INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

FOR THE

HOME2SUITES BY HILTON PROJECT

FEBRUARY 2017

Prepared for:

City of Tracy
333 Civic Center Plaza
Tracy, CA 95376
(209) 831-6000

Prepared by:

De Novo Planning Group
1020 Suncast Lane, Suite 106
El Dorado Hills, CA 95762
(916) 949-3231

De Novo Planning Group
A Land Use Planning, Design, and Environmental Firm

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INITIAL STUDY

PROJECT TITLE

Home2Suites by Hilton Project

LEAD AGENCY NAME AND ADDRESS

City of Tracy
333 Civic Center Plaza
Tracy, CA 95376

CONTACT PERSON AND PHONE NUMBER

Alan Bell, Senior Planner
Development Services Department
City of Tracy
(209) 831-6426

PROJECT SPONSOR NAME AND ADDRESS

Clover Hotel Partners
103 East Louise Avenue
Lathrop, CA 95330

PURPOSE OF THE INITIAL STUDY

An Initial Study (IS) is a preliminary analysis which is prepared to determine the relative environmental impacts associated with a proposed project. It is designed as a measuring mechanism to determine if a project will have a significant adverse effect on the environment, thereby triggering the need to prepare an Environmental Impact Report (EIR). It also functions as an evidentiary document containing information which supports conclusions that the project will not have a significant environmental impact or that the impacts can be mitigated to a "Less Than Significant" or "No Impact" level. If there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the lead agency shall prepare a Negative Declaration (ND). If the IS identifies potentially significant effects, but: (1) revisions in the project plans or proposals would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and (2) there is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment, then a Mitigated Negative Declaration (MND) shall be prepared.

This IS has been prepared consistent with California Environmental Quality Act (CEQA) Guidelines Section 15063, to determine if the proposed Home2Suites by Hilton Project (Project) may have a significant effect upon the environment. Based upon the findings and mitigation measures contained within this report, a MND will be prepared.

PROJECT LOCATION AND SETTING

PROJECT LOCATION

The Project site consists of approximately 2.56 acres located at 2025 and 2075 W. Grant Line Road in the northern portion of the City of Tracy, northwest of the intersection of W. Grant Line Road and N. Corral Hollow Road. The Project site encompasses Assessor Parcel Numbers (APNs) 214-020-34 and -35.

The Project's regional location is shown in Figure 1, and the Project vicinity is shown in Figure 2.

EXISTING SITE USES

The Project site currently consists of vacant, undeveloped agricultural land that is not currently being farmed. The Project site has recently been used as fallow agricultural land, and orchards or crops have not been present on-site since prior to 1993. A palm tree is located in the southeastern corner of the Project site. Figure 3 shows an aerial view of the Project site.

SURROUNDING LAND USES

The Project site is bound by W. Grant Line Road to the south and N. Corral Hollow Road to the east. Lands to the east of the Project site opposite Corral Hollow Road consist of single-family residential uses. The parcels adjacent to the north consist of vacant, undeveloped land, formerly used for agriculture over 25 years ago, two single-family residences, and a cul-de-sac. Further north approximately 0.15 miles is Interstate 205 (I-205). The parcels adjacent to the west consist of commercial uses, including the Sutter Gould Medical Foundation. Lands to the south of the Project site opposite W. Grant Line Road also contain commercial uses, such as medical offices, FedEx, and Chili's.

PROJECT DESCRIPTION

The proposed Project includes development of a four-story, 94-room hotel and associated parking, circulation improvements, and amenities on the 2.56-acre Project site. The Project includes approximately 107 parking spaces and a pool with a patio. Figure 4 shows the proposed site plan layout.

The proposed Home2Suites by Hilton hotel building would be approximately 60 feet tall at the top of the two proposed logo towers, and 44 feet tall for the remainder of the building. The hotel building would include a mix of materials, varied roof lines, and building recesses and articulations. A porte-cochère would be provided for hotel guests at the southern portion of the hotel building. Additionally, a common entrance would be provided at the southwestern corner of the site. Landscaping would be provided throughout the site.

The Project would be served by the following existing service providers:

- City of Tracy for water;
- City of Tracy for wastewater collection and treatment;
- City of Tracy for stormwater collection;
- Pacific Gas and Electric Company for gas and electricity.

Utility extensions would be installed to provide services to the Project. Utility lines within the Project site and adjacent roadways would be extended throughout the Project site. Wastewater, water, and storm drainage lines would be connected via existing lines along N. Corral Hollow Road and W. Grant Line Road. Sanitary sewer lines ranging in size from eight to 30 inches are currently located along N. Corral Hollow Road and W. Grant Line Road. Water lines ranging in size from two to 12 inches are currently located along N. Corral Hollow Road and W. Grant Line Road. Additionally, 12-inch storm drainage lines and a 10-inch gas line are currently located along W. Grant Line Road.

A lot line adjustment would be required to relocate the existing property line between APN 214-020-34 and APN 214-020-35 approximately 150 feet west of its current location. The proposed property line location is shown in Figure 4. Additionally, the Project applicant is requesting a General Plan amendment to change the land use designation on the adjusted eastern parcel from Office to Commercial. The adjusted western parcel would maintain the Office designation. No structures or buildings are proposed to be constructed on the western portion of what is now APN 214-020-34. As shown on Figure 4, parking lot improvements would be constructed on this parcel, in order to provide additional site access and internal circulation, and to provide continuity to the existing development located to the west and north of the Project site (the existing Sutter Gould Medical Center and vacant property).

Figure 4 depicts a hypothetical building pad on APN 214-020-34, consistent with the development intensity and allowable uses under the existing General Plan designation of Office (O) for this portion of the Project site. However, no office buildings are currently proposed for this portion of the site, and the City has not received any applications for development of this portion of the site. In the event that the City receives a development application for the western portion of APN 214-020-34, the City would undertake the appropriate level of project review, including appropriate CEQA compliance documentation. Approval of the proposed hotel Project would not result in any entitlements or approvals to construct office uses on the western portion of the Project site. As described above, the western portion of APN 214-020-34 would remain under the existing Office land use designation.

GENERAL PLAN AND ZONING DESIGNATIONS

The Project site is currently designated Office (O) by the City of Tracy General Plan Land Use Designations Map. Development in areas designated as Office are typically relatively large in scale, but can accommodate smaller offices in older parts of the City where parcel sizes and businesses tend to be smaller. Approval of a General Plan Amendment for APN 214-020-35 from O to Commercial (C) would be required prior to, or as a component of, Project approval. Additionally, the Project site is located in the Grant Line Road and Corral Hollow Road Area of Special Consideration. The vision for this area is for a medical office area that takes advantage of the proximity of the Kaiser Medical Center. The following General Plan policies apply to areas within the Grant Line Road and Corral Hollow Road Area of Special Consideration:

- 3a. Commercial uses that support the medical industry may be allowed in areas designated as Office.

- 3b. High density residential development, including projects for senior citizens, may be allowed on a case-by-case basis to take advantage of the close proximity to medical and retail services.

The following standards apply to the existing O land use designation:

- Office (O). The purpose of this designation is to provide for the maintenance and expansion of the job and economic base of the City of Tracy and to provide more Tracy residents with the potential to work in the City. The Office designation provides sites for office and research and development uses that accommodate high-tech, medical, hospital, legal, insurance, government and similar users. Office parcels may have a maximum floor-area-ratio (FAR) of 1.0.

The following standards apply to the proposed C land use designation:

- Commercial (C). The Commercial designation allows for a relatively wide range of uses but focuses primarily on retail and consumer service activities that meet the needs of Tracy residents and employees as well as pass-through travelers. Specific categories of commercial activity within this designation include general commercial, regional commercial and highway commercial. The specific location of each type of commercial use are provided in the zoning code. Commercially designated land may have a maximum FAR of 1.0

The Project site is currently zoned General Highway Commercial (GHC). A Zoning Amendment would not be required for the Project.

The existing General Plan land use and zoning designations for the Project site are shown on Figure 5 and Figure 6, respectively.

REQUESTED ACTIONS AND OTHER APPROVALS

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

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

- Adoption of the MND;
- Adoption of the Mitigation Monitoring and Reporting Program (MMRP);
- Approval of a lot line adjustment;
- Approval of a General Plan Amendment to amend the land use designation of the eastern portion of the site from Office to Commercial;
- Development Review approval; and
- Improvement plans and building permits.

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

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

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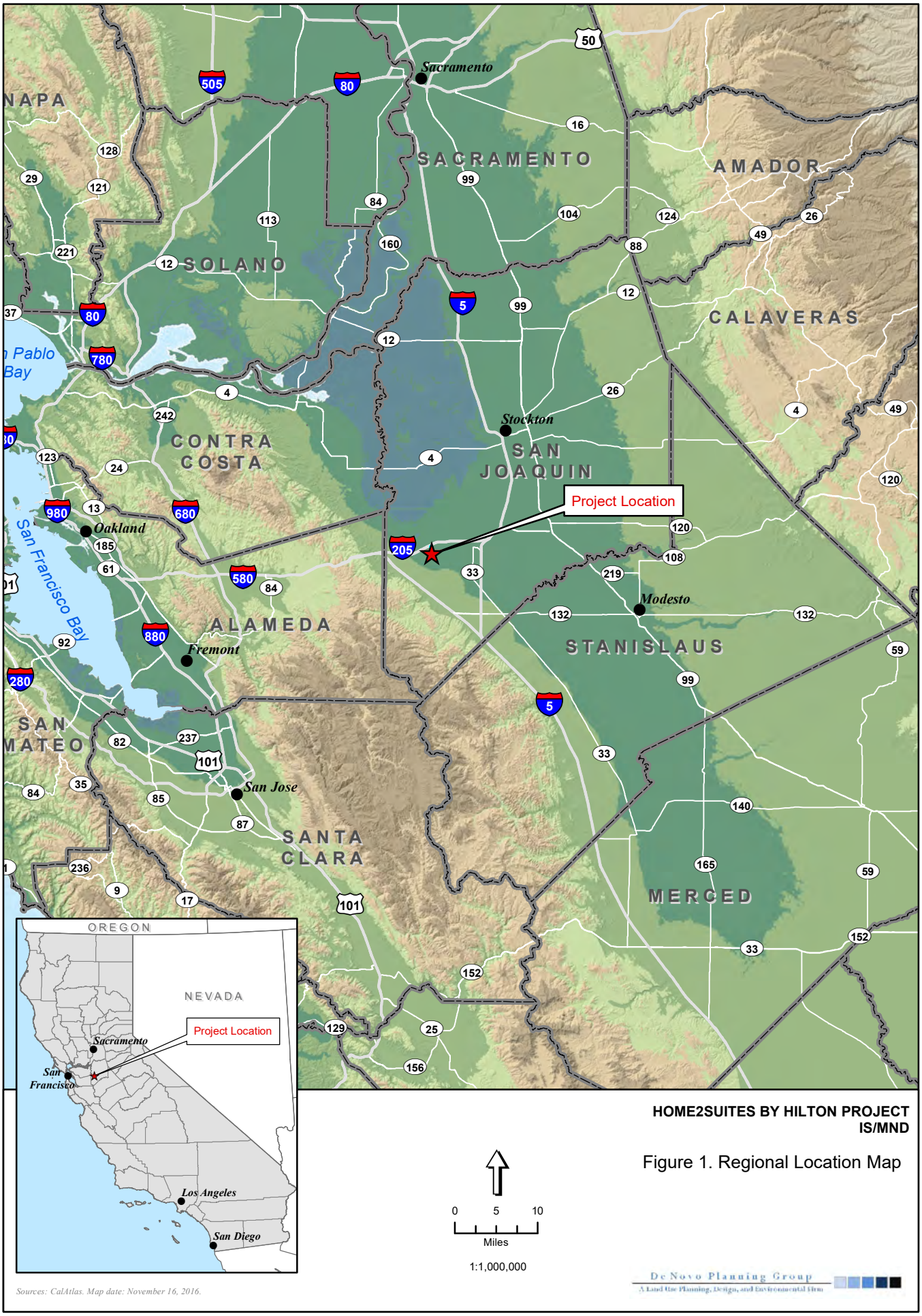

HOME2SUITES BY HILTON PROJECT IS/MND

Figure 1. Regional Location Map

Sources: CalAtlas. Map date: November 16, 2016.

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Legend

- Project Boundary
- CityLimits
- Schools
- Parks

N

0 250 500

Feet

1:12,000

HOME2SUITES BY HILTON PROJECT
IS/MND

Figure 2. Project Vicinity

Sources: San Joaquin County GIS; Open StreetMap; Google Maps. Map date: November 16, 2016.

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HOME2SUITES BY HILTON PROJECT
IS/MND

Legend

Project Boundary

N

0 75 150

Feet

1:3,000

Figure 3. Aerial View of Project Site

Sources: San Joaquin County GIS; ArcGIS Online World Imagery Service. Map date: November 16, 2016.

