THOMAS M. GAU
DIRECTOR

FRITZ BUCHMAN
DEPUTY DIRECTOR

MICHAEL SELLING
DEPUTY DIRECTOR

JIM STONE
DEPUTY DIRECTOR

ROGER JANES
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(209) 468-3000 FAX (209) 468-2999
www.sjgov.org/pubworks

June 25, 2013

Mr. Bill Dean
City Hall Annex
520 Tracy Boulevard
Tracy, California 95376

SUBJECT: THE CORDES RANCH SPECIFIC PLAN FINAL ENVIRONMENTAL IMPACT REPORT

Dear Mr. Dean:

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

1) The County is very concerned that the proposed development and subsequent annexation will result in short segments of County roadways on both Lammers and Schulte Roads between various City of Tracy (City) limits.

   To remedy this concern, the County requests the City consider including these remnant County road segments in any future annexation. This would allow for the City to uniformly expand its roadways without creating chokepoints or need for coordination with the County. Specifically, it would allow the City to build the New Schulte Road extension and make identified improvements to the intersection of New Schulte Road and Lammers Road (Intersection No. 18).

2) San Joaquin County is concerned with Impact Mitigation Measure TRANS-1:

   *New Schulte Road: Construct New Schulte Road from the eastern terminus of the Project Phase 1 network (east of Hansen Road) east to Lammers Road, as a two-lane road. At Intersection No. 18, New Schulte Road/Lammers Road, signalize the intersection and construct a left-turn lane on the eastbound approach, and right-turn lanes on the northbound and southbound approaches.*

   Currently, this proposed mitigation roadway (New Schulte Road) has a segment that is outside of the current City SOI. The County requests the City consider revising its Sphere of Influence to include this proposed mitigation within the City of Tracy's jurisdiction.

Thank you for the opportunity to comment on the Cordes Ranch Final Environmental Impact Report. Should you have any questions, please contact me at 468-3053.

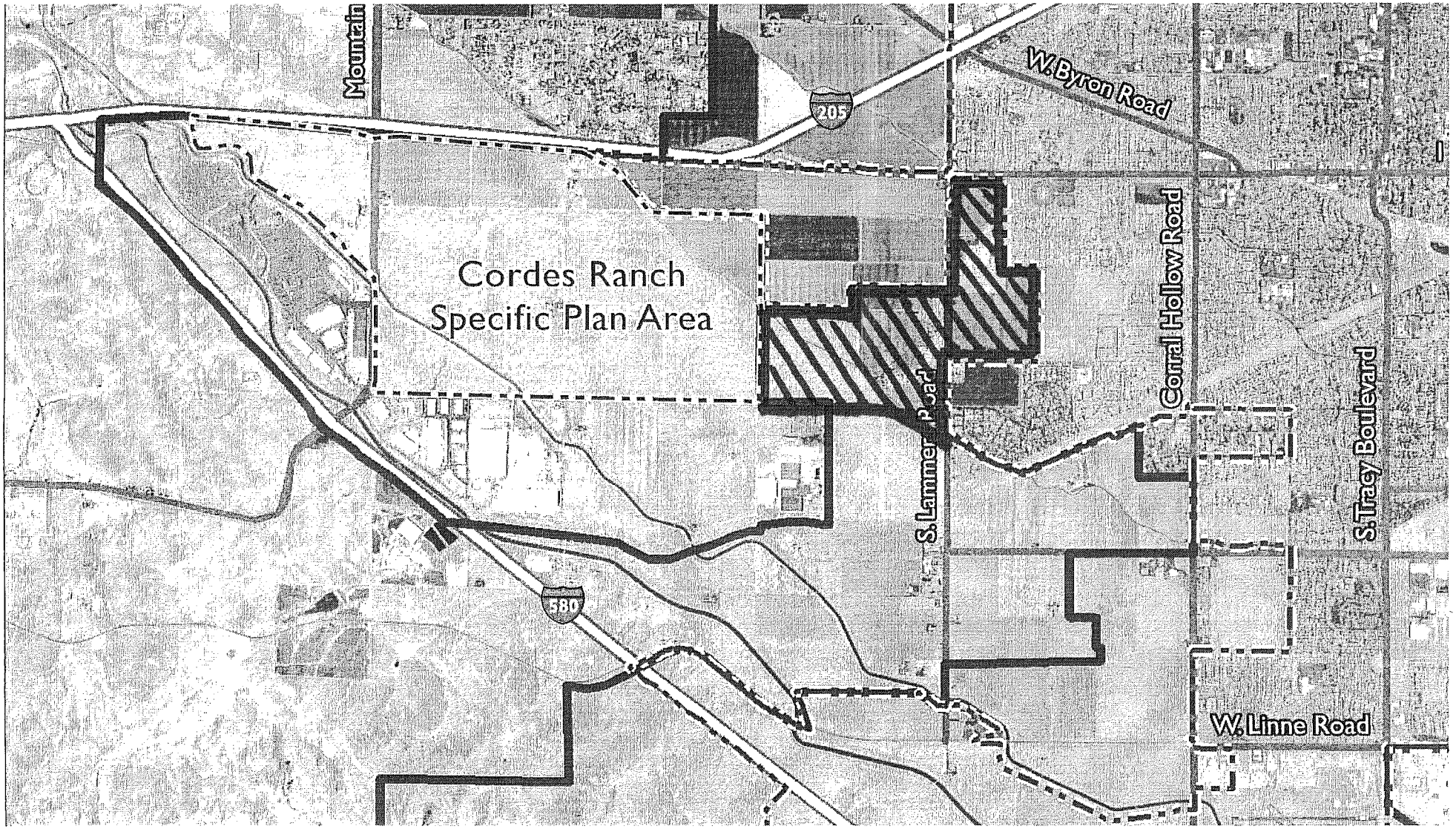
Sincerely,

MICHAEL SELLING
Deputy Director/Engineering

MS:JL:mk
TE-13F069-M1

Attachment

# ATTACHMENT A



City of Tracy
333 Civic Center Plaza
Tracy, CA 95376

DEVELOPMENT SERVICES
DEPARTMENT

MAIN 209.831.6400
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www.ci.tracy.ca.us

August 20, 2013

Mr. Michael Selling
Deputy Director/Engineering
San Joaquin County Department of Public Works
P.O. Box 1810
1810 E. Hazelton Avenue
Stockton, CA 95201

Dear Mr. Selling,

Thank you for your letter of June 25 regarding the Cordes Ranch Specific Plan Project Final Environmental Impact Report ("FEIR"). We appreciate your taking the time to review and consider this report and provide comments thereon.

Your letter raises two (2) concerns. First, you note that the Project may result in short segments of County roadways that will remain outside of the City of Tracy city limits, and have asked the City to consider including these remnant County road segments in any future annexation. We appreciate your concern in this regard, and will consider including these remnants in future annexations.

Second, you note that implementation of Mitigation Measure TRANS-1 will result in the construction of a segment of a new roadway, New Schulte Road, outside of the City's existing Sphere of Influence. To address this possibility, you have requested that the City consider revising its Sphere of Influence so that this proposed roadway will be within the City's Sphere of Influence. Again, we appreciate this concern and will consider revising the City's Sphere of Influence accordingly.

Thank you for providing the San Joaquin County Public Works Department's comments and input on the Cordes Ranch Project. Please feel free to contact me if you have further questions or would like to further discuss these issues.

Sincerely,

Andrew Malik
Development Services Director

Mountain House Community Services District
230 S. Sterling Drive, Suite 100, Mountain House, CA 95391
Tel (209) 831-2300 • Fax (209) 831-5610
www.mhcsd.com

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JUL 30 2013
CITY OF TRACY
D.E.S.

**CORDES RANCH SPECIFIC PLAN PROJECT**
**DRAFT ENVIRONMENTAL IMPACT REPORT**

July 25, 2013

City of Tracy Planning Commission
City of Tracy
333 Civic Center Plaza,
Tracy, CA 95376

Subject: **CORDES RANCH SPECIFIC PLAN PROJECT - ENVIRONMENTAL IMPACT REPORT**

Dear Planning Commission Members:

Mountain House Community Services District (MHCSD) reviewed the Cordes Ranch Draft Environmental Impact Report (DEIR) and made comments on the document. MHCSD's comments were submitted to the City of Tracy (City) within the timeline published by the City of Tracy.

MHCSD had some serious concerns with elements of the DEIR. City staff initiated significant changes to the Traffic Section of the EIR and to the Hydrology Section of the EIR. Mountain House is pleased with the City of Tracy Staff response to our concerns and, for the most part, the revisions in the Project Mitigation. Your Staff have been diligent and fair in our opinion.

At the time of this letter there is one remaining significant impact that Mountain House CSD believes needs to be addressed by the Project. Mountain House is a Master Planned Community. Mountain House is a Community Services District that is not financed the same way that Cities and Counties in the State of California are financed. Mountain House Community Services District is financed through fees collected at the time of development, ongoing special taxes from developed parcels of land and less than 16% of the property taxes collected on the land within Mountain House. Mountain House Community Services District (MHCSD) does not receive sales tax revenue, gas tax revenue, or vehicle fee revenue.

At the time that Mountain House was in the planning stages all parcels of land within the Sphere of Influence for Mountain House were assigned an infrastructure burden and a corresponding fair share of the fees and special taxes to mitigate that burden. The burden and fair share compensation was codified in the Mountain House Financing Plan that can be found on the MHCSD website. That Financing Plan

became the basis for the MHCSD Financing Agreement with San Joaquin County/LAFCo and a Master Acquisition and Reimbursement Agreement between San Joaquin County, MHCSD and the Master Developer/Land Owner.

