestrian and bicycle facilities, or other programs that would offset vehicle trips. The specifics of the program should be developed in coordination with SJCOG and SJVAPCD to ensure that proceeds would effectively fund projects that would reduce air pollutant emissions. However, these policies and the mitigation measure identified above may not completely mitigate this impact. Therefore, it is considered a significant and unavoidable impact.	SU
Impact AIR-2: The proposed General Plan does not provide adequate buffers between new or existing sources of odors and new or existing residences or sensitive receptors.	S	Mitigation Measure AIR-2: Policy 11 of Objective AQ-1.2 should be modified to include sources of odors as follows: Policy 11: Residential developments and other projects with sensitive receptors shall be located an adequate distance from ~~air pollution and~~ odors sources such as freeways, arterial roadways and stationary air pollutant sources. This would mitigate potentially significant land use conflicts that may result in frequent odor complaints.	LTS

LTS = Less-Than-Significant S = Significant SU = Significant Unavoidable Impact

3 PROJECT DESCRIPTION

Subsection K of this Chapter is amended as follows. Changes in text are shown in underline and ~~strikethrough~~.

K. General Plan Development Projections

The proposed Sphere of Influence (SOI) changes, land use designations and other policies would allow for new development in Tracy that responds to both market forces and City policy decisions. This Draft EIR provides an analysis of development that is projected to occur during the 20-year planning horizon of the proposed General Plan, as well as total future growth within the City limits and SOI, which is estimated to occur 69 to 159 years into the future, given current projections, as described in detail below and summarized in Table 3-2. This section summarizes the amount of residential and non-residential development expected under both scenarios. ~~This section summarizes the amount of development expected under the proposed General Plan.~~

1. Development through 2025

~~This Draft EIR discussion focuses on this 20-year development projection because the proposed General Plan is intended to have a time horizon of 20 years with updates to occur before that time. Moreover, it is generally held that modeling traffic and associated air quality and noise impacts beyond a 20-year time period is increasingly inaccurate and not considered to be reliable.~~ The amount of growth projected for the 20-year period through 2025 has been calculated for residential, industrial, commercial and office development.

As shown in Table 3-2, ~~During~~ during the 20-year planning horizon, the proposed General Plan is expected to add 10,341 new housing units, 11 million square feet of industrial development, four million square feet of commercial development and 2 million square feet of office development. In 2025, the total residential population is projected to be approximately 109,000 people and the employee population is projected to be approximately 55,000. The amount of projected buildout for the 20-year planning horizon in each of the seventeen Urban Reserve areas is provided in Table 3-3.

a. Residential

The General Plan 20-year development projections are based on land use designations, available acres and the existing building allotment regulations in the Tracy. The City adopted a Growth Management Ordinance (GMO) in 1987, that has been amended several times, including an amendment in 2001 by the voter-initiated Measure A, which was passed in November of 2000. In general terms, the goal of the GMO is to achieve a steady and orderly growth rate that allows for the adequate provisions of services and community facilities, and includes a balance of housing opportunities. According to the GMO, builders must obtain a Residential Growth Allotment (RGA) in order to secure a residential building permit. One RGA equals the public services and facilities required by one dwelling unit.[1]

For the proposed General Plan, residential growth is assumed to be limited by the GMO and by past allocations of RGAs. The GMO limits the number of RGA's and building permits to an average of 600 housing units per year of market rate housing and a maximum of 750 units in any single year, with exceptions for affordable housing. Thus, between the years 2000 and 2025, the number of residential units allowed under the City's Growth Management Ordinance is 15,000 units (600 per year times 25 years). Exceptions to allow for additional affordable housing is included. The General Plan Housing Element has a target of 1,200 affordable units during this same time period, bringing the total number of units to 16,200, resulting in an additional 52,000 people (using a multiplier of 3.21 persons per household based on the 2000 US Census), or a total population of 109,000 in the year 2025.[2]

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[1] City of Tracy *Residential Growth Management Plan*, 2005, p.5.

[2] According to the 2000 US Census, the population of Tracy was approximately 57,000 people.

TABLE 3-2 **20-YEAR AND TOTAL BUILDOUT PROJECTIONS– NEW GROWTH**

	20-year scenario	Total Buildout Scenario
Residential	10,341 units	46,000 units
Non-residential		
Commercial	4,000,000 sqft	21,400,000 sqft
Office	2,000,000 sqft	13,800,000 sqft
Industrial	11,000,000 sqft	87,200,000 sqft
Population (Additional/*Total)*	33,195/*109,000*	147,000/*221,000*
Employees (Additional/*Total)*	25,000/*55,000*	193,000/ *223,000*

In order to calculate the total number of units for analysis during the General Plan time frame (2005-2025), the number of permits issued between 2000 and 2005 must be included. This is because permits issued to vested projects between 2000 and 2005 were issued at a higher rate than 600 per year but count toward the yearly average of 600 units per year, according to the GMO.

Thus, the total number of *market rate* residential units allowed between 2000 (when the reductions of the GMO under Measure A took effect) and 2025 (the end of the planning horizon) is 15,000 (600 per year times 25 years). Between January 2000 and April 2004, 5,859 RGAs had been allocated to projects. Thus, for the purposes of this analysis, 9,141 more market rate residential units can be constructed before 2025.

TABLE 3-3 **PROJECTED DEVELOPMENT THROUGH 2025 IN URBAN RESERVE AREAS**

	Population	Dwelling Unit (DU)	% of Total DUs	Jobs	% of Total Jobs
UR 1	164	51	2%	-	0%
UR 2	-	-	0%	-	0%
UR 3	-	-	0%	1,133	68%
UR 4	-	-	0%	815	7%
UR 5	-	-	0%	222	8%
UR 6	-	-	0%	3,495	10%
UR 7	-	-	0%	-	0%
UR 8	-	-	0%	-	0%
UR 9	-	-	0%	-	0%
UR 10	5,136	1,600	71%	578	52%
UR 11	-	-	0%	-	0%
UR 12	321	100	71%	444	80%
UR 13	2,408	750	42%	-	-
UR 14	2,408	750	77%	-	-
UR 15	642	200	43%	-	-
UR 16	279	87	6%	-	-
UR 17	2,173	677	63%	-	-
Total	**13,530**	**4,215**	-	**6,687**	-

In addition, it is assumed that 1,200 affordable housing units over and above the 15,000 market rate units will be built between 2005 and 2025. This estimate is consistent with the goal stated in the Draft Housing Element of 60 affordable units per year. Thus, the ~~preferred plan~~20-year development scenario includes the addition of 10,341 units of housing.

The ~~preferred plan~~20-year development scenario also allocated the residential units between single family units and multi-family units (2-plus units). For purposes of this analysis, growth allocated to the Residential Very Low and Residential Low land use designations are assumed to be single family units. Units allocated to Residential Medium, Residential High, Downtown and Village Center designations are assumed to be multi-family units. Based on this methodology, the ~~preferred~~ 20-year ~~plan~~ projection ~~has~~ includes 6,455 single family units (62 percent) and 3,886 multi-family units (38 percent).

b. Industrial

The projected increase in industrial development over the planning horizon from 2005 to 2025 has been determined based on past trends. An analysis of the past five years of industrial development revealed that approximately 550,000 square feet on average was constructed each year. This EIR assumes that this trend will continue into the future. Thus, 11 million square feet of new industrial space is assumed in the ~~preferred plan~~20-year development projection. Based on an average of one employee per 1,000 square feet of building space, this translates into 11,000 new employees in the industrial sector.

c. Commercial

The increase in commercial development over the planning horizon from 2005 to 2025 has been projected based on past trends. An analysis of the past five years of commercial development revealed that approximately 200,000 square feet on average was constructed each year. This EIR assumes that this trend will continue into the future. Thus, 4 million square feet of new commercial space is assumed in the 20-year development projection~~preferred plan~~.

Based on an average of two employees per 1,000 square feet of building space, this translates into 8,000 new employees in the commercial sector.

d. Office

At present, there are no large-scale office uses in Tracy similar to those envisioned in the proposed General Plan. In order to determine a reasonable estimate for new office uses for the planning horizon, an analysis of office development trends over the last five years in the City of Livermore was conducted. Livermore was selected since it close to Tracy and experienced an expansion of office development over the last decade. Based on this analysis, this EIR assumes that an average of approximately 100,000 square feet per year of office space would be ~~conducted~~constructed. This translates into 2 million square feet of office space over 20 years and, based on three employees per 1,000 square feet, an addition of 6,000 new employees.

e. Development Locations

The amount of vacant and underutilized land within the existing City limits and proposed SOI will accommodate a larger amount of growth than is assumed for the planning horizon of the General Plan. For purposes of this EIR, new residential and non-residential growth was distributed throughout the City limits and Sphere of Influence based on a number of factors, including the availability of land, vested RGAs for projects that have not completed construction, existing approved specific plans, conversations with developers and landowners, and based on residential growth policies in the proposed General Plan. This represents a "best estimate" as to where growth will locate in the next 20 years. It is not a statement of policy.

In this EIR, new residential growth is assumed to be distributed throughout the existing City limits and on the west side of the SOI. It is assumed that 2,000 units would be infill development; that is, within the existing urbanized areas on vacant or underutilized parcels. This EIR also projects concentrations of multifamily housing in and around the Downtown, along Valpico Road, and in the northern portion of Urban Reserve 13 that abuts Eleventh Street. Single family housing is projected to be located along the western and

southern edge of the city (inside and outside of the City limits) in Urban Reserves 10, 13, 14, 15, 16 17 and in Tracy Hills.

New non-residential development is also projected to spread through the SOI. Industrial growth is assumed to be located in the Northeast Industrial Area, Urban Reserves 4 and 6, as well as a few areas in the Industrial Specific Plan (ISP) area, in Tracy Hills along I-580, and near the Tracy Municipal Airport in southern Tracy. Commercial growth is assumed to be distributed in the Downtown/Bowtie area, the I-205 area, along Grantline and Valpico Roads, Larch Clover, Urban Reserves 3, 4, 5 and 10, as well as in Tracy Hills. Office growth is focused in Tracy Gateway and on Tracy Boulevard south of Valpico Road, and near the intersection of Grant Line Road and Tracy Boulevard and in Tracy Hills along I-580.

2. Total Buildout

"Total buildout" refers to the scenario in which all available land within the ~~City limits and~~ SOI would be developed according to the land use designations in the proposed General Plan. As noted above, the amount of vacant and underutilized land within the SOI will accommodate a larger amount of growth than is assumed to occur during the 20-year planning horizon of the proposed General Plan. When compared to the 2025 development projections, total buildout would result in more development and would occur much farther into the future.

As is shown in Table 3-2, buildout of the SOI ~~At total buildout, the proposed General Plan~~ is expected to add approximately 46,000 new housing units; 87.2 million square feet of industrial development; 21.4 million square feet of commercial development; and 13.8 million square feet of office development. The total residential population is projected to be approximately 221,000 people and the employee population is projected to be approximately 223,000.

Total buildout for residential and non-residential development was estimated by applying land use designations in the proposed General Plan to vacant and

underutilized land within the SOI. For parcels with the Urban Reserve land use designation, the amount and type of land uses provided in the statistical profiles for each Urban Reserve were used for estimating purposes. For the Tracy Hills Specific Plan and Tracy Gateway PUD areas, the amounts of total future residential and non-residential development included in the approved plan were used in calculating total buildout.

Congruent with the 20-year development scenario, the total buildout scenario makes similar assumptions regarding residential and employee populations. Based on this methodology, the total buildout scenario would result in approximately an additional 46,000 units. Using a multiplier of 3.21 persons per household based on the 2000 US Census, total buildout of the SOI would result in approximately an additional 147,000 people for a total of 221,000 people.[3] Assuming that the current regulatory and policy framework for residential remains in place into the future, since it would be speculative to predict regulatory, policy and market changes unknown at this time, total buildout for residential growth would occur in approximately 69 years.

The total buildout scenario uses the same employee generation rates as the 20-year scenario for commercial, office and industrial uses. Thus, based on an average of one employee per 1,000 square feet of Industrial building space, this translates into approximately 100,000 new employees in the industrial sector. Based on an average of two employees per 1,000 square feet of commercial building space, this translates into approximately 52,000 new employees. Based on an average of three employees per 1,000 square feet of office building space, this translates into approximately 41,000 new employees. As noted above, the total number of new employees is estimated to be 193,000. Given the assumptions for absorption rates of commercial, office and industrial space used for the 20-year development projection, total buildout would be expected to occur in 107, 137 and 159 years, respectively.

[3] Additional population projected from total buildout was added to population of the City of Tracy in 2004 which was 74,070 persons.

4 ENVIRONMENTAL EVALUATION

No changes have been made to this section. Please refer to Chapter 4 Environmental Evaluation in the Draft EIR, issued on October 4, 2005.

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4.1 LAND USE

Subsection C of Section 4.1 Land Use is amended as follows. Changes in text are shown in underline and ~~strikethrough~~.

C. Impact Discussion

The proposed General Plan provides a guide to future growth within the City limits and SOI, as well as a general discussion of the Planning Area. Chapter 3 of this EIR provides a detailed description of the proposed General Plan land use categories, location of land uses proposed with in the City limits and SOI, and projections of future growth occurring during the 20-year planning horizon of the proposed General Plan and anticipated future growth within the City limits and SOI. ~~the 25 year planning period of the General Plan.~~

Implementation of the proposed General Plan would result in a change in existing land use for various parcels, both within the City limits and SOI. Table 3.2 depicts the anticipated change from existing General Plan land use designations to ~~General Plan~~ proposed ~~uses~~land use designations.

1. Divisions of Existing Communities

As described in Chapter 3, the majority of the growth under the General Plan is anticipated to occur on land that is currently vacant or under agricultural production. In those areas where development is proposed in existing neighborhoods, the Community Character, Circulation and Land Use Elements would work to promote the redevelopment of Tracy's existing neighborhoods in a way that preserves and enhances the character, identity and quality of the areas and does not allow new development to physically divide an existing neighborhood (Objective CC-6.3, P4); and directs the City to ensure that there is a high level of street connectivity (Objective CIR-1.2, P1 through P6). As a result of the fact that the majority of development would occur on vacant land where no established community exists, and with implementation of the policies to preserve the character, identity and quality of redeveloped neighborhoods, the proposed General Plan would not physically divide an established community and no associated impact is anticipated.

2. Consistency with Related Plans

Implementation of the proposed General Plan could theoretically impact related land use plans that have been adopted for the purpose of avoiding or mitigating an environmental effect. This section evaluates the potential impacts.

a. Zoning Ordinance

Per State law, the General Plan is the primary planning document for a community. The proposed General Plan would replace the City's existing 1993 General Plan once adopted. Therefore, upon approval and implementation of the proposed General Plan, other City documents may need to be updated to ensure consistency. The General Plan includes actions (Objective LU-1.1, A1 and A2) to amend the zoning map for overall consistency with the General Plan and update the City's zoning code to reflect that existing uses in areas subject to new development and redevelopment may remain even though they are inconsistent with the City's long-term vision for this area. Implementation of these actions would avoid a significant impact.

b. Growth Management Ordinance

Residential growth controls in the GMO are consistent with the proposed General Plan's Objective LU-1.4 which states that the City shall promote efficient residential development patterns that maximize efficient use of existing public services and infrastructure. Supporting this Objective are five policies that state the City will follow the GMO requirements, prioritize the allocation of RGAs to meet General Plan goals such as, "but not limited to, concentrated growth, infill development, affordable housing, senior housing, and development with a mix of residential densities and housing types." The proposed General Plan also includes one action that requires the City to develop additional criteria to guide issuance of RGAs. Implementation of the objective and supporting policies would ensure that the General Plan and GMO are consistent with each other, thereby avoiding a significant impact.

c. Specific Plans and Large Planned Unit Developments (PUDs)

The proposed General Plan includes Objective LU-1.1, A4 which requires existing Specific Plans and PUDs to be amended as necessary to be in conformance with the General Plan prior to development of these areas. Implementation of this action would ensure that the Specific Plans and PUDs would be consistent with the proposed General Plan, as required by law. Thus, implementation of the proposed General Plan would not result in any significant impacts since it would not result in any conflicts with existing Specific Plans or PUDs.

d. San Joaquin County General Plan and Sphere of Influence (SOI) ~~and San Joaquin County LAFCo~~

Initially, the proposed General Plan would not be consistent with the existing San Joaquin County General Plan, because the City of Tracy's proposed General Plan would designate land for urban uses in areas currently designated by the County for agriculture uses. Until these areas are annexed by the City, San Joaquin County has jurisdiction in these areas. Once annexation occurs, the land will be within the City's jurisdiction and the City's land use designations will apply. Therefore, at the time of development approval the land will not conflict with the County's designations or General Plan.

As mentioned in the Project Description, some of the areas with the proposed General Plan and SOI consist of expansions of the City's existing SOI. ~~As mentioned in the Project Description~~For these areas, prior to initiating the annexation process, the City would request the San Joaquin County LAFCo to update the City's SOI to include expansions ranging from 50 to 350 acres to the north and northeast, an expansion of approximately 1,730 acres to the west, and contractions to the southern portions of the SOI that total approximately 825 acres. The majority of the proposed expansions to the SOI would ultimately result in changes to the existing San Joaquin County General Plan Land Use designations from General Agriculture to a range of residential and non-residential uses, as properties are annexed to the City. Initially, the proposed General Plan would not be consistent with the existing San Joaquin County General Plan, because the City of Tracy's proposed

General Plan would designate land for urban uses in the expanded SOI in areas currently designated by the County for agriculture uses. Although this could create an initial conflict with policies stated in the County General Plan, Objective LU-1.1, A2 of the proposed General Plan directs the City to initiate the process with the County LAFCo and with community members in affected areas to adjust the SOI. ~~The City's General Plan land use designations apply once the property is annexed. Until they are annexed, San Joaquin County has jurisdiction in these areas.~~

If LAFCo does not approve the SOI in the proposed General Plan, the existing SOI will remain in effect. In this case, the City's land use designations outside the LAFCo-approved SOI would have to be removed and the County designations would remain in place. Therefore, either way, adoption and implementation of the proposed General Plan would not result in a conflict with the County General Plan policies.

e. San Joaquin County Airport Land Use Plan

The proposed General Plan includes Objective LU-6.3, P1 and P2 which state that land uses and new development within the airport hazard zones, as designated in the San Joaquin County Airport Land Use Plan, will conform to safety and development restrictions specified in the Plan. This policy will ensure that growth allowed under the proposed General Plan is consistent with the Airport Land Use Plan, therefore no significant impact would occur related to inconsistencies between the two plans.

3. Consistency with Habitat and Resource Conservation Plans

The proposed General Plan includes policy direction that addresses the SJMSCP. Objective OSC-1.1 P2 states that the City should continue to work with San Joaquin Council of Governments and other agencies to implement and enforce the SJMSCP. As discussed above, the Tracy Planning Area is identified as a Secondary Zone of the Delta so it is outside of the Delta Protection Commission's planning area, as defined in the *Land Use and Resource Management Plan for the Primary Zone of the Delta* (Delta Plan). Regarding guidance in the Delta Plan to provide adequate buffer areas in the Secondary

Area to the extent possible to avoid impacts to the Primary Zone, there are numerous policies in the Land Use and Open Space and Conservation Elements that address preserving agriculture and open space in areas outside of Tracy's Sphere of Influence and within its Planning Area (Objective LU-8.1, P3 and P4; Objective OSC-2.1, P4 and P5; Objective OSC-4.4, P1, P3 and A1).

Thus, implementation of the proposed General Plan would not conflict with any adopted conservation plan and no significant impact would occur.

4. Land Use Compatibility

Recognizing the importance of reducing conflicts between land uses, the proposed General Plan includes many policies to minimize conflict and encourage an orderly land use pattern. The proposed General Plan includes two objectives with supporting policies and actions which state that the city should have a clearly defined urban form structure, as well as require that the City comprehensively plans for new development within the SOI (Objectives LU 1.1 and 1.2).

In addition, the following are examples of some of the policies and actions that are included in the proposed General Plan to minimize conflict between land uses:

- Objective LU-6.1, P1. New industrial or mining uses shall be designed to not adversely impact adjacent uses, particularly residential neighborhoods, with respect to, but not limited to, noise, dust and vibration, water quality, air quality, agricultural resources and biological resources.
- Objective LU-6.1, P2. All proposed development shall comply with existing applicable County and State waste management plans and standards.
- Objective LU-6.1, P3. Use of berms, landscaped buffer zones, soundwalls, and other similar measures between quarrying operations and noise-sensitive adjacent uses is encouraged to ensure consistency with standards established in City's Noise Element of the General Plan.

- Objective LU-6.2, P1. Uses that are compatible with the noise, air quality and traffic impacts associated with freeways, such as auto-oriented commercial and industrial uses, should be located near and along freeway corridors whenever possible.
- Objective LU-6.2, P2. Adequate environmental protection and mitigation shall be provided for uses that are less compatible with development near and along freeway corridors.

Additional policy guidance to ensure land use compatibility is provided for areas identified as Special Areas of Consideration, which are shown in Figure 3-5, and for each of the 17 Urban Reserves.

Other sections of this DEIR identify additional policies that help reduce land use conflicts, such as between agricultural activities and adjacent urban uses (Agricultural section); between schools and hazardous waste generators (Hazardous Materials and Hazards section); and between mining activities and adjacent uses (Mineral Resources section). Another aspect of land use compatibility relates to the type, location and character of various land use development, which is addressed the Community Character Element of the proposed General Plan and discussed in Section 4.3 of this DEIR. Policies to address land use compatibility with the airport operations are discussed above.

In summary, implementation of policies and actions in the proposed General Plan and the LAFCo process would result in less-than-significant land use impacts related to conflicts with other lands, policies and regulations applicable in the Tracy area.

4.2 POPULATION, EMPLOYMENT AND HOUSING

Subsections C and D of Section 4.2 Population, Employment and Housing are amended as follows. Changes in text are shown in underline and ~~strikethrough~~.

C. Impact Discussion

Implementation of the General Plan will result in an increase of dwelling units and population within the Planning Area. The General Plan provides a policy framework to control and direct growth as it occurs. This section provides an analysis of impacts of future population and housing growth that is anticipated to occur within the 20-year planning horizon of the proposed General Plan, as well as total future growth within the SOI.

1. Future Population and Housing Growth

~~The~~ The development projections for the General Plan, through 2025, are based on land use designations, available acres and the City's existing building allotment regulations ~~in Tracy~~, insofar as they influence the timing and amount of residential development that may occur over the 20-year period. Development projections for total buildout within the City limits and the entire SOI are based on land use designations and available acres.

The Growth Management Ordinance (GMO) helps reduce the potential adverse impacts to Tracy from future development by setting controls on development. In accordance with the GMO, Tracy would be limited to allocating a total of 100 RGAs until approximately 2012 (however, there would be exceptions for affordable housing).[1] Including these projects, a maximum of 15,000 new residential market-rate units are projected to be approved by 2025, 2,000 of which are for priority projects. In addition, it is assumed that 1,200 units of affordable housing will be built inside and outside the City limits, in areas that allow medium- and high-density residential development for a maximum of up to 16,200 dwelling units by 2025. However, the actual rate

[1] *City of Tracy Draft Housing Element 2003-2008*. October 6, 2003.

of development that may occur pursuant to the proposed General Plan would also depend on market conditions and other factors, such as availability of infrastructure or environmental constraints.

Implementation of this General Plan and the GMO is projected to result in a Tracy population of approximately 109,000 people in the year 2025. This number is based on an estimate of the number of residential units allowed per year multiplied by the number of years multiplied by the number of people per residential unit (units x years x people per unit), and adding that to the population of Tracy in 2000, which was approximately 57,000 people, according to the U.S. Census.

Despite the limitations of the GMO, the extent of growth anticipated to occur may result in a potentially significant impact associated with substantial growth. However, the General Plan includes several policies to address this and reduce impacts to a less-than-significant level. For example, the General Plan states that new development in the SOI should be planned for in a comprehensive manner, and contain a balanced distribution of land uses between residential, employment-generating and public facilities (Objective LU-1.2, P1 through P3). The General Plan establishes that guidelines for residential growth shall be a component of the GMO as a separate objective, with supporting policies to direct RGA allotments to the goals of the Plan, including the provision of infill, senior, low-income and higher density housing (Objective LU-1.4, P1 through P5).

In addition, the projected amount of population and housing growth under the proposed General Plan through 2025 is much less than the San Joaquin County of Governments (SJCOG) projections, which state that Tracy's population is expected to grow 94% between 2005 and 2025.[2] Therefore, the projected population growth associated with implementation of the proposed General Plan would not result in the inducement of unexpected population

[2]http://www.sjcog.org/sections/departments/planning/research/projections?table_id=140&section_id=36&historic=0. Accessed on 6/30/05.

growth. Thus, no significant impact would occur for development through 2025.

Total buildout of the proposed General Plan would increase the population of Tracy by approximately 147,000 people and 46,000 housing units for a total of approximately 221,000 people and 69,000 housing units.[3] The employee population is projected to increase by approximately 193,000 for a total of 223,000 employees at total buildout.[4] As described in Chapter 3, total buildout is estimated to occur 69 to 159 years into the future, given current projections. This represents a substantial increase compared to the current population and employment in the city. The Community Character Element of the proposed General Plan includes goals, objectives, policies and actions intended to preserve and enhance quality of life and the unique character of Tracy as growth occurs. However, despite these policies, the overall amount of population and housing growth would result in a significant and unavoidable impact with regards to future population and housing growth at total buildout.

2. Housing and Population Displacement

Implementation of the General Plan would not displace housing or populations. The majority of growth proposed in the General Plan would occur on vacant and agricultural land, which has few existing housing units. Some growth is encouraged in existing neighborhoods and infill areas, however, the proposed General Plan includes policies that encourage the preservation and enhancement of the character of existing neighborhoods and specifically states that new development should not physically divide established neighborhoods (Objective CC-6.3, P1 and P4). Moreover, the Economic Development Element includes goals, objectives, policies and actions to ensure that Tracy

[3] Additional population projected from total buildout was added to the population and amount of housing units ~~of~~ in the City of Tracy in 2004 which was 74,070 persons and 23,005 dwelling units, respectively.

[4] The additional number of employees projected at total buildout of the proposed General Plan was added to the number of employees in Tracy in 2003, which was 29,758.

has a competitive workforce and is able to respond quickly to changing economic conditions, as a way to improve the match between Tracy residents' workforce needs and the jobs available in Tracy (Goals ED-7 and ED-8). As a result of these policies, no significant impacts to the displacement of populations or housing would occur.

D. Impacts and Mitigation Measures

While policies and other regulations would reduce impacts to future population and housing growth to the extent feasible for development projected through 2025, a significant and unavoidable impact would occur with regards to overall future population and housing growth projected at total buildout of the proposed General Plan.

Impact POP-1: As discussed on page 41, despite policies in the Community Character Element of the proposed General Plan to maintain and enhance quality of life as future growth occurs, development permitted under the proposed General Plan would result in approximately an additional 147,000 residents, 193,000 employees and 46,000 housing units for a total of 221,000 residents, 223,000 employees and 69,000 housing units at total buildout.

This is a significant and unavoidable impact. No additional mitigation is available.
~~Since no significant impacts were identified, no mitigation measures are required.~~

4.3 VISUAL QUALITY

Subsections A, C and D of Section 4.3 Visual Quality is amended as follows. Changes in text are shown in <u>underline</u> and ~~strikethrough~~.

A. Existing Setting

The following describes the existing visual resources within Tracy and current local and State regulations aimed at the protection of these resources.