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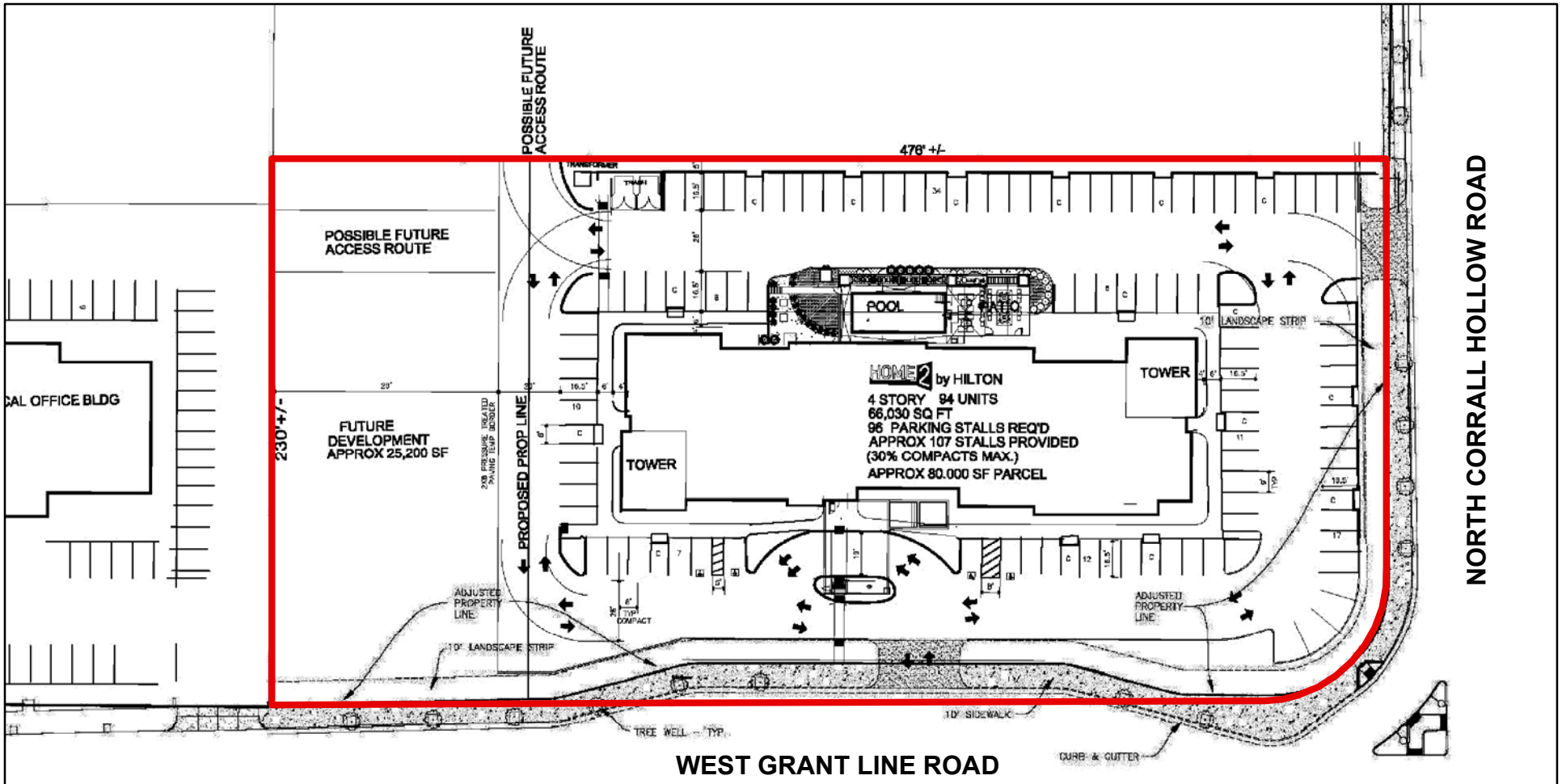

HOME2SUITES BY HILTON PROJECT
IS/MND

Figure 4. Site Plan

Legend

Project Boundary

N

0 25 50

Feet

1:800

Sources: Lee Gage & Associates, Inc.; San Joaquin County GIS.
Map date: February 24, 2017.

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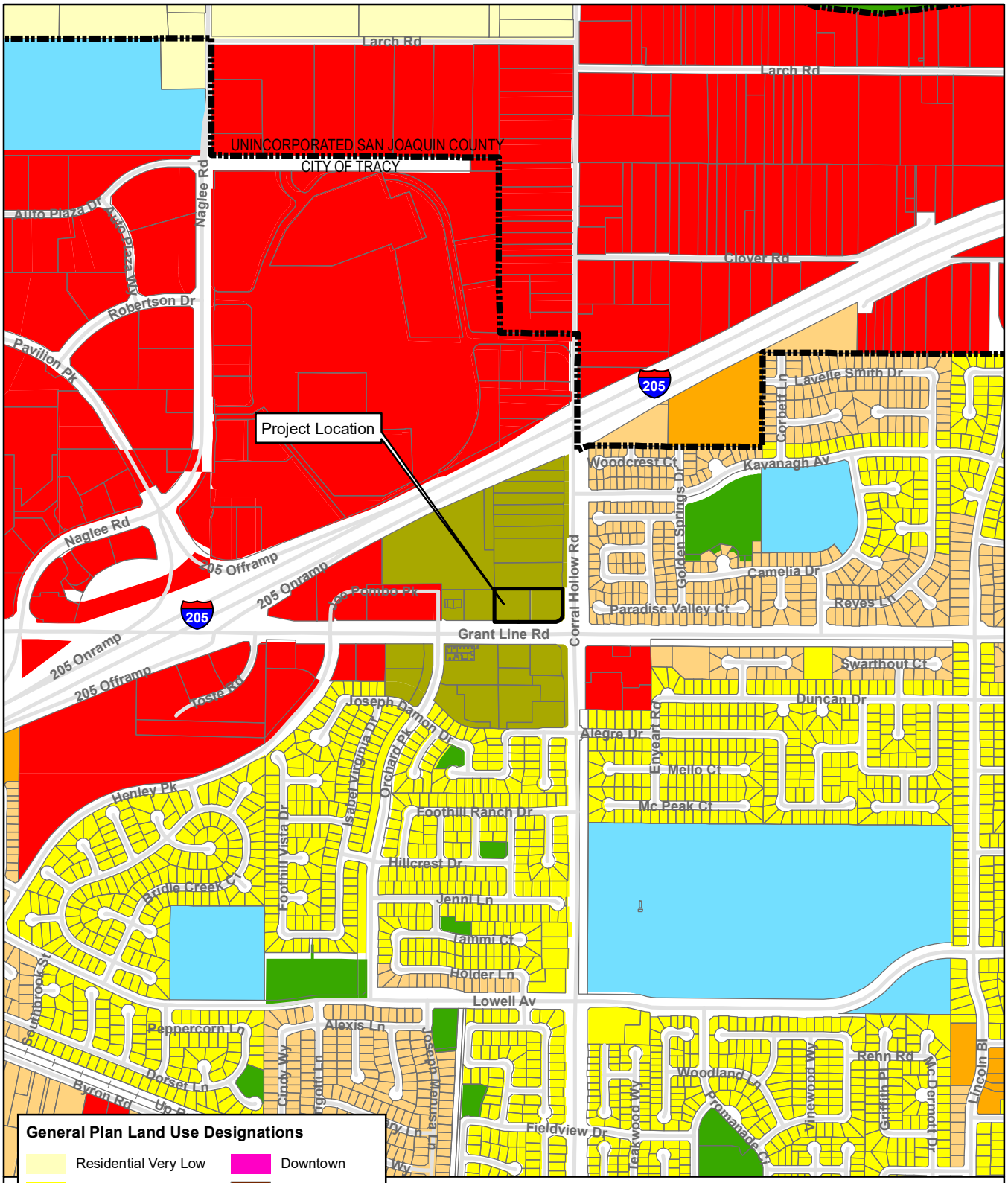

HOME2SUITES BY HILTON PROJECT IS/MND

Figure 5. Existing General Plan Land Use Map

Sources: City of Tracy General Plan 2011; San Joaquin County GIS.
Map date: November 18, 2016.

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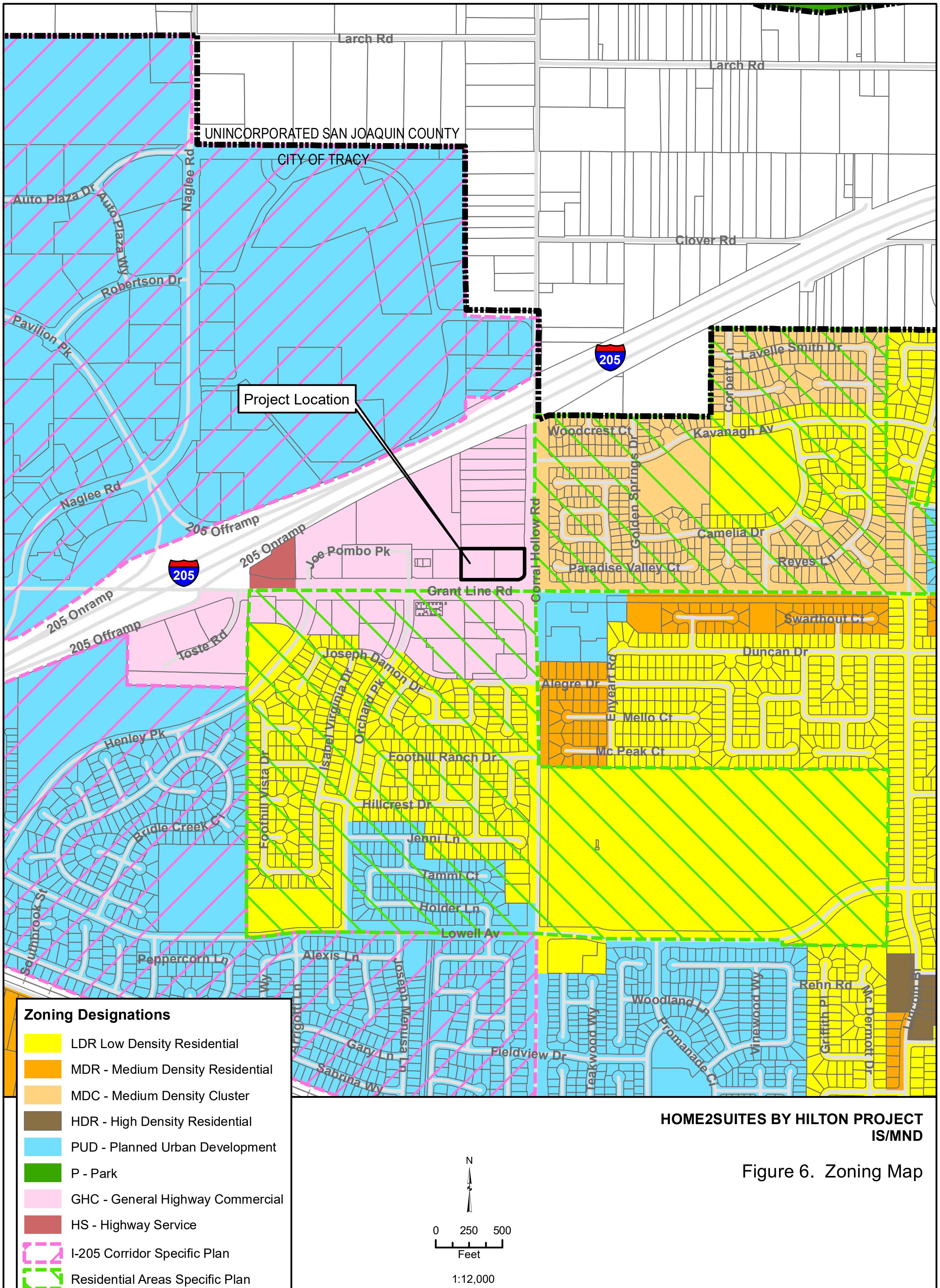

HOME2SUITES BY HILTON PROJECT IS/MND

Figure 6. Zoning Map

Sources: City of Tracy Zoning; San Joaquin County GIS.
Map date: November 18, 2016.

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

	Aesthetics		Agriculture and Forest Resources		Air Quality
	Biological Resources		Cultural Resources		Geology and Soils
	Greenhouse Gasses		Hazards and Hazardous Materials		Hydrology and Water Quality
	Land Use and Planning		Mineral Resources		Noise
	Population and Housing		Public Services		Recreation
	Transportation and Traffic		Tribal Cultural Resources		Utilities and Service Systems
	Mandatory Findings of Significance				

DETERMINATION:

On the basis of this initial evaluation:

	I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
X	I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
	I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
	I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
	I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

Signature Date

EVALUATION INSTRUCTIONS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).
5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
    a) Earlier Analysis Used. Identify and state where they are available for review.
    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9) The explanation of each issue should identify:
    a) The significance criteria or threshold, if any, used to evaluate each question; and
    b) The mitigation measure identified, if any, to reduce the impact to less than significance

EVALUATION OF ENVIRONMENTAL IMPACTS:

In each area of potential impact listed in this section, there are one or more questions which assess the degree of potential environmental effect. A response is provided to each question using one of the four impact evaluation criteria described below. A discussion of the response is also included.