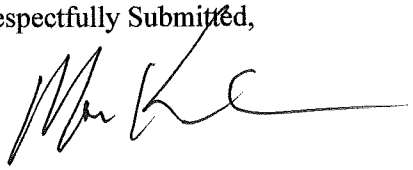
The Cordes Ranch Project will most likely have to redesign and construct the Mountain House Parkway and I-205 interchange. The new interchange configuration will more than likely require that land designated commercial in the Mountain House Sphere of Influence will be required for the new interchange, although the MHCSD staff does not know for sure since the Cordes Ranch Project has not developed a redesigned interchange configuration and provided that to MHCSD for review and determination of impact.

The portion of MHCSD Sphere of Influence/Master Plan area that will be impacted by a reconstructed I-205 interchange is in the most highly burdened infrastructure area (furthest away from the water and wastewater treatment plants) as well as the most financially viable. (Freeway Commercial, the first exist after the Bay Area.) The fees and special tax revenues that the parcels in that portion of the MHCSD Master Plan will provide to the Community Facilities District are vital to maintain a financial stable government/community. Any changes to the fees and special taxes due to acreage lost to an interchange will be a significant impact on the Mountain House Community.

The MHCSD requests that the City of Tracy add two mitigation measure to the Cordes Ranch Project. First, that the Cordes Ranch Project shall enter into an agreement with Mountain House Community Services District to reimburse it for the fees and ongoing special taxes lost due to the taking of land in the MHCSD Sphere of Influence for the construction of a revised interchange. Second, that the project be required to pay for a revised Specific Plan of the area if it is determined, in the opinion of the MHCSD, that the impact is significant enough to require a rethinking and re-planning of the area to accommodate the changes the Cordes Ranch Project inflict on the existing Specific Plan area.

If you have any questions regarding the enclosed statements, please do not hesitate to call me at 209-831-5666. I look forward to working with you and your staff or consultant to fully address the concerns that we have with the subject DEIR.

Respectfully Submitted,



Morgan K. Groover, P.E.
MHCSD Development Director

Copy to:
MHCSD General Manager
MHCSD Board of Directors

City of Tracy
333 Civic Center Plaza
Tracy, CA 95376

DEVELOPMENT SERVICES
DEPARTMENT

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July 30, 2013

Morgan K Groover, P.E.
MHCSD Development Director
230 S Sterling Drive, Suite 100
Mountain House, CA 95391

Dear Mr. Groover,

Thank you for your letter of July 25 regarding the Cordes Ranch Specific Plan draft environmental impact report ("DEIR"). The City of Tracy appreciates receiving feedback on the Cordes Ranch project and the DEIR. The City is also gratified to hear that changes to the traffic and hydrology sections of the DEIR have allayed concerns previously expressed by Mountain House Community Services District ("MHCSD").

As to the substance of the letter, the City takes quite seriously your expressed concerns. However, the impacts you identify are fiscal and regulatory in nature; the letter does not set forth any potential physical change to the environment that has not been addressed in the DEIR. It is a foundational principle of CEQA that economic and social effects are not in and of themselves considered as effects on the environment. (Pub. Res. Code, §§ 21080, 21082.2; Cal. Code Regs., tit. 14, §§ 15064, 15131; *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1019-22.) Accordingly, the issues detailed in your letter do not raise issues that the City of Tracy can address in the CEQA process. The circumstances regarding the acquisition of property required to construct necessary interchange improvements to accommodate projected increases in local and regional traffic remain uncertain at this point, and so the City of Tracy believes it is premature to commence discussion of the issues raised in your letter, before the Cordes Ranch project has even been approved. We, of course, look forward to working cooperatively with the MHCSD, Caltrans, and all other interested and affected stakeholders when such issues become ripe for discussion.

Thank you for your comments on the Cordes Ranch project and DEIR. The City appreciates your input and the consideration you have shown in communicating and working with staff in this matter.

Sincerely,

Andrew Malik
Development Services Director

**Brigit S. Barnes & Associates, Inc.**
*A Law Corporation*

Brigit S. Barnes, Esq.
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*landlawbybarnes.com*

July 30, 2013

***Via Personal Delivery***

City of Tracy Planning Commission
Council Chambers
333 Civic Center Plaza
Tracy, CA 95376

Re: City of Tracy Planning Commission
Special Meeting Agenda for July 30, 2013
Comments on Behalf of Horizon Planet re: Cordes Ranch, Agenda Item 2

Dear Commissioners:

This letter is submitted on behalf of Horizon Planet, an environmental advocacy group dedicated to protecting, preserving and conserving agricultural and open space lands throughout the State of California for future generations (hereinafter "Horizon"). Consistent with its mission, as expressed previously by comments opposing sprawl in various projects, Horizon has reviewed the Specific Plan and Environmental Impact Report ("EIR") for the Cordes Ranch Specific Plan ("Cordes Ranch"), and associated planning documents (collectively "the Cordes Ranch Project" or "the Project"), before the Planning Commission today, and has several concerns regarding those documents, especially with respect to deficiencies in the EIR that relate to Horizon's mission of preserving and protecting agricultural and open space. These concerns are summarized below.

1. THE EIR IS DEFICIENT AS IT DOES NOT ADDRESS THE POTENTIAL FOR URBAN DECAY AS A RESULT OF THE CORDES RANCH PROJECT

A. Urban decay is now recognized as an environmental impact that must be examined in the context of an EIR. The City of Tracy (the "City") has recognized this requirement on much smaller projects, such as the Winco shopping center and the Wal-Mart expansion, when it required a full analysis of urban decay resulting from these proposed land uses. Thus, the City has already created a precedent to study urban decay as a potentially significant environmental effect, which is consistent with the legal requirements of CEQA. (See *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal. App. 4th 1184 and *Anderson First Coalition v. City of Anderson* (2005) 130 Cal. App. 4th 1173.) However, Horizon finds no discussion of the effects of the Cordes Ranch Project, located outside the city limits, on existing commercial, retail and industrial projects located in the City center; whether approval of this Project adversely affects such projects, their vacancies, and remainder absorption; and how these commercial results affect surrounding residential land use.

B. The Cordes Ranch Project proposes 30,847,014 square feet of commercial space and is magnitudes larger than the Winco and Wal-Mart projects combined, yet the Cordes Ranch Project does not evaluate the potential for urban decay. The Cordes Ranch Project is adjacent to or in close proximity to the following specific plan areas in or adjacent to the City: Mountain House Master Plan, Ellis Specific Plan, Tracy Gateway Planned Unit Development, and the Tracy Hills Specific Plan (collectively the "Approved Plan Areas"). Combined, the Approved Plan Areas permit approximately 16 million square feet of approved commercial, office, and industrial uses.[1] This number does not include similar uses permitted throughout the City outside of the Approved Plan Areas, such as the Downtown Area; thus, the actual available commercial square footage may be much higher. Horizon has not seen any analysis of the remaining available square footage of the approximately 16 million square feet already available, the demand for this use, the impact of the Cordes Ranch Project on the balance of the City, and the potential for urban decay and deterioration as a result of over-supply of commercial property and the potential for businesses' flight from the Downtown Area, or the other Approved Plan Areas, to the Cordes Ranch.

The burden is on the Project applicant to analyze the potential effects of urban decay, which typically requires a full economic impact analysis. Horizon has not found any analysis in any of the Project documents, much less one that would satisfy CEQA requirements.

C. The Project documents do not identify any potential, immediate users for this site, and the Project proponents have indicated for the papers that they hope to "attract" potential users.[2] (For example, some Specific Plan areas are tailored to a specific user - i.e. Intel in Folsom, CA, the size and benefits of which justified the outskirts annexation.) In the absence of an indentified business, the Cordes Ranch Project has the potential to simply "absorb" commercial uses that would otherwise go to other areas in the City already planned for the commercial use, including the Downtown Area, or worse, to attract existing businesses from the core, often leaving a shell in the Center of the City. This pattern of commercial flight from existing areas can lead to urban decay and deterioration, and requires a full analysis under CEQA.

D. At a minimum, the issue of whether an additional 30,847,014 square feet of commercial use within the City will lead to urban decay and blight, especially to the Downtown Area, which is identified as an area where development should be targeted (GP Objective LU-5.1), should be investigated and thoroughly vetted by the Cordes Ranch

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1 Source: City of Tracy Planning Department web-site, numbers taken from Specific Plans listed on that web-site: http://www.ci.tracy.ca.us/?navId=595

2 At an August 7, 2012 meeting before the City Council, the Project Developers mentioned that they wanted to *attract* high-end commercial users, not that they already had commercial users identified for the site. (Source: Tracy Press Article, August 10, 2012, "Council guards Tracy's gateway", by Jon Mendelson.)

Project as part of the EIR before this Commission can provide a recommendation to the City Council.

2. THE EIR IS DEFICIENT IN THAT IT FAILS TO MITIGATE FOR THE CONVERSION OF AGRICULTURAL LAND AND LOSS OF OPEN SPACE

A. The mitigation measure proposed for the loss of agricultural land is legally deficient. The EIR acknowledges that over 1,700 acres of farmland will be irrevocably lost, and that this impact is both significant and unavoidable, even after mitigation measures[3] are imposed on the project.

B. Horizon believes the mitigation imposed is insufficient, and a more significant mitigation measure is both feasible and enforceable. By way of example, Horizon points out that litigation against the City's recent approval of the Ellis Specific Plan was successfully settled, in part, by payment of a mitigation fee to minimize the irrevocable loss of farmland. Horizon believes this precedent should be followed in this instance. The Project EIR does not explain why a fee that would allow a two-to-one ratio for replacement agricultural land is not feasible and therefore should not be imposed on the Project.