1. Regulatory Framework

For the most part, the aesthetic quality of Tracy is controlled by the City. However, because much of the local visual amenities are derived from the surrounding natural landscape, certain State and local regulations are also applicable to this visual resource analysis. There are no federal regulations pertaining to aesthetics in the area.

a. California Scenic Highways Program

State scenic highways are designated by the Department of Transportation (DOT) to promote the protection and enhancement of the beauty, amenities and quality of life in California. In order to acquire an "officially designated scenic highway" label, the State and Caltrans require local jurisdictions to adopt a scenic corridor protection program to protect and enhance the adjacent scenic resources. In the Tracy area, San Joaquin County is the responsible local agency. Guidelines for this program are listed on the DOT web site, but are not specifically required. The guidelines instead suggest jurisdictions adopt regulations and language that prohibit inappropriate land uses such as junkyards or gravel pits, and visual detractors, such as billboards. The DOT monitors scenic routes at least once every five years, and if adjacent development has occurred that detracts from the scenic value, the Scenic Highway designation may be revoked for portions or all of the roadway.[1]

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[1] http://www.dot.ca.gov/hq/LandArch/scenic/shpg2.htm#d; accessed on 7/19/05.

b. San Joaquin County General Plan

San Joaquin County is responsible for enforcing the protection of its State-designated scenic routes within its borders. The County's 1978 Scenic Highway Element contained policies to this effect, but as this Element is no longer a part of the State General Plan requirements, it has not been updated. In regards to scenic routes, the current County General Plan includes only a recommendation that additional electrical or radio towers be prohibited along scenic routes.[2]

The existing San Joaquin County General Plan does not include specific policies aimed at the protection of other visual resources. The adoption of a Hillside Ordinance was proposed in the San Joaquin County General Plan programming matrix, but one has not been adopted at this time. Certain landscape and screening requirements are required by the County's Landscaping, Fencing and Screening Manual as part of the project review process, including a 10-foot landscape buffer along scenic highways, but specific mitigation measures for visual impacts of new development are not included. This manual is discussed in greater detail below.

c. San Joaquin County Development Title: Landscaping, Fencing and Screening Manual

The San Joaquin County Development Title contains specific requirements of new project proposals on unincorporated County land, including those for landscaping, fencing and screening that are detailed in a separate manual. These guidelines and regulations provide some protection for existing visual resources, associated with plantings, street trees and the impacts of urban development on the visual landscape. Part of these screening requirements also help mitigate impacts to neighboring properties from additional light and glare associated with new development. Detailed landscaping and screening requirements are provided for four categories of building: residential, commercial, industrial and parking areas. For each category, the Manual outlines

[2] Conversation with Adam Brucker, San Joaquin County Public Works Department, August 18, 2004.

requirements for the number and type of street trees required and approved for all new development, as well as protection mechanisms for existing native and older trees.[3]

d. San Joaquin County Multi-Species Habitat Conservation and Open Space Plan

The San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP), discussed in detail in Sections 4.6 and 4.7 of this report, also serves as protection for scenic resources associated with open space and agricultural lands. For example, in addition to the protection of sensitive species and habitats, conservation easements adopted to preserve land in open space or agricultural use in perpetuity, as required by the SJMSCP, also result in the protection of scenic views.

e. Tracy Municipal Code

As street trees are an important visual amenity in Tracy, the City's Municipal Code contains standards for their planting and removal, as well as guidelines for understanding city versus private responsibilities for tree maintenance. The standards address issues of trees on private property and those on public easements through private property, especially for resident-requested removals and replacement requirements.

The City of Tracy Standard Plan #154 establishes minimum requirements for light illumination, but does not have regulations limiting glare. Rather, the city addresses light and glare issues on a case-by-case basis during project approval and typically adds requirements as a condition of project approval to shield and protect against light splashing from one development to adjacent properties.[4]

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[3] San Joaquin County Landscaping, Screening and Fencing Manual. http://www.sjgov.org/commdev/cgi-bin/cdyn.exe/handouts-planning_landscaping?grp=handouts-planning&obj=landscaping, accessed 7/5/05.

[4] Personal communication with DES Planning Division, July 18, 2005.

f. Tracy Hills Specific Plan EIR

As part of the adoption process of the Tracy Hills Specific Plan and EIR, the City of Tracy City Council adopted mitigation measures that included a measure to amend its engineering design standards to incorporate specific standards regarding mass grading and erosion control in the Tracy Hills Specific Plan area.[5] In adopting the Tracy Hills Specific Plan EIR, the City Council made findings that implementation of mitigation measures included in the Final EIR would mitigate most project-specific impacts to visual resources of the development within the Tracy Hills Specific Plan area to a less-than-significant level. The FEIR identified a significant and unavoidable cumulative impact to visual resources, for which the City Council adopted a Statement of Overriding Consideration (Resolution No. 98-001).

2. Existing Visual Character and Resources

The aesthetic character of Tracy and its surrounding area is comprised of both natural and manmade amenities.

a. City Visual Identity

Tracy's visual urban form can be divided into several distinct segments:

- **Tracy's Downtown** has a compact, grid street system and serves as the historical heart of the City. Tracy's identity is enhanced by numerous historical buildings, walkable main streets with a diverse mix of uses and a small town urban fabric.
- **Traditional residential neighborhoods** were built around the time of World War II and surround the Downtown. The homes are a variety of styles, including bungalows and ranch-style, and are generally built on a grid pattern with tree lined streets.
- **Contemporary residential subdivisions** are spread along arterials to the south and west of the Downtown. Older contemporary neighborhoods have modest ranch-style homes that are integrated with the traditional

[5] Adopted by City Council Resolution 2000-404, September 19, 2000.

residential neighborhoods. Newer residential subdivisions have larger homes, which are built on wider curvilinear streets and cul-de-sacs.

- **Retail and commercial areas** outside the Downtown are characterized by strip commercial development along major arterial roadways, with the West Valley Mall on the north side of the City. These areas are generally automobile-oriented, and are physically separated from nearby residential areas with walls, curbings and separated parking lots.
- **Industrial areas** on the northeast and south sides of the city provide a strong economic base for Tracy. These areas have relatively low intensity warehouse, distribution and manufacturing facilities on large parcels.
- **Parks and landscaping within the City limits**. In various sizes and composition, these areas provide variance from urban buildings and development.
- **Agricultural lands** surround the City and provide a source of identity and heritage for the City's residents. Some of these lands are targeted for future residential, commercial and industrial development.

b. Planning Area Scenic Resources

Most of Tracy's scenic vistas and corridors are associated with the open space and agricultural resources of the surrounding Sphere of Influence (SOI) and Planning Area, and are a valued local asset for the community. The surrounding farming and grazing lands, and grassy hillsides of the Diablo coastal range, serve to situate the City in its local environment and landscape, and provide a reminder of its agricultural heritage.

The scenic resources that are located outside the City limits and even beyond the Planning Area boundary, especially in the viewshed of the scenic routes, are generally controlled by the development guidelines in the San Joaquin County Development Title. Scenic resources in the Planning Area include:

- **Views of the Diablo Range**. Rising from the Southwest portion of the Tracy Planning Area, this range extends from near sea level to 1,652 feet and provides a visual barrier between the Central Valley and the San

Francisco Bay Area. Generally, the eastern slopes visible from Tracy have not been developed and contain sporadic tree groupings.

- **Natural landscapes surrounding the Paradise Cut, Old River and Tom Paine Sloughs**. Located on the North side of the Tracy Planning Area, these landscapes provide streamside vegetation that provide visual contrasts as they run through the relatively flat agricultural lands.
- **Expansive Agricultural Lands.** The surrounding SOI and Planning Area contain agricultural lands that are used for row crops and grazing.
- **Hillside Areas.** Hillside areas, located on the south-western side of the city to the west of I-580, including in the Tracy Hills Specific Plan area~~,~~ are a visual amenity for residents of the City and travelers on I-580.
- **Electricity-generating Windfarms.** Located on the ridgetops, ~~West~~ west of the City and close to the Altamont Pass, the windfarms are visible from Tracy on clear days.

c. Entry Corridors and Scenic Routes

Roadways leading to and through Tracy are aesthetically important since they expose both travelers and residents to the visual character of the City and the surrounding area as they travel through the area, or commute back and forth to work beyond the City limits.

i. Entry Corridors and Gateways

Entrances to the city from major roadways are called "entry corridors" or "gateways." They are important for providing both visitors and residents with their initial impression of Tracy and a transition from a rural to urban environment. Interstate 580 (I-580) is a major entry corridor to the Central Valley from the Bay Area. It routes over the Altamont Pass, through rolling hills covered with windmills and offers the first views of Tracy's urban area, surrounded by expansive agricultural lands. Drivers heading west on Interstate 205 (I-205) are provided with views of the surrounding lands and coastal range beyond Tracy to the southwest. There are also numerous gateways into the city from Interstate roadways. These gateways include exits from I-

205 on MacArthur Drive, Tracy Boulevard, Grant Line Road and Eleventh Street, and exits from I-580 at Lammers Road and Corral Hollow Road.

ii. Scenic Routes

There are two Officially Dedicated California Scenic Highway segments in the Tracy Planning Area and cover a total of 16 miles. The first designated scenic highway is the portion of I-580 between I-205 and I-5, which offers views of the Coast Range to the west and the Central Valley's urban and agricultural lands to the east. Part of this scenic highway passes through the existing City limits where the Tracy Hills project is proposed. The second scenic highway is the portion of I-5 that starts at I-205 and continues south to Stanislaus County, which allows for views of the surrounding agricultural lands and the Delta-Mendota Canal and California Aqueduct.[6] As stated in the proposed General Plan, no development is expected along I-5 during the planning horizon of this General Plan.

In addition to State-designated scenic highways, the Scenic Highway Element of the 1978 San Joaquin County General Plan designated the seven-mile portion of Corral Hollow Road that runs southwest from I-580 to the County line as a scenic road.[7] A small portion of this scenic corridor is in the SOI.

d. Streetscapes and Landscaping

Vibrant streetscapes are important components of a successful city. If properly designed and maintained, streetscapes may provide a visual amenity. High quality streetscapes offer residents with pleasant shopping and walking districts, as well as landscaped corridors throughout the City. In addition to aesthetic value, street trees also provide shade and cooling in residential and commercial areas during Tracy's hot summers.

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[6] http://www.dot.ca.gov/hq/LandArch/scenic/shpg2.htm#d; accessed on 7/19/05.

[7] *City of Tracy Urban Management Plan/General Plan Draft Environmental Impact Report*. 1993, p.92.

One example of Tracy's approach towards improving its streetscapes is its Downtown Streetscape Project on 10th Street from Central to E Streets, which is currently being implemented. The project involves planting street trees and improving paving materials in an effort to revitalize Tracy's Downtown and promote further redevelopment.

e. Light and Glare

Nighttime lighting is more intense within the Tracy City limits as compared to the mainly undeveloped agricultural lands in the SOI and Planning Area. Major light sources include:

- Household and street lighting
- West Valley Mall and I-205 Corridor Specific Plan developments
- Patterson Pass Business Park
- Motor vehicles on local streets and surrounding highways

Current occurrences of glare are mainly a result of the sun or street lighting reflecting off of large expanses of concrete or other light-colored surfaces, such as parking lots, wide streets and warehouse rooftops. Glass and other reflective surfaces can also be a source of glare.

C. Impact Discussion

Implementation of the proposed General Plan will result in additional urban development within existing agriculture and open space landscapes, which could result in changes to visual and scenic resources in the area. New building could also result in an increase in light and glare impacts on surrounding uses. The proposed General Plan therefore contains policies to enhance Tracy's "hometown feel" and provide high-quality development.

1. Visual Identity and Scenic Resources

The following subsections address the main aesthetic qualities of Tracy and the Planning Area, and the potential impacts on these resources from the implementation of the proposed General Plan. Included are references to goals,

objectives, policies and actions contained in the Plan that would help mitigate negative impacts to the visual identity and scenic resources of the area as development occurs. Instances when implementation of the proposed General Plan could result in a positive visual impact on the community are also noted.

a. City Visual Identity

Tracy's scenic character is associated with the surrounding agricultural landscapes and distant hillsides, and the community's "hometown feel." Development permitted under the proposed General Plan could change the character of Tracy through conversions of open space and agriculture lands to urban uses, or the infill of vacant parcels within the urbanized area. Policies in the proposed General Plan are intended to achieve a balance between maintaining the area's character and visual amenities, and accommodating growth (Objective CC-1.2).

In order that new development does not detract from the physical quality of Tracy, the proposed General Plan includes a Community Character Element that specifies urban design principles in accordance with the City's vision. This Element includes goals, objectives, policies and actions to maintain and enhance the City of Tracy's unique character. Objective CC-1.1 states that the City would preserve and enhance its unique character and "hometown feel" through high-quality urban design. Further stated, new development should incorporate human-scaled design, pedestrian-orientation, interconnectivity of street layout, siting buildings to hold corners, entryways, focal points and landmarks (Objective CC-1.1, P2). Objective CC-1.2, P1 commits the City to only approve new development projects that meet the design principles set forth in the Element and in detailed design guidelines approved by the City Council.

Tracy's visual character is also dependent on views to and from the City. The proposed General Plan therefore works to minimize the visual impacts of urban development for people traveling to or through Tracy. In general, the proposed General Plan seeks to enhance its identity by creating a soft transition between urban and non-urban uses around the edge of the city; imple-

mentation policies and techniques are discussed in greater detail in Section 4.7 (Goal CC-4). Objective CC-1.4, P3 aims to protect scenic views by discouraging the use of soundwalls along highway corridors, which can also help protect the scenic routes in and around Tracy. Soundwalls are also discouraged within the city, on both residential and commercial development, since street--facing buildings add rather than detract from the area's visual character (Objective CC-1.4, P1 and P2). Utilities are also recommended to be undergrounded, which will reduce visual "clutter" associated with above-ground power lines (Objective CC-1.5, P1). The proposed General Plan also includes specific policies in regard to the I-205 Regional Commercial Area, which is visible from the highway. Goal CC-7 establishes that high quality architecture, site planning and landscaping should be desired in the I-205 Regional Commercial Area.

Finally, overall visual identity may be preserved through the development of an open space program (OSC-4.4, A1) and the implementation of the San Joaquin Multi-Species Habitat Conservation and Open Space Plan (OSC-4.4, P2). Preservation of undeveloped land in and around the city will help to preserve overall visual identity.

Despite these policies, the General Plan is proposing a significant increase in the number of new homes (and thus residential population) and new jobs. As is stated in the project description, the new population as a result of the General Plan is expected to result in an increase of approximately 34,930 new residents and 25,000 new jobs by 2025. Beyond the 20-year planning horizon of the proposed General Plan, future growth projected under total buildout of the City limits and the SOI is expected to result in an increase of approximately 147,000 people and 193,000 new jobs. Accommodating this growth will convert all (or nearly all) of the ~~significant amount of~~ undeveloped land in the City limits and SOI to urban uses thereby altering the overall visual and aesthetic resources in the City.

As a result, the amount of growth will create a significant negative impact to Tracy's existing character associated with the surrounding agricultural landscapes and distant hillsides. ~~visual identity and scenic resources.~~

b. Scenic Vistas and Views

New development could also impact current scenic views of the area from the surrounding highways. The most defined scenic vistas and views are to the surrounding natural hillsides on the western edge of the city, which are mostly void of development, as well as views of agricultural land from highways and other roadways.

The 20-year development scenario of the proposed General Plan includes some development on the hillsides within the City limits as part of the proposed Tracy Hills Specific Plan; the total buildout scenario assumes full buildout of the Tracy Specific Plan. In addition to residential development, the project also includes over 3,500 acres of permanent open space for habitat conservation and managed grazing. This open space area is located along portions of the hillside visible from the freeways. As noted above, mitigation measures adopted by the City as part of the Tracy Hills Specific Plan EIR mitigated most project-specific impacts to a less-than-significant level. A cumulative, significant and unavoidable impact to visual resources was identified in the Final EIR, for which the City Council adopted a Statement of Overriding Consideration (Resolution No. 98-001).

In terms of views of agricultural land, the SJMSCP provides for some mitigation against adverse impacts to visual quality by requiring mandatory levels of open space and agriculture preservation in response to development. Policies in the General Plan are also geared towards the preservation of these resources in the Tracy Planning area, in part to maintain the City's heritage and scenic assets gained from its agricultural heritage. This would be achieved in part by encouraging feathered edges of development and the creation of landscaped and natural buffers between Tracy and neighboring communities (Objective CC-4.1) and through the implementation of an open space plan (Objective OSC-4.4, A1). More detailed information about the preservation of

open space and agricultural land is provided in Section 4.7 of this report. In spite of existing policies and regulations to preserve agricultural and open space lands, development ~~in hillside areas in Tracy Hills~~projected for the 20-year development scenario and under total buildout of the City limits and SOI ~~could~~ would result in ~~a potentially~~ significant negative impacts to scenic views from regional roadways.

c. Entry Corridors and Gateways

Entryways are an important visual resource for anyone traveling to and from Tracy. The proposed General Plan contains objectives and policies intended to support the development of these visual amenities in Tracy. In general, Objective CC-1.3 supports the use of art and entryways as a way to enhance the unique quality of the City. Objective CC-1.3, P1 states that entryways should be designed for the access points into the city, and incorporate landscaping, trees, and/or architectural elements, to enhance a sense of arrival to the city. Specifically, 11th Street should be designed as the entry corridor for the Downtown, as part of its revitalization efforts (Objective CC-8.3, P2). Finally, the proposed General Plan directs the City to implement the entry monument recommendations of the City's Civic Art Plan (Objective CC-8.3, A1). As a result, the proposed General Plan would positively affect corridors and gateways.

d. Streetscapes and Landscaping

The proposed General Plan recognizes the importance of streetscape design and the role of landscaping and street trees in preserving and enhancing the visual quality of the City. Various policies contained in the Plan apply to City-wide issues, residential and commercial design. At the neighborhood level, Goal CC-5 encourages neighborhoods that have recognizable identities and structures. Neighborhoods, as well as commercial areas, should also be walkable (Objective CC-5.2) and designed to enhance Tracy's "hometown feel." These goals are achieved in part through thoughtful streetscapes layouts and landscaping that includes street trees. Objective CC-5.2, P9 requires street trees to be planted on all residential streets, in the Downtown (Objective CC-8.1, P5) and in the I-205 Regional Commercial Area (Objective CC-

7.1, P8). Overall, they should be planted in an amount substantial enough to eventually provide a tree canopy over sidewalks and residential streets and minor collectors. Objective CC-8.1, P5 also guides development in the Downtown to use landscaping to improve the pedestrian environment and create screens from surface parking lots.

In addition to landscaping requirements, streetscapes are guided by various urban design policies contained in the proposed General Plan. Overall, whether in residential, commercial or employment areas, or in the Downtown, the Plan emphasizes pedestrian-friendly, walkable environments that utilize high-quality urban design. The combination of these policies is intended to prioritize the continuation of Tracy's hometown feel throughout phases of new development and redevelopment during the lifetime of the General Plan (Objective CC-1.1, P1). Objective CC-1.1, P2 specifically states that all new development and redevelopment shall adhere to the basic principles of high-quality urban design, architecture and landscape architecture including, but not limited to, human-scaled design, pedestrian-orientation, interconnectivity of street layout, holding corners, gateways, nodes and landmarks.

As a result of the above policies, implementation of the General Plan would enhance the visual character of streetscapes throughout Tracy.

2. Scenic Roadways

Implementation of the proposed General Plan would result in development along one of the State-designated scenic route segments in the Tracy Planning Area – the portion of I-580 between I-205 and I-5. As stated in the General Plan, no new development is expected on the portion of I-5 south of I-205 during the 20-year planning horizon of the General Plan. In addition, limited new residential, office and commercial development is expected on the County-designated scenic route west of the intersection of Corral Hollow Road and I-580 in the Tracy Hills Specific Plan area in the 20-year development scenario. At total buildout of the proposed General Plan, there would be development along a portion of I-5, south of I-205, between approximately

Grantline Road and Eleventh Street. There would also be new residential development, along with some office and commercial development, along I-580 as part of buildout of the Tracy Hills Specific Plan.

The new development proposed as part of this General Plan that is located along scenic routes is not expected to include any land uses that would detract from visual quality, such as junk yards or gravel pits. The majority of new development visible from the roadway is expected to be single family homes with some industrial and commercial development. All new development is expected to conform to the design guidance presented in the Community Character Element. In addition, the land abutting I-205 is identified as a hard edge in Figure 3-3 of the Community Character Element. According to a policy in Objective CC-4.1, hard edges shall include a narrow landscaped buffer to enhance the visual quality of the development, especially for those traveling along the highway. Additionally, the land use designation map (Figure 2-2) identifies 3,550 acres of open space in the Tracy Hills Specific Plan area. A portion of this land will be visible from the State-designated I-205 scenic route.

During the 20-year planning horizon of the General Plan, ~~As a result of these policies,~~ the impact of ~~proposed~~ projected development ~~will~~ would be mitigated to a less-than-significant level. At total buildout, the amount of growth would result in significant negative impacts to vistas and views from scenic roadways.

3. Light and Glare

New development allowed under the proposed General Plan would increase the number of light sources and amount of glare within Tracy. The proposed General Plan does not include policies to address the potential for these impacts. However, the City does addresses light and glare issues on a project-level basis through conditions of project approval. As a result of the amount of new development and the lack of a light and glare regulation, there is a potentially significant impact in terms of increased sources of light and glare in the city.

D. Impacts and Mitigation Measures

Potentially significant impacts were identified in regards to overall visual identity and light and glare.

Impact V-1: As discussed on pages 52 and 53, ~~4.3-10 through 4.3-11~~, in addition to policies in the SJMSCP and the City's Agricultural Mitigation Fee Ordinance, the proposed General Plan contains policies to preserve open space and agricultural lands and community character. Despite such policies to enhance "hometown feel" and preserve open space, development permitted under the proposed General Plan for both the 2025 and total buildout of the City limits and SOI will result in a significant impact to the existing visual identity and character of the City ~~due to the amount of growth allowed~~.

This is a significant and unavoidable impact. No additional mitigation is available.

Impact V-2: As discussed on page 53, despite policies in the proposed General Plan to protect scenic resources, including those along state designated scenic highways for development projected through 2025, a significant and unavoidable impact would occur with regards to scenic resources along the state designated scenic routes I-580 (between I-205 and I-5) and I-5 (south of I-205) at total buildout of the proposed General Plan.

This is a significant and unavoidable impact. No additional mitigation is available.

~~**Impact V-2:** Despite policies and regulations to protect open space and agricultural areas under the proposed General Plan, some scenic views and vistas, namely hillsides within the City limits in the Tracy Hills Specific Plan area would not remain in their natural state.~~

~~Mitigation Measure V-2: As part of the update to the Tracy Hills Specific Plan, the Plan shall provide guidelines to ensure the safe and sensitive treatment of hillsides, including the consideration of establishing a hillside ordinance that defines standards for mass grading, ridgeline protection, erosion control, viewshed analysis among other considerations.~~

Impact V-3: Development permitted under the proposed General Plan ~~could~~ would increase levels of light and glare to a ~~level~~ significant level ~~enough to~~ resulting in adverse impacts to the visual quality of Tracy.

Mitigation Measure V-3: The City should include a policy under Objective CC-1.1 to require that lighting on private and public property should be designed to provide safe and adequate lighting while minimizing light spillage to adjacent properties.

4.4 Traffic and Circulation

No changes have been made to this section. Please refer to Section 4.4 Traffic and Circulation in the Draft EIR, issued on October 4, 2005.

As discussed in detail in Chapter 1 of this document, the analysis of potential impacts to traffic and circulation was based on development projections for a 20-year period.

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4.5 CULTURAL RESOURCES

No changes have been made to this section. Please refer to Section 4.5 Cultural Resources in the Draft EIR, issued on October 4, 2005.

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4.6 BIOLOGICAL RESOURCES

Subsections C and D of Section 4.6 Biological Resources are amended as follows. Changes in text are shown in underline and ~~strikethrough~~.

C. Impact Discussion

The proposed General Plan provides a framework for growth in the City limits and SOI, and includes provisions for the conservation of natural resources, including the protection of sensitive biological resources. Development allowed under the proposed General Plan does have the potential to significantly impact biological resources, as discussed below, but these potential impacts would be addressed through General Plan goals, objectives and policies.

1. Sensitive Species and Habitat

~~Depending on its location and intensity, f~~Future urban development in the Tracy City limits and SOI ~~allowed by the proposed General Plan~~ could result in adverse impacts either directly or indirectly to sensitive species identified in the area. Biological resources can be compromised if their natural habitats, including riparian areas, other sensitive natural communities and wildlife nursery sites, are disturbed or eliminated by the introduction of urban uses and humans. In this regard, significant impacts to wildlife corridors that interfere or in any way impede the movement of native plants, migratory fish or wildlife species are also considered in this discussion.

The previously-mentioned federal and State programs and regulations for the protection of biological resources become the responsibility of individual municipalities as new development or substantial redevelopment occurs. Individual project proposals in Tracy are required to meet all federal, State and regional regulations for habitat and species protection (Objective OSC-1.1, P1). Depending on the project, subsequent CEQA review may also be required, to further analyze potential impacts to these resources on a case-by-case basis.

As a guiding statement for Tracy's future development and as an indication of the City's commitment to protect sensitive species and their habitats within the City, Goal OSC-1 of the proposed General Plan states the general intention to protect rare, endangered and threatened plant and animal species. Objective OSC-1.1, P2 of the proposed General Plan specifically outlines the City's intent to continue its participation, along with SJCOG and other local municipalities, to implement and enforce the SJMSCP. Thereby, the City would continue to facilitate adoption and compliance with the Plan by project applicants, and the collection of appropriate mitigation fees to compensate for any loss of sensitive species habitat from new development. To further support regional efforts for open space preservation, the proposed General Plan also outlines policies aimed at protecting and preserving undeveloped portions of the Planning Area, beyond the SOI as open space (Objective OSC-4.4). Policies P1 though P3 under this objective speak to the City's intention of forming partnerships with neighboring communities, and the County as a whole, for the creation of open space buffers between developing areas and the use of the SJMSCP as a legislative handle in this effort. Action 1 further directs the City of Tracy to prepare a comprehensive plan for areas outside of the City that, among other things, identifies important areas for non-urban, open space uses, analyzes appropriate preservation methods, develops funding mechanisms and identifies administrative processes. Open space lands, whether for agricultural production, recreation or wilderness, and especially those preserved in perpetuity, are an important component in protecting biological resources.

The General Plan also includes policies to mitigate impacts to biological resources on project sites as development occurs. Objective OSC-1.1, P3 outlines a design requirement that new development should incorporate native vegetation into landscape plans and discourage the use of invasive, non-native plant species. Specifics include the requirement that new golf courses be designed to minimize water, energy and chemical (e.g. pesticides and fertilizer) usage, preserve wildlife habitat, and incorporate native plants and drought-resistant turf (Objective OSC-4.1, P6). Finally, Objective OSC-3.2, P3 aims to mitigate impacts to biological resources as a result of mining activities.

As discussed above, the implementation of the SJMSCP for development projects provides adequate mitigation to reduce impacts to biological resources to a level acceptable to meet State and federal requirements. Project proponents that choose not to participate in the SJMSCP, as it is a voluntary plan, would still be required to comply with existing local, State and federal regulations, as described in the Existing Setting section, which require similar mitigation to reduce impacts to sensitive species and habitats to a less-than-significant level. ~~However, Urban Reserve 6, commonly known as Cordes Ranch, falls outside of Tracy's SJMSCP compensation maps. Therefore, this EIR outlines mitigation measures to reduce the potentially significant impact to sensitive species, associated habitats, wildlife movement and reproductive areas to a less-than-significant level.~~

2. Wetlands

Implementation of the proposed General Plan may result in development of lands containing federally-protected wetlands, which could result in significant impacts to wetland resources. The SJMSCP includes a category for wetland mitigation, based in part on a Clean Water Act regional general permit garnered by SJCOG from the Corps. As previously mentioned, not all sensitive species, especially in conjunction with wetland habitats, are covered by the SJMSCP. Regardless, State and federal requirements for wetlands mitigation as outlined in the Clean Water Act must be met prior to project approval. Any development project proposed in a wetland area would under-go CEQA review for biological resources, and review by CDFG, in order to determine if additional mitigation measures are required. For example, a detailed wetland delineation and verification by the Corps would be required to determine the extent of jurisdictional wetlands on sites where modifications are proposed and to provide the basis for mitigation. Therefore, significant adverse impacts to wetlands would not occur due to development permitted under the proposed General Plan.