- Potentially Significant Impact. This response is appropriate when there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries, upon completion of the Initial Study, an EIR is required.
- Less than Significant With Mitigation Incorporated. This response applies when the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact". The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.
- Less than Significant Impact. A less than significant impact is one which is deemed to have little or no adverse effect on the environment. Mitigation measures are, therefore, not necessary, although they may be recommended to further reduce a minor impact.
- No Impact. These issues were either identified as having no impact on the environment, or they are not relevant to the Project.

ENVIRONMENTAL CHECKLIST

This section of the Initial Study incorporates the most current Appendix "G" Environmental Checklist Form, contained in the CEQA Guidelines. Impact questions and responses are included in both tabular and narrative formats for each of the 18 environmental topic areas.

I. AESTHETICS -- WOULD THE PROJECT:

	Potentially Significant Impact	***Less Than Significant with Mitigation Incorporation***	***Less Than Significant Impact***	***No Impact***
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
c) Substantially degrade the existing visual character or quality of the site and its surroundings?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		X		

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant. There are no designated scenic vistas located on or adjacent to the Project site. The Project site currently consists primarily of vacant agricultural land surrounded by existing urban development and other vacant parcels. The vacant land to the north and northwest of the Project site is designated as Office by the City's General Plan, and I-205 is located further north.

The proposed Project uses are consistent and compatible with the surrounding land uses. Lands to the west, south, and southwest of the Project site consist of commercial and office uses. Lands to the north and east consist of residential uses.

Implementation of the proposed Project would provide for additional hotel development in an area of the City that is adjacent to existing commercial development. The Project site is not topographically elevated from the surrounding lands, and is not highly visible from areas beyond the immediate vicinity of the site. There are no prominent features on the site, such as extensive trees, rock outcroppings, or other visually distinctive features that contribute to the scenic quality of the site. The Project site is not designated as a scenic vista by the City of Tracy General Plan.

Implementation of the proposed Project would not significantly change the existing visual character of the Project area, as much of the areas immediately adjacent to the site are used for commercial purposes. Furthermore, the General Plan designates this area as Office, which is

intended to provide for the maintenance and expansion of the job and economic base of the City of Tracy and to provide more Tracy residents with the potential to work in the City. Implementation of the proposed Project would introduce a hotel building to the Project area that would be generally consistent with the surrounding commercial developments, and consistent with the intended uses established by the Tracy General Plan. Therefore, this impact is considered **less than significant**.

Response b): Less than Significant. As described in the Tracy General Plan EIR**,** there are two Officially Designated California Scenic Highway segments in the Tracy Planning Area, which extend a total length 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. 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.

The Project site lies approximately 5.3 miles northeast of the I-580 scenic highway. The Project site is approximately 6.0 miles west of the I-5 scenic highway. The Project site is not visible from the I-580 corridor or the I-5 corridor. The proposed Project, which consists of a four-story hotel structure, is visually compatible with the surrounding commercial uses. The structure proposed as part of the Project would be slightly more visually prominent than other existing commercial development area, as the proposed structure would be four stories in height, while the existing commercial buildings in the vicinity are one to three stories. Distant background views would remain roughly equal to existing conditions.

The Project site is not visible from any of the above-referenced scenic highways. Development of the proposed Project would not result in the removal of any rock outcroppings, or buildings of historical significance, and would not result in substantial changes to the viewsheds from the designated scenic highways in the vicinity of the City of Tracy. Therefore, this is a **less than significant** impact.

Response c): Less than Significant. The proposed Project would add additional commercial uses to an area that currently contains numerous commercial buildings. The proposed Project would be visually compatible with the surrounding commercial uses and would not significantly degrade the existing visual quality of the surrounding area. Site specific characteristics would change the site from vacant to commercial uses. However, taking into account the scope and location of the proposed Project relative to the surrounding area uses, this would not greatly alter the area's overall visual characteristics.

The Project site contains one palm tree in the southeastern corner of the site. Removal of this tree would not represent a visual impact, and removal would not increase views of the Project site from the surrounding roadways. Additionally, the Project is subject to the City of Tracy's development and design review criteria, which would ensure that the exterior facades of the proposed structures, landscaping, streetscape improvements and exterior lighting improvements are compatible with the surrounding land uses. Additionally, the proposed

Project includes extensive planting of new trees and other vegetation. Therefore, this impact is considered **less than significant**.

Response d): Less than Significant with Mitigation. Daytime glare can occur when the sunlight strikes reflective surfaces such as windows, vehicle windshields and shiny reflective building materials. The proposed Project would introduce new commercial structures into the Project site; however, reflective building materials are not proposed for use in the Project, and as such, the Project is not anticipated to result in increases in daytime glare.

The proposed Project would include exterior lighting around the proposed structures. The City of Tracy Standard Plan #140 establishes street light standards, and requirements for light illumination. Exterior lighting on new projects is also regulated by the Tracy Municipal Code, 10.08.4000 (a), which specifies that the site plan and architectural review package includes an exterior lighting standards and devices review. The City addresses light and glare issues on a case-by-case basis during Project approval and, consistent with Tracy Municipal Code Section 10.08.3530(h), requires parking area lighting to be directed downward and away from adjacent properties and structures.

The following mitigation measure requires the preparation of a lighting plan, which must demonstrate that exterior Project lighting has been designed to minimize light spillage onto adjacent properties to the greatest extent feasible. Implementation of the following mitigation measure would reduce this impact to a **less than significant** level.

MITIGATION MEASURE(S)

Mitigation Measure 1*: A lighting plan shall be prepared and approved prior to the issuance of a building permit and installation of the Project's exterior lighting. The lighting plan shall demonstrate that the exterior lighting systems have been designed to minimize light spillage onto adjacent properties to the greatest extent feasible. The lighting plan shall include the following:*

- *Design of site lighting and exterior building light fixtures to reduce the effects of light pollution and glare off of glass and metal surfaces;*
- *Lighting shall be directed downward and light fixtures shall be shielded to reduce upward and spillover lighting.*

II. AGRICULTURE AND FOREST RESOURCES -- WOULD THE PROJECT:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?			X	
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1222(g)) or timberland (as defined in Public Resources Code section 4526)?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant. The Project site is designated as Vacant or Disturbed Land by the Farmland Mapping and Monitoring Program and the USDA Soil Conservation Service.[1] Figure 7 identifies important farmlands, as mapped by the USDA, on and near the Project site. The Project site has been historically used for agricultural production. Due to the existing surrounding land uses, the Project site is not suitable for agricultural production and agricultural operations.

The potential environmental impacts from development of the site for urban uses and the associated removal of prime farmland soil for agricultural use were considered and addressed in the City of Tracy General Plan and Final EIR. There, it was determined that buildout of the General Plan would result in the conversion of Prime Farmland, Unique Farmland and Farmland of Statewide Importance to urban uses. The General Plan Draft EIR found this to be a significant and unavoidable impact. On February 1, 2011, the Tracy City Council adopted a Statement of Overriding Considerations (Resolution 2011-028) for the loss of prime agricultural land resulting from adoption of the Plan and EIR, and provided mitigation measures for the agricultural land lost to development in the City of Tracy's urbanized areas. Mitigation measures included the implementation of a "Right to Farm" ordinance by the City (Ord. 10.24 et seq.), intended to preserve and protect existing agricultural operations within the incorporated City, and participation in the City's agricultural mitigation fee program (Tracy Municipal Code, Chapter

[1] Available at: http://maps.conservation.ca.gov/ciff/ciff.html.

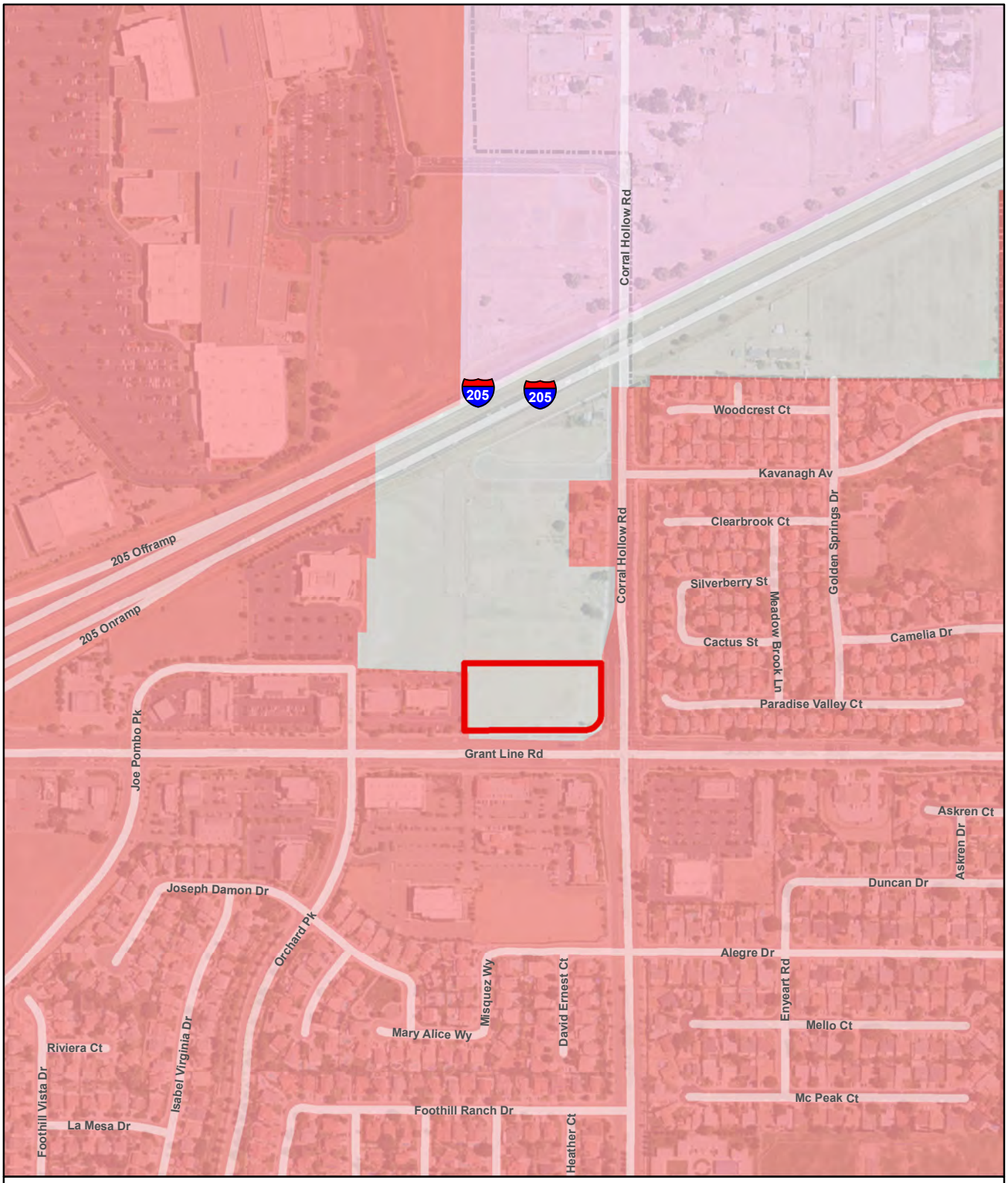
13.26). The analysis and findings contained in the Tracy General Plan EIR, adopted through Resolution 2011-028, are hereby incorporated by references into this document.

The proposed Project site is currently designated Office by the Tracy General Plan Land Use Map, which is intended for future urban land uses in the Tracy General Plan. As such, implementation of the proposed Project would not create new impacts over and above those identified in the General Plan Final EIR, nor significantly change previously identified impacts. Therefore, this would be considered a **less than significant** impact.

Response b): No Impact. The Project site is not under a Williamson Act Contract, nor are any of the parcels immediately adjacent to the Project site under a Williamson Act Contract. Therefore, implementation of the proposed Project would not conflict with a Williamson Act Contract. The Project site is currently zoned General Highway Commercial (GHC) by the City's Zoning Map. As such, the proposed Project would not conflict with any agricultural zoning or Williamson Act Contract. There is **no impact**.

Responses c) and d): No Impact. The Project site is located in an area consisting of residential and commercial development. One tree is present on the Project site; however, this tree is ornamental in nature. There are no forest resources on the Project site or in the immediate vicinity of the Project site. Therefore, development of the Project would result in **no impact**.

Response e): Less than Significant. As described under Responses (a) above, the proposed Project site has previously been used for agricultural purposes, but is not designated or zoned for agricultural uses, and is not designated as Important Farmland. The proposed Project is identified for urban land uses in the Tracy General Plan. The proposed Project is consistent with the overriding considerations that were adopted for the General Plan. As such, implementation of the proposed Project would not create new impacts over and above those identified in the General Plan Final EIR, nor significantly change previously identified impacts. Therefore, implementation of the proposed Project would result in a **less than significant** impact.