C. Lastly, the Project EIR does not justify why the Project should be approved in light of the significant and unavoidable loss of agricultural land. For example, the Project EIR does not identify the need for the in excess of thirty million square feet of commercial space in the City, and does not sufficiently explore Project alternatives within the City limits. The burden is on the Project proponent to justify the significant and unavoidable impact of the lost farmland - which it has failed to do - or, in the alternative, to actually mitigate for the loss of farmland, which is not achieved by the current mitigation measures.

D. If there is no need for the proposed commercial space in the region, as demonstrated by an economic analysis, Horizon believes that the impact of the loss of 1,700 acres in agricultural and open space is not justified, and is an avoidable and unnecessary impact. In the alternative, the Project should be required to mitigate for the loss of open space and agricultural land similar to the requirements of the Ellis Specific Plan.

3. THE EIR IS DEFICIENT IN THAT IT DID NOT IMPOSE OR OTHERWISE EXPLAIN WHY FEASIBLE MITIGATION MEASURES REGARDING THE ENVIRONMENTAL IMPACT OF GLOBAL WARMING WERE REJECTED

A. The EIR concludes that the environmental impact from emitting greenhouse gases is significant and unavoidable. Nevertheless, CEQA requires the Cordes Ranch Project to impose all feasible mitigation measures or otherwise explain why these mitigation measures were rejected.

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3 Pursuant to the City's Agriculture Mitigation Fee Ordinance.

B. In this case, the Cordes Ranch Project failed to articulate a threshold of significance, failed to quantify the amount of greenhouse gases ("GHG") emitted by the Project, and failed to examine other mitigation measures that have been identified as effective and feasible as required by CEQA.

C. Public agencies are encouraged to adopt thresholds of significance. (CEQA Guideline § 15064.7.) For evaluating individual projects, the State of California and regional state agencies have offered multiple thresholds of significance for global warming. For instance, the South Coast Air District believes a project emitting three tons of GHG a year is significant. (South Coast Air Quality Management District, "Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold" (October 2008), incorporated herein by reference.) AB 32 establishes a state goal of reducing GHG emissions to 1990 levels by 2020 (a reduction of approximately 25 percent from forecast emission levels).

D. Here, the Cordes Ranch Project fails to evaluate the impact of GHGs on the environment, as it fails to adequately disclose the projected GHG emissions that will be produced by the Project and whether, or how, the Project as a whole will meet the GHG reduction goals of AB 32. The Project EIR's summary and dismissive treatment of the thresholds or method to conclude whether an environmental effect is significant relative to the Project's immediate, cumulative, and long term impacts of GHG emission and environmental impacts render the EIR legally deficient. (See *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal. App. 4th 1099.)

E. For example, the EIR fails to address the feasibility of multiple mitigation measures that could be imposed to reduce the significant effect of GHG emissions. CEQA requires all feasible mitigation measures to be incorporated into a project, even if the environmental effect remains significant. The State of California, Office of the Governor, Office of Planning and Research, has identified thirty-three feasible mitigation measures to reduce GHG and attain the 2020 and 2050 goals. (See State of California, Office of Planning & Research. "CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review" (June 19, 2008), incorporated herein by reference.) Each mitigation measure in this document is feasible for the proposal, and the EIR has a duty to identify and discuss each proposed measure. Failing to perform this task results in an omission of information and failure to proceed in a manner required by law.

F. Lastly, the mitigation measures proposed by the EIR are not effective or enforceable. For example, mitigation measure GHG-1a encourages users to install solar panels and otherwise use alternative energy. Yet the mitigation measure does not define, nor does it even imply what constitutes encouragement, or who should do the encouraging. The

EIR analysis does not explain why requiring solar panels on the roofs of large buildings is infeasible or ineffective as a mitigation measure to reduce the amount of GHG emissions.

4. THE EIR IS LEGALLY DEFICIENT FOR FAILING TO EVALUATE THE ENVIRONMENTAL EFFECTS PRODUCED BY "HOT SPOTS"

A. The EIR reports that approximately 1,461 acres will be developed for general commercial, general office, and business/industrial park. The EIR assumes that each of these uses will build out at a certain Floor Area Ratio ("FAR"), ranging from 30 percent to 50 percent.

B. The EIR fails to disclose how much of the land will be devoted to paved parking lots. However, by applying the applicable FAR, it appears that approximately 745 acres of land will be devoted to paved parking lots. This raises a serious environmental issue, generally referred to as a "hot spot" or an "urban heat island effect".

C. Heat islands result from replacing natural land cover with buildings, pavement, and other infrastructure. The Environmental Project Agency ("EPA") reports that many cities have temperatures that are up to ten degrees higher than the surrounding natural land cover. It affects public health by amplifying the effect of hot weather. It also increases energy use for air conditioning (increasing GHG emissions) and accelerates formation of smog.

D. The EIR is required to consider and examine this environmental effect. By omitting any mention of this impact, the EIR fails as an informational document.

5. THE POTENTIAL FOR A GAS LINE EXPLOSION IS NOT EXAMINED IN THE EIR

A. In connection with the City's consideration of the Ellis Specific Plan project, considerable analysis both within the context of the EIR and as part of the hearing process was devoted to analyzing the possibility of a PG&E gas line explosion similar to the gas line explosion experienced by the City of San Bruno. According to the Cordes Ranch Project EIR, four gas lines and two oil lines rest within the Project boundary, including the same PG&E gas line that received so much attention during the Ellis Specific Plan hearing.

B. The CEQA guidelines direct public agencies to study whether a project would "create a significant hazard to the public through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment." The San Bruno situation illustrates that such a hazardous event is foreseeable, yet the potential for such a catastrophic event is not even examined by the Project EIR, which also fails to identify potential mitigation measures, including, but not limited to, building set-backs to protect City residents and workers should an explosion occur.

C. The EIR is required to consider and examine this environmental effect. By omitting any mention of this impact, the EIR fails as an informational document.

## CONCLUSION

Horizon respectfully requests that this Commission not recommend approval of the Cordes Ranch Project until such time as the Cordes Ranch Project is fully compliant with environmental laws mandating a full environmental analysis of project impacts, including, but not limited to:

1. The EIR should include an analysis of the Project's potential to lead to urban decay and deterioration which would include, at a minimum, an economic analysis addressing the existing commercial square footage already approved for development in and near the City, and the impact of the Project on these areas, as well as the justification for an additional thirty million square feet of commercial property in the City.

2. The EIR should include an analysis of all feasible alternatives to the Cordes Ranch Project and the justification for irrevocably removing 1,700 acres of agricultural and open space from the region, and the Project should be required to mitigate for loss of agriculture land consistent with the Ellis Specific Plan.

3. The EIR should include a full analysis of GHG emissions, thresholds of significance, all mitigation measures identified in *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review (June 19, 2008),* State of California, Office of Planning & Research, and an analysis of the Project's compliance with AB 32.

4. The EIR should analyze the impacts of the paved environment on the region, including the increase in temperature and associated environmental and health risks, as well as the impact on GHG emissions.

5. The EIR should analyze the potential for a natural gas line explosion and explore mitigation measures calculated to keep residents and workers in the City safe.

CEQA is an important tool for municipalities and residents of this state, and is intended to permit decision-makers to make informed and fully vetted decisions. In this case, Horizon submits that the Cordes Ranch Project omits critical analysis of multiple project impacts and does not contain sufficient data for a fully informed decision process as mandated by CEQA. These omissions of critical information render the EIR fatally flawed, such that it cannot move forward in compliance with CEQA until and unless these defects are addressed by an amended EIR. Such additional analysis will not prejudice the Project applicant, as the applicant has not identified an immediate user for this site, nor has it identified the

immediate need for the additional proposed square footage for the City. The City appears to have ample commercial square footage available to accommodate any foreseeable commercial users. Not only will there be no prejudice to the applicant, but the City will benefit by having a document that analyzes all Project impacts in compliance with CEQA, and will lead to a more informed decision making process. Thank you for your consideration of these matters.

Sincerely,

Brigit S. Barnes, Esq.

Annie R. Embree, Esq.

cc: Client (via email)

Horizon.Cordes\PlanningCommission.L01

City of Tracy
333 Civic Center Plaza
Tracy, CA 95376

DEVELOPMENT SERVICES
DEPARTMENT

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August 20, 2013

Ms. Brigit S. Barnes, Esq.
Ms. Annie R. Embree, Esq.
Brigit S. Barnes & Associates, Inc.
3262 Penryn Road, Suite 200
Loomis, CA 95650

Dear Ms. Barnes and Ms. Embree,

This responds to your letter of July 30, 2013, regarding the Cordes Ranch Specific Plan Project Environmental Impact Report ("EIR").

## INTRODUCTION

As you know, your letter was delivered to the City by hand at the City's July 30 Planning Commission hearing. Consequently, the City did not have time to prepare and include in the Final EIR a written response to your comments. Moreover, because your comments were not timely submitted within the 45-day comment period, the City is not required to provide a written response under CEQA. (Pub. Res. Code, § 21091, subd. (d)(1); Cal. Admin. Code, tit. 14, § 15088.) Nonetheless, we are providing you with this written response in a good faith effort to address your concerns and explain why we believe the EIR complies with all applicable CEQA requirements.

## RESPONSES TO COMMENTS

Your letter raises five concerns, which we address in order.

1. Urban Decay Analysis

Your letter first asserts that the EIR should include an urban decay analysis under *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184 and related cases. However, you have not explained how or why the Project may produce or result in urban blight. As noted in the *Bakersfield Citizens* case itself, the touchstone of CEQA analysis is whether there will be "adverse physical changes in the environment." (*Id.* at p. 1205.) Economic or social changes in and of themselves are not cognizable under the statute. (*Ibid.*) Absent some evidence that the Project may lead to physical changes that can fairly be characterized as

'urban blight,' we have no basis for undertaking an 'urban blight' or 'urban decay' analysis. (*Melom v. City of Madera* (2010) 183 Cal.App.4th 41, 49-52.) We have considered this possibility and have no reason to believe that the Project may lead to urban blight or urban decay.