3. Local Policies, Ordinances and Habitat Conservation Plans

As mentioned above in the Sensitive Species and Habitat discussion, the proposed General Plan includes policies to protect biological resources. If adopted, this Plan would supersede the existing City of Tracy Urban Management Plan, not conflict with it. The proposed General Plan includes a policy (Objective OSC-1.1, P2) stating that the City would continue to participate with the SJCOG and other agencies to implement and enforce the SJMSCP, which is considered an adopted Habitat Conservation Plan for the entire San Joaquin County. In this, the City would continue to require project applicants to comply with the SJMSCP, and other State and federal regulations in the protection of biological resources, and development permitted under the proposed General Plan would not adversely impact the purpose and function of the SJMSCP. As the City of Tracy has not adopted a tree ordinance or other related ordinance, there would be no conflict with implementation of the proposed General Plan. In summary, as the proposed General Plan would not conflict with any local policies, ordinances or Habitat Conservation Plans protecting biological resources, this impact would be less-than-significant.

D. Impacts and Mitigation Measures

Since no significant impacts were identified, no mitigation measures are required. ~~Potentially significant impacts were identified in regards to biological resources.~~

~~**Impact BIO-1:** Sensitive species, associated habitats, wildlife movement and reproductive areas could be impacted by development in Urban Reserve 6, commonly known as Cordes Ranch, which falls outside of Tracy's SJMSCP compensation maps.~~

> ~~Mitigation Measure BIO-1: The City shall require property owners of Cordes Ranch to amend the SJMSCP such that the area is included in the SJMSCP or shall ensure that adequate site-specific mitigation is undertaken to a level acceptable to meet State and federal requirements.~~

4.7 AGRICULTURAL RESOURCES

Subsections C and D of Section 4.7 Agricultural Resources are amended as follows. Changes in text are shown in underline and ~~strikethrough~~.

C. Impact Discussion

The proposed General Plan ~~was designed to guide future growth in a way that would~~includes policy direction to encourage the preservation of agricultural lands not targeted for urban uses, while also discouraging premature conversion to urban uses. However, impacts to farmland would still occur as a result of implementation of the proposed General Plan.

1. Conversion of Farmland

Farmland faces various degrees of development pressure depending on its proximity to Tracy's already urbanized areas. The proposed General Plan allows for the development of urban uses on land within the City limits, even if it is classified by the California Department of Conservation as Prime Farmland, Farmland of Statewide Importance and Unique Farmland. Although these areas are already designated for urban uses in the 1993 General Plan, the proposed General Plan would nevertheless result in the eventual conversion of farmland to urban uses. Furthermore, the proposed General Plan extends the SOI from its current boundary, which would further impact the conversion of farmland to urban uses.

As discussed in Section 4.6 and in the Regulatory Framework portion of this section, the City currently uses several regulatory tools for the protection of agricultural resources, including its participation in the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan. The City's recently-adopted Agricultural Mitigation Fee Ordinance will also be used to collect in-lieu fees for impacts from development on agricultural land. These funds will eventually be utilized for the purchase of conservation easements on agricultural lands.

The proposed General Plan includes policies that continue the City's support and implementation of these regulations (Objective OSC-1.1, P2 and OSC-2.1, P3). Objective OSC-2.1 outlines the City's intent to support San Joaquin County's efforts to preserve existing agricultural lands in the Tracy Planning Area and outside of the SOI. Objective OSC-2.1, P4 states that the City shall encourage the continued agricultural use of land within the Tracy Planning Area and outside the SOI that is currently being farmed. The City will also work cooperatively with non-profit organizations, such as land trusts, to preserve agricultural land in the Tracy Planning Area (Objective OSC-2.1, P5).

The proposed General Plan also contains policies geared toward the development of an open space program for the City, which would be partially comprised of agricultural lands. For example, the City would seek to prevent the development of undeveloped lands in the Tracy Planning Area beyond the SOI (Objective OSC-4.4), especially on such lands between Tracy and its adjacent communities (Objective OSC-4.4, P1). Objective OSC-4.4, P3 also states that the City would be assertive in forming partnerships with San Joaquin County in the pursuit of open space preservation. Objective OSC-4.4, A1 outlines nine specific actions for the City to take in its efforts of establishing a comprehensive open space program and plan. One of these directives includes partnering with non-profit organizations, such as the Central Valley Farmland Trust, to identify and purchase land and easements within the Tracy Planning Area.

Although these mitigation programs and supportive policies would somewhat reduce conversions of farmland and are important for curbing impacts to agricultural resources on a larger scale, the permanent loss of farmland that would occur as a result of the amount of growth expected in the General Plan would result in a significant and unavoidable impact to agricultural resources.

2. Conflict with Existing Zoning or Williamson Act Contracts

Much of the undeveloped land in the Tracy SOI and Planning Area is designated in the San Joaquin County General Plan as Agriculture and zoned for agricultural uses by the County. The proposed General Plan designates most

of the land within the Tracy SOI for future urban uses, which could result in a potentially-significant impact due to a zoning conflict. However, the City cannot approve any urban development on land within the SOI until it is annexed into the City limits, at which point the City-proposed land use designations and associated zoning would apply. Therefore, at the point that development is permitted, the zoning conflict would be mitigated. Until annexation occurs, the City shall support agricultural activities in the SOI. Objective OSC-2.1, P2 in the proposed General Plan states that the City shall support San Joaquin County policies and zoning actions that maintain agricultural lands in viable farming units. Therefore, there would be a less-than-significant impact in regards to zoning conflicts.

Development permitted under the proposed General Plan would direct urban uses to lands currently held in active Williamson Act contracts, both in the City limits and the SOI. Therefore, a potentially-significant impact as a result of a conflict with Williamson Act contracts could occur. However, all of the 1,360 acres of Williamson Act land currently within the City limits have filed for non-renewal prior to this General Plan update. In general, Williamson Act contracts are strictly voluntary, and the proposed General Plan does not obligate any land owner within the City limits or SOI to file for non-renewal or early cancellation of Williamson Act contracts, although land owners may be encouraged to do so in anticipation of urban growth.

The proposed General Plan contains policies to mitigate conflicts with Williamson Act contracts on land in the entire Tracy Planning Area. Objective OSC-2.1, P3 states that the City should endeavor to support the preservation of Williamson Act lands and Farmland Security Zone lands within the entire Tracy Planning Area (including lands within the City limits and SOI), and encourage the continued agricultural use of land within the Planning Area outside of the SOI that is currently being farmed (Objective OSC-2.1, P4). As described above, all Williamson Act contracts are renewable on a voluntary basis and can also be cancelled upon payment of a fee and compliance with additional legal requirements. ~~Therefore, implementation of the proposed General Plan would not result in conflicts with existing Williamson Act con-~~

~~tracts within the Tracy Planning Area and the impact would be less-than-significant.~~ Despite the voluntary nature of this program, buildout of the City limits and the SOI may result in 3,867 acres of land under active Williamson Act contracts being converted into urban uses. This would result in a significant impact to Williamson Act lands.

3. Pressure for Additional Conversion of Agricultural Land

New urban development can make farming more difficult or costly due to conflicts between urban and agricultural activities. For example, residents may complain about noise, dust, odors and low-flying aircraft that are often unavoidable, and increase restrictions on agriculture processes that lower productivity. Urban uses may also increase run-off and air pollution from additional impervious surfaces and automobile traffic. In addition, urban activities may also negatively affect nearby agricultural uses with increased vandalism and the introduction of domestic animals that may disturb certain agricultural activities. In addition, urban uses may drive up the potential value of properties, thereby increasing property taxes for surrounding farmland not protected by Williamson Act contracts. One or a combination of these conflicts could limit agricultural activities or encourage farmers to take their land out of agricultural production, resulting in adverse impacts to agricultural resources in the Tracy area.

As mentioned above, numerous programs and policies exist at the City and County level to support the continuation of working farmland and agricultural land. One of the most important of these is the City's Right-to-Farm Ordinance. The Ordinance is intended to educate the public as to the realities of living in a rural community surrounded by agricultural production activities and provides that these realities do not constitute nuisances that the City would support eradicating.

The proposed General Plan contains several policies to help minimize conflicts between agricultural and urban uses. Objective OSC-2.2, P2 states that land uses allowed near agricultural operations should be limited to those not negatively impacted by dust, noise and odors. In further support, Objective

OSC-2.2, P3 directs the City to review, maintain and update its Right-to-Farm Ordinance.

Policies are also contained in the proposed General Plan concerning the feathering of urban uses into agricultural uses, both city-wide and for individual project sites. For most of the City, a "soft edge" approach would be pursued to create appropriate transitions between the two uses and mitigate conflicts (Goal CC-4). A "soft edge" is defined as a gradual or smooth transition between urban and rural uses (Objective CC-4.1, P2). Objective CC-4.1, P3 provides three techniques for the implementing the soft edge, including buffer zones, cluster development and density feathering. The incorporation of site-specific buffers between agricultural uses and urban development also helps reduce these conflicts and are required of new projects. As further specified in Objective OSC-2.2, P1, these buffers, which can be created with roads, setbacks and other physical boundaries, shall be located on the development site and shall not become the maintenance responsibility of the City. To be effective, they are to be of sufficient size to protect the agriculture operations from the impacts of incompatible development and be established based on the proposed land use, site conditions and anticipated agricultural practices.

As a result of these County and City policies to support the continuation of working farmland and agricultural land, and to reduce to the extent feasible the potential impacts resulting from the development of urban uses adjacent to agricultural uses, the impact of urban development under the proposed General Plan would be mitigated to a less-than-significant level.

D. Impacts and Mitigation Measures

While policies and other regulations would reduce impacts to agricultural resources to the extent feasible, several additional impacts would occur in regard to loss of farmland to urban development permitted under the proposed General Plan.

Impact AG-1: As discussed on pages 67 through 71 ~~4.7-10 through 4.7-15~~, the proposed General Plan contains policies to preserve agricultural lands, in addition to policies in the SJMSCP and the City's Agricultural Mitigation Fee Ordinance. Despite these policies and regulations, development permitted under the proposed General Plan would result in the conversion of Prime Farmland, Unique Farmland and Farmland of Statewide Importance to urban uses.

This is a significant and unavoidable impact. No additional mitigation is available.

Impact AG-2: Despite policies in the proposed General Plan to support and encourage preservation of Williamson Act lands and the voluntary nature of the Williamson Act program, total buildout of the City limits and SOI may result in the conversion of land under active contracts to urban uses.

This is a significant and unavoidable impact. No additional mitigation is available.

Impact AG-~~2~~3: The proposed General Plan contains several policies to mitigate impacts to agricultural resources due to the conversion of additional farmland to urban uses. However, implementation of the proposed General Plan would result in additional and incompatible urban development adjacent to agricultural uses.

This is a significant and unavoidable impact. No additional mitigation is available.

4.8 MINERAL RESOURCES

No changes have been made to this section. Please refer to Section 4.8 Mineral Resources in the Draft EIR, issued on October 4, 2005.

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4.9 COMMUNITY SERVICES

Subsections A through E of Section 4.9 Community Services are amended as follows. Changes in text are shown in underline and ~~strike-through~~.

A. Police

3. Impact Discussion

The ~~Implementation of~~20-year development scenario of ~~-~~the proposed General Plan would allow for an additional 34,930 Tracy residents by 2025.[1] Total buildout of the City limits and SOI would allow for approximately an additional 147,000 people, which is expected to occur in approximately 69 years, based on current projections.[2] Both scenarios ~~which~~ would result in an increased ~~the~~ need for police services. The City will continue to provide law enforcement for property within the City limits, which will eventually adjust to include lands annexed from the SOI in preparation for development. To continue to provide the current level of police service, approximately 35 additional sworn officers would eventually need to be added to the Tracy Police Department under the 20-year development scenario. At total buildout of the proposed General Plan, 147 officers would need to be added to the Police Department. This is based on the current staffing level of approximately one sworn officer per 1,000 residents, which is a level deemed appropriate for the city by the Police Department. The City would also continue to provide mutual aid with the San Joaquin County Sheriff's Department when a situation exceeds the capabilities of either department (Objective PF-2.1, P4).

~~Overall~~The proposed General Plan includes goals, objectives, policies and actions~~, the City's adopted Growth Management Ordinance (described in~~

[1] As noted in Chapter 3, Tracy's population is projected to be 109,000 people in 2025. Increase in population is calculated by subtracting population of Tracy in 2004 from 109,000.

[2] Methodology and assumptions for projecting development for this Draft EIR are described in Chapter 3.

~~detail in Section 4.1: Land Use) is intended~~ to achieve a steady and orderly growth rate that allows for the adequate provision of services and community facilities. To support this goal as it relates to law enforcement, the proposed General Plan ~~also~~ outlines policies to ensure the provision of adequate police services needed to provide a safe environment in Tracy (Goal PF-2, Objective PF-2.1). Objective PF-2.1, P1 specifically states that the City would maintain adequate police staffing, performance levels and facilities to serve Tracy's existing population as well as any future growth.

The proposed General Plan also contains policies that were designed to provide police services in an efficient manner and ensure project designs help to reduce the need for policing. The Land Use Element of the proposed General Plan outlines two objectives to foster the efficient match of public facilities to development. Objective LU-1.3 would ensure that public facilities are accessible and distributed evenly and efficiently throughout the City, and that residential development is directed in a way to maximize the use of existing public services and infrastructure (Objective LU-1.4). In addition, the City would continually strive for improved performance and efficiency of the Tracy Police Department (Objective PF-2.1, P3), and would review all project proposals for potential law enforcement hazards and encourage the use of physical site planning for crime prevention. Four specific action items are also included under Objective PF-2.3 to maintain and improve law enforcement services to keep up with Tracy's changing population and help reduce crime in general. The combination of these policies would help minimize the demand for police services.

Since some level of staffing increases would be needed over the life time of the proposed General Plan, there may be a need for new or expanded police facilities in the City. The proposed General Plan does not specifically identify where potential expansions or new police facilities would occur since it would depend on the ultimate location of new development. However, police substations would be required in conjunction with new development as needed to meet the City's response time standards (Objective PF-2.3, P3). The proposed General Plan includes policies to offset these potential capital costs by

requiring new development to pay its fair share of these expenses through an assessed public facilities impact fee (Objective PF-2.1, P2).

Since the proposed General Plan is general in nature and the exact location and timing of future growth is yet to be determined, it is unknown at this time to what extent existing police facilities would be expanded, or if new substations or police stations would be required. Public facilities would be allowed under the Public Facilities, Urban Center, Urban Reserve and all Residential land use designations of the proposed General Plan, so their locations could occur in any of these areas. The specific environmental impact of constructing police facilities to support the growth permitted under the proposed General Plan cannot be determined at this first-tier level of analysis. Policies from the proposed General Plan that are identified in other sections of this EIR would also apply to any potential impacts associated with the construction and operation of police service facilities. As specific police facility projects are identified, additional second-tier environmental analysis would be completed pursuant to CEQA.

B. Fire Protection and Emergency Medical Services

3. Impact Discussion

As new development occurs pursuant to the proposed General Plan, there would be increased demand for fire and emergency medical protection to ensure adequate levels of service. Additional staff, equipment and facilities would also be required to maintain or exceed the current response time of 5.42 minutes as Tracy's population grows. Additional fire services and associated facilities would be needed under the 20-year planning horizon of the proposed General Plan, as well as at total buildout, as the population is projected to grow –by 34,930 persons and by 147,000 people, respectively. The actual location of new and expanded facilities would depend on where growth occurs within the City limits and SOI, which is not known at this time. Under the proposed General Plan, fire and emergency response facilities would be

allowed under Public Facilities, Urban Center, Urban Reserve and all Residential land use designations.

Recognizing the potential need for increases in fire protection and emergency medical services, the proposed General Plan includes policies to ensure that adequate related facilities are funded and provided to meet future growth (Objective PF-1.1, P1). Similar to the provision of police services discussed above, Objective PF-1.1 states that the City would strive to continuously improve the performance and efficiency of fire protection and emergency medical services. In this regard, the City would coordinate land use planning, project development and site design to reduce fire hazards. Fire hazards shall be identified and mitigated during the project review and approval process (Objective PF-1.2, P1), and new developments shall satisfy fire flow and hydrant requirements and other design requirements as established by the City (Objective PF-1.2, P5).

The proposed General Plan also outlines land use policies to take full advantage of the use of existing public services and minimize the need for additional ones. As discussed above in regards to police services, Objective LU-1.3 would ensures that public facilities are accessible and distributed evenly and efficiently throughout the City, and that residential development is directed in a way to maximize the use of existing public services and infrastructure (Objective LU-1.4). As new facilities are needed, the City shall plan fire station locations to maintain or enhance current response levels, including fire sub-stations that are required in conjunction with new development (Objective PF-1.2, P3 and P4). ~~Furthermore, the proposed General Plan would support the City's adopted Growth Management Ordinance (described in detail in Section 4.1: Land Use), which is intended to achieve a steady and orderly growth rate that allows for the adequate provision of services and community facilities.~~

The specific environmental impact of constructing new fire and emergency medical response facilities to support the growth allowed under the proposed General Plan cannot be determined at this first-tier level of analysis. Poten-

tially significant impacts that may result from the development and operation of these facilities are addressed by various plans, policies and mitigation measures identified in other sections of this EIR. As specific fire and emergency response facility expansion projects are identified, additional project-specific, second-tier environmental analysis would be completed pursuant to CEQA.

C. Schools

3. Impact Discussion

Implementation of the proposed General Plan would increase demand for school facilities during the 20-year planning horizon, as well as under total buildout of the proposed General Plan. Additional staff, equipment and facilities would also be required to maintain or exceed the current school service standards.

As discussed in greater detail in the Project Description, development projected through the 20-year planning horizon of the proposed General Plan would result in approximately 10,341 additional housing units, 6,455 of which would be single-family (62 percent) and 3,886 that would be multi-family units (38 percent). According to the development projected through the 20-year planning horizon of the proposed General Plan, approximately 58 percent of this growth would occur within the TUSD, with the remainder within the JESD. Given these same growth projections, the Lammersville, Banta and New Jerusalem districts are not expected to see significant growth through 2025. ~~under the proposed General Plan.~~

Based on the TUSD student generation rates, which are differentiated by grade level and housing type, the TUSD is anticipated to add 1,889 K through 5 students, 912 6 through 8 students and 1,954 9 through 12 (includes 982 students living in the JESD) through 2025. According to the JESD student generation rate, ~~it would add~~ approximately 2,298 K-8 students would be added to the district during the same time period. Therefore, the total number of new students estimated ~~over~~ during the 20-year ~~the life~~planning horizon of

the General Plan is 7,053; a detailed breakdown by grade and district is shown in Table 4.9-8.

Under total buildout of the proposed General Plan, development is projected in all four school districts within the SOI.[3] These projections were also based on the TUSD student generation rates since they were the most comprehensive, providing generation rates for grades K through 12. These rates are very similar to the Jefferson School District. Lammersville and Banta School Districts currently have lower or no student generation rates, reflecting the existing level of development and population. However, under total buildout of the SOI, it can be assumed that a range of school facilities, elementary, middle and high schools would be needed to accommodate projected development. Total buildout of the proposed General Plan is estimated to result in a new student population of approximately 21,900 students. A detailed breakdown by grade and district is shown in Table 4.9-9.

For the most part, TUSD schools are operating near to or over capacity, with portable classrooms being used at many schools. The JESD currently has 203 seats remaining between the Monticello and Jefferson schools, with 500 more to be added upon completion of Phase 2 of the K-8 Anthony C. Traina School. Based on the new student population projected during the ~~timeline~~ 20-year planning horizon of the proposed General Plan, it can be assumed that new school facilities would need to be constructed within both districts. Under total buildout of the proposed General Plan, new facilities would need to be constructed within all school districts within the SOI. The actual location of new and expanded facilities would depend on where growth occurs in the City limits and SOI; schools would probably be located in residential areas, in proximity to the student populations they serve. Under the land use

[3] The New Jerusalem School District is within the Tracy Planning Area, however it is outside the boundary of the SOI. Therefore, no development was projected in this district in either the 20-year nor the total buildout scenarios.

TABLE 4.9-8 **STUDENT ENROLLMENT PROJECTIONS AS A RESULT OF THE PROPOSED GENERAL PLAN, THROUGH 2025**

	Number of Additional Students According to Housing Type, between 2005 and 2025 (Current Generation Rates in Parentheses)		
	Single-Family Residential	**Multi-Family Residential[1]**	**Total Students by Grade**
TUSD			
K-5 School	1,349 (0.449)	540 (0.1822)	1,889
6-8 School	700 (0.233)	212 (0.07155)	912
9-12 School	1,743[2] (0.270)	211[3] (0.05435)	1,954
Total New TUSD Students	**3,792[2]**	**963[3]**	**4,775**
JESD			
K-8 Schools	1,656 (0.75)	642 (0.75)	2,298
Total New Students in Tracy	**5,448**	**1,605**	**7,053**

[1] Includes mobile home residential generation rate.

[2] Includes 932 high school students living in the JESD, in single-family housing units.

[3] Includes 50 high school students living in the JESD, in multi-family housing units; the JESD does not have a separate generation rate for multi-family housing.

Note: Calculations are based on TUSD and JESD generation rates and General Plan growth projections. Between 2005 and 2025, 10,341 total new housing units are expected to be developed; 6,455 would be single-family residential.

TABLE 4.9-9 **ADDITIONAL STUDENT ENROLLMENT PROJECTIONS AT TOTAL BUILDOUT**[1]

	TUSD	Jefferson	Banta	Lammersville	Total Students by Grade
K-5 School	5,072	3,741	1,333	1,217	11,363
6-8 School	2,272	1,737	669	575	5,253
9-12 School	2,182	1,759	746	596	5,284
Total New Students in Tracy	9,527	7,237	2,748	2,388	**21,900**

[1]Number of new students were based on generation rates for the TUSD for single-family and multi-family units.

designations proposed in the General Plan, school facilities would be allowed in Public Facilities, Urban Center, Urban Reserve and all Residential areas.

The proposed General Plan includes policies and actions to provide sufficient educational facilities to meet the demands of existing and new development (Goal PF-3) and assist the school districts serving the City to develop new facilities (Objective PF-3.1). In this regard, the City would provide school districts with the opportunity to review proposed residential developments and make recommendations for needed facilities based on a number of factors (Objective PF-3.1, P2). In order to ensure that school expansions or new facilities are funded by developers to the extent allowed by law, the City would collect land dedications or in-lieu school impact fees from project applicants in accordance with limits established by State law. Funding of school facilities has been impacted by the passing of SB 50, which limits the impact fees and site dedication that school districts can require of developers to off-set the

impact of new development on the school system. In general, school projects would occur on land reserved in cooperation with the associated school district (Objective PF-3.3, P1).

The specific environmental impact of constructing new schools and related facilities to support the proposed General Plan growth cannot be determined at this first-tier level of analysis. However, development and operation of school facilities, both public and private, may result in potentially significant impacts that are addressed by various plans, policies and mitigation measures identified in other sections of this EIR. As specific school expansion or improvement projects are identified, additional project specific, second-tier environmental analysis would be completed.

D. Solid Waste

3. Impact Discussion

Growth permitted under the both the 20-year planning horizon and under total buildout of the proposed General Plan would result in additional solid waste in Tracy. Based on the 2001 per capita generation rate for residential solid waste, the additional 34,930 residents anticipated through 2025 would generate an extra 27,284 tons of garbage per year, or approximately 75 tons per day. The total population projected under the 20-year planning horizon of the proposed General Plan, 109,000 persons, would generate 233 tons of solid waste per day, for a total of 85,140 tons per year. Tracy's compliance with AB 939 would divert an average of 50 percent or more of this waste away from the landfill to recycling and composting. Based on 2001 data, residential garbage comprised approximately 27 percent of the solid waste deposited from Tracy at the landfill. Taking all of this into consideration, the total residential solid waste generated by 2025 would use 8 to 16 percent of the Foothill landfill's daily permitted amount. Additional commercial and industrial wastes would total approximately 125 tons per day, with variable diversion rates resulting in the use of between 4 to 8 percent of the landfill capacity. Therefore, as the total of 358 tons per day disposed into the Foothill

landfill from Tracy by 2025, as anticipated under the proposed General Plan, would use approximately 12 to 24 percent of the landfill's permitted daily capacity, implementation of the General Plan would not compromise the landfill's current assessed lifetime through 2054.

The total population estimated under total buildout of the City limits and SOI of the proposed General Plan, 221,000 persons, would generate approximately 473 tons of solid waste per day for a total of 172,578 tons per year. At total buildout, additional non-residential wastes would total approximately 1,034 tons per day or 377,386 tons per year. These estimated totals in solid waste generation would be reached through an incremental increase each year until total buildout.

As discussed in Chapter 3, total buildout of the proposed General Plan would be expected to occur in 69 years for residential development and from 107 to 159 years for non-residential development, given current development assumptions. Assuming that Tracy's solid waste is the only input to the Foothill Landfill, and that the City continues to comply with AB 939, then the Foothill landfill would have enough capacity to accommodate the City's needs at total buildout. However, the Foothill Landfill receives waste from numerous other sources in San Joaquin County, as reflected by the landfill's current assessed lifetime through 2054. Since the estimated buildout under the proposed General Plan would occur well beyond 2054, it is reasonable to assume that additional landfill capacity would be needed some time in the future.[4] It is also reasonable to assume that adequate planning for further landfill expansion will occur in the 48-year period before the existing landfill reaches capacity.

[4] It is important to note the estimates for solid waste generation and landfill capacity at total buildout are speculative at best since the timeframe is so far into the future; a number of factors, such as improvements in resource recovery technology and major changes in materials used to produce items could affect solid waste generation and disposal rates.

The proposed General Plan includes actions to ensure that adequate infrastructure is in place for solid waste collection and disposal in the city. The Land Use Element includes a policy that states that new development shall not be approved unless there is infrastructure in place or planned to support the growth (Objective LU-1.4, P5). In addition, (Objective PF-5.2) in the Public Facilities Element includes a number of actions regarding the collection and disposal of solid waste. They include the continuation of weekly curbside trash collection service, continued operation of the Tracy Material Recovery Facility and Transfer Station, and a partnership with San Joaquin County to ensure that there is adequate landfill space to meet projected growth (Objective PF-5.2, A1-3 respectively).

To meet State requirements and ensure the lifespan of the landfill, the proposed General Plan includes policies to encourage recycling and resource conservation to minimize the amount of disposable solid waste generated by residents and businesses in Tracy (Objective PF-5). Objective PF-5, P1 states that the City would strive to meet or exceed the State's goal of diverting 50 percent of all solid waste from landfills. The proposed General Plan encourages local businesses to expand their recycling efforts and to reduce packaging of products manufactured in the city (Objective PF-5, P3). In general, the City would encourage all construction projects in Tracy to salvage and reuse construction and demolition materials and debris as possible (Objective PF-5, P4), and residential, industrial, commercial and retail buildings to be designed or improved to accommodate an increase in the amount and type of recycled materials (Objective PF-5, P6).

The proposed General Plan also includes a number of policies in regards to the City's own operations and facilities. Objective PF-5, P4 directs public buildings to be designed or improved with on-site storage facilities for recycled materials, and Objective PF-5, P5 encourages the use of post-consumer recycled paper and other recycled materials in all City operations. The proposed General Plan also outlines six actions for facilitating recycling and composting efforts within the city, including for example, the bi-weekly, citywide collection program to compost leaf and yard waste (Objective PF-5.1,

A1), residential single-stream curbside recycling (Objective PF-5.1, A3), and develop and maintain a recycling and diversion plan (Objective PF-5.1, A3).

The combination of these policies and actions outlined in the proposed General Plan would ensure that the City complies with applicable regulations related to the disposal and reduction of solid waste, and in general reduces the amount of solid waste it disposes into Foothill landfill. Furthermore, the City will not approve new development unless there is infrastructure (including landfill capacity) in place or planned to support the growth. Therefore, implementation of the proposed General Plan would not result in significant impacts in regard to solid waste, from the exceedence of its landfill capacity or from non-compliance with applicable regulations.