Legend

Project Boundary

FMMP Designation

Vacant or Disturbed Land

Rural Residential Land

Urban and Built-Up Land

N

0 150 300

Feet

1:6,000

Sources: Farmland Mapping and Monitoring Program, San Joaquin County 2014; San Joaquin County GIS; ArcGIS Online World Imagery Service. Map date: November 16, 2017.

HOME2SUITES BY HILTON PROJECT
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Figure 7. Important Farmland Map

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III. AIR QUALITY -- WOULD THE PROJECT:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Conflict with or obstruct implementation of the applicable air quality plan?		X		
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?		X		
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?		X		
d) Expose sensitive receptors to substantial pollutant concentrations?			X	
e) Create objectionable odors affecting a substantial number of people?			X	

EXISTING SETTING

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

RESPONSES TO CHECKLIST QUESTIONS

Responses a), b), c): Less than Significant with Mitigation. Air quality emissions would be generated during construction of the proposed Project and during operation of the proposed Project. Construction-related air quality impacts and operational air quality impacts are addressed separately below.

Construction-Related Emissions

The SJVAPCD has published guidance on determining CEQA applicability, significance of impacts, and potential mitigation of significant impacts, in the SJVAPCD Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI). The SJVAPCD has established thresholds of significance for criteria pollutant emissions, which are based on District New Source Review (NSR) offset requirements for stationary sources. Using project type and size, the SJVAPCD has pre-quantified emissions and determined a size below which it is reasonable to conclude that a project would not exceed applicable thresholds of significance for criteria pollutants. In the interest of streamlining CEQA requirements, projects that fit the descriptions and project sizes provided in the SJVAPCD Small Project Level (SPAL) are deemed to have a less than significant impact on air quality and, as such, are excluded from quantifying criteria pollutant emissions for CEQA purposes.

The SJVAPCD's approach to analysis of construction impacts is that quantification of construction emissions is not necessary if an Initial Study demonstrates that construction emissions would be less than significant based on the SJVAPCD SPAL screening levels (SJVAPCD, 2015). The proposed Project would only generate a very small number of vehicle trips during its construction and operational phases and would not require a large Project area (far less than the SPAL screening threshold of 1,673 trips/day for commercial land uses, and 200 units for the hotel land use, respectively). Based on these Project characteristics, the proposed Project would be deemed to have a less than significant impact on air quality under the SPAL guidelines (SJVAPCD, 2015). As such, the proposed Project is excluded from quantifying criteria pollutant emissions for CEQA purposes.

However, regardless of emission quantities, the SJVAPCD requires construction related mitigation in accordance with their rules and regulations. Implementation of the following mitigation measures in addition to compliance with all applicable measures from SJVAPCD Rule VIII would ensure that the Project would have a **less than significant** impact related to construction emissions.

MITIGATION MEASURE(S)

Mitigation Measure 2*: Prior to the commencement of grading activities, the City shall require the contractor hired to complete the grading activities to prepare a construction emissions reduction plan that meets the requirements of SJVAPCD Rule VIII. The construction emissions reductions plan shall be submitted to the SJVAPCD for review and approval. The Project applicant shall comply with all applicable APCD requirements prior to commencement of grading activities.*

Mitigation Measure 3*: The following mitigation measures, in addition to those required under Regulation VIII of the SJVAPCD, shall be implemented by the Project's contractor during all phases of Project grading and construction to reduce fugitive dust emissions:*

- *Water previously disturbed exposed surfaces (soil) a minimum of two-times/day or whenever visible dust is capable of drifting from the site or approaches 20 percent opacity.*
- *Water all haul roads (unpaved) a minimum of two-times/day or whenever visible dust is capable of drifting from the site or approaches 20 percent opacity.*
- *Reduce speed on unpaved roads to less than 5 miles per hour.*
- *Reduce the amount of disturbed surface area at any one time pursuant to the scope of work identified in approved and permitted plans.*
- *Restrict vehicular access to the area to prevent unlawful entry to disturbed areas and limit unnecessary onsite construction traffic on disturbed surfaces. Restriction measures may include fencing or signage as determined appropriate by the APCD.*
- *Cease grading activities during periods of high winds (greater than 20 mph over a one-hour period).*
- *Asphalt-concrete paving shall comply with SJVAPCD Rule 4641 and restrict use of cutback, slow-sure, and emulsified asphalt paving materials.*

Implementation of this mitigation shall occur during all grading or site clearing activities. The SJVAPCD shall be responsible for monitoring.

Operational-Related Emissions

For the purposes of this operational air quality analysis, actions that violate Federal standards for criteria pollutants (i.e., primary standards designed to safeguard the health of people considered to be sensitive receptors while outdoors and secondary standards designed to safeguard human welfare) are considered significant impacts. Additionally, the SJVAPCD has established operations related emissions thresholds of significance as follows: 10 tons per year of oxides of nitrogen (NO_x), 10 tons per year of reactive organic gases (ROG), and 15 tons per year particulate matter of 10 microns or less in size (PM_{10}) and 15 tons per year particulate matter of 2.5 microns or less in size ($PM_{2.5}$). Additionally, as discussed previously, the SJVAPCD has established thresholds of significance for criteria pollutant emissions, which are based on District NSR offset requirements for stationary sources. Using project type and size, the SJVAPCD has pre-quantified emissions and determined a size below which it is reasonable to conclude that a project would not exceed applicable thresholds of significance for criteria pollutants.

The proposed Project is smaller in scope and size than the SJVAPCD's SPAL for hotel uses (200 rooms). Therefore, localized CO modeling is not warranted for this Project.

Rule 9510 Indirect Source Review

District Rule 9510 requires developers of large residential, commercial and industrial projects to reduce smog-forming (NOx) and particulate (PM_{10} and $PM_{2.5}$) emissions generated by their projects. The Rule applies to projects which, upon full build-out, will include 2,000 square feet of commercial space. Project developers are required to reduce:

- 20 percent of construction-exhaust nitrogen oxides;
- 45 percent of construction-exhaust PM_{10};
- 33 percent of operational nitrogen oxides over 10 years; and
- 50 percent of operational PM_{10} over 10 years.

Developers are encouraged to meet these reduction requirements through the implementation of on-site mitigation; however, if the on-site mitigation does not achieve the required baseline emission reductions, the developer will mitigate the difference by paying an off-site fee to the District. Fees reduce emissions by helping to fund clean-air projects in the District.

The proposed Project includes development of a 94-room hotel. Therefore, the Project would be subject to the requirements of Direct Rule 9510. Additionally, the SJVAPCD has established thresholds of significance for criteria pollutant emissions, which are based on District New Source Review (NSR) requirements. Projects with emissions below the thresholds of significance for criteria pollutants would be determined to "not conflict or obstruct implementation of the District's air quality plan." As such, the Project would result in **less than significant** air quality impacts, and would not conflict or obstruct implementation of the District's air quality plan.

However, the Project is still subject to the requirements of SJVAPCD Rule 9510, as described above.

MITIGATION MEASURE(S)

Mitigation Measure 4*: Prior to the issuance of any building permits, the Project applicant shall comply with the requirements of District Rule 9510, which is aimed at the following reductions:*

- *20 percent of construction-exhaust nitrogen oxides;*
- *45 percent of construction-exhaust PM10;*
- *33 percent of operational nitrogen oxides over 10 years; and*
- *50 percent of operational PM10 over 10 years.*

The Project applicant shall coordinate with SJVAPCD to develop measures and strategies to reduce operational emissions from the proposed Project. If feasible measures are not available to meet the emissions reductions targets outlined above, then the Project applicant may be required to pay an in-lieu mitigation fee to the SJVAPCD to off-set Project-related emissions impacts. If in-lieu fees are required, the Project applicant shall coordinate with the SJVAPCD to calculate the amount of the fees required to off-set Project impacts. The Project applicant shall provide verification of compliance to the City prior to the issuance of any building permits.

Response d): Less than Significant. Sensitive receptors are those parts of the population that can be severely impacted by air pollution. Sensitive receptors include children, the elderly, and the infirm. In addition to the existing residences located to the east of the Project site, there is one school located in close proximity to the Project site. Jacobson Elementary School is located approximately 0.27 miles east of the Project site.

Implementation of the proposed Project would not expose these sensitive receptors to substantial pollutant concentrations. Air emissions would be generated during the construction phase of the Project. The construction phase of the Project would be temporary and short-term, and the implementation of Mitigation Measures 2, 3, and 4 would greatly reduce pollution concentrations generated during construction activities.

Operation of the proposed Project would result in emissions primarily from vehicle trips. As described under Response a) – c) above, the proposed Project would not generate significant concentrations of air emissions. Impacts to sensitive receptors would be negligible and this is a **less than significant** impact.

Response e): Less than Significant. Operation of the proposed Project would not generate notable odors. The proposed Project includes development of hotel uses, which is compatible with the surrounding land uses. Occasional mild odors may be generated during landscaping maintenance (equipment exhaust), but the Project would not otherwise generate odors. Trash receptacles would be provided in the northern portion of the site. The receptacles would have lids in order to contain potential odor from trash and waste. This is a **less than significant** impact and no mitigation is required.

IV. BIOLOGICAL RESOURCES -- WOULD THE PROJECT:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				X
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			X	
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		X		
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?		X		

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant with Mitigation. A background search of special-status species within one mile of the Project site that are documented in the California Natural Diversity Database (CNDDB) was completed. Figure 8 illustrates the special-status species records located within one mile of the Project site.

Special-status invertebrates that occur within the San Joaquin County region include: longhorn fairy shrimp, vernal pool fairy shrimp, and midvalley fairy shrimp, which requires vernal pools and swale areas within grasslands; and the valley elderberry longhorn beetle, which is an insect that is only associated with blue elderberry plants, oftentimes in riparian areas and sometimes on land in the vicinity of riparian areas. The Project site does not contain essential habitat for these special status invertebrates. Additionally, no CNDDB records of the aforementioned special-status invertebrates exist within one-mile of the Project site. Implementation of the

proposed Project would have a **less than significant** impact on these species. No mitigation is necessary.

Special-status reptiles and amphibians that occur within the region include: the western pond turtle, which requires aquatic environments located along ponds, marshes, rivers, and ditches; the California tiger salamander, which is found is grassland habitats where there are nearby seasonal wetlands for breeding; the silvery legless lizard, which is found in sandy or loose loamy soils under sparse vegetation with high moisture content; San Joaquin whipsnake, which requires open, dry habitats with little or no tree cover with mammal burrows for refuge; the Alameda whipsnake, which is restricted to valley-foothill hardwood habitat on south-facing slopes; the California horned lizard, which occurs in a variety of habitats including, woodland, forest, riparian, and annual grasslands, usually in open sandy areas; the foothill yellow-legged frog, which occurs in partly shaded and shallow streams with rocky soils; the California red legged frog, which occurs in stream pools and ponds with riparian or emergent marsh vegetation; and the western spadefoot toad, which requires grassland habitats associated with vernal pools.

No CNDDB records of the aforementioned special-status reptiles or amphibians exist within one-mile of the Project site. The Project site does not contain essential habitat for these special status reptiles and amphibians. Implementation of the proposed Project would have a **less than significant** impact on these species. No mitigation is necessary.

Numerous special-status plant species are known to occur in the region. Many of these special status plant species require specialized habitats such as serpentine soils, rocky outcrops, slopes, vernal pools, marshes, swamps, riparian habitat, alkali soils, and chaparral, which are not present on the Project site. The Project site is located in an area that was likely valley grassland prior to human settlement, and there are several plant species that are found in valley and foothills grasslands areas. These species include large-flowered fiddleneck, bent-flowered fiddleneck, big balsamroot, big tarplant, round-leaved filaree, Lemmon's jewelflower, and showy golden madia. Human settlement has involved a high frequency of ground disturbance associated with the historical farming activities in the region, including the Project site.

CNDDB records of two special-status plant species exist within one mile of the Project site: big tarplant and caper-fruited tropidocarpum. The Project site does not contain suitable habitat for special-status plant species, and these species are not expected to be present on the site due to ongoing site disturbance. Implementation of the proposed Project would have a **less than significant** impact on these species. No mitigation is necessary.

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

Swainson's Hawk. The Swainson's hawk is threatened in California and is protected by the California Department of Fish and Wildlife (CDFW) and the Migratory Bird Treaty Act (MBTA).

Additionally, Swainson's hawk foraging habitat is protected by the CDFW. Swainson's hawks forage in open grasslands and agricultural fields and commonly nest in solitary trees and riparian areas in close proximity to foraging habitat. The foraging range for Swainson's hawk is ten miles from its nesting location. There is one documented occurrence of Swainson's hawk within one mile of the Project site, although no nesting habitat for this species occurs onsite. The site and the surrounding open grassland habitat will provide low to medium quality foraging opportunities for local Swainson's hawks. SJCOG administers the San Joaquin County Multi- Species Open Space and Conservation Plan (SJMSCP) for the region. The proposed Project would require coverage under the SJMSCP. SJCOG would apply incidental take minimization measures for the Project. As such, impacts to Swainson's hawk are **less than significant** with mitigation.