In addition, to prepare an urban decay analysis under these circumstances would disserve the CEQA purpose of providing information for disclosure and decision-making. Unlike urban decay cases such as *Bakersfield Citizens* that have pertained to site-specific development projects and stores, here the proposed Project is a comprehensive specific plan covering approximately 1,780 acres, which will be constructed in phases over a significant period of time. While the level of the proposed development associated with the Project was anticipated as part of the City's General Plan, the actual businesses that will be developed are currently unknown and would be subject to market forces. Particularly given the lack of certainty with respect to the future Project users, any attempted urban decay analysis would be inherently "too speculative for evaluation." (Cal. Admin. Code, tit. 14, § 15145.)

Moreover, even if this type of project were the appropriate subject of an urban decay study, based on the proposed land uses and the reasonable assumptions used to evaluate potential individual and cumulative impacts, the Project does not present an urban decay issue under CEQA. The development of the Cordes Ranch Specific Plan Area was anticipated and evaluated in the City of Tracy General Plan. Moreover, the Project would also further General Plan goals, policies, and objectives for economic growth and development. For instance, General Plan Goal ED-1 calls for "a diversified local economy," and Objective ED-1.1 seeks to "[a]ttract emerging growth industries in order to increase employment opportunities for a wide range of skill levels and salaries to meet the current and future employment needs of residents." Other economic goals of the General Plan furthered by the Project include ED-5 ("Support for Tracy's key economic assets") and ED-6 ("Healthy, key economic activity centers"). Thus, far from causing blight, the Project will instead result in positive economic growth and development for the community by putting into place land use designations and zoning districts under which future development contemplated in the General Plan would occur. Accordingly, there is no legal or factual basis to conclude that an urban decay analysis is warranted here.

See also responses to Comments ORG1-6 through ORG1-11 in the Final EIR for further information on this topic.

2. Location of the Project and Conversion of Agricultural Land

You have also claimed that the EIR does not adequately assess the Project's potential impacts relating to loss of agricultural lands, does not adequately explain the selection of the location for these proposed uses, and that "the mitigation imposed is insufficient, and a more significant mitigation measure is both feasible and enforceable."

The proposed Project implements a long-standing City policy relating to the use of the Project site. As explained in chapter 4.2 of the EIR, the Project implements planning efforts set forth in the previously-approved General Plan, which designates the Project area as Urban Reserve and thus subject to development with urban uses. Accordingly, the Project implements a policy determination made as part of the City's adoption of the existing General Plan. Moreover, development of the Project actually furthers protection of open space and agricultural lands as the City seeks to protect such areas by prioritizing development in Urban Reserves. In addition, the General Plan and LAFCO's amendment to the City's sphere of influence identify the Project area as one where urban development is planned. This is consistent with the Project's location in an area of unincorporated San Joaquin County that has been planned for urban development as demonstrated by Patterson Pass Business Park immediately south, the Gateway Project in the City, and the nearby Mountain House community. The policy decisions underlying these projects were made when the General Plan and other relevant land use determinations were approved; thus, the time to raise the issue of location would have been at that time. Furthermore, there is ample basis in the record to justify the location of the Project as it implements the goals of the General Plan by, for example, appropriately locating projects near existing infrastructure and away from housing and facilitating employment-generating uses.

As for the impacts to agricultural resources, the EIR fully analyzed these impacts in Chapter 4.2. This section of the EIR sets forth the regulatory framework and existing conditions of the Specific Plan area, which currently encompasses approximately 1700 acres of farmland and 77 acres of vacant and semi-agricultural/rural commercial land. (EIR, p. 4.2-7.) As noted in the EIR, the Project would entail conversion of this area, including the farmland, to urban uses, which would result in significant and unavoidable impacts on agricultural resources after mitigation. (EIR, pp. 4.2-15-16.)

You have also proposed that the Project be required to pay "a mitigation fee to minimize the irrevocable loss of farmland." This proposed mitigation measure is already described in the EIR as follows:

*As part of the development process for each individual site-specific development project under the Specific Plan, the applicable agricultural mitigation fee for each acre of farmland to be developed shall be paid, in compliance with Chapter 13.28, Agricultural Mitigation Fee, of the Tracy Municipal Code. The fees shall be collected by the City at the time that building permits are issued for such site-specific development project, or as otherwise required by City.*
(EIR, p. 4.2-15.) Accordingly, the EIR properly analyzed the impacts relating to the proposed agricultural conversion and identified appropriate feasible mitigation measures.

3. Greenhouse Gas Analysis

With respect to the EIR's analysis of the Project's potential greenhouse gas ("GHG") emissions, you suggest that the City improperly failed to adopt a threshold of significance, improperly

failed to quantify GHG emissions, improperly failed to identify related impacts, and improperly failed to adopt additional feasible mitigation measures. We respectfully disagree.

All of these issues are discussed in some length in Chapter 4.7 and Appendix D of the EIR. The EIR specifically sets forth the standards of significance adopted by the San Joaquin Valley Air Pollution Control District ("SJVAPCD"). (EIR, pp. 4.7-19-20.) The EIR then goes to significant lengths to quantify and analyze projected GHG emissions from the Project and resulting effects. For a summary of these analyses, see tables 4.7-2, 4.7-3, 4.7-4, and 4.7-5. The EIR also sets forth numerous best performance standards ("BPS") as identified by the SJVAPCD to obtain reductions in GHG emissions. (See table 4.7-6.)

The EIR then goes beyond the above analysis, and also evaluates the Project's potential impacts relating to GHG emissions by comparing the Project's consistency with applicable plans, policies, regulations and strategies relating to GHG emissions and climate change impacts. The Project was thoroughly evaluated against policies and measures set forth in the City of Tracy Sustainability Action, policies and mitigations of the California Air Pollution Control Officer's Association (CAPCOA), and measures of the California Attorney General's office, among others. (See tables 4.7-7, 4.7-8, & 4.7-9.) The EIR also identifies specific design features intended to further mitigate GHG-related impacts. (EIR, pp. 4.7-32, 4.7-45-49.)

To summarize, the EIR extensively analyzes GHG emissions and related impacts stemming from the Project and identifies numerous measures and policies to reduce those emissions and impacts where feasible. This analysis more than meets the requirements of CEQA.

4. Urban Heat Island Effect

You have also suggested that the EIR must address the so-called urban heat island effect (also known as "hot spots") purportedly caused by the Project. This is not an independently cognizable issue under CEQA. However, the Specific Plan contains numerous measures intended to reduce heat gain in the Project area, which contribute to the heat island effect. For instance, the Specific Plan requires "cool" roofs for all new buildings, requires the selection of large-canopy tree species and their placement on the west and east portions of the Project area, and encourages the use of canopies, awnings and architectural shade structures. (Specific Plan Chapter 7, p. 7-3.) Off-street parking standards for the Project also include a requirement that landscaping include canopy trees that will shade 40 percent of the parking area. (Specific Plan Chapter 3, Table 3-5, p. 3-8.)

5. Possibility of Gas Line Explosion

Finally, you've asserted that the EIR does not analyze the potential for an explosion from a natural gas line within the Project area. This is incorrect. The EIR specifically addresses this issue, and the City retained a consultant to prepare a comprehensive safety assessment. The

Pipeline Safety Assessment ("PSA") prepared by the Planning Center | DC&E for the Project is attached to the EIR as Appendix H. The EIR itself summarizes the PSA's findings as follows:

- The pipelines are similar to a large number of pipelines making up the pipeline transportation infrastructure in California and throughout the US and have been evaluated by others for proposed development projects to the north (Mountain House) and south (Ellis Development). The gas pipelines are relatively new, ranging in age from 1962 to 2001, and are in sound condition, based on the results of recent integrity assessments and in-line inspections.

- The crude oil pipeline was constructed in 1945 but is regularly inspected and assessed for its integrity in accordance with Federal regulations. No incidents have been reported along this pipeline in the vicinity of the site except for third party excavation damage.

- The pipelines are expected to continue to operate reliably and safely as the pipeline operators conduct periodic inspections and integrity assessments in accordance with federal and State regulatory requirements.

- The pipelines are exposed to a limited range of potential integrity threats which are mitigated by pipeline operating practices, such as regular inspections and corrosion controls, and the location of the pipelines within easements that limits the potential for third party excavation damage.

- The pipelines would not impose hazards to persons occupying the Project above and beyond those which are commonly present and associated with the same pipelines already in place in adjacent communities. The pipelines present lower risk compared to many other societal risks, such as motor vehicle accidents, household accidents, disease, or crime.

- Building setbacks from pipelines are not required by Federal or State regulations nor are they incorporated in the City of Tracy zoning standards.

(EIR, p. 4.8-25-26.)

The PSA set forth in Appendix H fully addresses the potential risk of gas line breaches and explosions. Thus, there is no deficiency in the EIR on this issue.

**CONCLUSION**

We appreciate your interest in the Cordes Ranch project, and also appreciate your taking the time to consider and provide comments on the Cordes Ranch EIR. We hope that the foregoing fully addresses your concerns.

Please feel free to contact me if you have further questions or would like to further discuss these issues.