E. Parks and Recreational Resources

3. Impact Discussion

New development under the proposed General Plan has the potential to increase the demand for parks and recreational facilities. Using the City's adopted requirement of 4 acres of parkland per 1,000 residents and the estimated population increase of 34,930 residents through 2025, there would be a need for ~~133~~ 140 additional acres of parkland to serve development projected during the 20-year planning horizon of the proposed General Plan. Of this amount, approximately ~~9~~ 35 acres would need to be in Community Parks, and the remainder would need to be in either Neighborhood Parks or Mini-Parks. At a ratio of 5 acres per 1,000 residents, 175 additional acres of parkland would be required to serve additional development projected through 2025. At total buildout of the proposed General Plan, the estimated increase in population of 147,000 residents would result in a need for 588 additional acres of parkland to serve development of all available land within the City limits and entire proposed SOI at a ratio of 4 acres per 1,000 residents. At a ratio of 5 acres per 1,000 residents, 735 additional acres of parkland would be needed to serve projected development at total buildout.

If these additional acres in parkland are not provided, there could be a significant impact associated with a shortage of park and open space facilities and the substantial deterioration of existing facilities from overuse, since new residents would be forced to use existing facilities. Therefore, the proposed General Plan includes policies and actions to ensure that the City's parkland goal is met and existing facilities are not negatively impacted by growth permitted under the Plan. The proposed General Plan designates 460 total acres of land for park uses, 260 in the City limits and another 200 in the SOI. Future park lands will also be identified during the project approval process for residential developments. These parks have not been identified nor are they included on the land use designation map.

Although only 460 acres of land identified for park use in the proposed General Plan, and there would be a need for 588 acres of parkland to serve population projected at total buildout, existing policies, such as the Quimby Act and the City's Parks Master Plan, as well as policies and actions in the proposed General Plan will ensure that there is sufficient parkland provided (Objective OS-4.1 P1 through P3, P4 and P7 through P10, and A1, and Objective OS-4.2 P1, P6 and A1). The existing City policy requires that new residential projects provide 4 acres of parks per 1,000 population. Implementation of this policy will ensure that there is no shortage of parks facilities for current and future residents. Additionally, the City shall consider increasing the parks standard of 4 acres per 1,000 population to 5 acres per 1,000 population (Objective OSC-4.2, P1). This policy would also require that new developments provide new park acreage or in-lieu fees at this ratio. Objective OSC-4.2, P2 and P3 provide guidelines for developers in this regard, mainly that land dedicated towards the parkland requirement must meet certain usability criteria and that golf courses and active detention basins would not count toward dedication requirements. Objective OSC-4.2, P4 through P6 provide design direction for ensuring that new parks are easily accessible and match the area's needs. Objective OSC-4.3 also contains four policies and one action related to the establishment of a regional parkways system that bolsters park and recreation opportunities for residents of Tracy. No changes are proposed in the General Plan that would inhibit the ability of the City to provide rec-

reational facilities in the future, since parks are allowed and specific land is designated for parkland.

In addition, Objective OSC-4.1 states that the City would provide and maintain a diversity of parks and recreational facilities in Tracy, which are geographically distributed (Objective OSC-4.1, P2). This is further supported by Objective LU-1.3, which states that the City shall ensure that parks are accessible and distributed evenly and efficiently throughout the city. Objective OSC-4.1, Policies 1 though 10 outline specific direction for the development of parks and recreation facilities in the City, including guidelines for the incorporation of natural features, environmentally-friendly specifications for golf courses, and definitions of the types of parks and associated service goals. Objective OSC-4.1, A1 directs the City to update its Parks Master Plan on a regular basis and expand partnership opportunities with the school districts for joint facilities (OSC-4.1, A2). Finally, OSC-4.1, A3 obliges the City to explore the development and funding of a large City park, possibly 60 to 100 acres in size, that includes both passive and active recreational amenities.

The specific environmental impact of constructing new individual park or recreation facilities cannot be determined at this first-tier level of analysis. Development and operation of park facilities may result in potentially significant impacts that are addressed by various plans, policies and mitigation measures identified in other sections of this EIR. As specific park and recreation facility expansion projects are identified, additional project-specific, second-tier environmental analysis will be completed.

Overall, as a result of the policies mentioned above, impacts resulting in the increased use of existing parks, such that substantial physical deterioration would occur or be accelerated, would be less-than-significant.

4.10 INFRASTRUCTURE

The impact discussions for subsections A through C in Section 4.10 Infrastructure are amended as follows. Changes in text are shown in underline and ~~strikethrough~~.

A. Water Services

3. Impact Discussion

Proposed General Plan goals, objectives, policies and actions call for the provision of an adequate supply of water; the maintenance of water infrastructure; the coordination between land use planning and water facilities and service; and the promotion of water conservation measures. These goals, objectives, policies and actions, combined with the improvements in the City's *Urban Water Management Plan* and the *Water Master Plan*, are expected to meet Tracy's water needs and avoid impacts on water supply over time.

This section provides an analysis of impacts to water service that is anticipated to occur within the 20-year planning horizon of the proposed General Plan, as well as impacts from total buildout of the SOI, which would occur much farther into the future.

a. Storage and Distribution Facilities

The City of Tracy currently has the water storage capacity needed to meet the needs of operating storage, fire-reserves storage and emergency reserves for its existing water system. An analysis of future demand based on the population growth estimated in the proposed General Plan through 2025 indicates that an additional 12 million gallons of storage will need to be distributed throughout the City. For total buildout of the SOI, it is estimated that an additional 33 million gallons of storage will be needed. Additionally, the City will need to construct new distribution infrastructure, including pump stations associated with the storage reservoirs. The pump stations will need to be distributed throughout the city. Based on estimates of growth through 2025, the City should have a total pumping capacity of approximately 36 million gpd. At total buildout, the City should have a total of 100 million gpd.

The City will also need to install new wells. ~~approximately~~ Approximately three to four new wells will be needed to accommodate growth anticipated through 2025. Based on the total buildout scenario, the City will need to install 15 new wells from what currently exists.

~~These f~~Facilities to accommodate projected growth through the 20-year planning horizon of the proposed General Plan are foreseen in the City's 1994 *Water Master Plan* since future water demand was estimated based on much higher population growth projected by the 1993 General Plan. ~~Moreover, t~~The proposed General Plan addresses potential future growth and water service demands beyond the 20-year planning horizon by ~~identifies~~ identifying actions for the *Water Master Plan* to be updated upon adoption of the General Plan and on a regular basis thereafter (Objective PF-6.1, A1). The proposed General Plan also requires the City to implement the *Water Master Plan*, including providing adequate water infrastructure facilities needed to support current and future populations (Objective PF-6.2).

The proposed General Plan also contains policies that will minimize the potential environmental impacts of storage reservoirs and distribution facilities. One policy recommends that storage facilities should be buried or partially buried to allow for the joint use of the site with parks or recreational facilities (Objective PF-6.2, P2). Another policy recommends that storage facilities should be located at naturally high topographic locations to capitalize on gravity flow whenever possible, as opposed to requiring energy to transport water (Objective PF-6.4, P4). Without the implementation of the above policies, there would be an adverse impact with regard to water storage, supply and/or distribution, since a shortage of water storage would affect the availability of adequate water supply to meet the demand.

The need for new distribution infrastructure would be minimized by General Plan policies that direct a portion of the growth to developed areas of the city that already contain infrastructure. The policies and actions under Objective LU-1.4 direct the City to promote a pattern of residential growth that is efficient with respect to maximizing existing public services and infrastructure.

For example, Objective LU-1.4, P1 and P2 in the Land Use Element directs the City to follow the guidelines set forth in the Growth Management Ordinance and to prioritize allowing new residential development that is concentrated near existing development, in order to maximize the use of existing infrastructure. Adherence to these policies would reduce the need for additional distribution infrastructure.

The specific environmental impact of constructing new water storage and distribution facilities in the City limits and Sphere of Influence cannot be determined at this first-tier level of analysis; however, development and operation of water storage facilities may result in potentially significant impacts that are addressed by various plans, policies and mitigation measures identified in other sections of this EIR. As specific water storage facility expansion projects are identified, additional project specific, second-tier environmental analysis will be completed.

For these reasons, development under the General Plan is not expected to create an adverse environmental impact from the expansion of additional water storage and distribution infrastructure.

b. Water Supply

Water use projections have been developed for the proposed General Plan on the basis of long-term average per capita water usage, population growth and non-residential growth. Based on this analysis, the City is expected to require an additional 9,028 AF of water to accommodate projected growth under 20-year development scenario of the proposed General Plan, which ~~. This~~ will bring the estimated total water demand to approximately 27,530 AF in the year 2025~~, the planning horizon for the General Plan~~.[1] Using the same methodology to project water use under the total buildout scenario of the pro-

[1] Water demand ~~in the year 2025~~ is calculated by adding projected future water demand ~~during the planning horizon~~ of the proposed General Plan and a baseline demand that includes estimated water demand in 2005, as noted in the City's *Water Inventory Report,* August 2, ,2005.

posed General Plan, the City would be expected to require an additional 42,268 AF of water, or a total estimated water demand of 60,770 AF per year. Total buildout of the SOI is expected to occur approximately 69 years into the future for residential growth and approximately 107, 137 and 159 years for commercial, office and industrial growth, based on current projections.

New development has the potential to result in potentially significant impacts. However, numerous water sources have been identified by the City in the *Urban Water Management Plan*, some of which are expected to be available in the next several years. These sources are listed in Table 4.10-2 and include up to 5,000 AFY from each the West Side Irrigation District and the Banta-Carbona Irrigation District; up to 10,000 AFY from the South County Surface Water Supply Project; and up to 4,500 AFY from the Byron-Bethany Irrigation District. As noted above, groundwater supplies are also available, however, the City's long-term objectives are to only utilize groundwater for emergency and peak demand needs. Assuming the City renews its contract for 10,000 AF with the US Bureau of Reclamation, there will be sufficient water supply to meet the projected demand through 2025. Additional water sources will need to be identified to accommodate growth projected under total buildout of the City limits and SOI. This would be considered a potentially significant impact.

To ensure that there is enough water for future growth, the General Plan directs the City to acquire reliable, additional sources of water supplies to meet the city's future demand (Objective PF-6.1, P2) and to update the *Urban Water ~~Master~~ Management Plan*, which identifies sources of water to meet future demand (Objective PF-6.1, A1). In addition, Objective PF-6.3, P5 directs the City to take into account whether sufficient, reliable water is available for the project when considering the approval of new development. Without the implementation of these policies, there would be an adverse impact with regard to water supply.

The City also has measures in place to reduce the water demand through water conservation and water recycling. Policies for the use of water conserva-

tion are identified in Objective PF-6.5, P1, P2, P3 and P4 which direct the use recycled water in city-owned facilities and for non-potable uses in general, and for new development projects to construct "purple pipe" for the distribution of recycled water. In the General Plan, the City would also be directed to implement the Best Management Practices in the *Urban Water Management Plan* (Objective PF-6.1, P1) and to update the *Water Master Plan* to include recycled water (Objective PF-6.4, A3). These policies are expected to reduce the overall water demand in the City.

c. Ground Water Depletion

As previously stated, studies have shown that the aquifer can support Tracy ~~Utilizing~~ using 9,000 AF per year without negatively impacting the aquifer. The City's current use of groundwater is less than 9,000 AF.[2] During drought years when surface water sources are reduced, the City may have to depend more heavily on groundwater sources. However, the City's existing Groundwater Management Policy prohibits groundwater extraction to exceed 9,000 AF.[3] Additionally, it is part of the City's policy over the long-term to utilize groundwater for emergency and peak demand needs and to utilize the aquifer for water storage to improve water quality and increase water system reliability for the City's water customers.[4] As a result of adopted City policies and General Plan policies, a less-than-significant impact to groundwater is anticipated as a result of the implementation of the General Plan.

The General Plan also contains policies to address groundwater use and conservation that will assist in avoiding impacts to groundwater sources. The City will use surface water supplies to the greatest extent feasible to reduce reliance on groundwater (Objective PF-6.1, P3) and to reserve groundwater supplies for emergency use, such as droughts or short-term shortages (Objective PF-6.4, P1). The use of recycled water as discussed above can also con-

[2] City of Tracy, Urban Water Management Plan, revised 2002, p.4-2.

[3] *Ibid*.

[4] City of Tracy Public Works, August 2005.

tribute to the recharge of groundwater supplies through reduced pumping. These policies will ensure that groundwater supplies and recharge will not be negatively impacted.

4. Impacts and Mitigation Measures

~~Because the General Plan policies offset potential impacts,~~ No significant water-related impacts have been identified for development projected through 2025. However, a significant and unavoidable impact would occur with regards to water supply needed for growth projected under total buildout of the proposed General Plan. ~~no significant water-related impacts have been identified and therefore no mitigation measures are required.~~

Impact INF-1: As discussed on page 78, no significant water-related impacts have been identified for development projected through 2025. However, despite policies in the Public Facilities Element of the proposed General Plan directing the City to acquire reliable, additional sources of water supplies to meet the city's future demand as new development occurs, there is currently an insufficient water supply secured to serve projected development under total buildout of the proposed General Plan.

This is a significant and unavoidable impact of total buildout of the proposed General Plan. No additional mitigation is available. Despite policies in the proposed General Plan to ensure infrastructure is in place or planned to support growth, current water supplies would be insufficient to accommodate projected development at total buildout. However, as noted on page 78, no significant impacts would occur related to development through 2025, since current water supply could accommodate projected development through this period.

B. Wastewater

This section describes current conditions and potential impacts of the proposed General Plan that is anticipated to occur within the 20-year planning

horizon as well as under total buildout of the SOI with regard to wastewater in Tracy.

3. Impact Discussion

The General Plan sets forth the City's goal to collect, transmit, treat and dispose of wastewater in ways that are safe, sanitary and environmentally acceptable (Goal PF-7). This goal is expected to be met through a combination of objectives, policies and actions in the General Plan and upgrades to the City's wastewater system, as described in detail below.

a. WWTP Expansion and Regional Water Quality Control Board Requirements

A major upgrade to the entire wastewater treatment system is currently underway to increase capacity and meet Regional Water Quality Board requirements. In order to meet discharge requirements, the WWTP will be upgraded to remove ammonia, improve disinfection and provide tertiary treatment. Since the upgrade is addressed in a separate EIR and is expected to comply with Regional Water Quality Board requirements and new treatment plants will meet State standards, no impact is expected.

b. Wastewater Treatment

The upgrade and expansion of the WWTP is designed to increase the capacity to 16.0 mgd and improve the level of treatment, however much of this capacity has already been allocated to existing and currently approved projects such as Plan C development, infill projects and the Northeast Industrial Area. Based on the amount of residential and non-residential growth projected in the 20-year planning horizon of the General Plan, an additional 2.1 mgd of capacity would be needed by 2025. At total buildout, an additional 21.2 mgd of capacity would be required. Thus, there is a potential impact since the existing system is not designed to accommodate development projected under total buildout of the SOI~~in the General Plan~~.

To address deficiencies in wastewater service, the General Plan directs the City to prepare a comprehensive update to the Wastewater Master Plan. The

General Plan specifically states that the update should identify the number of wastewater treatment plants, capacity and potential locations needed to serve future development (Objective PF-7.1, A1). The General Plan also calls on the City to maintain wastewater infrastructure in good working condition (Objective PF-7.1, P1) and to not extend wastewater infrastructure into new areas until existing infrastructure is brought to adequate standards.

The Land Use and Public Facilities and Services Elements also contain policies that mitigate the potential impact of a lack of wastewater treatment and collection capacity by ensuring that new development would not occur in the absence of sufficient capacity in the wastewater treatment system and access to wastewater services (Objective PF-7.3, P3, P5 and P6 and Objective LU 1.4, P5). Without the implementation of these policies, there would be adverse impacts with regard to wastewater collection and treatment.

~~Additional wastewater collection facilities would also be necessary to support new development. This~~ The impact of additional wastewater collection facilities to support new development during the 20-year planning horizon of the proposed General Plan would also be minimized by targeting growth to existing areas thereby more efficiently using of existing infrastructure. For example, Objective LU-1.4, P1 and P2 directs the City to follow guidelines of its Growth Management Ordinance and to prioritize allocation of RGAs to new development that is near existing development to maximize the use of existing infrastructure. Objective LU-1.4, P4 directs the City to make RGAs available for infill development as a high priority. These policies would reduce the need for additional collection infrastructure for buildout to 2025. However, significant new collection facilities would be needed to serve buildout of the SOI, the location of which is not known at this time. As stated above, policies in the proposed General Plan call for updates to the Wastewater Master Plan, which would address the issue of infrastructure location.

The General Plan also includes policy language to reduce the impact of wastewater treatment on the environment. Policies direct the City to consider

locating public facilities and wastewater reclamation sites with agricultural and open space preservation programs to the extent possible (Objective PF-7.4, P2). The General Plan also calls for the use of recycled water, which could include tertiary treated wastewater, to be used for non-potable uses (Objective PF-6.5, P4) and to dispose of biosolids in a manner that minimizes impacts on the environment and public health (Objective PF-7.3, P3).

The specific environmental impact of constructing wastewater treatment facilities in the City limits and Sphere of Influence cannot be determined at this first-tier level of analysis; however, development and operation of wastewater treatment facilities may result in potentially significant impacts that are addressed by various plans, policies and mitigation measures identified in other sections of this DEIR. As specific wastewater treatment expansion projects are identified, additional project specific, second-tier environmental analysis will be completed.

C. Stormwater

This section describes current conditions and potential impacts of the proposed General Plan within the 20-year planning horizon as well as under total buildout of the SOI with regard to stormwater handling in Tracy.

3. Impact Discussion

Development under 20-year planning horizon and under total buildout of the General Plan has the potential to cause significant impacts by increasing stormwater runoff associated with construction activities and increasing impermeable surfaces, thereby placing greater demands on the stormwater handling system. Runoff from developed surfaces, building roofs, parking lots and roads also contain impurities and have the potential to increase flooding. The proposed General Plan would address these potential impacts for both the 20-year and total buildout time horizons in several ways. Objective PF-8.2, P1 directs new development projects to incorporate methods of reducing stormwater runoff to reduce requirements for downstream storm drainage

infrastructure and improve stormwater quality. The proposed General Plan also contains an action that also modifies the zoning ordinance to limit the amount of impervious surfaces in private yards (Objective PF-8.2, A1). These measures would mitigate potential impacts from increases in impermeable surfaces within the city.

Additionally, the proposed General Plan sets forth the City's policies and actions aimed at developing the stormwater collection system to satisfy future conditions and meet the needs of development. Objective PF-8.1, A1 and A2, directs the City to prepare a comprehensive update of the *Storm Drainage Master Plan* and update this plan on a periodic basis of at least every five years, in order to accurately evaluate flows and comprehensive improvement requirements based on the growth projections in the General Plan. The proposed General Plan also calls for stormwater infrastructure to be maintained in good condition and for infrastructure to attain capacity that conforms with the *Stormwater Management Plan, Storm Drainage Master Plan* and the *Parkways Design Manual* (Objective PF-8.1, P1 and Objective PF-8.2,P2). Objective PF-8.2, P3 calls for approval of development conditional upon existing or planned stormwater infrastructure that is in compliance with environmental regulations. Further, the proposed General Plan contains a policy that requires temporary on-site retention facilities that are in conformance with City standards for new development if sufficient downstream stormwater infrastructure has not yet been constructed (Objective PF-8.2, P4).

Additional policies in the Land Use Element would coordinate the approval of development projects with the provision of infrastructure and public services (Objective LU-1.4, P5), call for a concentrated pattern of residential development (Objective LU-1.4, P1 and P2) and encourage infill development (Objective LU-1.6, P4). These policies would provide the City with a framework to ensure that new stormwater handling infrastructure can be provided to meet the needs of continuing development under the General Plan.

Pursuant to regulations of the State Water Resources Control Board (SWRCB)[5], the City has prepared a *Storm Water Management Plan* that establishes BMPs to limit the discharge of pollutants from the City's storm sewer system to the Maximum Extent Practicable (MEP), as specified by Section 402(p) of the Clean Water Act. The *Storm Water Management Plan* includes BMPs related to construction site and post-construction runoff controls, illicit discharge detection and elimination, pollution prevention, as well as public education and outreach.

The specific environmental impact of constructing new stormwater infrastructure in the City limits and Sphere of Influence cannot be determined at this first-tier level of analysis; however, development and operation of stormwater infrastructure may result in potentially significant impacts that are addressed by various plans, policies and mitigation measures identified in other sections of this EIR. As specific stormwater infrastructure expansion projects are identified, additional project specific, second-tier environmental analysis will be completed.

The policy direction described above, in addition to other regulatory requirements regarding stormwater management ensure that the proposed General Plan will not have a significant impact on storm drainage facilities.

[5] Section 402(p) of the federal Clean Water Act and Provision D, General Permit dated April 30, 2003. (Water Quality Order No. 2003-0004-DWQ).

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4.11 Geology, Soils and Seismic Hazards

No changes have been made to this section. Please refer to Section 4.11 Geology, Soils and Seismic Hazards in the Draft EIR, issued on October 4, 2005.

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4.12 HYDROLOGY AND FLOODING

Subsection C of Section 4.12 Hydrology and Flooding is amended as follows. Changes in text are shown in underline and ~~strikethrough~~.

C. Impact Discussion

The proposed General Plan includes specific goals, objectives, policies and actions to address potential impacts related to hydrology and flooding. Storm drainage impacts and mitigation measures are discussed in Section 4.10 of this Draft EIR. The greatest flooding risks to the Tracy Planning Area exist as a result of flooding from the Tom Paine Slough and Old River and the failure of the San Luis Reservoir, New Melones and New Exchequer dams.

a. Flooding

The majority of the urbanized area of Tracy is outside of the 100-year floodplain and thus would not be at risk to flooding hazards. As is discussed above, there are areas in the northern portion of the City limits in the I-205 Regional Commercial area and just north of I-205 and the Northeast Industrial Area, and within the Sphere of Influence or Planning Area, that are within the 100-year floodplain. The proposed General Plan does anticipate some non-residential development for some of these areas within the 20-year planning horizon and under total buildout of this General Plan, which could result in a significant impact related to flooding.

To minimize the risk of exposing people or property to flood hazards, the proposed General Plan includes a goal and an objective, supported by several policies and actions to minimize risks to development related to flooding and inundation (Goal SA-2, Objective SA-2.1). This goal and objective includes a policy that would prohibit development in areas within the 100-year floodplain, as mapped by FEMA, if it would result in any increased flooding risk and impacts related to flooding, such as increasing erosion or sedimentation, increased costs to providing emergency services during and after flooding, deterioration of water quality, among other conditions. Other policies included under this goal and objective would require that development, includ-

ing public facilities, within the 100-year floodplain be flood-proofed at or above the base year flood elevation, and that the City would prevent the construction of flood barriers that divert flood water or increase flooding in other areas (Objective SA-2.1, P2 and P3). A policy is also included to encourage property-owners within the 100-year floodplain to purchase National Flood Insurance (Objective SA-2.1, P3). Actions to support Objective SA 2.1 direct the City to continue to participate in the National Flood Insurance Program, to implement the City's existing *Storm Drainage Master Plan*, which provides storm drainage capacity sufficient to contain 100-year and 10-year flood flows under specific conditions, and to require structures that are allowed to be built in areas of flood risk to be built in a manner to minimize that risk (Objective SA-2.1, A1 through A3). Moreover, Chapter 9.52 of the Tracy Municipal Code establishes regulations limiting new construction in an area of special flood hazard. As a result, the implementation of the proposed General Plan and its policies would reduce the potential impact associated with exposure to the 100-year flood plain to a less-than-significant level.

b. Dam Failure

The failure of dams in the San Joaquin River floodplain in the event of an earthquake has the potential to create flooding in the northern portion of the Sphere of Influence (SOI) and in some areas within the City limits. Under the 20-year planning horizon of the proposed General Plan, some of the areas in the northern edge of the City limits would be expected to develop with commercial and some industrial uses. ~~A~~ Through 2025, a majority of the area within the SOI and outside of the City limits would not be developed and remain in agricultural use. ~~Moreover, t~~The proposed General Plan states that development is not expected in Urban Reserve ~~1~~ 2 within the 20-year planning horizon of this General Plan. Under total buildout of the proposed General Plan, areas located in the northern portion of the City limits and SOI, including portions of Urban Reserves 2 and 3, the I-205 Specific Plan area, the Holly Sugar area, and the northern part of the Northeast Industrial Area would have the potential of flooding in the event of dam failure resulting from an earthquake. ~~As~~However, as discussed above, the proposed General Plan includes policies and actions under Objective SA-2.1 that are in-

tended to minimize flood risk to development, including prohibiting development to be located in the 100-year floodplain, as established by FEMA, unless certain conditions are met, and to continue to participate in the National Flood Insurance Program. As risk of dam failure is small, because the County continues to maintain the dam to withstand probable seismic activity, the potential impact of allowing additional development within the dam inundation area would be considered less-than-significant.

c. Drainage Patterns and Stream Alignments

Development proposed under the General Plan is not anticipated to significantly alter existing drainage patterns or stream alignments. First, no new development is located adjacent to existing streams or other waterways. Additionally, new development would not be approved within the 100-year flood plain if it interferes with existing waterflow capacity, increases erosion or sedimentation and contributes to the deterioration of any watercourse (Objective SA-2.1, P1). Several proposed General Plan policies and actions address the potential for new development to increase stormwater runoff, which could increase the risk of flooding. These policies and actions, which are discussed in more detail in Section 4.10 of this Draft EIR, would mitigate the potential for increased storm water runoff and flooding. Hence no significant impact would be expected.

d. Seiche and Tsunami

As previously mentioned, Tracy is at a low risk to seiche and tsunami and the implementation of the proposed General Plan is not expected to increase these risks. In addition, other than the Tracy Hills project, which was approved under a previous process, no new development is proposed in the hillsides, where there is a risk of mudflow. Thus, no impact associated with seiche, tsunami or mudflow would be expected.

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4.13 Hazardous Materials and Other Hazards

No changes have been made to this section. Please refer to Section 4.13 Hazardous Materials and Other Hazards in the Draft EIR, issued on October 4, 2005.

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4.14 Noise

No changes have been made to this section. Please refer to Section 4.14 Noise in the Draft EIR, issued on October 4, 2005.

As discussed in detail in Chapter 1 of this document, the analysis of potential noise impacts was based on development projections for a 20-year period.

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4.15 Air Quality

No changes have been made to this section. Please refer to Section 4.15 Air Quality in the Draft EIR, issued on October 4, 2005.

As discussed in detail in Chapter 1 of this document, the analysis of potential air quality impacts was based on development projections for a 20-year period.

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5 ALTERNATIVES TO THE PROPOSED PROJECT

This Chapter is amended in its entirety, as follows.

The proposed General Plan ("the proposed Plan") has been described and analyzed in the previous sections with an emphasis on potentially significant impacts and recommended mitigation measures to avoid those impacts to the extent feasible. The State CEQA Guidelines require the description and comparative analysis of a range of reasonable alternatives to the proposed project that could feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant effects of the project.

The following discussion is intended to inform the public and decision-makers of project alternatives that have been developed and the positive and negative aspects of those alternatives. In accordance with the CEQA Guidelines and procedures, four project alternatives, including the No Project Alternative, are discussed below. CEQA Guidelines also require that the environmentally superior alternative be identified. This information is included at the end of this chapter.

In addition to the No Project alternative, there are three alternatives that have been developed. Each of these alternatives has the potential for accomplishing several of the basic objectives of the proposed General Plan and two of the alternatives would substantially lessen, however not completely avoid, at least one of the significant impacts that have been identified in this EIR.

All four of the alternatives, the No Project, the Concentrated Growth, the City Limits and the Existing SOI Alternatives, are based on the same assumptions as the proposed General Plan with regards to the rate of residential and non-residential growth, both in terms of total buildout and for the 20-year period from 2005 to 2025. The assumptions and methodology of calculating new residential units and new non-residential square footage for the proposed General Plan under total buildout, as well as for the 20-year planning horizon, are described in detail in Chapter 3.