Burrowing Owls. Burrowing owls are a California Species of Special Concern and are protected by the CDFW and the MBTA. Burrowing owls forage in open grasslands and shrublands and typically nest in old ground squirrel burrows. There are numerous documented occurrences of burrowing owls within one mile of the Project site. The nearest documented occurrence of burrowing owl is located approximately 0.28 miles north of the Project site. The Project site contains suitable, but not high quality habitat for burrowing owls. The Project site is near to other lands that are currently undeveloped that offer foraging and roosting habitat for wintering or breeding owls. However, there is the potential for burrowing owls to occupy the site. While considered unlikely, this is considered potentially significant impact. The proposed Project would require coverage under the SJMSCP and SJCOG would apply incidental take minimization measures for the Project. In addition, implementation of Mitigation Measure 5 would ensure that burrowing owls are not impacted during construction activities. Implementation of Mitigation Measure 5 would ensure a **less than significant** impact to burrowing owls.

Tricolored Blackbird. Tricolored blackbirds are a California Species of Special Concern and are protected by the CDFW and the MBTA. Tricolored blackbirds nest in dense colonies in emergent marsh vegetation, such as tules and cattails, or upland sites with blackberries, nettles, thistles, and grainfields. Tricolored blackbird habitat must be large enough to support 50 pairs and likely requires water at or near the nesting colony. The Project site does not contain suitable habitat for tricolored blackbirds. As such, impacts to tricolored blackbirds are **less than significant**.

Participation in the SJMSCP is recommended for all new projects on previously undeveloped land in Tracy. Although the likelihood for the occurrence of any special status plant or wildlife species on the site is extremely low, the implementation of Mitigation Measure 6 would ensure that special status plant or wildlife species are protected throughout the region. Impacts to special status plant or wildlife species would be reduced to a **less than significant** level with mitigation.

MITIGATION MEASURE(S)

Mitigation Measure 5*: Prior to the commencement of grading activities or other ground disturbing activities on the Project site, the Project applicant shall arrange for a qualified biologist to conduct a preconstruction survey for western burrowing owls in accordance with SJMSCP requirements. If no owls or owl nests are detected, then construction activities*

may commence. If burrowing owls or occupied nests are discovered, then the following shall be implemented:

- *During the breeding season (February 1 through September 1) occupied burrows shall not be disturbed and shall be provided with a 75 meter protective buffer until and unless the SJCOG Technical Advisory Committee (TAC), with the concurrence of the Permitting Agencies' representatives on the TAC; or unless a qualified biologist approved by the Permitting Agencies verifies through non-invasive means that either: 1) the birds have not begun egg laying, or 2) juveniles from the occupied burrows are foraging independently and are capable of independent survival. Once the fledglings are capable of independent survival, the burrow can be destroyed. They should only be destroyed by a qualified biologist using passive one-way eviction doors to ensure that owls are not harmed during burrow destruction. Methods for removal of burrows are described in the California Department of Fish and Game's Staff Report on Burrowing Owls (October, 1995).*
- *During the non-breeding season (September 1 through January 31) burrowing owls occupying the Project site should be evicted from the Project site by passive relocation as described in the California Department of Fish and Game's Staff Report on Burrowing Owls (Oct., 1995)*

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

***Mitigation Measure 6**: Prior to commencement of any grading activities, the Project proponent shall seek coverage under the SJMSCP to mitigate for habitat impacts to covered special status species. Coverage involves compensation for habitat impacts on covered species through payment of development fees for conversion of open space lands that may provide habitat for covered special status species. These fees are used to preserve and/or create habitat in preserves to be managed in perpetuity. In addition, coverage includes incidental take avoidance and minimization measures for species that could be affected as a result of the proposed Project. There are a wide variety of incidental take avoidance and minimization measures contained in the SJMSCP that were developed in consultation with the USFWS, CDFW, and local agencies. The applicability of incidental takes avoidance and minimization measures are determined by SJCOG on a Project basis. The process of obtaining coverage for a Project includes incidental take authorization (permits) under the Endangered Species Act Section 10(a) and California Fish and Game Code Section 2081. The Section 10(a) permit also serves as a special-purpose permit for the incidental take of those species that are also protected under the MBTA. Coverage under the SJMSCP would fully mitigate all habitat impacts on covered special-status species. The SJMSCP includes the implementation of an ongoing Monitoring Plan to ensure success in mitigating the habitat impacts that are covered. The SJMSCP Monitoring Plan includes an Annual Report process, Biological Monitoring Plan, SJMSCP Compliance Monitoring Program, and the SJMSCP Adaptive Management Plan SJCOG.*

Responses b): No Impact. Riparian natural communities support woody vegetation found along rivers, creeks and streams. Riparian habitat can range from a dense thicket of shrubs to a closed canopy of large mature trees covered by vines. Riparian systems are considered one of the most important natural resources. While small in total area when compared to the state's size, they provide a special value for wildlife habitat.

Over 135 California bird species either completely depend upon riparian habitats or use them preferentially at some stage of their life history. Riparian habitat provides food, nesting habitat, cover, and migration corridors. Another 90 species of mammals, reptiles, invertebrates and amphibians depend on riparian habitat. Riparian habitat also provides riverbank protection, erosion control and improved water quality, as well as numerous recreational and aesthetic values.

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

Response c): Less than Significant. A wetland is an area that is inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.

Wetlands are defined by regulatory agencies as having special vegetation, soil, and hydrology characteristics. Hydrology, or water inundation, is a catalyst for the formation of wetlands. Frequent inundation and low oxygen causes chemical changes to the soil properties resulting in what is known as hydric soils. The prevalent vegetation in wetland communities consists of hydrophytic plants, which are adapted to areas that are frequently inundated with water. Hydrophytic plant species have the ability to grow, effectively compete, reproduce, and persist in low oxygen soil conditions.

Below is a list of wetlands that are found in the Tracy planning area:

- Farmed Wetlands: This category of wetlands includes areas that are currently in agricultural uses. This type of area occurs in the northern portion of the Tracy Planning Area.
- Lakes, Ponds and Open Water: This category of wetlands includes both natural and human-made water bodies such as that associated with working landscapes, municipal water facilities and canals, creeks and rivers.
- Seasonal Wetlands: This category of wetlands includes areas that typically fill with water during the wet winter months and then drain enough to become ideal plant habitats throughout the spring and summer. There are numerous seasonal wetlands throughout the Tracy Planning Area.

- Tidal Salt Ponds and Brackish Marsh: This category of wetlands includes areas affected by irregular tidal flooding with generally poor drainage and standing water. There are minimal occurrences along some of the larger river channels in the northern portion of the Tracy Planning Area.

There are no wetlands located on the Project site. Therefore, this is a **less than significant** impact and no mitigation is required.

Response d): Less than Significant. The CNDDB record search did not reveal any documented wildlife corridors or nursery sites on or adjacent to the Project site. Furthermore, field surveys did not reveal any wildlife nursery sites on or adjacent to the Project site. Implementation of the proposed Project would have a **less than significant** impact. No mitigation is necessary.

Responses e), f): Less than Significant with Mitigation. The Project site is located within the jurisdiction of the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan ("Plan" or "SJMSCP") and is located within the Central/Southwest Transition Zone of the SJMSCP. The San Joaquin Council of Governments (SJCOG) prepared the Plan pursuant to a Memorandum of Understanding adopted by SJCOG, San Joaquin County, the United States Fish and Wildlife Service (USFWS), the CDFW, Caltrans, and the cities of Escalon, Lathrop, Lodi, Manteca, Ripon, Stockton, and Tracy in October 1994. On February 27, 2001, the Plan was unanimously adopted in its entirety by SJCOG. The City of Tracy adopted the Plan on November 6, 2001.

According to Chapter 1 of the SJMSCP, its key purpose is to "provide a strategy for balancing the need to conserve open space and the need to convert open space to non-open space uses, while protecting the region's agricultural economy; preserving landowner property rights; providing for the long-term management of plant, fish and wildlife species, especially those that are currently listed, or may be listed in the future, under the Federal Endangered Species Act (ESA) or the California Endangered Species Act (CESA); providing and maintaining multiple use Open Spaces which contribute to the quality of life of the residents of San Joaquin County; and, accommodating a growing population while minimizing costs to project proponents and society at large."

In addition, the goals and principles of the SJMSCP include the following:

- Provide a County-wide strategy for balancing the need to conserve open space and the need to convert open space to non-open space uses, while protecting the region's agricultural economy.
- Preserve landowner property rights.
- Provide for the long-term management of plant, fish, and wildlife species, especially those that are currently listed, or may be listed in the future, under the ESA or the CESA.
- Provide and maintain multiple-use open spaces, which contribute to the quality of life of the residents of San Joaquin County.

- Accommodate a growing population while minimizing costs to project proponents and society at large.

In addition to providing compensation for conversion of open space to non-open space uses, which affect plant and animal species covered by the SJMSCP, the SJMSCP also provides some compensation to offset impacts of open space conversions on non-wildlife related resources such as recreation, agriculture, scenic values and other beneficial open space uses. Specifically, the SJMSCP compensates for conversions of open space to urban development and the expansion of existing urban boundaries, among other activities, for public and private activities throughout the County and within Escalon, Lathrop, Lodi, Manteca, Ripon, Stockton, and Tracy.

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

Responsibilities of permittees covered by the SJMSCP include collection of fees, maintenance of implementing ordinances/resolutions, conditioning permits (if applicable), and coordinating with the Joint Powers Authority (JPA) for Annual Report accounting. Funds collected for the SJMSCP are to be used for the following: acquiring Preserve lands, enhancing Preserve lands, monitoring and management of Preserve lands in perpetuity, and the administration of the SJMSCP. Because the primary goal of SJMSCP to preserve productive agricultural use that is compatible with SJMSCP's biological goals, most of the SJMSCP's Preserve lands would be acquired through the purchase of easements in which landowners retain ownership of the land and continue to farm the land. These functions are managed by San Joaquin Council of Governments.

As described under Response (a) the proposed Project is subject to participation in the SJMSCP by Mitigation Measure 6. The City of Tracy and the Project applicant shall consult with SJCOG and determine coverage of the Project pursuant to the SJMSCP. Implementation of Mitigation Measure 6 would ensure that the Project complies with the requirements of the SJMSCP, and would not conflict with any applicable habitat conservation plans. With the implementation of Mitigation Measure 6, the Project would have a **less than significant** impact.

MITIGATION MEASURE(S)

Implement Mitigation Measure 6

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Figure 8. California Natural Diversity Database

1-mile Radius Search

Sources: California Natural Diversity Database, November 1, 2016; San Joaquin County GIS; ArcGIS Online Topographic Map Service. Map date: November 28, 2017.

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V. CULTURAL RESOURCES -- WOULD THE PROJECT:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Cause a substantial adverse change in the significance of a historical resource as defined in '15064.5?		X		
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?		X		
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		
d) Disturb any human remains, including those interred outside of formal cemeteries?		X		

RESPONSES TO CHECKLIST QUESTIONS

Response a), b), c), d): Less than Significant with Mitigation. The City of Tracy General Plan and subsequent EIR does not identify the site as having prehistoric period cultural resources. Additionally, there are no known unique cultural, historical, paleontological or archeological resources known to occur on, or within the immediate vicinity of the Project site. Furthermore, the site is not designated as a historical resource as defined by Public Resources Code § 21084.1, or listed in, or eligible for listing in the California Register of Historical Resources.

The site has previously been used for agricultural uses. No instances of cultural resources or human remains have been unearthed on the Project site, and site visits did not identify any historical, cultural, paleontological, or archeological resources present on site. Therefore, it is not anticipated that site grading and preparation activities would result in impacts to cultural, historical, archaeological or paleontological resources. There are no known human remains located on the Project site, nor is there evidence to suggest that human remains may be present on the Project site. However, as with most projects in California that involve ground-disturbing activities, there is the potential for discovery of a previously-unknown cultural or historical resource or human remains. This is considered a **potentially significant** impact.

The implementation of the following mitigation measure would require appropriate steps to preserve and/or document any previously undiscovered resources that may be encountered during construction activities, including human remains. Implementation of this measure would reduce this impact to a **less than significant** level.

MITIGATION MEASURE(S)

Mitigation Measure 7*: If any prehistoric or historic artifacts, human remains or other indications of archaeological or paleontological resources are found during grading and construction activities, an archaeologist meeting the Secretary of the Interior's Professional*

Qualifications Standards in prehistoric or historical archaeology, as appropriate, shall be consulted to evaluate the finds and recommend appropriate mitigation measures.