Sincerely,

Andrew Malik
Development Services Director

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August 2, 2013

**10-SJ-205-1.35**
**Cordes Ranch Specific Plan**
**SCH #2011122015**

**Correction dated 8/5/2013**

Mr. Bill Dean
City of Tracy
333 Civic Center Plaza
Tracy, CA 95376

Dear Mr. Dean:

Thank you for meeting with us to discuss the mitigation measures proposed for the **Cordes Ranch Specific Plan.** As a result of a teleconference held Friday, July 19, 2013, Ellen Poling with Fehr & Peers sent revised mitigation measures (attached) for the Cordes Ranch Specific Plan EIR on July 23, 2013 for our comment. Caltrans (Department) does not find the proposed mitigations to be adequate and the following revisions/additions will need to be incorporated into the Final Environmental Impact Report (FEIR). Our comments are as follows:

**Existing+Phase 1 – Mitigation Measure TRANS-1:**

The I-205 Freeway Inputs and Results Summary provided by Fehr and Peers on July 17, 2013, show a Level of Service (LOS) F for the eastbound I-205 diagonal on-ramp merging onto mainline I-205. Therefore, it is the proposed project's responsibility to mitigate this impact by installing ramp metering and widening the eastbound I-205 onramp to two mixed flow lanes and one HOV lane under Existing+Phase 1 Project.

The Synchro analysis from Cordes Ranch Specific Plan Draft Environmental Impact Report (DEIR) indicates that under Existing +Phase 1 PM with mitigation at eastbound I-205 ramps/Mountain House Parkway (Intersection #2), the project proposes to convert the existing northbound Mountain House Parkway right-turn lane to a free right-turn lane with an acceptance lane on the eastbound on-ramp. However, with these mitigations the intersection LOS is E, LOS for northbound right-turn land is F and the queue on the northbound right-turn spills over its existing right-turn storage lane. Therefore, the proposed project's responsibility is to mitigate this impact by lengthening the existing northbound Mountain House Parkway right-turn lane to provide additional storage and access to the eastbound I-205 on-ramp.

Please add the above two mitigations to Mitigation Measure TRANS-1 in the Revised Mitigation Measures of the Cordes Ranch Specific Plan FEIR.

**Mitigation Measure TRANS-8:**

**Bullet One** – The 2035+Phase 1 mitigation condition at Mountain House Parkway/I-205 Westbound Ramps the synchro analysis shows two free westbound off-ramp right-turn lanes with two receiving lanes on northbound Mountain House Parkway. However, construction of these two receiving lanes on northbound Mountain House Parkway was not included in Mitigation Measure TRANS-8. Please revise and include the construction of these two receiving lanes on northbound Mountain House Parkway into this mitigation measure.

The following mitigation should be added as **Bullet Five**:

The I-205 Freeway Inputs and Results Summary provided by Fehr & Peers on July 17, 2013, show LOS F for the southbound loop ramp merging onto eastbound I-205 with a volume of 1510 vehicles in the AM peak and 1820 vehicles in the PM peak under 2035+Phase 1 condition. Therefore, the project needs to mitigate its' impact at this existing metered loop ramp by reconstructing to provide two mixed-flow lanes and a HOV lane.

**Mitigation Measure TRANS-10:**

This mitigation measure addresses impacts at the I-205/Mountain House Parkway Interchange and the I-580/Patterson Pass Road interchange. The Department does not agree with the statement in the second paragraph of Mitigation Measure TRANS-10 that the City will require a re- assessment of traffic forecasts and projected operating conditions at these two interchanges be performed upon completion of Phase 1 of the project due to uncertainty of traffic projections for 2035+Build-Out case. If the City is uncertain about how long it will take for the project to build out and about changes in regional land use and demographic changes over that period, the City should only approve Phase 1 of this project.

**Bullets One and Two** – These improvements need to be mitigated under Existing+Phase 1 Project, Mitigation Measure TRANS-1. Please see our comments under Mitigation Measure TRANS-1.

**Bullet Three** – Please see comment under Mitigation Measure TRANS-8. This should be ramp metering, with two mixed-flow and 1 HOV bypass lane for the eastbound I-205 loop on-ramp.

**In addition, the PSR-PDS will identify the interchange design for Cumulative Conditions based on one of the following improvement options:**

**Option #1** –Eliminating the free movement from southbound Mountain House Parkway onto southbound loop ramp and have the right-turn movement controlled at the signalized intersection eastbound I-205/Mountain House Parkway is not feasible. It will not improve the overall operation at the intersection and would create potential safety and delay issues since the right-turn vehicles have to stop before making a right-turn onto the loop ramp. The Department recommends keeping the southbound loop ramp with the improvement of two receiving lanes on the on-ramp as shown in option #3 land configuration sheet. Westbound I-205 off-ramp lane configurations need to be included in this option.

**Option #2** - Eliminating the free movement from southbound Mountain House Parkway onto the southbound loop ramp and controlling the signalized intersection at eastbound I-205/Mountain House Parkway is not feasible. It will not improve overall operations at the intersection and will create potential safety and delay issues since the right-turn vehicles have to stop before making a right-turn onto the loop ramp. The Department recommends keeping the southbound loop ramp with the improvement of two receiving lanes at the on-ramp shown in option #3 land configuration sheet. Westbound I-205 off-ramp lane configurations need to be included in this option.

**Option #3**- Westbound I-205 off-ramp lane configurations need to be included in this option.

**I-580/Patterson Pass Interchange:**

The following mitigation should be added as **Bullet Six:**

- Add ramp metering improvements for southbound Patterson Pass to eastbound loop ramp, northbound to eastbound ramp, and southbound to westbound ramp.

If you have any questions, please contact Barbara Hempstead at (209) 948-3909 (e-mail: Barbara_Hempstead@dot.ca.gov) or myself at (209) 941-1921.

Sincerely,

for Barbara P. Hempstead

TOM DUMAS, CHIEF
OFFICE OF METROPOLITAN PLANNING

Attachments

**Proposed changes to Transportation Impact and MM text**
**7-23-13**

**Impact TRANS-8** Construction of Phase 1 of the Project results in significant impacts at four intersections (#1, #4, #18, and #20), based on 2035 conditions under the 2035 Plus Phase 1 scenario, with the Tracy Roadway and Transportation Master Plan roadway network in place. This is a *significant* impact.

Mitigation Measure TRANS-8: The Project will construct the following improvements, in accordance with then-applicable engineering standards and requirements and as determined by the City Engineer:

- *Intersection #1 (Mountain House Parkway/I-205 Westbound Ramps):* Change the striping from two left turns and one through-right (which is recommended in Mitigation Measure TRANS-1 to mitigate the Existing Plus Phase 1 impact) to one through-left and two right-turn lanes, and change the signal phasing to allow westbound right turns and southbound through lanes to run concurrently on the same phase. This mitigation would provide LOS C in the AM peak hour and LOS D in the PM peak hour, for 2035 Plus Phase 1 Project conditions. This mitigation will be implemented, in coordination with Caltrans, when appropriate, based on periodic traffic volume monitoring by the City, and is expected to be needed when both the southbound through and westbound left-turn volumes grow substantially (in either peak hour), relative to the current volumes.
- Intersection #4 (New Schulte Road/Mountain House Parkway): Signalize the intersection.
- *Intersection #18 (New Schulte Road/Lammers Road):* Add a right-turn lane to the eastbound approach, for a mitigated configuration of one left turn lane, two through lanes, and one right-turn lane.
- *Intersection #20 (Valpico Road/Lammers Road):* Add a second southbound left-turn lane, for a mitigated configuration of two left-turn lanes, three through lanes, and one right-turn lane.

**Impact TRANS-10**: Project Build-out would cause over-capacity conditions on the 2035 roadway and freeway network, in the 2035 Plus Project Build-Out scenario with the 2035 Transportation Master Plan in place. Impact locations include, but are not limited to, the I-205/Mountain House Parkway Interchange and the I-580/Patterson Pass Road interchange. This is a *significant* impact.

Mitigation Measure TRANS-10: Each Project applicant will pay the applicable TMP Program Fee, the RTIF, and any other applicable transportation fees that may be in place when individual projects are processed under the Specific Plan in accordance with applicable laws and regulations.

In addition to the above mitigation, the following interchange improvements have been identified based on 2035 Plus Build-Out traffic turn movement projections derived from the roadway segment projections in the DEIR. These mitigations will be provided through a combination of the City Transportation Master Plan fee, state and federal funding sources. Planning, design and construction of these improvements will require cooperation between the City, Caltrans, Mountain House Community Facilities District, and the San Joaquin County Council of Governments. Since the traffic projections for the 2035 Plus Build-Out case, that form the basis for these improvement designs, are speculative due to uncertainty regarding how long it will take for the Project to build out and regarding changes in regional land use and demographic changes over that period, the City will require that a re-assessment of traffic forecasts and projected operating conditions at these two interchanges be performed upon completion of Phase 1 of the Project. The re-assessment will include forecasts of traffic through Project Build-Out, to the

appropriate horizon year at the time the re-assessment occurs, and the forecasts will include all other planned/projected land use growth and planned/funded infrastructure projects in Tracy and the region, through the horizon year. Based on the re-assessment, the design and timing of the two interchange improvements will be adjusted if appropriate, and the City will continue to work with the above agencies to plan, design and construct the improvements based on the updated design and schedule. This process will include all necessary steps to comply with the requirements of CEQA.