The alternatives differ from each other in terms of the location and distribution of projected growth, in the total land available for development, and hence in their total buildout capacity. Specifically, the four alternatives are as follows:

- **No Project Alternative.** The proposed General Plan would not be adopted and the existing General Plan for the City of Tracy, including the existing Sphere of Influence (SOI), would remain in effect. This alternative includes development projected in both the Tracy Hills Specific Plan and Tracy Gateway Planned Unit Development areas, since these areas have adopted plans.
- **Concentrated Growth Alternative.** Under this alternative, the General Plan would include policy direction to ensure that new growth would be concentrated near the existing urbanized area (both within and outside the City limits). This alternative would include development of all available land within the existing City limits, except for the Tracy Hills Specific Plan area. It would also include development in areas identified as "Secondary Residential Growth Areas" in Figure 2-3 of the proposed General Plan. Under this alternative, the City's SOI would be contracted to encompass only the areas identified for development. The same General Plan land use designations as under the proposed General Plan would be applied to these areas. All other policies proposed for the General Plan would be included.
- **City Limits Alternative.** Under this alternative, the proposed General Plan land use designations would be applied to all land within the existing City limits. The SOI would be contracted to become coterminous with the existing City limits. All other policies proposed for the General Plan would be included.
- **Existing SOI Alternative.** Under this alternative, the proposed General Plan land use designations would be applied to all land within both the existing City limits and the existing Sphere of Influence (SOI). However, no new development-oriented General Plan designations or development

would occur outside of the existing SOI. All other policies proposed for the General Plan would be included.

Diagrams of the three alternatives other than No Project are shown in Figures 5-1 through 5-3.

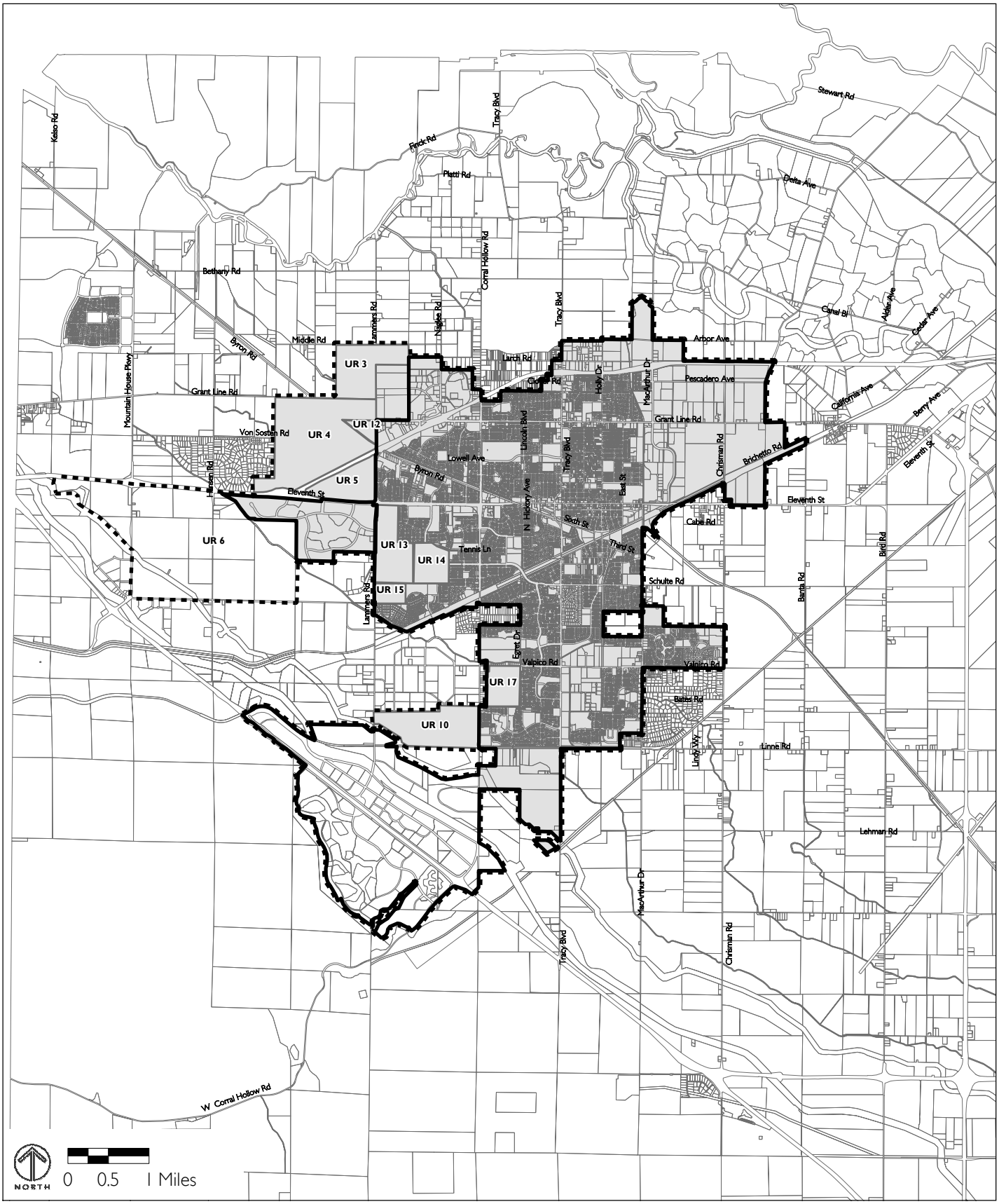
In this chapter, each alternative is analyzed against the impact factors considered for the proposed General Plan at total buildout, with a finding as to whether the alternative would create greater or lesser impacts than the proposed Plan. An analysis of projected development through the 20-year planning horizon is also provided where it is relevant. The impact factors of each alternative are analyzed in terms of whether they are: a substantial improvement compared to the proposed project; an insubstantial improvement compared to the proposed project; the same as the proposed project; an insubstantial deterioration compared to the proposed project; or a substantial deterioration compared to the proposed project.

As noted above, the alternatives have different buildout capacities. However, the same amount of residential and non-residential development is assumed for the proposed Plan and all four alternatives for the 20-year development horizon, since development totals over the next 20 years are expected to be controlled by the City's Growth Management Ordinance and market forces, and not by land supply.

Table 5-1 summarizes the results of the analysis.

A. The No Project Alternative

This section analyzes the No Project Alternative against the proposed General Plan, as required by CEQA Guidelines. It allows for a comparison between the impacts of adopting the proposed Plan with the impacts of not adopting the Plan and continuing with the policy framework of the existing



Projected Growth Area

City Limits

Sphere of Influence

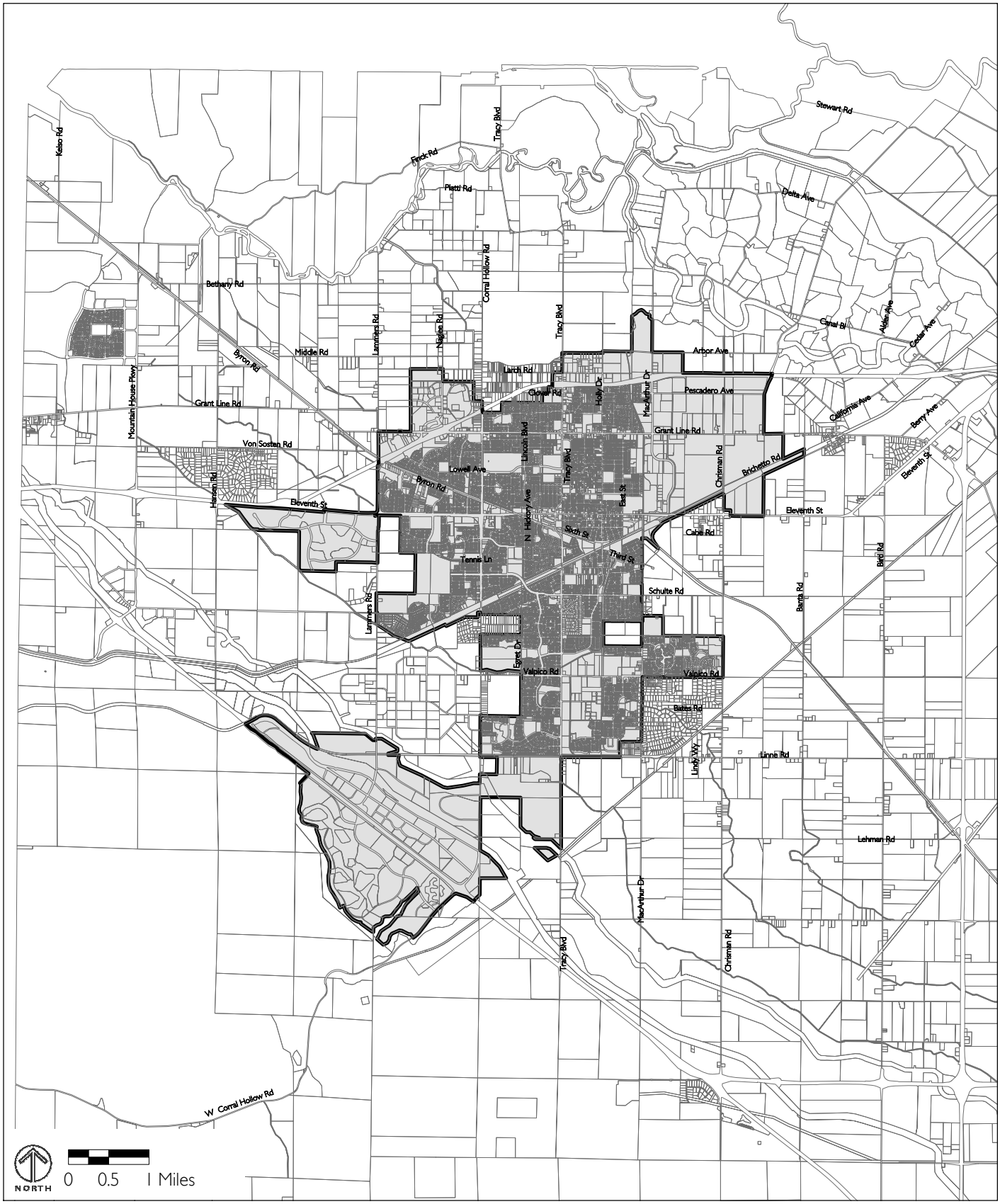
UR **Urban Reserve**

FIGURE 5-1

CONCENTRATED GROWTH ALTERNATIVE

CITY OF TRACY

AMENDMENT TO THE GENERAL PLAN DRAFT EIR



Projected Growth Area

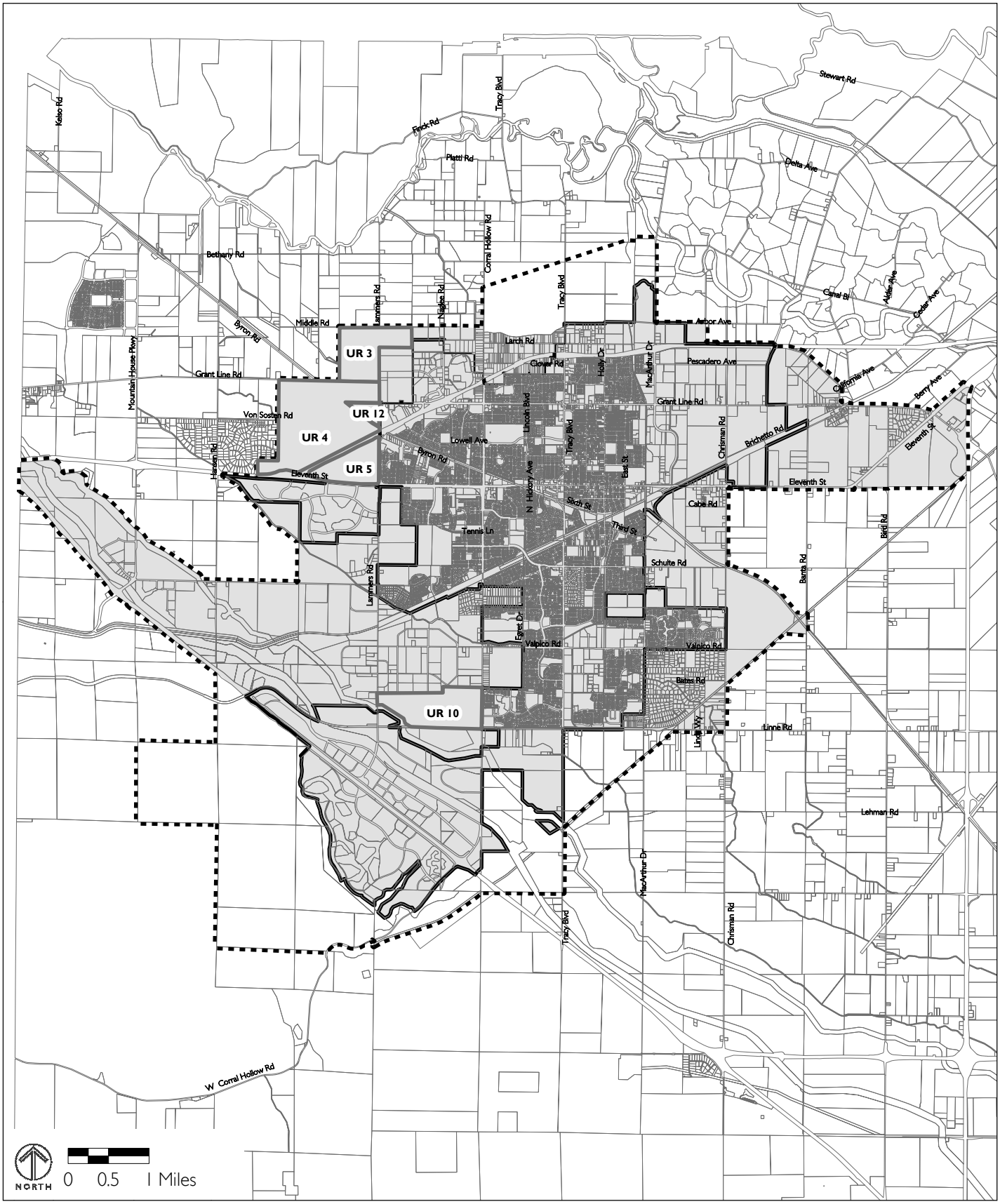
City Limits and Sphere of Influence

FIGURE 5-2

CITY LIMITS ALTERNATIVE

CITY OF TRACY

AMENDMENT TO THE GENERAL PLAN DRAFT EIR



Projected Growth Area

Sphere of Influence

City Limits

FIGURE 5-3

EXISTING SOI ALTERNATIVE

CITY OF TRACY

AMENDMENT TO THE GENERAL PLAN DRAFT EIR

General Plan.[1] This alternative was chosen because it represents a Plan with a Sphere of Influence that could accommodate an expansion of jobs-producing land uses, which is similar to policy direction in both the existing General Plan (1993) and the proposed General Plan. Additionally, this alternative would achieve several of the land use goals and policies of the proposed Plan, even if the proposed Plan were not adopted. Namely, under Goal 1 of the proposed Plan's Land Use Element, Objective LU-1.1 P2, which states that the City shall maintain a Sphere of Influence that is consistent with the long-term land use vision of the Plan, and Objective LU-1.2 P1, which calls for comprehensive planning in large land areas within the Sphere of Influence, are similar to policies of the existing General Plan's Goals LU 1, 2, and 4, which call for a surplus land supply, comprehensive planning for areas within the Sphere of Influence, and for the City to be a leader in planning for areas within the entire Planning Area. Because several other land use and economic development policies in the existing 1993 General Plan are similar to those of the proposed Plan, the No Project alternative should be considered for analysis. The Community Areas concept of the existing Plan is similar to the Urban Reserve concept in the proposed Plan; moreover, the attention to economic development and public facilities is similar in that both of these topics are General Plan Elements of both Plans.

1. Principal Characteristics

Under this alternative, the proposed General Plan would not be adopted and the existing General Plan would remain in effect. Thus, new development would occur according to the existing General Plan land use designations, SOI boundary and the existing policy guidance for the City. The total buildout projection for this alternative includes development projected in both the Tracy Hills Specific Plan and Tracy Gateway Planned Unit Development areas, since these areas have adopted plans.

Most development areas under the No Project Alternative and the proposed General Plan would be the same. However, since the existing SOI is smaller

[1] CEQA Guidelines secs. 15125, 15126.6(e).

than the proposed SOI by approximately 2 square miles, there would be less development under this Alternative than projected under the proposed Plan. In particular, development in areas such as Urban Reserve 6 (1,730 acres of commercial, office and industrial development), north of Larch Clover (50 acres of residential very low development) and the north of the Northeast Industrial Area (139 acres of industrial development) would be eliminated. The area north of Holly Sugar would also not be included, but this area is already designated for open space under the proposed General Plan.

Several other areas not included in the proposed Plan and its SOI would be developed under this alternative. These areas include a 575-acre area designated for industrial use south of the Patterson Pass Business Park, and a 230-acre area designated for public use. These areas currently fall within the existing SOI but are proposed to be removed in the proposed Plan through a contraction of the SOI in that area.

Overall, the No Project Alternative would result in fewer residential units and significantly less employment in Tracy, since the existing General Plan land use designations include a higher proportion of lower density residential as compared to the proposed Plan and less land is projected for development overall. As shown in Table 5-2, buildout would be approximately 40,000 residential units and 90 million square feet of non-residential (commercial, office and industrial) uses, which is approximately 6,000 fewer dwelling units and 33 million fewer square feet less non-residential development than in the proposed Plan.

As noted above, the number of residential units and the amount of non-residential growth through 2025 is assumed to be the same under the No Project Alternative and the proposed General Plan. Residential growth through 2025 would be projected to occur in a similar pattern to that under the proposed General Plan. Non-residential growth would occur in a pattern similar to the proposed Plan, except in a few key areas. Urban Reserve 6 would not be developed. Instead, more office and commercial uses would occur in

TABLE 5-1 **COMPARISON OF PROJECT ALTERNATIVES**

Impact Factors	No Project	Concentrated Growth Alternative	City Limits Alternative	Existing SOI Alternative
Land Use	-	+	=	=
Population, Employment and Housing	+	+	+	+
Visual Quality and Community Character	-	+ +	+	+
Traffic and Circulation	=	+	+	=
Cultural Resources	=	=	=	=
Biology	+	+	+ +	+
Agriculture	+	+ +	+ +	+
Mineral Resources	=	=	=	=
Community Services	=	=	=	=
Infrastructure	-	+	+	=
Geologic and Seismic Hazards	=	+	=	=
Hydrology and Flooding	=	=	+	=
Hazardous Materials and Other Hazards	=	+	=	=
Noise	=	=	=	=
Air Quality	=	+	=	=

+ + Substantial improvement compared to the proposed project
+ Insubstantial improvement compared to the proposed project
= Same impact as proposed project
- Insubstantial deterioration compared to the proposed project
- - Substantial deterioration compared to the proposed project

Note: Competing aspects within some factors would create both improvement and deterioration simultaneously for a single alternative. These trade-offs are discussed in the text.

TABLE 5-2 **BUILDOUT PROJECTIONS OF ALTERNATIVES – NEW GROWTH**

	No Project	Concen-trated Growth Alternative	City Limits Alternative	Existing SOI Alternative
Residential (units)	40,000	22,000	21,000	46,000
Non-Residential				
Commercial (Sq. Ft.)	18,000,000	12,000,000	11,000,000	20,000,000
Office (Sq. Ft.)	8,000,000	7,000,000	7,000,000	9,000,000
Industrial (Sq. Ft.)	64,000,000	27,000,000	31,000,000	76,000,000
Population				
New	127,000	71,000	67,000	147,000
Total	*201,000*	*145,000*	*141,000*	*221,000*
Jobs				
New	143,000	72,000	95,000	166,000
Total	*173,000*	*101,000*	*125,000*	*196,000*

Please see text for an explanation of the basis for these calculations.

Tracy Gateway and Tracy Hills, and more industrial development would occur in the northeast portion of the City and in Tracy Hills. Finally, land use designations under the existing General Plan would not be changed to "Office" in the under the No Project Alternative.

2. Impact Analysis

The No Project Alternative would have the following impacts relative to the Proposed General Plan.

a. Land Use

At total buildout, the No Project Alternative would result in a smaller amount of residential and non-residential growth than the proposed Plan. This is because the No Project Alternative proposes development within the existing SOI, which is smaller than the proposed SOI boundary. Moreover, the existing General Plan proposes development at lower residential densities overall, as compared to the proposed Plan. However, this difference would be incremental relative to the total amount of development permitted and would not result in any substantial difference from a land use perspective.

The No Project Alternative and the proposed Plan would be similar in other regards vis-a-vis land use. Under the No Project Alternative, the amount and distribution of residential and non-residential growth for the 20-year planning horizon would be similar to the proposed General Plan. Neither the proposed General Plan nor the No Project Alternative would divide existing communities. Like the proposed Plan, the No Project Alternative would not conflict with any applicable land use plan, policies or adopted habitat conservation plans.

However, the No Project Alternative would not include new land use policies found in the proposed Plan that represent an improvement with regard to land use. Under this alternative, the City would have less of an ability to direct specific development changes to ensure that new development is well-connected and compatible with surrounding uses. The proposed General Plan includes a refinement of land use designations, increased policy direction

for the City overall, as well as specific policies for land use in certain areas in the Areas of Special Consideration and Urban Reserves sections of the Land Use Element. The lack of these policies would represent a worsening relative to the proposed Plan.

Taking into consideration the fact that the No Project alternative would be similar to the proposed Plan in many regards, but would be worse than the proposed Plan with regard to land use policy, the No Project Alternative would be an insubstantial deterioration to the proposed General Plan with regard to land use overall.

b. Population, Employment and Housing

At total buildout, the No Project Alternative would result in smaller residential and employee populations than the proposed Plan, as shown in Table 5-2, with approximately 201,000 people and 173,000 jobs. However, the total projected population and jobs under both the No Project Alternative and the proposed Plan would represent substantial increases in population and employment relative to existing conditions, and would thus both result in a significant and unavoidable impact. In this regard, population, employment and housing impacts of the No Project Alternative would be an insubstantial improvement as compared to the proposed Plan .

Neither the proposed General Plan nor the No Project Alternative would result in displacement of substantial numbers of existing housing or people.

In summary, the No Project Alternative would be an insubstantial improvement as compared to the proposed Plan with regard to population, employment and housing.

c. Visual Quality

The existing General Plan does not have a Community Character Element, so this important part of the proposed Plan would be missing from the No Project Alternative. The No Project Alternative would not provide policy guidance with respect to enhancing neighborhood character and sense of place in

the Land Use Element, nor would it include a description of the City's structure and how these elements should relate to each other in term of connections, building design and layout, streetscape design, and the enhancement of Tracy's "small town feel." The lack of this additional policy guidance in the No Project Alternative represents a minor deterioration relative to the proposed Plan.

As with the proposed General Plan, the No Project Alternative would result in significant and unavoidable impacts because growth would occur over many acres of currently undeveloped land, including areas abutting state designated scenic routes. In this regard, the No Project Alternative would be similar to the proposed Plan.

Given the above considerations, the No Project Alternative would be an insubstantial deterioration as compared to the proposed project with respect to impacts on visual quality.

d. Traffic and Circulation

Under the No Project Alternative, the level of roadway improvements and extensions required to serve future development would be similar to that needed to serve the proposed General Plan. The only difference would be that the extension of Schulte Road to serve development in Urban Reserve 6 (UR 6) would not be needed, since no development would occur in UR 6. Otherwise, the same types of roadway extensions, roadway widenings, construction of new facilities and at least 30 intersection signalizations would be required under both the No Project Alternative and the proposed Plan.

Daily traffic volumes generated would be similar for this alternative and the proposed General Plan. Traffic forecasts indicate that the City's level of service standards would be maintained under this alternative at all locations except for the Eleventh Street/ Lammers Road and Eleventh Street/Corral Hollow Road intersections. An urban interchange would also be required at the intersection of Eleventh Street/Lammers Road. These impacts would be the same for both the No Project Alternative and the proposed Plan.

The No Project Alternative would be subject to policy guidance under the existing General Plan, which includes policies and actions in the Circulation Element under Objective CIR-1.3 to allow LOS C on all streets and intersections, except within ¼-mile of a freeway, where LOS D is acceptable. These policies are similar to those in the proposed General Plan.

At total buildout, the No Project Alternative would result in less housing and employment growth than the proposed Plan. However, impacts on Tracy roadways would be similar between this alternative and the proposed Plan. The level of development, and hence the associated traffic, would be similar for both the proposed Plan and this alternative in the first 20 years. At total buildout, the level of development would differ but the likely total trip generation would vary by only 15 to 20 percent. Given the geographic similarities and the general correspondence in the level of development, local roadway impacts would be similar between the No Project and the proposed Plan.

Regional traffic would be a factor in Tracy under both the No Project Alternative and the proposed Plan. Since the VMT and trip generation associated with the No Project Alternative is similar to that of the proposed Plan, it can be concluded that the impacts on regional roadways would be similar and would result in a significant and unavoidable impact in the 20-year development scenario as well as for total buildout. These impacts would be similar under both the No Project and the proposed Plan.

In terms of traffic safety, emergency access, parking, transit planning and air traffic patterns, the No Project Alternative is similar to the proposed General Plan.

In sum, the impacts of the No Project Alternative would be the same as those of the proposed Plan with regard to traffic and circulation.

e. Cultural Resources

The policy guidance contained in the existing General Plan provides similar protections regarding historic and cultural resources to that found in the proposed General Plan. The existing General Plan includes policies to preserve archeological and paleontological resources. While such policies are not included in the Draft General Plan, this EIR includes mitigation measures that would require the inclusion of such policies in the final adopted Plan.

Therefore, the No Project Alternative would be the same as the proposed General Plan with regard to cultural resources.

f. Biology

Both the No Project Alternative and the proposed General Plan would be subject to the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). As discussed in Section 4.6, implementation of the SJMSCP for projects would generally provide adequate mitigation to reduce impacts to biological resources to a level acceptable to meet CEQA- requirements, except for wetlands impacts. Furthermore, State and federal requirements regarding wetland mitigation as a condition of project approval would mitigate potential impacts to wetlands to less-than-significant levels.

The policy emphasis in this alternative that would limit proposed development to the area within the existing SOI, would result in less conversion of land to urban uses. This represents a minor improvement relative to the proposed Plan.

For this reason, the No Project Alternative would be considered an insubstantial improvement when compared to the proposed Plan with regard to biological resources.

g. Agriculture

Implementation of the No Project alternative would result in slightly less of an impact to agricultural resources when compared to the proposed Plan. This is because a slightly smaller amount of land designated as Prime, Unique

or Farmland of Statewide Importance, and Williamson Act land classified as "prime agricultural land in non-renewal" would be developed with urban uses in the No Project Alternative when compared to the amount of farmland converted to urban uses in the proposed General Plan. Approximately 1,070 acres, consisting of 450 acres of Prime, 50 acres of Unique and 560 acres of Locally Important Farmland, and 80 acres of land under active Williamson Act contracts would not be planned for conversion to urban uses when compared with the proposed Plan at total buildout.

There would be slightly less development of land to urban uses under this alternative. However, there would be some conversion of important farmland to urbanized uses under this alternative, so both this alternative and the proposed Plan would result in a significant and unavoidable impact to agricultural resources.

For these reasons, the No Project alternative would represent an insubstantial improvement over the proposed Plan in regard to agricultural impacts.

h. Mineral Resources

A similar amount and location of land is designated as Aggregate in the proposed General Plan as in the existing Plan. Moreover, policy guidance regarding mineral resources in the existing General Plan is similar to that provided in the proposed Plan. Thus, the No Project Alternative is considered to have the same impacts to mineral resources as the proposed General Plan.

i. Community Services

The No Project Alternative would result in a slightly smaller amount of residential and non-residential growth distributed over a smaller area than under the proposed Plan. However, this would not result in a substantial difference in the level of impact related to the provision of community services, including police, fire, schools, solid waste, and parks and recreation. Both the existing General Plan and the proposed Plan include policies to address any unforeseen impacts associated with the need to construct and operate additional police, fire, schools, solid waste facilities and parks and recreation facilities to

applicable local, State and federal standards. Any potential impacts to community services would be identified and addressed at a project-specific, second-tier level of analysis, pursuant to CEQA.