- *If cultural resources or Native American resources are identified, every effort shall be made to avoid significant cultural resources, with preservation an important goal. If significant sites cannot feasibly be avoided, appropriate mitigation measures, such as data recovery excavations or photographic documentation of buildings, shall be undertaken consistent with applicable state and federal regulations.*

- *If human remains are discovered, all work shall be halted immediately within 50 meters (165 feet) of the discovery, the County Coroner must be notified, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California's Health and Safety Code. If the remains are determined to be Native American, the coroner will notify the Native American Heritage Commission, and the procedures outlined in CEQA Section 15064.5(d) and (e) shall be followed.*

- *If any fossils are encountered, there shall be no further disturbance of the area surrounding this find until the materials have been evaluated by a qualified paleontologist, and appropriate treatment measures have been identified.*

VI. GEOLOGY AND SOILS -- WOULD THE PROJECT:

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*No Impact*
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?		X		
iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?		X		
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?		X		
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?		X		
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X

RESPONSES TO CHECKLIST QUESTIONS

Responses a.i), a.ii): Less than Significant. The Project site is located in an area of low to moderate seismicity. No known active faults cross the Project site, and the site is not located within an Alquist-Priolo Earthquake Fault Zone; however, relatively large earthquakes have historically occurred in the Bay Area and along the margins of the Central Valley. Many earthquakes of low magnitude occur every year in California. The nearest earthquake fault zoned as active by the State of California Geological Survey is the Greenville fault, located approximately 11 miles southwest of the site. Figure 9 shows nearby faults in relation to the Project site.

The Tracy area has a low-to-moderate seismic history. The largest recorded measurable magnitude earthquake in Tracy measured 3.9 on the Richter scale. The greatest potential for significant ground shaking in Tracy is believed to be from maximum credible earthquakes

occurring on the Calaveras, Hayward, San Andreas, or Greenville faults. Further seismic activity can be expected to continue along the western margin of the Central Valley, and as with all projects in the area, the Project will be designed to accommodate strong earthquake ground shaking, in compliance with the applicable California building code standards.

Other faults capable of producing ground shaking at the site include the San Joaquin fault, 6.7 miles southwest; the Midway fault, 6.9 miles southwest; and the Corral Hollow-Carnegie fault, 10.7 miles southwest of the site. Any one of these faults could generate an earthquake capable of causing strong ground shaking at the subject site. Earthquakes of Moment Magnitude (Mw) 7 and larger have historically occurred in the region and numerous small magnitude earthquakes occur every year.

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

An earthquake of moderate to high magnitude generated within the San Francisco Bay Region and along the margins of the central valley could cause considerable ground shaking at the site, similar to that which has occurred in the past. In order to minimize potential damage to the proposed structures caused by groundshaking, all construction would comply with the latest California Building Code standards, as required by the City of Tracy Municipal Code 9.04.030.

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

Implementation of the California Building Code standards, which include provisions for seismic building designs, would ensure that impacts associated with groundshaking would be **less than significant**. Building new structures for human use would increase the number of people exposed to local and regional seismic hazards. Seismic hazards are a significant risk for most property in California.

The Safety Element of the Tracy General Plan includes several goals, objectives and policies to reduce the risks to the community from earthquakes and other geologic hazards. In particular, the following policies would apply to the Project site:

> **SA-1.1, Policy P1:** Underground utilities, particularly water and natural gas mains, shall be designed to withstand seismic forces.
>
> **SA-1.1, Policy P2:** Geotechnical reports shall be required for development in areas where potentially serious geologic risks exist. These reports should address the degree of

hazard, design parameters for the project based on the hazard, and appropriate mitigation measures.

SA-1.2, Policy P1: All construction in Tracy shall conform to the California Building Code and the Tracy Municipal Code including provisions addressing unreinforced masonry buildings.

The City reviews all proposed development projects for consistency with the General Plan policies and California Building Code provisions identified above. This review occurs throughout the project application review and processing stage, and throughout plan check and building inspection phases prior to the issuance of a certificate of occupancy.

Consistency with the requirements of the California Building Code and the Tracy General Plan policies identified above would ensure that impacts on humans associated with seismic hazards would be **less than significant**. No additional mitigation is required.

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

Expansive soils are those that undergo volume changes as moisture content fluctuates; swelling substantially when wet or shrinking when dry. Soil expansion can damage structures by cracking foundations, causing settlement and distorting structural elements. Expansion is a typical characteristic of clay-type soils. Expansive soils shrink and swell in volume during changes in moisture content, such as a result of seasonal rain events, and can cause damage to foundations, concrete slabs, roadway improvements, and pavement sections.

Soil expansion is dependent on many factors. The more clayey, critically expansive surface soil and fill materials will be subjected to volume changes during seasonal fluctuations in moisture content. Figure 10 shows the soils within the Project site, and Figure 11 shows the shrink-swell potential of the soils within the site. The soils encountered at the site consist of capay clay, zero to two percent slopes. The capay series consists of very deep, moderately well drained, and firm to very firm soils. Therefore, the potential for liquefaction to occur at the Project site is considered low. However, as shown in Figure 11, the capay clay has a relatively high moisture content, posing a potentially high risk of soil expansion. Implementation of the mitigation measure below would bring this impact to **less than significant**.

MITIGATION MEASURE(S)

Mitigation Measure 8*: Prior to the development of the Project site, a subsurface geotechnical investigation must be performed to identify onsite soil conditions and identify any site-specific engineering measures to be implemented during the construction of building foundations and subsurface utilities. The results of the subsurface geotechnical investigation shall be reflected on the Improvements Plans, subject to review and approval by the City's Building Safety and Fire Prevention Division.*

Mitigation Measure 9*: Expansive materials and potentially weak and compressible fills at the site shall be evaluated by a Geotechnical Engineer during the grading plan stage of development. If highly expansive or compressible materials are encountered, special foundation designs and reinforcement, removal and replacement with soil with low to non-expansive characteristics, compaction strategies, or soil treatment options to lower the expansion potential shall be incorporated through requirements imposed by the City's Development Services Department.*

Responses a.iv): Less than Significant. The Project site is relatively flat and there are no major slopes in the vicinity of the Project site. According to the City's General Plan EIR, the landslide risk in Tracy is low in most areas. In the wider Tracy Planning Area, some limited potential for risk exists for grading and construction activities in the foothills and mountain terrain of the upland areas in the southwest. The potential for small scale slope failures along river banks also exists. The Project site is not located in the foothills, mountain terrain, or along a river bank. Additionally, the Project site is essentially flat. As such, the Project site is exposed to little or no risk associated with landslides. This is a **less than significant** impact and no mitigation is required.

Response b): Less than Significant with Mitigation. During the construction preparation process, existing vegetation would be removed to grade and compact the Project site, as necessary. As construction occurs, these exposed surfaces could be susceptible to erosion from wind and water. Effects from erosion include impacts on water quality and air quality. Exposed soils that are not properly contained or capped increase the potential for increased airborne dust and increased discharge of sediment and other pollutants into nearby stormwater drainage facilities. Risks associated with erosive surface soils can be reduced by using appropriate controls during construction and properly re-vegetating exposed areas. Mitigation Measures 2 and 3 (air quality) require the implementation of various dust control measures during site preparation and construction activities that would reduce the potential for soil erosion and the loss of topsoil. Additionally, Mitigation Measure 13 would require the implementation of various best management practices (BMPs) and a SWPPP that would reduce the potential for disturbed soils and ground surfaces to result in erosion and sediment discharge into adjacent surface waters during construction activities. The implementation of these required mitigation measures would reduce these impacts to a **less than significant** level and no additional mitigation is required.

MITIGATION MEASURE(S)

Implement Mitigation Measures 2, 3 and 13

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

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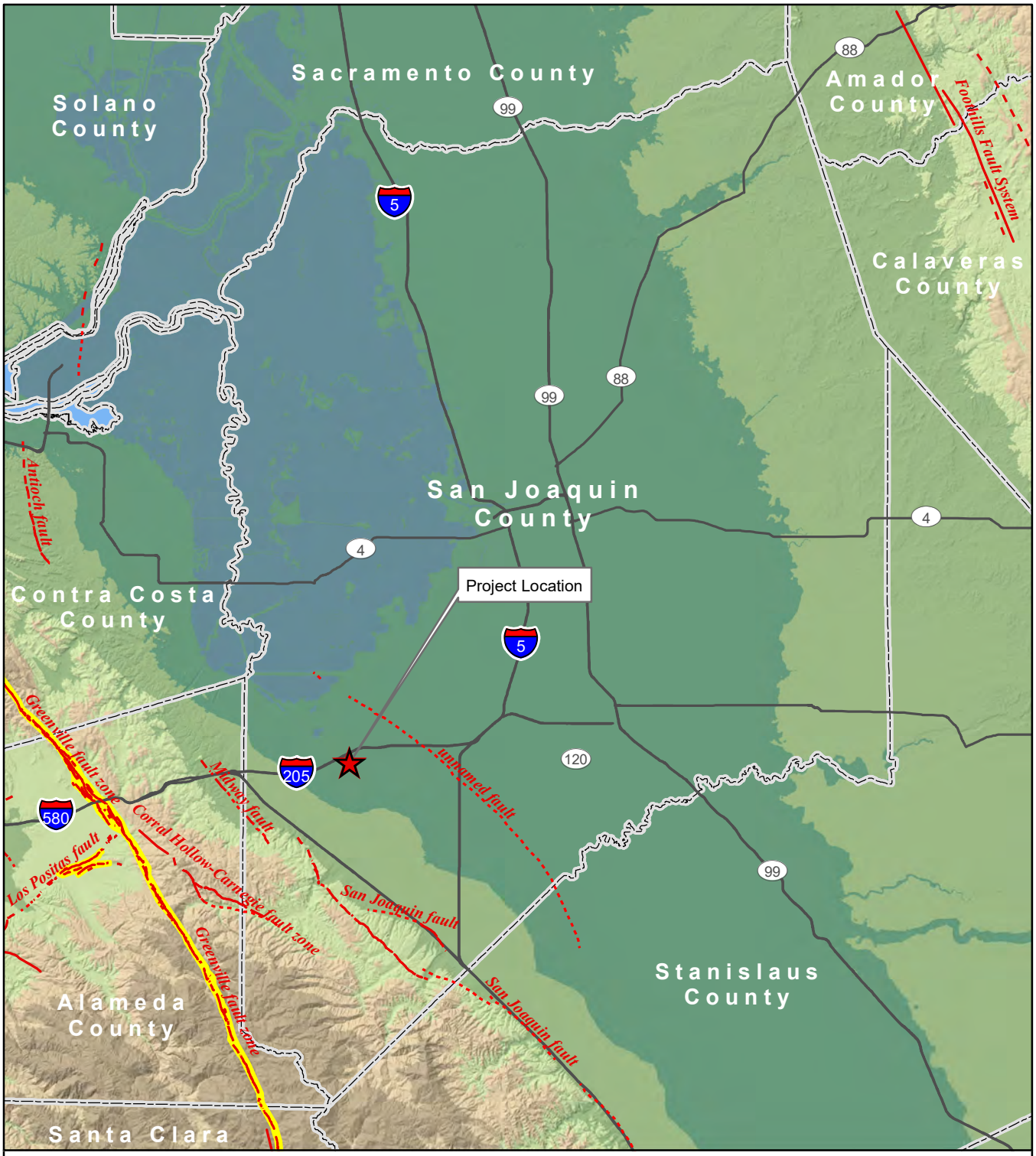

HOME 2SUITES BY HILTON PROJECT
IS/MND

Quaternary Faults

- Well-constrained
- Moderately-constrained
- Inferred
- Alquist-Priolo Fault Zones

N

0 2.5 5

Miles

1:500,000

Figure 9. Earthquake Fault Map

Data sources: US Geologic Survey; San Joaquin County GIS; ESRI Streetmap North America. Map date: November 21, 2016.

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HOME2SUITES BY HILTON PROJECT
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Figure 10. Project Site Soils

Legend

Project Boundary (2.56 ac)

NRCS Soil Survey Description

Capay clay, 0-2% slopes (2.56 ac)

N

0 75 150

Feet

1:3,000

Sources: NRCS Web Soil Survey, San Joaquin County, California (CA077); San Joaquin County GIS; ArcGIS Online World Imagery Service. Map date: November 22, 2017.

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Legend

Project Boundary

Shrink-Swell Potential*

High

*Shrink-Swell Potential is determined by linear extensibility. Linear extensibility refers to the change in length of an unconfined clod as moisture content is decreased from a moist to a dry state. Soils are considered to have low potential when the linear extensibility is less than 3%, moderate if 3-6%, and high if 6-9%.

Sources: NRCS Web Soil Survey, San Joaquin County, California (CA077); San Joaquin County GIS; ArcGIS Online World Imagery Service. Map date: November 22, 2017.

N

0 75 150

Feet

1:3,000

HOME2SUITES BY HILTON PROJECT
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Figure 11. Shrink-Swell Potential

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XII. GREENHOUSE GAS EMISSIONS -- WOULD THE PROJECT:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?		X		
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?		X		

BACKGROUND

Various gases in the Earth's atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the Earth's surface temperature. Solar radiation enters Earth's atmosphere from space, and a portion of the radiation is absorbed by the Earth's surface. The Earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation.

Naturally occurring greenhouse gases include water vapor (H_2O), carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and ozone (O_3). Several classes of halogenated substances that contain fluorine, chlorine, or bromine are also greenhouse gases, but they are, for the most part, solely a product of industrial activities. Although the direct greenhouse gases CO_2, CH_4, and N_2O occur naturally in the atmosphere, human activities have changed their atmospheric concentrations. From the pre-industrial era (i.e., ending about 1750) to 2005, concentrations of these three greenhouse gases have increased globally by 36, 148, and 18 percent, respectively (IPCC 2007)[2].