At the I-205/Mountain House Parkway Interchange, the City of Tracy will prepare a Project Study Report - Project Development Support (PSR-PDS) document that includes the following improvements; the City will coordinate with Caltrans, San Joaquin County, Mountain House Community Services District, and San Joaquin Council of Governments (SJCOG) in the preparation of the document:

- Lengthen the northbound Mountain House Parkway right-turn lane to provide additional storage and access to the eastbound I-205 on-ramp
- Ramp metering , with two mixed-flow and 1 HOV bypass lane for the eastbound I-205 diagonal on-ramp
- Ramp metering, with one mixed-flow and 1 HOV bypass lane for the eastbound I-205 loop on-ramp

In addition, the PSR-PDS will identify the interchange design for Cumulative Conditions based on one of the following improvement options:

- Option #1 -- Signal Controlled Ramps with Existing Bridge: Construct a northbound-to-westbound loop on-ramp, including relocation and potential widening of the westbound off-ramp, and reconstructing the southbound to eastbound loop on-ramp to eliminate the free movement.
- Option #2: Signal Controlled Ramps with Widened Bridge: Construct a northbound-to-westbound loop on-ramp, including relocation and potential widening of the westbound off-ramp, and reconstruct the southbound to eastbound loop on-ramp to eliminate the free movement. In addition to the ramp improvements, the existing bridge would be widened by one lane to accommodate the additional width necessary to achieve improved LOS. The widening would occur within Caltrans existing right-of-way.
- Option #3: Free Flow Ramps with Existing Bridge: Construct of a northbound-to-westbound loop ramp, including relocation and potential widening of the westbound off-ramp.

Based on analysis of 2035 Plus Project Buildout Conditions, option #3, with a partial cloverleaf on both the north and south sides of I-205 would provide acceptable LOS D conditions during both AM and PM Peak Hour Conditions. Therefore, the PSR-PDS will identify the ultimate footprint of the interchange in order to preserve the required right-of-way before development occurs in the vicinity of the I-205/Mountain House Parkway Interchange.

At the I-580/Patterson Pass Interchange the City of Tracy will prepare a Project Study Report - Project Development Support (PSR-PDS) document that includes the following interchange improvements; the City will coordinate with Caltrans, San Joaquin County, and San Joaquin Council of Governments (SJCOG) in the preparation of the document:

- Construction of a partial cloverleaf (par-clo) interchange on the south side of I-580, and a spread diamond configuration on the north side of I-580. This will provide the required right-of-way for a northbound Patterson Pass to westbound I-580 loop on-ramp;

- Add a two-lane southbound Patterson Pass to eastbound I-580 loop on-ramp;

- Widen the bridge to four lanes;

- At the Patterson Pass/I-580 Eastbound Ramps intersection, on the northbound approach, provide one through lane and one right-turn lane; southbound, one through lane and two right-turn lanes feeding the loop on-ramp; and eastbound (I-580 off-ramp), one left-turn lane, one through-left, and one right-turn lane; and

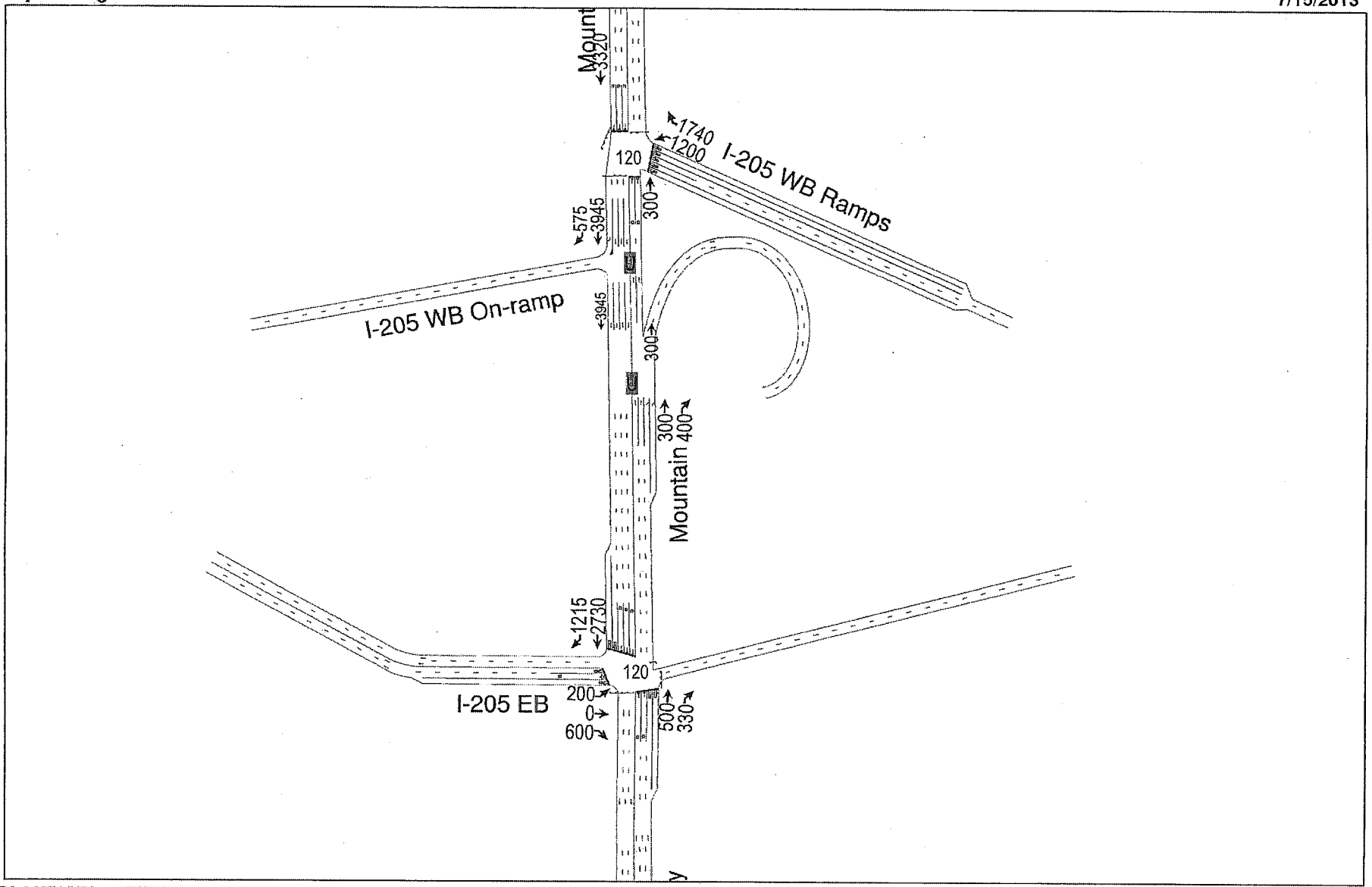
- At the Patterson Pass/I-580 Westbound Ramps: on the northbound approach, one left-turn lane and two through lanes; southbound, two through lanes and one right-turn lane; and westbound (I-580 off-ramp), one through-left lane and two right-turn lanes.

These improvements will provide LOS C or better operation at the ramp terminal intersections, based on 2035 Plus Project Build-Out volumes estimated from the roadway segment volumes presented in the DEIR.

Implementation of these mitigation measures will provide the first step toward the funding, design and construction of the ultimate interchange improvements at I-205/Mountain House Parkway and I-580/Patterson Pass Road, However, because construction of the improvements depends on future actions by the City of Tracy, SJCOG, Caltrans, San Joaquin County, and Mountain House Community Services District, these impacts remain significant and unavoidable after mitigation.

Map - I-205 / Mountain House Pkwy Interchange
Cycle Lengths

Option #1 - Signal Controlled Ramps (Existing Bridge)
7/15/2013

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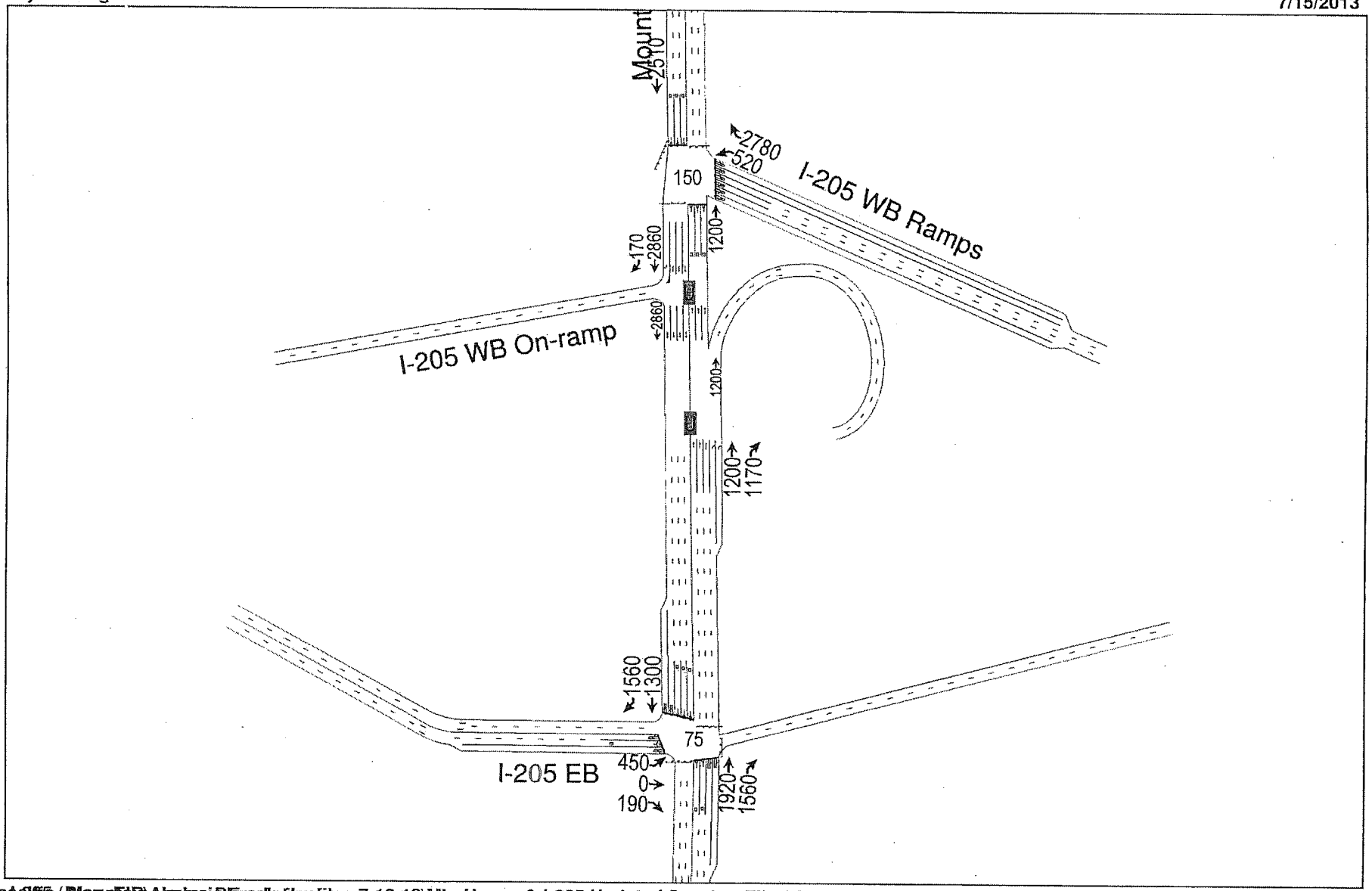
Map - I-205 / Mountain House Pkwy Interchange
Cycle Lengths