Thus the No Project Alternative would result in the same level of impacts to community services as the proposed General Plan.

j. Infrastructure

Impacts of the No Project Alternative and the proposed Plan would be similar in regard to water supply. As with the proposed Plan, there would be sufficient water supply to meet the projected demand through 2025 under the No Project Alternative. However, additional water sources would need to be secured to accommodate growth projected at total buildout under both the existing General Plan and the proposed Plan, which would result in a significant and unavoidable impact in both cases.

The No Project Alternative would result in an incremental reduction in the need for new infrastructure when compared to the proposed Plan, due to the slightly smaller area that would be developed. However, the amount of land developed and the total infrastructure needs would not be significantly different from a planning or infrastructure perspective. The No Project Alternative would be subject to the policy guidance for infrastructure provision and energy conservation in the existing General Plan, which includes goals, policies and actions to ensure that adequate water, wastewater and stormwater facilities are provided to meet the needs of future growth and to encourage conservation. Specifically, the existing General Plan includes actions to update the City's *Water Master Plan*, *Wastewater Master Plan* and *Storm Drainage Master Plan* to meet the needs of future development. Thus, as is the case with the proposed General Plan, no significant impact with regard to infrastructure, including sewer service and drainage capacity would occur for the No Project Alternative other than the significant and unavoidable impact with regards to water supply discussed above.

However, the proposed General Plan includes additional detailed policy guidance to promote energy conservation not included in the existing General Plan. Policies and actions in the proposed Plan that do not exist in the existing General Plan would promote the development of alternative energy systems, require consideration of energy-efficiency in the review of future development projects, encourage the replacement of diesel vehicles with less-polluting alternatives, and call for public education programs about energy efficiency.

Because the proposed General Plan includes these additional energy policies, the No Project Alternative would be considered insubstantially worse than the proposed General Plan with regards to impacts to infrastructure and energy.

k. Geologic and Seismic Hazards

The No Project Alternative proposes development that is distributed in a similar manner to the proposed General Plan. Current State and federal regulations require specific mitigations to avoid impacts related to geologic and seismic hazards, which would apply to both the No Project Alternative and the proposed General Plan. For these reasons, the No Project Alternative is considered to have the same impacts as the proposed General Plan in regard to geology and seismicity.

l. Hydrology and Flooding

Under this alternative, new policies proposed in the General Plan regarding flood protection would not be adopted. However, similar policies in the existing General Plan would be maintained, so impacts in this regard would be similar.

The No Project Alternative proposes slightly less development in the 100-year floodplain or in areas identified at risk of inundation from dam failure when compared to the proposed Plan. However, this would not be considered a substantial difference, given that there would still be some areas at risk from flooding or inundation that would be included under this alternative.

Additionally, since similar policies intended to minimize risk of flooding and inundation would be in place under both this alternative and the proposed Plan, the No Project Alternative would be considered to have the same impact as the proposed Plan with regard to hydrology and flooding.

m. Hazardous Materials and Other Hazards

A smaller amount of residential and non-residential growth is projected at total buildout of the No Project Alternative than the proposed Plan, which would theoretically result in lower levels of household and other hazardous waste that would be generated, stored and transported. However, this would not be a significant improvement relative to the proposed Plan, since it would only be an incremental difference.

The No Project Alternative would not include the additional hazardous materials and public safety policies and actions contained in the proposed General Plan. However, hazardous materials generation, storage and clean-up are heavily regulated by federal, State and local regulations that would reduce the potential for hazards and hazardous materials to a less-than-significant level for both the No Project Alternative and the proposed Plan. Thus the impacts of this alternative and the proposed Plan would be similar in this regard as well.

Therefore, the No Project Alternative would be the same as the proposed General Plan with regard to impacts related to hazardous materials and other hazards.

n. Noise

Under this alternative, residential growth would be distributed in a similar proximity to significant sources of noise as under the proposed General Plan. Moreover, increases in regional traffic would cause noise levels to worsen under both this alternative and the proposed Plan; these changes in regional traffic are generally independent of any land use changes called for in the proposed General Plan and would also occur under the No Project Alternative.

For these reasons, the No Project Alternative is considered to be the same as the proposed General Plan with regard to noise impacts.

o. Air Quality

The No Project Alternative would be subject to the existing General Plan land use map, which has slightly fewer sensitive receptor uses in proximity to the significant sources of air quality. Due to increases in regional traffic, air quality would worsen under both the No Project Alternative and the proposed General Plan, so there would also still be a significant and unavoidable impact with regard to air quality.

For these reasons, the No Project Alternative would be considered to have the same impacts as the proposed General Plan with regard to impacts to air quality.

B. Concentrated Growth Alternative

This section analyzes the Concentrated Growth Alternative against the proposed General Plan. A diagram of this alternative is shown in Figure 5-1.

This alternative was developed in order to assess whether the proposed Plan might be improved if future growth were to be located in closer proximity to existing urbanized areas than under the proposed Plan. During the development of the proposed Plan, numerous workshops were held to address land use designations within the Sphere of Influence[2] and where the next increment of residential growth should occur.[3] A development pattern reflective of a greater concentration of growth around the existing development in Tracy was discussed. Furthermore, the Concentrated Growth Alternative

[2] City Council Workshops #7-Land Use 12/1/03, #8-Land Use Designation Map 2/2/04, #9-Land Use in the SOI 3/1/04, and Community Workshop #4-Land Use in the SOI 2/18/04.

[3] City Council Workshops #16-Major Policies Discussion 12/13/04, #17-Growth Priorities 1/11/05, and #20-General Plan Revisions 5/16/05.

allows for an expansion of residential growth consistent with the "Secondary Residential Growth Areas" described in Objective LU-1.4, P3 and shown in Figure 2-3 in the Land Use Element of the proposed Plan, as well as continued jobs development within areas including the Tracy Gateway project area—two major objectives of the proposed Plan, albeit in a much more confined area. Additionally, numerous other proposed General Plan goals, objectives, policies and actions could be achieved under this Alternative.

1. Principal Characteristics

Under this alternative, the General Plan would include policy direction to ensure that new growth would be concentrated near the existing urbanized area (both within and outside the City limits).

Development would occur within the existing City limits, not including the Tracy Hills Specific Plan area, and in areas currently outside the City limits in areas identified as "Secondary Residential Growth Areas" in Figure 2-3 of the proposed General Plan. The SOI would be redrawn to contain these development areas, as shown in Figure 5-1. Proposed land use designations would be the same as the proposed General Plan for the areas to be developed. Total buildout under this alternative would result in less residential and non-residential growth, adding a total of approximately 71,000 people and 72,000 jobs, for a total population of 145,000 people and 101,000 jobs, as shown in Table 5-2.

Over the course of the 20-year planning horizon, new residential uses other than those already permitted would be located both inside and outside of the existing City limits, in areas north of Linne Road, east of Lammers Road, south of I-205 and west of MacArthur Drive. These areas are designated primarily for multi-family development; the only low density development under this alternative during the 20-year planning horizon would be located in Urban Reserve 10. Thus, the average density of new development during the 20-year planning horizon under this alternative would be higher than that foreseen under the proposed General Plan.

Non-residential uses developed over the 20-year planning horizon would also be concentrated near the existing urbanized area in the following manner: industrial development would be concentrated in the Northeast Industrial Area with pockets near the airport and north of I-205; –commercial development would be concentrated in the Downtown, the I-205 area, Urban Reserves 9 and 10, and Larch Clover, with additional growth as infill development in existing commercial districts; office uses would be concentrated in Tracy Gateway, the Downtown and on Tracy Boulevard south of Valpico Road.

2. Impact Analysis

The Concentrated Growth Alternative would have the following impacts relative to adoption of the Proposed General Plan.

a. Land Use

At total buildout, the Concentrated Growth Alternative would result in a much smaller amount of residential and non-residential growth than the proposed Plan. While some people might feel that this overall reduction in potential growth represents an improvement relative to the proposed Plan, it could actually have the result of pushing development off to other cities, with similar impacts on the region from a land use perspective.

This alternative would also include increased policy direction for the City to ensure a more compact development pattern than in the proposed General Plan. This would represent an improvement relative to the proposed Plan, since it would conserve undeveloped land and minimize impacts related to automobile trips and air quality.

The Concentrated Growth Alternative would be similar to the proposed General Plan in other regards. Neither the proposed General Plan nor the Concentrated Growth Alternative would divide existing communities. Both the proposed Plan and the Concentrated Growth Alternative would be subject to the same policy direction with regards to ensuring land use compatibility with surrounding uses. Similar to the proposed Plan, the Concentrated

Growth Alternative would also not conflict with any applicable land use plan, policies or adopted habitat conservation plans.

Overall, the Concentrated Growth Alternative would represent an insubstantial improvement with regard to land use impacts when compared to the proposed General Plan.

b. Population, Employment and Housing

At total buildout, the Concentrated Growth Alternative would result in smaller residential and employee populations than the proposed Plan, as shown in Table 5-2, with approximately 145,000 people and 101,000 jobs. However, the total projected population and jobs under the Concentrated Growth Alternative would still represent a substantial increase in population relative to existing conditions, and would thus result in a significant and unavoidable impact, just like the proposed Plan.

As with the proposed General Plan, this alternative would not require displacement of housing or people for both total buildout and for the initial 20-year planning period.

Overall, the Concentrated Growth Alternative would be an insubstantial improvement to the proposed General Plan with regards to impacts to population, employment and housing.

c. Visual Quality

Since growth would be concentrated, this alternative would preserve more undeveloped land from urban development than the proposed Plan. In particular, it would avoid visual impacts to the I-205 corridor caused by new development in Urban Reserve 6, and along state designated scenic routes including I-580 in the Tracy Hills Specific Plan area and I-5 along the eastern border of Urban Reserve 2. This avoidance of these sensitive visual areas through concentration of development would have a substantial positive impact on visual quality of the City.

However, this alternative would be similar to the proposed Plan in other respects. Policies to enhance "hometown feel" and preserve open space in the proposed General Plan would be implemented under both the proposed Plan and this alternative. Despite these policies and the fact that the Concentrated Growth Alternative would result in the development of less land than the proposed Plan at total buildout, the amount of development permitted would still result in an impact to the existing visual identity of the City, just like the proposed Plan.

On balance, this alternative would be a substantial improvement when compared to proposed Plan with regards to impacts on visual resources.

d. Traffic and Circulation

As with the proposed Plan, the Concentrated Growth Alternative would require an expanded local roadway network, which would involve extending and widening existing roadways and the construction of new roadways. Additional traffic signals would be required at locations throughout the City, including intersections that are currently unsignalized and other future intersections.

The Concentrated Growth Alternative would be subject to similar policy guidance as the proposed General Plan. This includes actions in the Circulation Element under Objective CIR1.3, P1 which allows LOS C on all streets and intersections, except within ¼-mile of a freeway, where LOS D is acceptable; and allows LOS E in the Downtown and Bowtie areas of Tracy. Objective CIR-1.3, P2 indicates that the City may allow individual locations to fall below the City's LOS standards in instances where the construction of physical improvements would be infeasible, prohibitively expensive, significantly impact adjacent properties or the environment, or have a significant adverse effect on the character of the community. In these regards, this alternative would be the same as the proposed Plan.

The 20-year traffic forecast for the Concentrated Growth Alternative indicates that the City's level of service standards would be maintained except for

the Eleventh Street/Lammers Road and Eleventh Street/Corral Hollow Road intersections. An urban interchange would also be required at the intersection of Eleventh Street/Lammers Road. The Eleventh Street/Corral Hollow Road intersection would require exemption, as there are no acceptable physical mitigation measures that could be developed to bring this intersection to LOS C or better. All of these impacts would be the same for both the Concentrated Growth Alternative and the proposed Plan.

However, the Concentrated Growth Alternative would result in less employment and residential growth at buildout. The Concentrated Growth Alternative is estimated to generate approximately 40-50 percent fewer trips on a daily basis, as compared to the proposed Plan. Therefore, the number of local roadway impacts is expected to be less at total buildout. Additionally, this alternative limits development geographically; therefore there would be less need for roadway improvements beyond those identified to serve the 20-year development scenario.

For regional roadways, significant unavoidable impacts would still be expected to occur under the Concentrated Growth Alternative, primarily because much of projected regional traffic is expected to come from outside of Tracy. Under the 20-year scenario, impacts would be similar between the proposed Plan and this alternative, given the similarities in the total population and employment. At total buildout, regional traffic impacts may be slightly reduced as compared to the proposed Plan since much less land is being developed under this alternative, and hence would result in a correspondingly smaller amount of trip-generating land uses. However, significant impacts to major adjacent roadway facilities such as I-5, I-205, and I-580 would still occur at buildout of the Concentrated Growth Alternative, given the current level of congestion on these roadways, the limited funding available for improvement, and the potential growth in adjacent communities.

In terms of traffic safety, emergency access, parking and air traffic patterns, the Concentrated Growth Alternative is essentially similar to the proposed General Plan and would not result in a significant impact.

In sum, the Concentrated Growth Alternative would have the same impacts as the proposed Plan related to traffic and transportation during the 20-year scenario but would be considered an insubstantial improvement at buildout relative to the proposed Plan.

e. Cultural Resources

The Concentrated Growth Alternative would result in less land being developed with urban uses, and thus would theoretically have correspondingly lower chance of potentially disturbing undiscovered archaeological or paleontological resources in the Planning Area. However, the policy guidance contained in the proposed General Plan and this EIR regarding cultural resources would also be implemented under the Concentrated Growth Alternative. Thus, the potentially significant impact identified in Section 4.5 to archeological and paleontological resources would be the same for both the this alternative and the proposed General Plan.

In sum, this alternative would have the same impacts on cultural resources as the proposed Plan.

f. Biology

As discussed in Section 4.6, no significant impacts with regard to biological impacts would occur under the proposed General Plan. This would also be true under the Concentrated Growth Alternative.

The goals, objectives, policies and actions contained in the proposed General Plan regarding biological resources would also be implemented under the Concentrated Growth Alternative. Thus, the City would continue to participate in the SJMSCP, which provides adequate mitigation to reduce impacts to biological resources to a level acceptable to meet CEQA review and mitigation except for wetlands impacts. As discussed in Section 4.6, State and federal requirements regarding wetland mitigation as a condition of project approval would mitigate potential impacts to wetlands to less-than-significant levels.

The policy emphasis in this alternative that limits new growth to selected areas adjacent to existing urbanized areas would result in less conversion of land to urban uses. This represents an improvement relative to the proposed Plan.

Thus, the Concentrated Growth Alternative would be an insubstantial improvement with respect to biological resources when compared to the proposed General Plan.

g. Agriculture

Compared to the proposed General Plan, implementation of this alternative would result in less of an impact to agricultural resources since a smaller amount of important farmland would be developed with urban uses. Approximately 12,400 acres, consisting of 7,900 Prime, 780 Unique and 3,700 Locally Important Farmland, and 3,870 acres of land under active Williamson Act contracts would not be planned for development to urban uses when compared with the proposed Plan at total buildout.

Moreover, less important farmland would also be converted during the 20-year development period from 2005 through 2025 would be due to this alternative's policy emphasis on development adjacent to existing urbanized areas.

However, there would be some conversion of important farmland to urbanized uses projected under this alternative, which would still represent a significant and unavoidable impact, just like for the proposed Plan. Nonetheless, this alternative represents a substantial improvement over the proposed Plan in regard to agricultural resources.

h. Mineral Resources

The Concentrated Growth Alternative proposes the same development-oriented land use designations as the proposed General Plan, but in a more constrained area. Development would located in an area that either has no significant mineral deposits or is part of an agreement between the City and

the State Division of Mines and Geology that allows urban development to occur in the area.[4] The policy guidance contained in the proposed General Plan regarding mineral resources would also be implemented under this alternative.

Thus, the Concentrated Growth Alternative would be the same as the proposed General Plan with regard to impacts on mineral resources.

i. Community Services

The Concentrated Growth Alternative would result in a smaller amount of residential and non-residential growth distributed over a smaller area than under the proposed Plan. However, this would not result in a substantial difference in the level of impact related to the provision of community services such as police, fire, schools, solid waste, and parks and recreation, since the policy guidance regarding service provision in the proposed General Plan would also be included under this alternative. Policies to be included would address any unforeseen impacts associated with the need to construct and operate additional police, fire, schools, solid waste facilities and parks and recreation facilities. Any potential impacts to community services would be identified and addressed at a project-specific, second-tier level of analysis, pursuant to CEQA.

Thus the Concentrated Growth Alternative would be the same as the proposed General Plan with regard to impacts on community services.

j. Infrastructure

Impacts of the Concentrated Growth Alternative and the proposed Plan would be similar in regard to water supply. As with the proposed Plan, there would be sufficient water supply to meet the projected demand through 2025 under the Concentrated Growth Alternative. However, additional water sources would need to be secured to accommodate growth projected at total

[4] As discussed in Section 4.8, the City of Tracy has an agreement with the State Division of Mines and Geology to allow for urban development in the City north of Linne Road.

buildout under both this alternative and the proposed Plan, which would result in a significant and unavoidable impact in both cases.

The infrastructure analysis in Section 4.10 did not identify any capacity shortfalls for the proposed General Plan for other infrastructure, including sewer service and drainage capacity. This would be the same under the Concentrated Growth Alternative.

This alternative would be subject to the same policy direction as the proposed General Plan. Thus, goals, objectives, policies and actions ensuring that infrastructure plans be updated regularly to accommodate future planned growth would also apply under this alternative.

The Concentrated Growth Alternative would require that new development be located in selected areas adjacent to existing developed areas, which would result in efficiencies such as building upon existing infrastructure.

For this last reason, the Concentrated Growth Alternative would represent an insubstantial improvement to the proposed General Plan with regards to impacts to infrastructure.

k. Geologic and Seismic Hazards

In this alternative, new growth would be focused in areas away from potentially active faults in the southwestern portion of the Tracy Planning Area. However, the proposed General Plan would include policies to mitigate any potential impacts from geologic and seismic hazards to a less-than-significant level. Therefore, the Concentrated Growth Alternative would be considered only an insubstantial improvement to the proposed General Plan in regard to geology and seismicity.

l. Hydrology and Flooding

The Concentrated Growth Alternative proposes more concentrated development than that proposed in the General Plan, but it still includes areas for development in the north of the city that are subject to flooding. Flood con-

trol policies under Objective SA.1 of the proposed General Plan would also be adopted. Thus, the Concentrated Growth Alternative would be the same as the proposed Plan with regard to hydrology and flooding.

m. Hazardous Materials and Other Hazards

Under this alternative, growth would be allowed in a much smaller area than in the proposed Plan, which would theoretically result in lower levels of household and other hazardous waste that would be generated, stored and transported. However, this would not be a significant improvement relative to the proposed Plan, since there are many existing safeguards in place at the federal, State and local levels to minimize risks from commonly-used hazardous materials.

The policy direction regarding hazardous materials and public safety policies and actions contained in the proposed General Plan would also apply in the Concentrated Growth Alternative. Additionally, hazardous materials generation, storage and clean-up are heavily regulated by federal, State and local regulations that would reduce the potential for hazards and hazardous materials to a less-than-significant level for both the Concentrated Growth Alternative and the proposed Plan.

Unlike the proposed Plan, the Concentrated Growth Alternative does not propose development in the Tracy Hills Specific Plan area, which is identified in Section 4.13 as an area with Moderate Fire Hazard Severity. For this reason, the Concentrated Growth Alternative would be considered a slight improvement to the proposed General Plan with regards to other hazards.

For these reasons, the Concentrated Growth Alternative would represent an insubstantial improvement relative to the proposed General Plan with regard to hazardous materials and other hazards.

n. Noise

As is the case with the proposed General Plan, significant noise level increases (3 dBA L_{dn} or greater) associated with increased traffic would occur under this

alternative adjacent to existing noise sensitive uses during the 20-year planning horizon and at buildout. Since these noise level increases are related to regional traffic and are generally independent of any land use changes called for in both the proposed General Plan or the Concentrated Growth Alternative, the two are considered to have the same impacts with regard to noise.

o. Air Quality

Since this alternative would include policy guidance to concentrate development in a more compact manner than the proposed Plan, new residents might choose to use alternative means of transportation to reach their destinations, resulting in a corresponding but insubstantial reduction in local emissions.

However, this would not avoid the significant, unavoidable impact associated with the proposed Plan, since population growth would still exceed that assumed in the adopted regional Clean Air Plan. Moreover, due to increases in regional traffic, air quality would worsen during the 20-year planning horizon. These changes are generally independent of any land use changes called for in the proposed General Plan and would occur under both the proposed Plan and the Concentrated Growth Alternative.

Overall, this alternative would be considered an insubstantial improvement to the proposed Plan with regard to air quality.

C. City Limits Alternative

This section analyzes the City Limits Alternative against the proposed General Plan. A diagram of this alternative is shown in Figure 5-2.

This alternative was developed in order to assess whether the proposed Plan might be improved if future growth were limited to areas within the existing City limits, which represents a considerably smaller area than would be allowed to develop under the proposed Plan. Among the reasons why this alternative was selected relate to the fact that several large tracts of land within

the City limits have yet to develop, including the Tracy Hills Specific Plan area, and completion of the Northeast Industrial Area and the Tracy Gateway Planned Unit Development area. In addition, numerous goals, objectives policies and actions in the proposed General Plan may still be achieved under this alternative, including Objective LU-1.5 P1 and P2 which relate to encouraging development near transit, Goal LU-4.1 P1, P2, and P3 which relate to mixes of housing types, Objective LU-5.2 related to Downtown development, Goal LU-6 related to ensuring that land development mitigates its environmental, design and infrastructure impacts, as well as Objective LU-6.3, which is aimed at ensuring that land uses in the vicinity of the Tracy Municipal Airport are minimized, among other goals and policies.

1. Principal Characteristics

Under this alternative, the proposed land use designations inside existing City limits would be the same as in the proposed General Plan. However, growth would be located exclusively within the existing City limits; no new development would occur outside the City limits, neither in areas that are currently inside the existing SOI nor in areas outside of it. The SOI would be changed to become coterminous with the existing City Limits, as shown in Figure 5-2.

Some of the key areas proposed for development under the draft General Plan that would be excluded in this Alternative are Urban Reserves 1 through 13, 16 and 17; as well as areas designated for industrial uses in the "Patterson Pass Business Park area that abuts I-580 and east of the Northeast Industrial Area, and some commercially-designated areas to the west of the I-205 Specific Plan area.

Overall, the City Limits Alternative would result considerably less residential and non-residential growth than the proposed Plan. As shown in Table 5-2, buildout would be approximately 21,000 residential units and 49 million square feet of non-residential (commercial, office and industrial) uses, which is allows for approximately 25,000 fewer dwelling units and 73 million fewer square feet of non-residential uses than the proposed Plan.

For analysis of this alternative at the 20-year planning horizon, it was assumed that a large percentage of residential growth would occur in the Tracy Hills Specific Plan area, with additional, concentrations in the Bowtie and near Downtown, along Valpico Road, Byron Road and in Urban Reserve 14, Urban Reserve 15 and the area generally known as the Kagehiro property. Most of the future industrial uses would occur to the Northeast Industrial Area and the Tracy Hills Specific Plan area, with small amounts north of I-205 and near the Tracy Municipal Airport. Office uses would be concentrated in Tracy Gateway and along Tracy Boulevard south of Valpico Road. Commercial uses would be spread throughout the City but concentrated in the Downtown, Bowtie, Tracy Hills, Tracy Gateway, along existing commercial corridors (Eleventh Street and Grant Line Road) and in the I-205 area.

2. Impact Analysis

The City Limits Alternative would have the following impacts relative to adoption of the Proposed General Plan.

a. Land Use

At total buildout, the City Limits Alternative would result in a much smaller amount of residential and non-residential growth than the proposed Plan. While some people might feel that this overall reduction in potential growth represents an improvement relative to the proposed Plan, it could actually have the result of pushing development off to other cities, with similar impacts on the region from a land use perspective.

The City Limits Alternative would be similar to the proposed General Plan in other aspects. Neither the proposed General Plan nor the City Limits Alternative would divide existing communities. Both the proposed Plan and the City Limits Alternative would be subject to the same policy direction regarding to ensuring land use compatibility with surrounding uses. Similar to the proposed Plan, the Concentrated Growth Alternative would also not conflict with any applicable land use plan, policies or adopted habitat conservation plans.

Overall, the City Limits Alternative would be the same with regard to land use when compared to the proposed General Plan.

b. Population, Employment and Housing

At total buildout, the City Limits Alternative would result in much smaller residential and employee populations than the proposed Plan, as shown in Table 5-2 above. However, the total projected population and jobs under the City Limits Alternative, 141,000 people and 125,000 jobs, respectively, would be a substantial increase in population relative to existing conditions, and would thus result in a significant and unavoidable impact, just like the proposed Plan.

Neither the proposed General Plan nor the City Limits Alternative would result in displacement of substantial numbers of existing housing or people.

Overall, the City Limits Alternative would be an insubstantial improvement to the proposed Plan with regards to impacts to population, employment and housing due to the numbers of future residents and employees being much smaller.

c. Visual Quality

Since growth would be restricted to within the City limits, this alternative would preserve more undeveloped land from urban development than the proposed Plan. In particular, it would avoid the deterioration of views of agricultural land from I-205 associated with the development of Urban Reserve 6. This would be an improvement over the proposed Plan. However, at total buildout, both this alternative and the proposed Plan would propose development in the Tracy Hills Specific Plan area, resulting in a similar deterioration of views from the County-designated scenic road along Corral Hollow Road southwest from I-580, and the state-designated scenic route along I-580 (between I-205 and I-5). Thus, this alternative is slightly better than the proposed Plan with respect to impacts on view corridors.

In other respects, this alternative would be similar to the proposed Plan. Policies to enhance community character and preserve open space would be implemented under both the proposed Plan and this alternative. Despite these policies and the fact that the City Limits Alternative would result in the development of less land than the proposed Plan at total buildout, the amount of development permitted would still result in a significant impact to the existing visual identity of the City, just like the proposed Plan.

Thus, in overall terms, the City Limits Alternative would be an insubstantial improvement with respect to visual impacts when compared to the proposed project.

d. Traffic and Circulation

As under the proposed General Plan, the City Limits Alternative would require an expanded local roadway network, which would involve extending and widening existing roadways and the construction of new roadways. Additional traffic signals would be required at locations throughout the City, including the 17 unsignalized intersections and other locations. The level of physical improvements required would be substantially similar to that needed to serve the proposed General Plan.

The City Limits Alternative would be subject to similar policy guidance as the proposed General Plan. This includes actions in the Circulation Element under Objective CIR-1.3, P1, which allows LOS C on all streets and intersections except within ¼-mile of a freeway, where LOS D is acceptable; and allows LOS E in the Downtown and Bowtie areas of Tracy. Objective CIR-1.3, P2 indicates that the City may allow individual locations to fall below the City's LOS standards in instances where the construction of physical improvements would be infeasible, prohibitively expensive, significantly impact adjacent properties or the environment, or have a significant adverse effect on the character of the community.

The 20-year traffic forecast for the City Limits Alternative indicates that the City's LOS standards would be maintained except at the following three intersections, one more than the proposed General Plan:

- Eleventh Street/Corral Hollow Road
- Eleventh Street/Lammers Road
- New Schulte Road/Lammers Road.

Mitigating these impacts would require an urban interchange at the intersection of Eleventh Street/Lammers Road. As allowed under the policy guidance in effect under both the proposed General Plan and City Limits Alternative, an exemption to the City's LOS policy would be required at the intersection of Eleventh Street/Corral Hollow Road. Similarly, the intersection of New Schulte Road/Lammers Road would require either an urban interchange or an exemption from the City's LOS policy. The City Limits Alternative would result in an additional intersection to fail to meet the City's LOS standards when compared to the proposed Plan. As stated, since policy guidance that would be in effect under both the proposed Plan and this Alternative, this would be considered an insubstantial difference.

However, the City Limit Alternative would result in less employment and residential growth than the proposed Plan at total buildout. The City Limit Alternative may generate approximately 40-50 percent fewer trips on a daily basis, when compared to the proposed Plan. Therefore, the number of local roadway impacts is expected to be less at total buildout.