Greenhouse gases, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, this radiation that otherwise would have escaped back into space is now retained, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect. Among the prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), ozone (O_3), water vapor, nitrous oxide (N_2O), and chlorofluorocarbons (CFCs).

Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors (California Energy Commission 2006a)[3]. In California, the transportation sector is the largest emitter of GHGs, followed by electricity generation (California Energy Commission 2006a).

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[2] Intergovernmental Panel on Climate Change. 2007. "Climate Change 2007: The Physical Science Basis, Summary for Policymakers." Available at: http://www.ipcc.ch/publications_and_data/publications_ipcc_fourth_assessment_report_wg1_report_the_physical_science_basis.htm.

[3] California Energy Commission. 2006a. Inventory of California Greenhouse Gas Emissions and Sinks 1990 to 2004. Available at: http://www.arb.ca.gov/cc/inventory/archive/archive.htm.

As the name implies, global climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern, respectively. California produced 492 million gross metric tons of carbon dioxide equivalents ($MMTCO_2e$) in 2004 (California Energy Commission 2006a). By 2020, California is projected to produce 507 $MMTCO_2e$ per year.[4]

Carbon dioxide equivalents are a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the global warming potential of a GHG, is also dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO_2 were being emitted.

Consumption of fossil fuels in the transportation sector was the single largest source of California's GHG emissions. In 2012 transportation sector emissions, accounted for approximately 37 percent of the total GHG emissions in the state (California Greenhouse Gas Emission Inventory: 2000-2012).[5] This category was followed by the industrial sector contributing 21.9 percent of GHG emissions. The electric power generation sector (including both in-state and out of-state sources) has seen the greatest decline in GHG emissions down 14 percent from 2000, and currently contributing 11.2 percent of all state GHG emissions.

EFFECTS OF GLOBAL CLIMATE CHANGE

The effects of increasing global temperature are far-reaching and extremely difficult to quantify. The scientific community continues to study the effects of global climate change. In general, increases in the ambient global temperature as a result of increased GHGs are anticipated to result in rising sea levels, which could threaten coastal areas through accelerated coastal erosion, threats to levees and inland water systems and disruption to coastal wetlands and habitat.

If the temperature of the ocean warms, it is anticipated that the winter snow season would be shortened. Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), which is a major source of supply for the state. The snowpack portion of the supply could potentially decline by 70 to 90 percent by the end of the 21st century (Cal EPA 2006).[6] This phenomenon could lead to significant challenges securing an adequate water supply for a growing state population. Further, the increased ocean temperature could result in increased moisture flux into the state; however, since this would likely increasingly come in the form of rain rather than snow in the high elevations, increased

[4] California Air Resources Board. 2010. "Functional Equivalent Document prepared for the California Cap on GHG Emissions and Market-Based Compliance Mechanisms."

[5] EPA. Available at: http://www.arb.ca.gov/cc/inventory/pubs/reports/ghg_inventory_00-12_report.pdf.

[6] California Environmental Protection Agency, Climate Action Team. 2006. Climate Action Team Report to Governor Schwarzenegger and the Legislature. Available at: http://www.climatechange.ca.gov/climate_action_team/reports/.

precipitation could lead to increased potential and severity of flood events, placing more pressure on California's levee/flood control system.

Sea level has risen approximately seven inches during the last century and it is predicted to rise an additional 22 to 35 inches by 2100, depending on the future GHG emissions levels (Cal EPA 2006). If this occurs, resultant effects could include increased coastal flooding, saltwater intrusion and disruption of wetlands (Cal EPA 2006). As the existing climate throughout California changes over time, mass migration of species, or failure of species to migrate in time to adapt to the perturbations in climate, could also result. Under the emissions scenarios of the Climate Scenarios report (Cal EPA 2006), the impacts of global warming in California are anticipated to include, but are not limited to, the following.

Public Health

Higher temperatures are expected to increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to ozone formation are projected to increase from 25 to 35 percent under the lower warming range and to 75 to 85 percent under the medium warming range. In addition, if global background ozone levels increase as predicted in some scenarios, it may become impossible to meet local air quality standards. Air quality could be further compromised by increases in wildfires, which emit fine particulate matter that can travel long distances depending on wind conditions. The Climate Scenarios report indicates that large wildfires could become up to 55 percent more frequent if GHG emissions are not significantly reduced.

In addition, under the higher warming scenario, there could be up to 100 more days per year with temperatures above 90°F in Los Angeles and 95°F in Sacramento by 2100. This is a large increase over historical patterns and approximately twice the increase projected if temperatures remain within or below the lower warming range. Rising temperatures will increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress caused by extreme heat.

Water Resources

A vast network of man-made reservoirs and aqueducts capture and transport water throughout the State from Northern California rivers and the Colorado River. The current distribution system relies on Sierra Nevada snow pack to supply water during the dry spring and summer months. Rising temperatures, potentially compounded by decreases in precipitation, could severely reduce spring snow pack, increasing the risk of summer water shortages.

The state's water supplies are also at risk from rising sea levels. An influx of saltwater would degrade California's estuaries, wetlands, and groundwater aquifers. Saltwater intrusion caused by rising sea levels is a major threat to the quality and reliability of water within the southern edge of the Sacramento/San Joaquin River Delta, a major state fresh water supply. Global warming is also projected to seriously affect agricultural areas, with California farmers projected to lose as much as 25 percent of the water supply they need; decrease the potential for hydropower production within the state (although the effects on hydropower are uncertain); and seriously harm winter tourism. Under the lower warming range, the snow dependent winter

recreational season at lower elevations could be reduced by as much as one month. If temperatures reach the higher warming range and precipitation declines, there might be many years with insufficient snow for skiing, snowboarding, and other snow dependent recreational activities.

If GHG emissions continue unabated, more precipitation will fall as rain instead of snow, and the snow that does fall will melt earlier, reducing the Sierra Nevada spring snow pack by as much as 70 to 90 percent. Under the lower warming scenario, snow pack losses are expected to be only half as large as those expected if temperatures were to rise to the higher warming range. How much snow pack will be lost depends in part on future precipitation patterns, the projections for which remain uncertain. However, even under the wetter climate projections, the loss of snow pack would pose challenges to water managers, hamper hydropower generation, and nearly eliminate all skiing and other snow-related recreational activities.

Agriculture

Increased GHG emissions are expected to cause widespread changes to the agriculture industry reducing the quantity and quality of agricultural products statewide. Although higher carbon dioxide levels can stimulate plant production and increase plant water-use efficiency, California's farmers will face greater water demand for crops and a less reliable water supply as temperatures rise.

Plant growth tends to be slow at low temperatures, increasing with rising temperatures up to a threshold. However, faster growth can result in less-than-optimal development for many crops, so rising temperatures are likely to worsen the quantity and quality of yield for a number of California's agricultural products. Products likely to be most affected include wine grapes, fruits and nuts, and milk.

Crop growth and development will be affected, as will the intensity and frequency of pest and disease outbreaks. Rising temperatures will likely aggravate ozone pollution, which makes plants more susceptible to disease and pests and interferes with plant growth.

In addition, continued global warming will likely shift the ranges of existing invasive plants and weeds and alter competition patterns with native plants. Range expansion is expected in many species while range contractions are less likely in rapidly evolving species with significant populations already established. Should range contractions occur, it is likely that new or different weed species will fill the emerging gaps. Continued global warming is also likely to alter the abundance and types of many pests, lengthen pests' breeding season, and increase pathogen growth rates.

Forests and Landscapes

Global warming is expected to alter the distribution and character of natural vegetation thereby resulting in a possible increased risk of large of wildfires. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55 percent, which is almost twice the increase expected if temperatures stay in the lower warming range. However, since wildfire risk is determined by a combination of factors, including precipitation,

winds, temperature, and landscape and vegetation conditions, future risks will not be uniform throughout the state. For example, if precipitation increases as temperatures rise, wildfires in Southern California are expected to increase by approximately 30 percent toward the end of the century. In contrast, precipitation decreases could increase wildfires in Northern California by up to 90 percent.

Moreover, continued global warming will alter natural ecosystems and biological diversity within the state. For example, alpine and sub-alpine ecosystems are expected to decline by as much as 60 to 80 percent by the end of the century as a result of increasing temperatures. The productivity of the state's forests is also expected to decrease as a result of global warming.

Rising Sea Levels

Rising sea levels, more intense coastal storms, and warmer water temperatures will increasingly threaten the state's coastal regions. Under the higher warming scenario, sea level is anticipated to rise 22 to 35 inches by 2100. Elevations of this magnitude would inundate coastal areas with saltwater, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats.

Significance Thresholds

Governor's Office of Planning and Research's (OPR's) Guidance does not include a quantitative threshold of significance to use for assessing a project's GHG emissions under CEQA. Moreover, the California Air Resources Board (CARB) has not established such a threshold or recommended a method for setting a threshold for project-level analysis. In the absence of a consistent statewide threshold, a threshold of significance for analyzing the Project's GHG emissions was developed. The issue of setting a GHG threshold is complex and dynamic, especially in light of the California Supreme Court decision in *Center for Biological Diversity v. California Department of Fish and Wildlife* (referred to as the Newhall Ranch decision hereafter). The California Supreme Court ruling also highlighted the need for the threshold to be tailored to the specific project type, its location, and the surrounding setting. Therefore, the threshold used to analyze the Project is specific to the analysis herein and the City retains the ability to develop and/or use different thresholds of significance for other projects in its capacity as lead agency and recognizing the need for the individual threshold to be tailored and specific to individual projects.

The SJVAPCD provides a tiered approach in assessing significance of project specific GHG emission increases. Projects implementing Best Performance Standards (BPS) would be determined to have a less than cumulatively significant impact. Otherwise, demonstration of a 29 percent reduction in GHG emissions, from business-as-usual (BAU), is required to determine that a project would have a less than cumulatively significant impact. The BAU approach was developed consistent with the GHG emission reduction targets established in the Scoping Plan. However, the BAU portion of the tiered approach is problematic based on the Newhall Ranch decision.

It is recommended that mass emission thresholds of significance developed by Sacramento Metropolitan Air Quality Management District (SMAQMD) and the Bay Area Air Quality Management District (BAAQMD) be used for evaluating construction- and operation-related GHG

emissions. These thresholds are available in the SMAQMD CEQA Guide, last updated in February 2016 (SMAQMD 2016), and the 2010 BAAQMD CEQA Air Quality Guidelines, respectively.

The SMAQMD recommends a two-tiered approach for assessing a project's operational emissions. The two-tier framework is recommended by all air districts in the Sacramento region and is retained in this analysis. The second tier is replaced with a more appropriate threshold based on issues raised in the Newhall Ranch decision.

The first tier consists of comparing a project's annual operational emissions to SMAQMD's recommended mass emission threshold. The first tier gives lead agencies the ability to assess smaller projects and conclude that each development proposal would not necessarily make a considerable contribution to the cumulative impact of climate change.

The second tier consists of evaluating a project's consistency with California's GHG reduction targets. In light of the Newhall Ranch decision, efficiency metrics were developed to assess the Project's consistency with California's adopted GHG reduction target for 2020 under AB 32. Based on the discussion above, the following thresholds are applied to this analysis:

- For the evaluation of construction-related emissions, if the mass emissions associated with construction of the Project would exceed of 1,100 metric tons of carbon dioxide-equivalent per year ($MTCO_2e$/year) then they would be cumulatively considerable.
- For the evaluation of operational emissions, a two-tiered approach is used:
    - (Tier I) Operational emissions of a Project would not have a significant impact on the environment if they are less than 1,100 $MTCO_2e$/year, and
    - (Tier II) Projects that would become fully operational on or before 2020 with operational emissions that exceed 1,100 $MTCO_2e$/year, but are able to demonstrate consistency with a GHG efficiency metric of 4.9 metric tons of carbon dioxide equivalents per service population per year($MTCO_2e$/SP/year) by 2020, would not conflict with AB 32 and California's envisioned post-2020 GHG reduction goals.

For the evaluation of this Project in relation to the SMAQMD approach for assessing a project's operational emissions, an impact would be significant if both Tier I and Tier II thresholds are exceeded.

On June 2, 2010, the BAAQMD adopted new CEQA significance thresholds including the thresholds for GHGs of 1,100 metric tons $MTCO_2e$/yr or 4.6 $MTCO_2e$/SP/yr for evaluating operation-related emissions (BAAQMD 2010). These thresholds were developed based on overall projections of development in the region, and how the region would come into compliance with the goals established by AB 32.

On March 5, 2012, the Alameda County Superior Court issued a judgment finding that the BAAQMD had failed to comply with CEQA when it adopted these thresholds. The court did not determine whether the thresholds were valid on the merits, but rather found that the adoption of the thresholds was a project under CEQA. The court issued a writ of mandate ordering the BAAQMD to set aside the thresholds and cease their dissemination until the BAAQMD had complied with CEQA.