Option #2 - Signal Controlled Ramps (Widened Bridge)
7/15/2013

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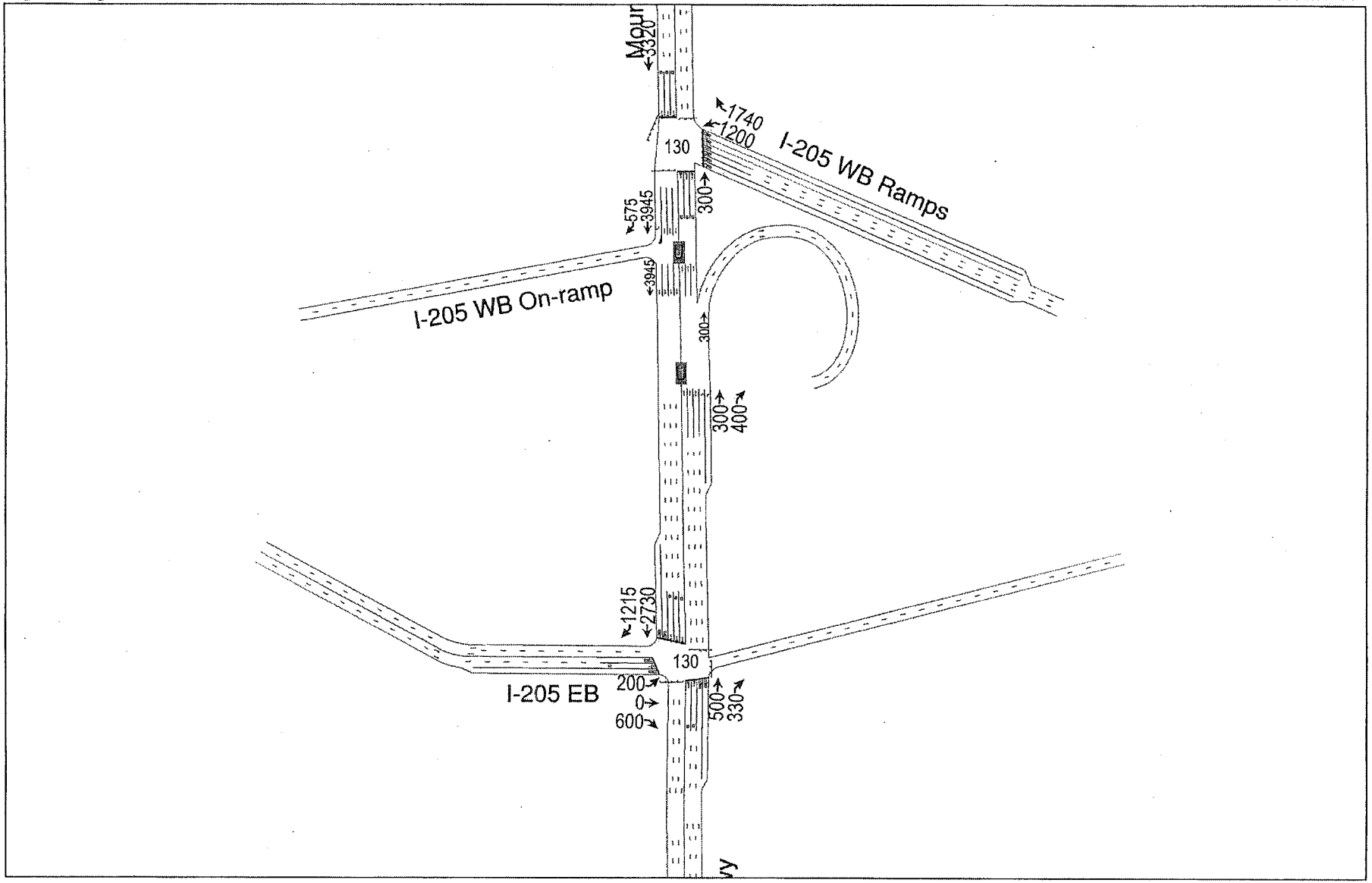
Map - I-205 / Mountain House Pkwy Interchange
Cycle Lengths

Option #2 - Signal Controlled Ramps (Widened Bridge)
7/15/2013

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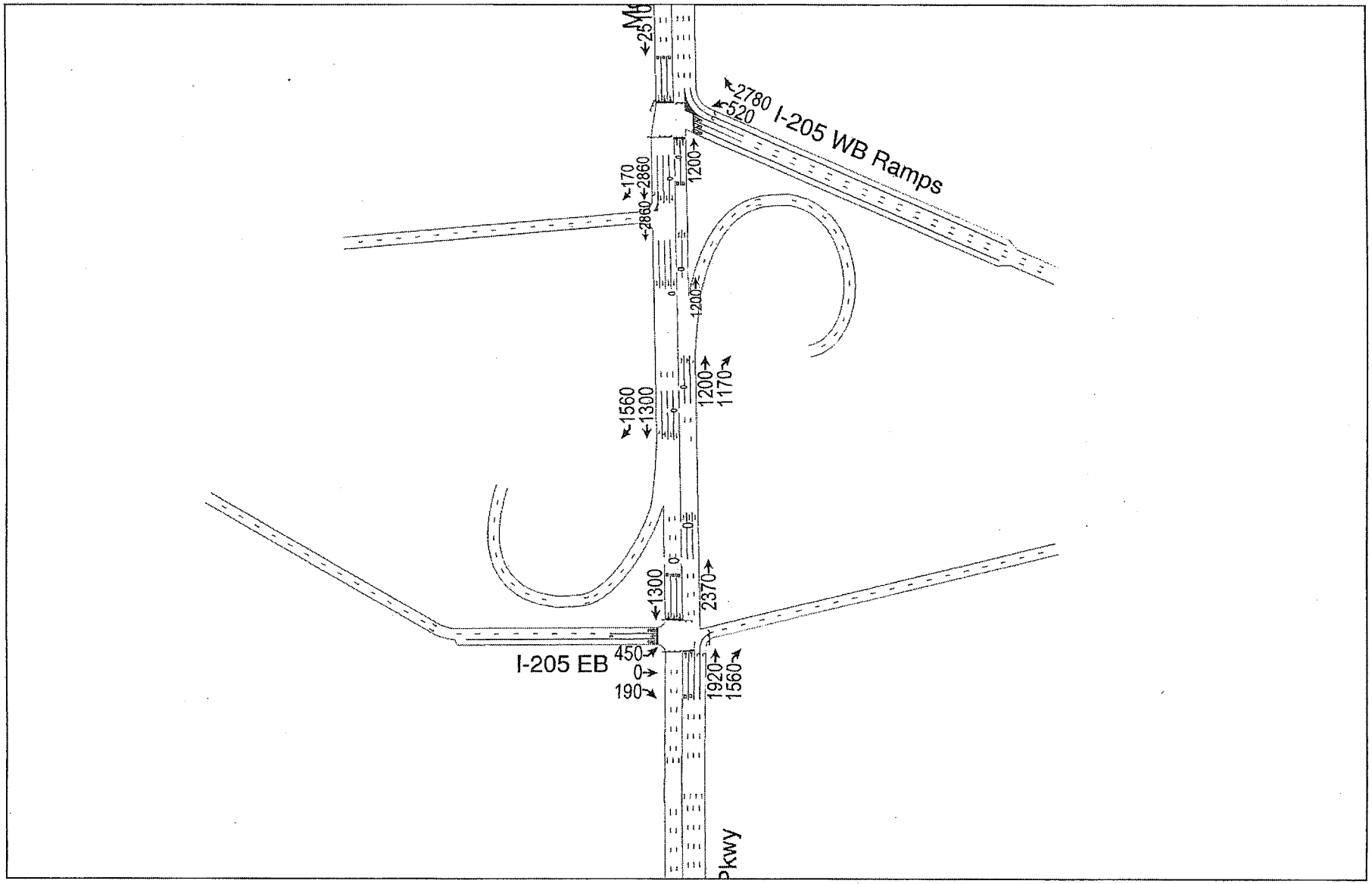
Map - I-205 / Mountain House Pkwy Interchange
Volume Balance Between Intersections