For regional roadways, significant and unavoidable impacts would be still expected to occur under the City Limit alternative, primarily because much of projected regional traffic is expected to come from outside Tracy. Under the 20-year scenario, impacts would be similar between the proposed Plan and the City Limit Alternative, given the similarities in the total population and employment. While regional traffic impacts may be lower at total buildout, they would be reduced only marginally from a significant level. Similar to the proposed Plan, impacts to major adjacent facilities such as I-5, I-205, and I-580 would still occur under the City Limit Alternative, given the current

level of congestion on these roadways, the limited funding available for improvement, and the potential growth in adjacent communities.

In terms of traffic safety, emergency access, parking and air traffic patterns, the City Limit Alternative is essentially similar to the proposed General Plan and would not result in a significant impact.

On balance, the City Limit Alternative would be considered as only an insubstantial improvement when compared to the proposed Plan.

e. Cultural Resources

The City Limits Alternative would result in less undeveloped land being developed with urban uses, and thus would theoretically have slightly lower chance of potentially disturbing undiscovered archaeological or paleontological resources in the Planning Area. However, the policy guidance contained in the proposed General Plan regarding cultural resources would also be implemented under the City Limits Alternative. Thus, the potentially significant impact identified in Section 4.5 to archeological and paleontological resources would be the same for both the this alternative and the proposed General Plan.

For this reason, the City Limits Alternative would be considered to have the same impacts as compared to the proposed General Plan with regard to cultural resources.

f. Biology

As discussed in Section 4.6, no significant impacts with regards to biological impacts would occur under the proposed General Plan. This would also be true for the City Limits Alternative.

The goals, objectives, policies and actions contained in the proposed General Plan regarding biological resources would also be implemented under the City Limits Alternative. Thus, the City would continue to participate in the SJMSCP, which provides adequate mitigation to reduce impacts to biological

resources to a level acceptable to meet CEQA review and mitigation except for wetlands impacts. As discussed in Section 4.6, State and federal requirements regarding wetland mitigation as a condition of project approval would mitigate potential impacts to wetlands to less-than-significant levels. Even though the proposed Plan has a mechanism to mitigate impacts to biological resources through participation in the SJMSCP, development under the City Limits Alternative would not need to avail itself of this mitigation for several new areas of development. This is because several of these areas, while covered under the SJMSCP, are largely in "no-pay" areas, already developed areas, or within the Tracy Hills Specific Plan area which has a separate agreement outside of the SJMSCP to mitigate biological impacts for the majority of the Tracy Hills project.

The policy emphasis in this alternative that limits new growth to areas within the existing City limits would result in less conversion of land to urban uses. This represents and improvement relative to the proposed Plan.

Thus, the City Limits Alternative would be considered a substantial improvement over the proposed General Plan with regard to biological resources.

g. Agriculture

Implementation of this alternative would result in a substantially reduced impact to agricultural resources since a considerably smaller amount of farmland overall, as identified in Section 4.7, would be developed with urban uses as is projected at total buildout and in the 20-year period from 2005 to 2025 under the proposed General Plan. Approximately 10,600 acres, consisting of 7,800 Prime, 850 Unique and 1,950 Locally Important Farmland, and 3,870 acres of land under active Williamson Act contracts would not be planned for development to urban uses when compared with the proposed Plan at total buildout.

However, since there would be some conversion of farmland to urbanized uses projected under this alternative, as there are areas within the City that

are not developed and are still farmland. Under this alternative, impacts to farmland conversion cannot not be entirely avoided and there would still be a significant unavoidable impact, as would be the case for the proposed General Plan. Nonetheless, this alternative represents a substantial improvement over the proposed Plan with respect to agricultural resources.

h. Mineral Resources

The City Limits Alternative proposes the same land use designations as the proposed General Plan, but in a smaller area overall. The policy guidance contained in the proposed General Plan regarding mineral resources would also be implemented under this Alternative.

Thus, the City Limits Alternative is considered to be the same to the proposed General Plan with regards to impacts to mineral resources.

i. Community Services

The City Limits Alternative would result in a smaller amount of residential and non-residential growth distributed over a smaller area than under the proposed Plan. However, this would not result in a substantial difference in the level of impact related to the provision of community services such as police, fire, schools, solid waste, and parks and recreation, since the policy guidance regarding service provision in the proposed General Plan would also pertain to this alternative. Policies to be included would address any unforeseen impacts associated with the need to construct and operate additional police, fire, schools, solid waste facilities and parks and recreation facilities. Any potential impacts to community services would be identified and addressed at a project-specific, second-tier level of analysis, pursuant to CEQA.

In sum, the City Limits Alternative would be considered to be the same to the proposed General Plan with regard to impacts to community services.

j. Infrastructure

Impacts of the City Limits Alternative and the proposed Plan would be similar in regard to water supply. As with the proposed Plan, there would be

sufficient water supply to meet the projected demand through 2025 under the City Limits Alternative. However, additional water sources would need to be secured to accommodate growth projected at total buildout of this alternative and the proposed Plan, which would result in a significant and unavoidable impact in both cases.

The infrastructure analysis in Section 4.10 did not identify any capacity shortfalls for the proposed General Plan for other infrastructure, including sewer service and drainage capacity. This would be the same under the City Limits Alternative.

This alternative would be subject to the same policy direction as the proposed General Plan. Thus, goals, objectives, policies and actions ensuring that infrastructure plans be updated regularly to accommodate future planned growth would also apply under this alternative.

The City Limits Alternative would require that new development be located in selected areas adjacent to existing developed areas, which would result in efficiencies such as building upon existing infrastructure.

For this last reason, the City Limits Alternative would represent an insubstantial improvement to the proposed General Plan with regards to impacts to infrastructure.

k. Geologic and Seismic Hazards

This alternative proposes development that is distributed throughout the current City limits in a similar manner to the proposed General Plan. Development would be similar in areas where risk is identified from potentially active faults in the southwestern portion of the Tracy Planning Area. Additionally, State and federal regulations require specific mitigations to avoid impacts related to geologic and seismic hazards, which would apply to both this alternative and the proposed Plan. Thus, the City Limits Alternative would be considered to be the same as the proposed General Plan in regard to impacts related to geology and seismicity.

l. Hydrology and Flooding

The City Limits Alternative proposes development inside the City limits only, which would avoid most of the area subject to flooding in the north of Tracy. Approximately 1,096 acres of land at the northern portion of the General Plan area and outside the existing City limits falls within the 100-year floodplain or is at potential risk for dam inundation. This area would not be developed under this alternative. This would represent an improvement over the proposed Plan.

However, the City Limits Alternative would be subject to the same policy direction as the proposed Plan, and would include goals, objectives, policies and actions intended to minimize risk of flooding and inundation. Specifically, policies and actions under Objective SA-2.1 would limit development in the 100-year flood zone.

Given that these policies would be in place under both the City Limits Alternative and the proposed Plan, the City Limits Alternative offers only an insubstantial improvement over the proposed Plan with regard to hydrology and flooding.

m. Hazardous Materials and Other Hazards

Under this alternative, growth would be allowed in a much smaller area in than in the proposed Plan, which would theoretically result in lower levels of household and other hazardous waste that would be generated, stored and transported. However, this would not be a significant improvement relative to the proposed Plan, since there are many existing safeguards in place at the federal, Sate and local levels to minimize risks from commonly-used hazardous materials.

The policy direction regarding hazardous materials and public safety policies and actions contained in the proposed General Plan would also apply in the City Limits Alternative. Additionally, hazardous materials generation, storage and clean-up are heavily regulated by federal, State and local regulations

that would reduce the potential for hazards and hazardous materials to a less-than-significant level for both the City Limits Alternative and the proposed Plan. With regards to hazardous materials, the City Limits Alternative would be similar to the proposed Plan.

Both the City Limits Alternative and the proposed General Plan project development in the entire Tracy Hills Specific Plan area, which is identified in Section 4.13 as an area with Moderate Fire Hazard Severity. Thus, this alternative would be considered similar to the proposed Plan with regards to other hazards.

Taking all these factors into consideration, on balance, the City Limits Alternative would be the same as the proposed General Plan with regard to impacts related to hazardous materials and other hazards.

n. Noise

As is the case with the proposed Plan, significant noise level increases (3 dBA L_{dn} or greater) associated with increased traffic would occur adjacent to existing noise sensitive uses during the 20-year planning horizon and at buildout under this alternative. Since these noise level increases are related to regional traffic and are generally independent of any land use changes called for in either the proposed General Plan or the City Limits Alternative, the two are considered to be the same with regard to noise impacts.

o. Air Quality

This alternative proposes less overall development, and would result in fewer trips, relative to the proposed Plan. However, this would not avoid a significant and unavoidable impact to air quality associated with the proposed Plan. This is because population growth would still exceed that assumed in the adopted regional Clean Air Plan. Moreover, due to increases in regional traffic, air quality would worsen during both the 20-year planning horizon and at total buildout. These changes are generally independent of any land use changes called for in the proposed General Plan and would also occur under the City Limits Alternative.

Thus, this alternative would be considered to be the same to the proposed Plan with regard to impacts to air quality.

D. Existing SOI Alternative

This alternative would include application of the proposed General Plan land use designations and policies in an area corresponding only to the City's existing Sphere of Influence (SOI), rather than the expanded SOI in the proposed Plan.

This alternative was created in order to mitigate the proposed Plan by analyzing a scenario that followed the policy direction provided by the proposed Plan but reduced the overall amount of new development by not expanding the SOI. A diagram of this alternative is shown in Figure 5-3. Additionally, this alternative was chosen based on public comments at General Plan workshops related to land uses in the Sphere of Influence that the Sphere of Influence was large enough and should not be extended beyond its current boundary.[5] This alternative could achieve numerous General Plan Goals, Objectives and Policies in terms of land use, economic development, public facilities, and community character.

1. Principal Characteristics

Under this alternative, new development would occur under the proposed General Plan land use designations within the existing SOI. However the existing SOI boundary would remain in effect. Land use designations in areas outside the SOI would be set to preserve agriculture.

As discussed in Chapter 3, the existing SOI is smaller than the proposed SOI by approximately 2 square miles. This means that there would be less devel-

[5] City Council Workshops #7-Land Use 12/1/03, #8-Land Use Designation Map 2/2/04, #9-Land Use in the SOI 3/1/04, #19-Jobs and Open Space 1/31/05 and Community Workshop #4-Land Use in the SOI 2/18/04.

opment than foreseen under the proposed Plan. In particular, development in area Urban Reserve 6 (1,730 acres of commercial, office and industrial development), north of Larch Clover (50 acres of residential very low development) and the north of the Northeast Industrial Area (139 acres of industrial development) would be eliminated. The area north of Holly Sugar would also not be included, but this area is already designated for open space under the proposed General Plan.

Several other areas not included in the proposed Plan and its SOI would be developed under this alternative. These areas include a 575-acre area designated for industrial use south of the Patterson Pass Business Park, and a 230-acre area designated for public use. These areas currently fall within the existing SOI but are proposed to be removed in the proposed Plan through a contraction of the SOI in that area.

In this alternative, allowed development densities would be the same as in the proposed Plan. But with slightly less land area to develop, total buildout would be less. The amount of new residential growth would be very similar between the Existing SOI Alternative and the proposed Plan. Non-residential growth (commercial, office and industrial uses) at buildout would result in approximately 17 million fewer square feet of non-residential uses than the proposed Plan at total buildout, as shown in Table 5-2.

For analysis of the 20-year planning horizon, the distribution of projected development would be similar to the proposed Plan, except in those areas listed above that would not be included in this alternative because they do not fall within the existing SOI. Thus, residential growth is projected to occur in and around the Downtown, along Valpico Road, in Urban Reserves 10, 13, 14, 15, 16 17 and in Tracy Hills. New industrial growth would be located primarily in the Northeast Industrial Area, Urban Reserve 4, in the Tracy Hills Specific Plan area along I-580, as well as a few areas in the Industrial Specific Plan (ISP) area. Commercial growth is assumed to be distributed in the Downtown/Bowtie area, the I-205 area, along Grantline and Valpico Roads, Larch Clover, Urban Reserves 3, 4, 5 and 10, as well as in Tracy Hills.

Office growth would be focused in Tracy Gateway and on Tracy Boulevard south of Valpico Road, and near the intersection of Grant Line Road and Tracy Boulevard and in Tracy Hills along I-580.

2. Impact Analysis

The Existing SOI Alternative would have the following impacts relative to adoption and buildout of the proposed General Plan.

a. Land Use

Applying the proposed General Plan land use designations within the existing SOI would result in a net decrease of approximately 1,570 acres in the amount of land that would be developed under total buildout. The major difference between this alternative and the proposed Plan is that this alternative would result in a smaller amount of non-residential uses at the periphery of the City, the majority of which would be in Urban Reserve 6. However, this difference would be incremental relative to the total amount of development permitted and would not result in any substantial difference from a land use perspective.

The Existing SOI Alternative and the proposed Plan would be similar in other regards with respect to land use. Neither the proposed Plan nor this alternative would divide existing communities. They would both be subject to the same policy direction regarding to ensuring land use compatibility with surrounding uses. For this reason, this alternative is considered to be similar than the proposed project with regards to land use.

Overall, the Existing SOI Alternative would represent the same level of impact with regards to land use when compared to the proposed Plan.

b. Population, Employment and Housing

The amount of residential growth for this alternative is similar to the proposed Plan. Under the Existing SOI Alternative, land designated for non-residential use would decrease by approximately 1,200 acres, which would translate into approximately 27,000 fewer employees than under the proposed

Plan. The total projected population and jobs under the Existing SOI Alternative would still represent a substantial increase in population relative to existing conditions, and would thus result in a significant and unavoidable impact, just like the proposed Plan.

As with the proposed General Plan, this alternative would not require displacement of substantial numbers of existing housing or people for both total buildout and for the initial 20-year development period.

Overall, the Existing SOI Alternative would represent an insubstantial improvement when compared to the proposed Plan with regards to impacts to population, employment and housing.

c. Visual Quality

At total buildout, this alternative would preserve more undeveloped land from urban development than the proposed Plan. In particular, it would avoid visual impacts to the I-205 corridor associated with development in Urban Reserve 6. However, development would occur along state-designated routes along I-580 and I-5 under both this alternative and the proposed Plan. Thus, this alternative would only be a slight improvement with regards to impacts to scenic views and scenic roadways.

In other aspects related to visual quality, this alternative would be similar to the proposed Plan. Policies to enhance the City's "hometown feel" would be implemented under both the proposed General Plan and the Existing SOI Alternative. Despite these policies and the fact the Existing SOI Alternative would result in slightly less development of land than the proposed Plan at buildout, the amount of overall development of agricultural and other undeveloped lands to urban uses permitted would still result in a significant impact with regards to visual identity, as with the proposed Plan.

On balance, the Existing SOI Alternative would be an insubstantial improvement to the proposed project in regard to visual resources.

d. Traffic and Circulation

Under the Existing SOI Alternative, the level of local roadway improvements and extensions required to serve projected development would be similar to that needed to serve the proposed Plan. The main difference would be that roadway improvements to serve new development in Urban Reserve 6 would not be needed since it would not be developed under this alternative. Otherwise, the same types of roadway extensions, roadway widenings, construction of new facilities and at least 30 intersection signalizations would be needed for both this alternative and the proposed Plan.

The Existing SOI Alternative would be subject to similar policy guidance as the proposed General Plan. This includes actions in the Circulation Element under Objective CIR1.3, P1, which allows LOS C on all streets and intersections except within ¼-mile of a freeway, where LOS D is acceptable; and allows LOS E in the Downtown and Bowtie areas of Tracy. Objective CIR-1.3, P2 indicates that the City may allow individual locations to fall below the City's LOS standards in instances where the construction of physical improvements would be infeasible, prohibitively expensive, significantly impact adjacent properties or the environment, or have a significant adverse effect on the character of the community.

The 20-year traffic forecast for this alternative would be similar to the proposed Plan. As with the proposed Plan, the City's LOS would be maintained at all locations except for Eleventh Street/Lammers Road and Eleventh Street/Corral Hollow Road intersections. An urban interchange would also be required at the intersection of Eleventh and Lammers Road. These impacts would be the case for both this alternative and the proposed Plan.

At total buildout, the Existing SOI Alternative would result in similar amounts of residential and less non-residential growth than the proposed Plan. However, impacts on Tracy roadways would be similar between this alternative and the proposed Plan. The level of development for this alternative and the proposed Plan would be similar for the first 20 years. At total buildout, the level of projected development would differ, however the likely

trip generation would only vary by 15-20 percent. Given the similarities in the location of projected development and the general correspondence in the level of development, impacts to local roadways would be similar for the Existing SOI Alternative and the proposed Plan.

Regional traffic would be a factor in Tracy under both the Existing SOI Alternative and the proposed Plan. Since the VMT and trip generation associated with the this alternative would be similar to that of the proposed Plan, it can be concluded that the impacts on regional roadways would be similar and would result in a significant and unavoidable impact during the first 20-years and at buildout.

In terms of traffic safety, emergency access, parking and air traffic patterns, the Existing SOI Alternative is essentially similar to the proposed General Plan and would not result in a significant impact.

In sum, the Existing SOI Alternative would have the same level of impacts as the proposed Plan related to traffic and circulation.

e. Cultural Resources

This alternative would result in marginally less land being developed, and thus would theoretically have slightly lower chance of potentially disturbing undiscovered archaeological or paleontological resources in the Planning Area. However, the policy guidance contained in the proposed General Plan regarding cultural resources would also be implemented under the Existing SOI Alternative. Thus, the potentially significant impact identified in Section 4.5 to archeological and paleontological resources would be the same for both the this alternative and the proposed General Plan.

In conclusion, the Existing SOI Alternative would have the same impacts on cultural resources as the proposed Plan.

f. Biology

As discussed in Section 4.6, no significant impacts with regards to biological impacts would occur under the proposed General Plan. This would also be true for the Existing SOI Alternative.

The goals, objectives, policies and actions contained in the proposed General Plan regarding biological resources would also be implemented under the Existing SOI Alternative. Thus, the City would continue to implement the SJMSCP, which gives participating project applicants a means to provide adequate mitigation to reduce impacts to biological resources to a level acceptable to meet CEQA review and mitigation except for wetlands impacts. As discussed in Section 4.6, State and federal requirements regarding wetland mitigation as a condition of project approval would mitigate potential impacts to wetlands to less-than-significant levels.

The policy emphasis in this alternative that would limit proposed development to the area within the existing SOI, would result in less conversion of land to urban uses. The represents a minor improvement relative to the proposed Plan.

For this reason, the Existing SOI Alternative would be considered an insubstantial improvement to the proposed Plan with regard to biological resources.

g. Agriculture

Compared to the proposed Plan, implementation of this alternative would result in slightly less of an impact to agricultural resources since a smaller amount of farmland overall, as identified in section 4.7, would be developed with urban uses under total buildout if the proposed expansion to the SOI did not occur. Approximately 1,070 acres, consisting of 450 acres of Prime, 50 acres of Unique and 560 acres of Locally Important Farmland, and 80 acres of land under active Williamson Act contracts would be preserved from development to urban uses when compared with the proposed Plan at total buildout.

There would be slightly less development of land to urban uses under this alternative. However, there would be some conversion of important farmland to urbanized uses under this alternative, so both this alternative and the proposed Plan would result in a significant and unavoidable impact to agricultural resources.

For these reasons, the Existing SOI alternative would represent an insubstantial improvement over the proposed Plan in regard to agricultural impacts.

h. Mineral Resources

None of the additional area that would be developed under total buildout of the proposed SOI is classified or designated as containing significant mineral deposits. The Existing SOI Alternative proposes the same land use designations as the proposed General Plan. The policy guidance contained in the proposed General Plan regarding mineral resources would also be implemented under this alternative.

Thus, the Existing SOI Alternative is considered as having the same impacts as the proposed Plan with regard to mineral resources.

i. Community Services

The Existing SOI Alternative would result in a similar residential population and a lower employee population since comparatively less land would be developed for non-residential uses. However, when taken into consideration against the overall amount of land being developed, and would not result in a substantial difference in the level of impact related to the provision of community services such as police, fire, schools, solid waste, and parks and recreation, since the policy guidance regarding service provision

In addition, policies included in the proposed General Plan, which would also be implemented under this alternative, would address any unforeseen impacts associated with the need to construct and operate additional police, fire, schools, solid waste facilities and parks and recreation facilities to applicable

local, State and federal standards. Moreover, as discussed in detail in section 4.9, the specific impacts of additional services cannot be identified at this first-tier, plan-level analysis. Any potential impacts to community services would be identified and addressed at a project-specific, second-tier level of analysis, pursuant to CEQA.

Thus, the Existing SOI Alternative would be considered the same as the proposed Plan with regard to community services.

j. Infrastructure

Impacts of this alternative and the proposed Plan would be similar with regards to water supply. As with the proposed Plan, there would be sufficient water supply to meet the projected demand through 2025 under the Existing SOI Alternative. However, additional water sources would need to be secured to accommodate growth projected at total buildout of this alternative and the proposed Plan, which would result in a significant and unavoidable impact in both cases.

The infrastructure analysis in Section 4.10 did not identify any capacity shortfalls for the proposed General Plan for other infrastructure, including sewer service and drainage capacity. This would be the same under the Existing SOI Alternative.

This alternative would be subject to the same policy direction as the proposed General Plan. Thus, goals, objectives, policies and actions ensuring that infrastructure plans be updated regularly to accommodate future planned growth would also apply under this alternative.

The Existing SOI Alternative would result in ~~a~~ an incremental reduction in the overall demand for new infrastructure when compared to the proposed Plan, due to the smaller area that would be developed. However, the amount of land developed and the total infrastructure needs would not be significantly different from a planning or infrastructure perspective.

Therefore, the Existing SOI Alternative would result in the same level of impacts with regard to infrastructure when compared to the proposed General Plan.

k. Geologic and Seismic Hazards

Relative to the proposed Plan, this alternative proposes a similar amount and distribution of development in terms potential impact from geologic and seismic hazard. Moreover, current State and federal regulations require specific mitigations to avoid impacts related to geologic and seismic hazards, which would apply to both the Existing SOI Alternative and the proposed Plan. For this reason, the Existing SOI Alternative would be considered to be the same as the proposed Plan with respect to impacts related to geologic and seismic hazards.

l. Hydrology and Flooding

The Existing SOI Alternative proposes slightly less development in the 100-year floodplain or in areas identified at risk of inundation from dam failure when compared to the proposed Plan. However, the Existing SOI Alternative would be subject to the same policy direction as the proposed Plan, and would include goals, objectives, policies and actions intended to minimize risk of flooding and inundation. Specifically, policies and actions under Objective SA-2.1 would limit development in the 100-year flood zone.

Given that these policies would be in place under both the Existing SOI Alternative and the proposed Plan, the Existing SOI Alternative would be considered the same as the proposed Plan with regard to impacts to hydrology and flooding.

m. Hazardous Materials and Other Hazards

As noted above, this alternative would have similar amounts of residential development to the proposed Plan. Relative to the proposed Plan, this alternative overall proposes a smaller amount of non-residential development likely to be a generator of hazardous materials, which would theoretically result in lower levels of hazardous waste that would be generated, stored and

transported. However, this would not be a significant improvement relative to the proposed Plan, since there are many existing safeguards in place at the federal, State and local levels to minimize risks from commonly-used hazardous materials.

The policy direction regarding hazardous materials and public safety policies and actions contained in the proposed General Plan would also apply in the Existing SOI Alternative. Additionally, hazardous materials generation, storage and clean-up are heavily regulated by federal, State and local regulations that would reduce the potential for hazards and hazardous materials to a less-than-significant level for both the Existing SOI Alternative and the proposed Plan. With regards to hazardous materials, the Existing SOI Alternative would be similar to the proposed Plan.

Both the Existing SOI Alternative and the proposed General Plan project development in the entire Tracy Hills Specific Plan area, which is identified in Section 4.13 as an area with Moderate Fire Hazard Severity. Thus, this alternative would be considered similar to the proposed Plan with regards to other hazards.

Taking all these factors into consideration, the Existing SOI Alternative would be the same as the proposed General Plan with regard to impacts related to hazardous materials and other hazards.

n. Noise

As is the case with the proposed General Plan, significant noise level increases (3dbA L_{dn} or greater) associated with traffic would occur under this alternative adjacent to existing noise sensitive uses during the 20-year planning horizon and at buildout. Since these noise level increases are related to regional traffic and generally independent of any land use changes called for in both the proposed General Plan and the Existing SOI Alternative, the two are considered to be the same with regard to noise impacts.

o. Air Quality

The Existing SOI Alternative would result in a similar distribution of development when compared to the proposed Plan. Due to increases in regional traffic, air quality would worsen under both this alternative and the proposed Plan, so there would be a significant and unavoidable impact with regard to air quality in both cases.

For these reasons, the Existing SOI Alternative would be considered the same as the proposed General Plan with regard to air quality impacts.

E. Environmentally Superior Alternative

CEQA requires the identification of the environmentally superior alternative in an EIR. Based upon the above analysis, which is summarized in Table 5-1, the Concentrated Growth Alternative is environmentally superior to both the proposed General Plan and the other alternatives. This alternative would offer a substantial improvement with respect to visual quality and community character, and agriculture, although it would not avoid the significant and unavoidable impacts associated with those areas for the proposed Plan. The Concentrated Growth Alternative would also offer an insubstantial improvement with respect to land use, population, employment and housing, traffic and circulation, biology, infrastructure, hydrology and flooding, hazardous materials and other hazards, and air quality.

As shown in Table 5-1, the City Limits Alternative is also environmentally superior to the proposed Plan, but on balance it is marginally inferior to the Concentrated Growth Alternative. As shown in Table 5-1, the City Limits does not offer as much of an improvement as the Concentrated Growth Alternative with respect to visual quality and it also does not offer improvements with respect to land use, hazardous materials and hazards, and air quality. The Existing SOI Alternative is also environmentally superior to the proposed Plan, but it is slightly inferior to the Concentrated Growth Alternative since it does not offer similar improvements with respect to land use,

traffic and circulation, infrastructure, hazardous materials and hazards and air quality.

F. Conclusions

The City of Tracy has developed the proposed Plan to represent the best possible balance between on-going residential growth, development of employment areas, and open space and agricultural preservation. Although two of the alternatives each have the potential of substantially reducing two of the significant impacts that have been identified in this EIR, overall, the alternatives analysis shows that none of the alternatives would result in a level of improvement that would completely avoid a significant impact that is associated with the proposed Plan.

Furthermore, all of the alternatives are infeasible because they are undesirable and impractical from a policy standpoint.

An important goal of the General Plan is to balance the development of new retail and job-creating commercial, office and industrial development with the development of new housing so that residents have the opportunity to work in Tracy. This is underscored a number of times throughout the proposed Plan, including in its opening Vision Statement (General Plan, p.1-2), as well as in Goal LU-2 of the Land Use Element and Goal ED-4 of the Economic Development Element. None of the alternatives would meet the City's goal to increase its land supply for industrial, office and employment-generating uses and balancing this with the development of new housing, as effectively as the proposed Plan. The Concentrated Growth, City Limits and Existing SOI Alternatives would exclude considerable amounts of area that are envisioned in the General Plan to promote economic development in the City as put forth in Goal ED-6 of the proposed Economic Development Element to have "healthy, key economic activity centers", which includes Objective ED-6.7 to "develop higher-end office an office-flex uses, particularly along entryways to the City along I-205 and I-580." The No Project Alternative would not in-

clude the specific policy guidance that is included in the proposed General Plan Economic Development Element which was based on the City's adopted Economic Development Strategy (Resolution #2003-094, adopted April 2003).

Overall, the incremental improvements offered by the alternatives do not outweigh the benefits offered by the increase in land for economic development, which will ultimately provide additional jobs for Tracy residents, improve jobs-housing balance and reduce regional commuting. In addition, the No Project Alternative was not selected because the proposed General Plan includes more comprehensive policy direction in many areas, including land use and orderly growth management, energy, community character, noise and air quality.

6 CEQA-REQUIRED ASSESSMENT CONCLUSIONS

Subsections A, B, and C of this Chapter are amended as follows. Changes in text are shown in underline and ~~strikethrough~~.