NB to WB Loop Ramp Option
7/15/2013

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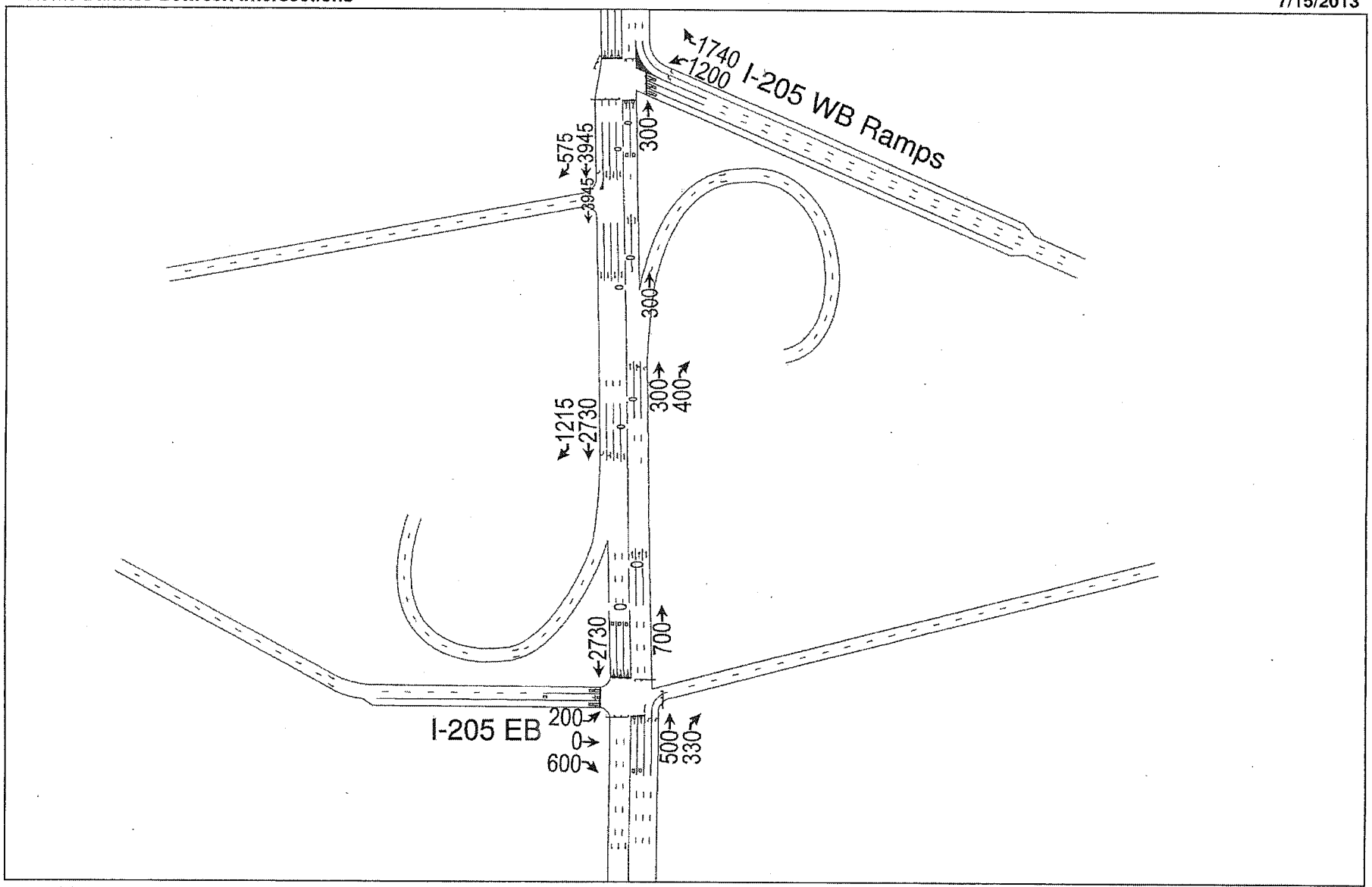
Map - I-205 / Mountain House Pkwy Interchange
Volume Balance Between Intersections

NB to WB Loop Ramp Option
7/15/2013

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KHA

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August 15, 2013

Mr. Tom Dumas, Chief
Office of Metropolitan Planning
Department of Transportation
P.O. Box 2048
Stockton, CA 95201

Dear Mr. Dumas,

Thank you for your letter of August 2 regarding the Cordes Ranch Specific Plan Project Final Environmental Impact Report ("FEIR"), requesting further changes to the mitigation measures first described in the Cordes Ranch Specific Plan Project Draft Environmental Impact Report ("DEIR").

This letter follows on earlier correspondence and communications between the City of Tracy's traffic consultant, Ms. Ellen Poling of Fehr & Peers, and your office and staff. Specifically, on August 8, Ms. Poling forwarded to you a description of the additional changes to the Project's traffic-related mitigation measures that the City of Tracy and the Project applicant have agreed to implement in response to Caltrans' requests. For your convenience, a copy of those changes and the accompanying email correspondence from Ms. Poling are attached hereto. As shown, these latest changes fully incorporate all of the additional traffic-related changes requested by Caltrans on August 2.

Thank you for providing Caltrans' comments and input on the Cordes Ranch Project and associated traffic analysis; we trust that we have fully addressed all of its legitimate concerns.

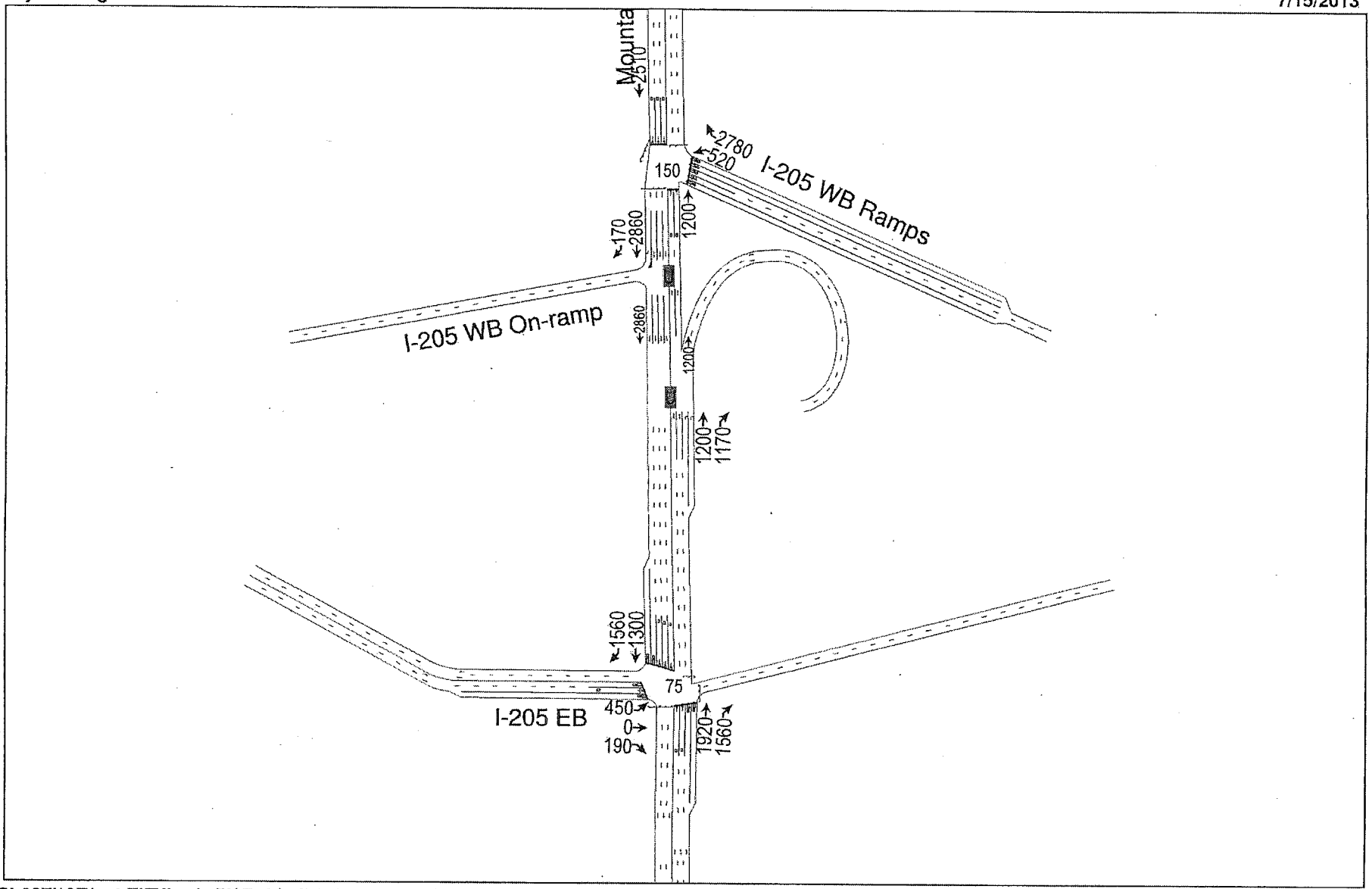
Please feel free to contact me if you have further questions or would like to further discuss these issues.

Sincerely,

Andrew Malik
Development Services Director

Map - I-205 / Mountain House Pkwy Interchange
Cycle Lengths

Option #1 - Signal Controlled Ramps (Existing Bridge)
7/15/2013




Ranch_Specific_Plan_EIR Analysis\Fredericksburg 7-12-13\Mtn House & I-205 Updated Synchro Files\Option#1-2035 Plus Build Out - Ultimate 7 Lane IC PM_New.syn
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