A. Growth Inducement

A project is typically considered to be growth-inducing if it fosters economic or population growth. Typical growth inducements might be the extension of urban services or transportation infrastructure to a previously unserved or under-served area, or the removal of major barriers to development. Not all growth inducement is necessarily negative. Negative impacts associated with growth inducement occur only where the projected growth would cause adverse environmental impacts.

Growth-inducing impacts fall into two general categories: direct and indirect. Direct growth-inducing impacts are generally associated with the provision of urban services to an undeveloped area. The provision of these services to a site, and the subsequent development, can serve to induce other landowners in the vicinity to convert their property to urban uses. Indirect, or secondary growth-inducing impacts consist of growth induced in the region by the additional demands for housing, goods and services associated with the population increase caused by, or attracted to, a new project.

1. Direct Impacts

As discussed in Chapter 3, during the next 20 years, based on land use designations, available acres and existing building allotment regulations, 10,341 new housing units will be built in Tracy, the population is estimated to reach 109,000 and the number of employees will increase to 55,000. Total buildout under the proposed General Plan is projected to add approximately 46,000 new units; the total residential and employee populations are estimated to reach 221,000 people and 223,000 jobs, respectively. As noted, giving the current policy framework, buildout would be expected to occur from 69 years to 159 years into the future, given current policy and market assumptions.

Implementation of the proposed General Plan would induce some the population and housing growth in Tracy, in part because it increases intensity of uses and densities in ~~established urban centers~~the Downtown and in Village Centers, close to transportation nodes. This type of residential growth can be beneficial in that it would help preserve open space and agricultural lands on the periphery, and because higher density, multi-family housing would allow the City to meet its fair share housing allocation requirements. While growth would be allowed under the proposed General Plan, the market indicates that growth would occur in Tracy whether or not the General Plan is adopted at a similar rate controlled by the City's Growth Management Ordinance.

The General Plan provides goals and policies to maintain the character of Tracy and minimize the environmental impacts of the anticipated growth. Proposed policies are intended to be obtainable and as such, take into account market conditions and realistic growth assumptions that are consistent with the Growth Management Ordinance and discourage undesirable development in areas with sensitive natural resources, critical habitats and important scenic resources. The impact on agricultural land in the Tracy area is also incorporated, especially as it affects Prime Farmland and Farmland of Statewide Importance. The Plan encourages new development to occur in areas adjacent to existing urban uses and requires developers to provide service extensions. The San Joaquin Multi-Species Habitat Conservation and Open Space Plan also requires dedications of agriculture and open space at a one-to-one acre ratio for non-urbanized land that is converted to urban uses.

Finally, the proposed General Plan also includes policies specifically designed to discourage urbanization in unincorporated County areas outside the SOI (Goal LU-8). For example, Objective LU-8.1, P1 states that the City will not support development within the SOI until the property is annexed. P3 and P4 state that the City will support the maintenance of existing County land use designations in the Planning Area and encourage the County to preserve significant agricultural lands outside the SOI. Finally, P2 states that the City will not make new commitments to provide water and wastewater outside the

City limits until the property is subject to an approved annexation agreement.

As a result, while the proposed General Plan would result in an increase of growth locally, the policies included in the Plan reduce the potential for negative impacts associated with directly induced growth to a less-than-significant level.

2. Indirect Impacts

While the proposed General Plan does allow additional growth, it also includes specific policies that limit that growth to the City limits and SOI, as mentioned above. For example, policies under Objective LU-8.1 work to discourage development outside the defined City limits and SOI. The land use plan also provides a mixture of housing, shopping and employment opportunities so that as the number of residents increase they do not pressure adjacent communities to provide new commercial and employment opportunities. Also, as previously stated, commitments to provide water and sewer infrastructure would be limited to areas within the City limits, or that have pre-annexation agreements. As result, the proposed General Plan policies would result in a less-than-significant indirect growth inducing impact.

B. Cumulative Impacts

CEQA Guidelines require consideration of the potential cumulative impacts that could result from a proposed project in conjunction with other projects in the vicinity. Such impacts can occur when two or more individual effects create a considerable environmental impact or compound other environmental consequences. In the case of a City-wide planning document such as the proposed General Plan, cumulative effects are effects that combine impacts from the project's development in the City with effects of development in other portions of the region. By definition, no development within the City limits and SOI would be considered part of the cumulative impacts; instead, development inside the City and SOI is part of the project itself.

The cumulative impacts of a General Plan take into account growth projected by the Plan, in combination with impacts from projected growth in other cities in the region. The following sections, the cumulative impact analysis examines cumulative effects of the proposed General Plan, in combination with San Joaquin County Council of Governments (SJCOG)-projected growth for the other cities in San Joaquin County.

SJCOG is responsible for estimating regional growth for San Joaquin County. In 2000, SJCOG estimated future anticipated growth for the county as a whole, and individual jurisdictions. The 2025 population for San Joaquin County, as projected by SJCOG, is 900,338.[1] SJCOG's projected 2025 population for Tracy is 137,341. Table 6-1 depicts the projected growth for San Joaquin County. The projections do not reflect actual 2000 Census data, but ended up closely in line with the real data.

For the purposes of this cumulative analysis, a county-level cumulative analysis is used for the impact analyses. The potential cumulative effects of the proposed General Plan are summarized in each of the following subsections.

The following sections summarizes the potential cumulative impacts of the proposed General Plan at the regional level, by topics outlined in Chapter 4 of this report.

1. Land Use

As the primary planning document for Tracy, the proposed General Plan would have a less-than-significant impact in relation to potential conflicts with other applicable plans, policies and regulations, including the County's General Plan and LAFCo's SOI. In addition, potential land use incompatibility problems resulting from implementation of the proposed General Plan would be mitigated by policies contained in the Land Use and Open Space

[1] http://www.sjcog.org/sections/departments/planning/research/projections?table_id=140&section_id=36&historic=0. Accessed on 6/30/05.

TABLE 6.1 **SJCOG POPULATION PROJECTIONS FOR SAN JOAQUIN COUNTY IN 2025 COMPARED TO 2004 AND 2000 CENSUS**

Area	2000 Census [1, 2] (SJCOG #s)	2004 [3]	2025
San Joaquin County	563,598 (566,600)	630,577	900,338
Escalon	5,963 (5,825)	6,706	9,883
Lathrop	10,445 (9,975)	12,427	23,902
Lodi	56,999 (57,900)	60,769	72,617
Manteca	49,258 (49,500)	59,705	86,370
Ripon	10,146 (10,400)	12,275	23,637
Stockton	243,771 (247,400)	269,147	406,482
Tracy	56,929 (54,200)	74,070	137,341
Unincorporated	130,087 (131,400)	135,478	140,103

Sources:
[1] SJCOG population projections as of 2000. [2] US Census, 2000. [3] California Department of Finance estimates for January, 2004.

Elements. Specific policies in these Elements work to prevent conflicts between various land uses, such as residential and the airport or agriculture, and avoid environmental impacts at the project level. The proposed General Plan also upholds additional guidelines from the County and State in regards to open space, such as the SJMSCP, which requires the preservation of open space and agriculture acres according to the amount of land converted to urban uses. Therefore, implementation of the General Plan will not result in significant and unavoidable cumulative impacts at the project or regional level.

2. Population, Employment and Housing

As discussed in Section 4.2, the proposed General Plan includes policies to control and direct growth in a well planned manner and does not result in the division of existing communities. While there is no project-level significant impact associated with the 20-year planning horizon, a project-level significant and unavoidable impact is associated with total buildout, relative to existing conditions. ~~As a result there would not be a significant, unavoidable project level impact.~~ Growth would also occur in other communities throughout the County and the region. Just as the City of Tracy is expected to grow considerably as its General Plan builds out, other communities in the region will do so as well. This will constitute a significant and unavoidable cumulative impact on population and employment.

San Joaquin and Alameda ~~County~~ Counties and other incorporated jurisdictions, are required by State law to use the General Plan process, as well as other planning processes~~,~~ such as utility master plans, to plan for and control future growth. As a result, ~~there would not be a~~the cumulative impact associated with ~~unplanned~~ population and employment growth would be reduced somewhat, since planning for it would occur. However, many people would find the sheer change in population and employment in the region to be significant. ~~. As a result, no significant population, employment and housing cumulative impact would occur.~~

3. Visual Quality

The proposed General Plan would result in changes to the visual character of the Tracy Planning Area from a more rural setting to one that is more characterized by urban uses, with increased light and glare sources. As outlined in Section 4.3, despite the proposed General Plan's policies and actions, in conjunction with adopted State, County and City regulations to enhance "hometown feel" and preserve open space, development permitted under the proposed General Plan would result in a significant impact to the existing visual identity and character of the City due to the amount of growth allowed. Similarly, development associated with the anticipated regional growth would result in a substantial change to the visual character of San Joaquin County.

Continual urbanization of existing agriculture and open space land has the potential to permanently alter the character of the area. State and local regulations, such as the State Scenic Highway guidelines and the San Joaquin County Multi-Species Critical Habitat Plan mitigate some potential impacts along scenic corridors by preserving views and open space land.

Therefore, the proposed General Plan, combined with the overall growth trends in San Joaquin County would contribute to the cumulative conversion of the County's visual character from a rural, agricultural character to a more urban feel and thus, would result in a cumulative significant, unavoidable aesthetics impact.

4. Traffic and Circulation

The quantitative, project-level traffic analysis through 2025 included in Section 4.4 also addresses cumulative impacts to the regional transportation system since the traffic model used analyzed the cumulative impacts of the proposed General Plan along with projected regional growth for San Joaquin County. While the proposed General Plan incorporates a range of features that work to help reduce the potential impact of future growth in Tracy to regional roadways, traffic levels along regional roadways will increase, creating a significant and unavoidable impact to I-205, I-580, I-5, Altamont Pass Road, Patterson Pass Road and Tesla Road. As a result, there would be a significant unavoidable impact to the regional transportation system. Significant regional roadway impacts are also anticipated to continue to occur after 2025 through total buildout, so a significant and unavoidable cumulative impact would also occur during that period.

5. Cultural Resources

While grading and other construction activities have the potential to impact cultural resources in the Tracy Planning Area, proposed General Plan policies, mitigation measures contained in this EIR, and compliance with federal and State regulations reduce the project-specific impact to a less-than-significant level. Cultural resources such as, historical, archaeological and paleontological resources, in San Joaquin County could be cumulatively im-

pacted by future development and related construction activities in the region. However, potential impacts would be mitigated at an individual project level by current State and federal regulations, as well as other local and County regulations and mitigations. Such regulations and mitigation would include the monitoring of construction sites in proximity to known resources, immediate cessation of construction activity upon discovery of unidentified human remains and the protection of cultural resources. The combination of the above-mentioned efforts would reduce potential cumulative impact related to cultural resources to a less-than-significant level.

6. Biological Resources

Development associated with implementation of the proposed General Plan would contribute to the ongoing loss of natural and agricultural lands in the Tracy area, which currently provide habitat for a variety of species. Proposed development under the proposed General Plan would result in the conversion of existing agricultural habitat to urban uses. Section 4.6 of this report references policies in the proposed General Plan and regional, State and federal regulations that mitigate impacts to biological resources at a project level. Development outside of Tracy in San Joaquin County, would also be subject to the same regional, State and federal regulations addressing sensitive species. Implementation of regional, State and federal regulations, such as the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP), and the Endangered Species Act would also minimize risks to sensitive populations and reduce cumulative impacts throughout the region to a less-than-significant level.

7. Agricultural Resources

With the implementation of the proposed General Plan there would be a loss of the existing agricultural lands and land under active Williamson Act contracts within the City limits and SOI. While the proposed General Plan includes policies to minimize this impact, there would still be a project level significant, unavoidable impact. The loss of agricultural land within Tracy and the SOI as a result of urban development is part of an overall trend within San Joaquin County, with 80 percent (2,037 acres) of new urban acres

occurring on formerly irrigated farmland between 1998 and 2000.[2] According to the FMMP, agricultural land in San Joaquin County will continue to face development pressure in the foreseeable future.

The proposed General Plan does include several policies and actions under Objective OSC-2.1 stating that the City will work at a regional level to control the conversion of agricultural uses. The City also recently adopted an Agricultural Mitigation Fee Ordinance to help mitigate for the loss of farmland; in-lieu fees will be collected for impacts from development on agricultural land, which will eventually be utilized for the purchase of conservation easements on agricultural lands. In addition, the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan works at a regional level to promote the permanent preservation of agricultural lands in San Joaquin County. However, since the County is projected to continue to urbanize at a significant rate, the loss of agricultural lands and land under active Williamson Act contracts as a result of the proposed General Plan would contribute to a significant unavoidable cumulative impact to agricultural resources.

8. Mineral Resources

As discussed in Section 4.8, the proposed General Plan includes land use and design policies to avoid significant impacts to important mineral resources in Tracy. These policies are in compliance with State laws that require local jurisdictions to take into consideration the continued availability of important mineral resources in land use decisions. As a result, the Tracy General Plan would not add to any cumulative impact on mineral resources in San Joaquin County.

9. Community Services

The following provides a cumulative analysis broken down by each community service.

[2] *California Farmland Conversion Report 1998-2000*. California Department of Conservation, Division of Land Resource Protection.

a. Police Service

Future regional growth would result in a need for expanded police service throughout the County. However, only growth within Tracy and its SOI would result in the need for the City to construct additional police facilities to serve its population, resulting in additional environmental impacts. The project-level analysis contained in Section 4.9 t~~ook~~ takes into consideration the potential growth within the area that would be provided police service by Tracy and no significant impact was identified in regards to the construction of new and expanded facilities. Therefore, the project would not contribute to a significant cumulative impact associated with police services.

b. Fire Protection and Emergency Medical Services

Future regional growth would result in increased demand for fire services throughout the County. However, only growth within the Tracy Fire Department service area would result in the need for the Tracy Fire Department to construct additional facilities, resulting in additional environmental impacts. The project-level analysis contained in Section 4.9 t~~ook~~ takes into consideration the potential growth within the area that would be provided fire service by Tracy, and no significant impact was identified in regards to the construction of new and expanded facilities. ~~Since~~ Moreover, since Tracy represents the largest concentration of population for the Tracy Fire Department service area, facilities needed to service the proposed General Plan would also be adequate to meet the demand generated by any other growth occurring within the Department's service area. Therefore, the project would not contribute to a significant cumulative impact associated with fire services.

c. Schools

Future regional growth would result in increased demand for schools throughout the County. However, only growth within the TUSD, JESD, LESD, BUSD, and NJSD service areas would result in the need for that various districts to construct additional facilities, resulting in additional environmental impacts. For some of the districts, growth within Tracy would be the primary source of demand for additional school facilities. However, the LESD is planning for additional schools to support the Mountain House

community and the BESD would need to serve proposed residential development in the River Islands of Lathrop project. As with the proposed General Plan project-level analysis, it is unknown exactly where these school facilities would occur to support the cumulative increase in population resulting from growth outside of Tracy. As specific school facility expansion or improvement projects are identified, additional project-specific, second-tier environmental analysis would be completed. Therefore, the project would not contribute to a significant cumulative impact associated with schools.

d. Solid Waste

Growth within San Joaquin County would contribute to the need for adequate solid waste disposal facilities. As discussed in Section 4.9 for the project-level analysis, the Foothill landfill has capacity until at least 2054. The cumulative population growth within the County was considered when evaluating the lifespan of the facility and planning for future expansions. It is also reasonable to assume that adequate planning for further landfill expansion will occur in the 48-year period before the existing landfill reaches capacity. As a result, it can be concluded that there would be adequate capacity to support regional increases in population, and a significant cumulative impact would not occur.

e. Parks and Recreational Facilities

The California Quimby Act allows a City to require land or in-lieu fees for a minimum of 3 acres per 1,000 residents, with the possibility of increasing the requirement to a maximum of 5 acres per 1,000 residents if the City already provides more than three acres per 1,000 residents. As discussed in Section 4.9, Tracy's current park dedication ordinance requires a dedication of 4 acres per 1,000 people for all new development projects. Furthermore, the proposed General Plan includes an action for the City to consider increasing its parkland dedication standard to 5 acres per 1,000 residents. San Joaquin County requires 3 acres per 1,000 residents for new development, as do the neighboring communities of Lathrop and Manteca. Through its regulations, Tracy is providing more than the State-defined need for parkland. Given the parkland requirements of Tracy and neighboring communities which will

ensure that new development provides adequate parkland for new residents to the extent allowed by State law, the project would not contribute to a significant cumulative impact associated with the demand for new parkland in Tracy or in neighboring areas.

10. Infrastructure

The following provides a cumulative analysis broken down by each infrastructure type.

a. Water Services

Future growth in San Joaquin County would generate an additional demand for water. A portion of this growth would be dependent on the groundwater basin for its primary water source. As mentioned in Section 4.10, a study has been completed for the groundwater basin and users have entered into an agreement to limit their use of the basin to a sustainable level. In addition, new development throughout the County would also be subject to SB 610 and SB 221, which require adequate water supplies be identified prior to approval of the project. As a result of these existing regulations, there would not be a cumulative impact associated with water supplies.

Future regional growth would result in a need for expanded water infrastructure throughout the County. However, only growth within Tracy and its SOI would result in the need for the City to construct additional water facilities to serve its population, resulting in additional environmental impacts. The project-level analysis for the proposed General Plan in Section 4.10 takes into consideration all potential growth within the area that would be provided water service by Tracy. ~~and n~~No significant impact was identified in regards to the construction of new and expanded facilities during the 20-year planning horizon. However, a project-level significant and unavoidable impact associated with total buildout was found with regards to water supply. ~~Therefore,~~ While the project would not contribute to a significant cumulative impact associated with water services during the 20-year planning horizon, it would contribute to a cumulative significant and unavoidable at total

buildout, since regional water supplies are also not ensured into the future for development that would begin beyond a 20-year planning horizon.

b. Wastewater

Future regional growth would result in increased demand for wastewater services throughout San Joaquin County. However, only growth within Tracy and its SOI would result in the need for the City to construct additional wastewater facilities, resulting in additional environmental impacts. The project-level analysis in Section 4.10 ~~for the proposed General Plan took~~ takes into consideration all potential growth within the area that would require wastewater service by Tracy and no significant impact was identified for the 20-year planning horizon and for total buildout. Therefore, the project would not contribute to a significant cumulative impact associated with wastewater services.

c. Stormwater

As development proceeds within Tracy and the SOI, impervious surfaces would increase, as would the amount of pollutants in runoff, thereby increasing stormwater drainage rates and potentially impacting surface and groundwater quality. However, project-level water quality impacts to water resources would be reduced to a less-than-significant level by implementing BMPs in accordance with the NDPES and other applicable regulations, as well as implementation of the water quality policies contained in proposed General Plan. New development within the County would also result in an increase in runoff. Regional development would also be required to comply with regional, State and federal regulations addressing stormwater runoff and water quality. These regulations would reduce the potential for a cumulative water quality impact to a less-than-significant level.

Future regional growth would result in increased demand for additional stormwater drainage infrastructure throughout the County. However, only growth within Tracy and its SOI would result in the need for the City to construct additional stormwater drainage infrastructure, resulting in additional environmental impacts. The project-level analysis for the proposed General

Plan in Section 4.10 ~~took~~ takes into consideration all potential growth within the area that would require stormwater drainage infrastructure in Tracy and the SOI, and no significant impact was identified in regards to the construction of new and expanded facilities for the 20-year planning horizon and for total buildout. Therefore, the project would not contribute to a significant cumulative impact associated with stormwater drainage infrastructure.

d. Energy

As growth occurs throughout San Joaquin County, there will be an increased demand for electricity and natural gas. As discussed in Section 4.10, Tracy would avoid a significant project-level impact associated with the wasteful use of energy by implementing proposed General Plan policies, as well as complying with State regulations. Similarly, other jurisdictions in San Joaquin County are required to meet State regulations in regards to energy conservation, such as required by Title 24. As a result, there would not be a significant cumulative wasteful, inefficient or unnecessary use of energy.

11. Geology, Soils and Seismic Hazards

Regional development would increase the number of people and structures subject to geologic- and soils-related risks. The policies contained in the proposed General Plan, along with compliance with federal, State and local regulations addressing building construction, run-off and grading, reduce the potential project-level impact associated with geology and soils to a less-than-significant level. Development in other communities in San Joaquin County would also be required to comply with federal, State and local regulations that are designed to protect increases in people and structures from hazards related to such issues as earthquakes, landslides and soil erosion. As a result, conformance with adopted California building codes, and other measures to protect people and structures from geologic hazards, would reduce this impact to a less-than-significant level.

12. Hydrology and Flooding

As development proceeds within Tracy and the SOI, additional population would also be exposed to the risk of flooding and dam inundation. As men-

tioned in Section 4.12, existing regulations and proposed General Plan policies and actions would reduce the risk to a less-than-significant level. However, new development within the County may locate additional population and structures within areas subject to flooding. Regional development would also be required to comply with regional, State and federal regulations flooding. These regulations would reduce the potential for a cumulative hydrology impact to a less-than-significant level.

13. Hazardous Materials and Other Hazards

As discussed in Section 4.13, the increase in local population and employment under proposed General Plan would result in the increased use of hazardous household, commercial and industrial materials. In addition, there would be an increase in population that would be exposed to potential wildland fires and hazards associated with aircraft operation. Potential project-level impacts associated with hazards and hazardous materials would be reduced to a less-than-significant level due to local, regional, State and federal regulations, such as those that control the production, use and transportation of hazardous materials and waste and control the location of incompatible land uses in airport hazard area. Similarly, as growth occurs in the County, additional people would be exposed risks associated with hazardous materials, wastes, wildland fires and airport operations. However, as would occur within Tracy, regional, State and federal regulations would apply to development countywide development, thereby reducing the potential for cumulative impacts associated with hazards and hazardous materials to a less-than-significant level.

14. Noise

Cumulative noise impacts are considered as part of the project-level noise analysis since the future traffic projections used for the noise analysis were generated by a cumulative traffic model. The quantitative traffic model that considered growth through 2025 under the proposed General Plan in conjunction with the projected regional growth for San Joaquin County for that period. As discussed in detail in Section 4.14, future noise level increases related to increases in traffic associated with new roadways facilitated by the

proposed General Plan would contribute to a significant and unavoidable noise impact at the project-level and cumulative level. Since these noise level increases related to regional traffic would also be anticipated to continue to occur after 2025 through total buildout, a significant and unavoidable cumulative impact would also occur during that period.

15. Air Quality

Cumulative ~~noise~~ air impacts are considered as part of the project-level analysis since the future traffic projections used for the air quality analysis were generated by a cumulative traffic model. The traffic model considered growth under the proposed General Plan in conjunction with projected regional growth for San Joaquin County. As discussed in detail in Section 4.15, due to the existing air quality issues in the San Joaquin Valley Air Basin, the proposed General Plan would contribute to a significant, unavoidable cumulative air quality impact. Since air quality impacts associated with increases in regional traffic would also be anticipated to occur after 2025 through total buildout, a significant and unavoidable cumulative impact would also occur during that period.

C. Unavoidable Significant Effects

While the majority of impacts associated with the proposed General Plan would be reduced to a less-than-significant level, adoption and implementation of the proposed General Plan would result in the following significant and unavoidable impacts:

- **Impact POP-1:** As discussed on page 41, despite policies in the Community Character Element of the proposed General Plan to maintain and enhance quality of life as future growth occurs, development permitted under the proposed General Plan would result in approximately an additional 147,000 residents, 193,000 employees and 46,000 housing units for a total of 221,000 residents, 223,000 employees and 69,000 housing units at total buildout.

- **Impact V-1:** As discussed on pages 52 and 53, ~~4.3-10 through 4.3-11~~, the proposed General Plan contains policies to preserve open space and agricultural lands and community character, in addition to policies in the SJMSCP and the City's Agricultural Mitigation Fee Ordinance. Despite such policies to enhance "hometown feel" and preserve open space, development permitted under the proposed General Plan for both the 2025 and total buildout of the City limits and SOI will result in a significant impact to the existing visual identity and character of the City due to the amount of growth allowed. No additional mitigation is available.

- **Impact V-2:** As discussed on page 53, despite policies in the proposed General Plan to protect scenic resources, including those along state designated scenic highways for development projected through 2025, a significant and unavoidable impact would occur with regards to scenic resources along the state designated scenic routes I-580 (between I-205 and I-5) and I-5 (south of I-205) at total buildout of the proposed General Plan.

- **Impact CIR-1:** The proposed General Plan incorporates a range of features to help reduce the potential impact of future growth on regional roadways. However, traffic levels along regional roadways listed below will increase, creating a significant and unavoidable impact.
  - I-205
  - I-580
  - I-5
  - Altamont Pass Road
  - Patterson Pass Road
  - Tesla Road

- **Impact AG-1:** As discussed on pages ~~4.7-10 through 4.7-15~~ 67 through 71, the proposed General Plan contains policies to preserve agricultural lands, in addition to policies in the SJMSCP and the City's Agricultural Mitigation Fee Ordinance. Despite these policies and regulations, development permitted under the proposed General Plan would result in the conversion of Prime Farmland, Unique Farmland and Farmland of Statewide Importance to urban uses. No additional mitigation is available.

- **Impact AG-2:** Despite policies in the proposed General Plan to support and encourage preservation of Williamson Act lands and the voluntary nature of the Williamson Act program, total buildout of the City limits and SOI may result in the conversion of land under active contracts to urban uses.

- **Impact AG-~~2~~3:** The proposed General Plan contains several policies to mitigate impacts to agricultural resources due to the conversion of additional farmland to urban uses. However, implementation of the proposed General Plan would result in additional and incompatible urban development adjacent to agricultural uses to the extent that the conversion of additional farmland to non-agricultural uses.

- **Impact INF-1:** As discussed on page 78, no significant water-related impacts have been identified for development projected through 2025. However, despite policies in the Land Use and Public Facilities Elements of the proposed General Plan directing the City to acquire reliable, additional sources of water supplies to meet the city's future demand as new development occurs, there is currently insufficient water supply secured to serve projected development under total buildout of the proposed General Plan. This is a significant and unavoidable impact of total buildout of the proposed General Plan. No additional mitigation is available.

- **Impact NOI-1:** As discussed on page 4.14-22, the City's Noise Ordinance and policies in the proposed General Plan serve to control excessive sources of noise in the city and ensure that noise impacts from new projects are evaluated when they are reviewed. Despite these policies and regulations, significant noise levels increases (3 dBA Ldn or greater) associated with increased traffic would occur adjacent to existing noise sensitive uses along portions of Interstate 205, Grant Line Road, Schulte Road, Linne Road, Lammers Road, Corral Hollow Road, Tracy Boulevard, and MacArthur Drive. New roadways facilitated by the General Plan would also increase existing noise levels at receivers in Tracy. This is a significant and unavoidable impact. No additional mitigation is available.

- **Impact AIR-1**: The General Plan would not be consistent with applicable clean air planning efforts of the SJVAPCD, since vehicle miles traveled that could occur under the General Plan would exceed that projected by SJCOG, which are used in projections for air quality planning. The projected growth could lead to an increase in the region's VMT, beyond that anticipated in the SJCOG and SJVAPCD's clean air planning efforts. Development in Tracy and the SOI would contribute to the on-going air quality issues in the San Joaquin Valley Air Basin.

  Mitigation Measure AIR-1: The City of Tracy should study adopting an air quality impact mitigation fee program, which would provide for partial mitigation of adverse environmental effects associated with new development and establish a formalized process for air quality standards as growth and development requires. Fees collected could be used to fund transit, rideshare programs, pedestrian and bicycle facilities, or other programs that would offset vehicle trips. The specifics of the program should be developed in coordination with SJCOG and SJVAPCD to ensure that proceeds would effectively fund projects that would reduce air pollutant emissions.

  However, these policies and the mitigation measure identified above may not completely mitigate this impact. Therefore, it is considered a significant and unavoidable impact.

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7 REPORT PREPARATION AND REFERENCES

No changes have been made to this section. Please refer to Chapter 7 Environmental Evaluation in the Draft EIR, issued on October 4, 2005.

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