Although the Alameda County Superior Court has ordered the BAAQMD to cease dissemination of the previously adopted thresholds, the court has made no finding on the applicability or the merits of the quantitative threshold. BAAQMD states that lead agencies will need to determine appropriate air quality thresholds to use for each project they review based on substantial evidence that they should include in the administrative record for the project. One resource BAAQMD provides as a reference for determining appropriate thresholds is the CEQA Thresholds Options and Justification Report developed by staff in 2009 (BAAQMD 2009). The CEQA Thresholds Options and Justification Report outlines substantial evidence supporting a variety of thresholds of significance.

Therefore, because the Project would result in operational-related emissions of GHGs from mobile and indirect sources (i.e., energy consumption), and is located adjacent to the BAAQMD's jurisdiction for which these thresholds were determined to be applicable, the thresholds of 1,100 MT CO2e/yr and 4.6 MT CO2e/SP/yr were determined to be acceptable thresholds for CEQA significance with regards to operational GHG emissions for this Project.

Based on the discussion above, the following thresholds are applied to this analysis:

- generate greenhouse gas emissions that exceed 1,100 $MTCO_2e$/yr); or
- generate greenhouse gas emissions that exceed 4.6 $MTCO_2e$/SP/yr.

For the evaluation of this Project in relation to the BAAQMD approach for assessing a project's operational emissions, an impact would be significant if both thresholds are exceeded.

The approach of applying both the SMAQMD and BAAQMD thresholds replaces the BPS and BAU approach previously recommended by the SJVAPCD.

RESPONSES TO CHECKLIST QUESTIONS

Response a) and b): Less than Significant with Mitigation. The proposed Project's short-term construction-related and long-term operational GHG emissions for buildout of the proposed Project, were estimated using the California Emission Estimator Model (CalEEMod)™ (v.2016.3.1). CalEEMod is a statewide model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify GHG emissions from land use projects. The model quantifies direct GHG emissions from construction and operation (including vehicle use), as well as indirect GHG emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. Emissions are expressed in annual metric tons of CO_2 equivalent units of measure (i.e., $MTCO_2e$), based on the global warming potential of the individual pollutants.

Short-Term Construction GHG Emissions

Estimated increases in GHG emissions associated with construction of the proposed Project (all phases collectively) are summarized in Table 1. The modeling included mitigation inputs for construction operations including the following:

- Reduce vehicle speed on unpaved roads to 5 miles per hour (mph); and
- Water exposed area 2 times daily.

TABLE 1: CONSTRUCTION GHG EMISSIONS (METRIC TONS/YR)

	Bio-CO_2	*NBio-CO_2*	*Total CO_2*	*CH_4*	*N_2O*	*CO_2e*
2017	0.0000	83.4000	83.4000	0.0222	0.0000	83.9551
2018	0.0000	57.5853	57.5853	0.0106	0.0000	57.8502
Maximum	**0.0000**	**83.4000**	**83.4000**	**0.0222**	**0.0000**	**83.9551**

SOURCE: CALEEMOD VERSION 2016.3.1.

As shown above in Table 1, construction activities would result in maximum annual emissions of 83.9551 $MTCO_2e$/year and would not exceed the recommended mass emission threshold for GHG emissions of 1,100 $MTCO_2e$/year.

These construction GHG emissions are a one-time release and are comparatively much lower than overall emissions associated with operational phases of a project. Construction GHG emissions from the proposed Project do not impede local GHG reduction efforts, or violate GHG reduction goals set by AB 32, as required by the Public Resources Code, Section 21082.2. Additionally, as discussed previously, Mitigation Measure 4 requires the Project applicant to comply with District Rule 9510 which is intended to reduce construction related emission. Therefore, cumulatively these construction emissions would not generate a significant contribution to global climate change.

Long-Term Operational GHG Emissions

The long-term operational GHG emissions estimate for buildout of the proposed Project incorporates the potential area source and vehicle emissions, and emissions associated with utility and water usage, and wastewater and solid waste generation. The modeling included mitigation inputs including the following:

<u>Traffic Mitigation</u>

- Increase Diversity to 28 jobs per acre[7]
- Improve Destination Accessibility (minimum distance to downtown is 1.75 miles)
- Increase Transit Accessibility in the Project area (minimum distance to transit stops is 0.1 miles)
- Improve Pedestrian Network so that the Project area connects to offsite pedestrian networks

<u>Energy Mitigation</u>

- Exceed Title 24 by 15%
- Install High Efficiency Lighting
- Install High Efficiency Appliances

[7] Source: Southern California Association of Governments. Employment Density Study Summary Report. October 31, 2001. Table 1A.

Area Mitigation

- Use Low VOC Paint - Interior
- Use Low VOC Paint - Exterior
- Use Low VOC Cleaning Supplies
- Use Only Natural Gas Hearths

Water Mitigation

- Install Low Flow Bathroom Faucet
- Install Low-Flow Kitchen Faucet
- Install Low-Flow Toilet
- Install Low-Flow Shower
- Use Water-Efficient Irrigation Systems

Estimated GHG emissions associated with buildout of the proposed Project with and without the above mitigation incorporated are summarized in Tables 2 and 3.

TABLE 2: OPERATIONAL GHG EMISSIONS - 2018 (UNMITIGATED METRIC TONS/YR)

	Bio-CO_2	***NBio-CO_2***	***Total CO_2***	***CH_4***	***N_2O***	***CO_2e***
Area	0.0000	1.6800e-003	1.6800e-003	0.0000	0.0000	1.7900e-003
Energy	0.0000	161.6428	161.6428	7.7400e-003	2.9600e-003	162.7185
Mobile	0.0000	943.4723	943.4723	0.0840	0.0000	945.5710
Waste	10.4459	0.0000	10.4459	0.6173	0.0000	25.8793
Water	0.7565	2.0576	2.8140	0.0779	1.87ooe-003	5.3190
Total	**11.2024**	**1,107.1743**	**1,118.3761**	**0.7869**	**4.8300e-003**	**1,139.4895**

SOURCE: CALEEMOD VERSION 2016.3.1.

TABLE 3: OPERATIONAL GHG EMISSIONS - 2018 (MITIGATED METRIC TONS/YR)

	Bio-CO_2	***NBio-CO_2***	***Total CO_2***	***CH_4***	***N_2O***	***CO_2e***
Area	0.0000	1.6800e-003	1.6800e-003	0.0000	0.0000	1.7900e-003
Energy	0.0000	138.5761	138.5761	6.6700e-003	2.5400e-003	139.4993
Mobile	0.0000	854.7475	854.7475	0.0812	0.0000	856.7782
Waste	10.4459	0.0000	10.4459	0.6173	0.0000	25.8793
Water	0.7565	1.6652	2.2704	0.0623	1.5000e-003	4.2745
Total	**11.2024**	**994.9904**	**1,006.0415**	**0.7676**	**4.0400**	**1,026.4330**
% Reduction	**1.35**	**10.13**	**10.04**	**2.46**	**16.36**	**9.92**

SOURCE: CALEEMOD VERSION 2016.3.1.

As shown in Table 3, operation of the project would result in annual emissions of 1,026.4330MT CO_2e/year, which does not exceed the recommended SMAQMD Tier I and BAAQMD mass emission GHG threshold of 1,100 $MTCO_2e$ per year. Therefore, this impact would be **less than significant.**

In addition, as stated previously, the proposed Project would be required to comply with the minimum mandatory measures of the CALGreen Code, which would result in an estimated 1.8 percent reduction. Furthermore, reduction of cumulative ROG and NO_X emissions due to the Indirect Source Rule mitigation (discussed under Air Quality) would subsequently result in an associated reduction in CO_2 emissions.

The City of Tracy adopted the Tracy Sustainability Action Plan in 2011. The Sustainability Action Plan includes programs and measures to reduce GHGs through community and municipal operations. Programs and measures contained in the Sustainability Action Plan that relate to the proposed Project include:

- Measure E-1: Implement California Green Building Standards, as contained in Title 24, Part 11, CCR.
- Measure T-4: Promote transit ridership increase transit route coverage to within ¼ mile of 75 percent of residents within new development areas.
- Measure T-5 c and d: Which promote the use of alternative transportation measures, including bikes and pedestrian travel, by providing connections to existing bike and pedestrian facilities.
- Measure E-2 e: Requiring energy efficient exterior lighting.
- Measure PH-12: Encourage new development to use non-toxic building materials.

The proposed Project would assist the City of Tracy with implementation of the Sustainability Action Plan, and is consistent with the measures described above. The proposed Project would be constructed in compliance with the California Green Building Standards, would install energy efficient lighting, promote connections to existing bike and pedestrian facilities, and encourage the use of nontoxic building materials.

Conclusion

As stated previously, short-term construction GHG emissions are a one-time release of GHGs and are not expected to significantly contribute to global climate change over the lifetime of the proposed Project. Construction GHG emissions from the proposed Project do not impede local GHG reduction efforts, or violate GHG reduction goals set by AB 32, as required by the Public Resources Code, Section 21082.2. Additionally, as discussed previously, Mitigation Measure 4 requires the Project applicant to coordinate with the SJVAPCD to verify that the Project meets the requirements of District Rule 9510, which is intended to reduce construction related emission. Therefore, cumulatively these construction emissions would not generate a significant contribution to global climate change.

Because project-related construction emissions of GHGs would be less than the SMAQMD Tier I and BAAQMD mass emission threshold of 1,100 MT CO2e/year, and because the project's operational GHG efficiency would be consistent with statewide GHG reduction goals, the project would not generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment. Implementation of the proposed Project (all phases) would not exceed an established threshold, conflict with any applicable plan, policy, or regulation related to

GHG reduction. Therefore, impacts related to GHG emissions and global climate change would be considered **less-than-significant** with the implementation of the following mitigation measure.

MITIGATION MEASURE(S)

Mitigation Measure 10*: Along with the mitigation measures contained in Section III (Air Quality), the Project applicant shall institute the following mitigation measures during construction and operation of the Project to reduce greenhouse gas emissions and energy consumption.*

- *Increase transit accessibility in the Project site by ensuring a minimum distance of 0.1 miles to transit stops*
- *Ensure that the pedestrian network within the Project site connects to offsite pedestrian networks*
- *Exceed Title 24 by 15% through verified compliance with CALGreen Tier 1 efficiency requirements*
- *Install high efficiency lighting and appliance*
- *Install low-flow faucets, toilets, and showers as applicable*
- *Use water-efficient irrigation systems throughout the Project site*

VIII. HAZARDS AND HAZARDOUS MATERIALS -- WOULD THE PROJECT:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		X		
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		X		
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?			X	
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?			X	
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			X	

RESPONSES TO CHECKLIST QUESTIONS

Responses a), b): Less than Significant with Mitigation. The proposed Project would place hotel uses in an area of the City that currently contains residential and commercial uses. Like most agricultural and farming operations in the Central Valley, agricultural practices in the area have used agricultural chemicals including pesticides and herbicides as a standard practice. Although no contaminated soils have been identified on the Project site or the vicinity above applicable levels, residual concentrations of pesticides may be present in soil as a result of historic agricultural application and storage. Continuous spraying of crops over many years can potentially result in a residual buildup of pesticides, in farm soils. Of highest concern relative to

agrichemicals are chlorinated herbicides, organophosphate pesticides, and organochlorine pesticides, such as Mecoprop (MCPP), Dinoseb, chlordane, dichloro-diphenyltrichloroethane (DDT), and dichloro-diphenyl-dichloroethylene (DDE). There are no records of soil contamination on the Project site.

The proposed commercial land uses do not routinely transport, use, or dispose of hazardous materials, or present a reasonably foreseeable release of hazardous materials, with the exception of common hazardous materials such as household cleaners, paint, etc. The operational phase of the proposed Project does not pose a significant hazard to the public or the environment.

Onsite reconnaissance and historical records indicate that there are no known underground storage tanks or pipelines located on the Project site that contain hazardous materials. Therefore, the disturbance of such items during construction activities is unlikely. Construction equipment and materials would likely require the use of petroleum based products (oil, gasoline, diesel fuel), and a variety of common chemicals including paints, cleaners, and solvents. Transportation, storage, use, and disposal of hazardous materials during construction activities would be required to comply with applicable federal, state, and local statutes and regulations. Compliance would ensure that human health and the environment are not exposed to hazardous materials.

Mitigation Measure 11 presented below require a Soils Management Plan (SMP) to be submitted and approved by the San Joaquin County Department of Environmental Health prior to the issuance of a grading permit. The SMP will establish management practices for handling hazardous materials, including fuels, paints, cleaners, solvents, etc., during construction.

In addition, Mitigation Measure 13 requires the Project applicant to implement a SWPPP during construction activities, which would prevent any contaminated runoff from leaving the Project site. Further, Mitigation Measure 12 requires submittal of a Hazardous Materials Business Plan. Therefore, the proposed Project would have a **less than significant** impact relative to this issue.

MITIGATION MEASURE(S)

Implement Mitigation Measure 13 (SWPPP)

Mitigation Measure 11*: A Soils Management Plan (SMP) shall be submitted and approved by the San Joaquin County Department of Environmental Health prior to the issuance of a grading permit. The SMP shall establish management practices for handling hazardous materials, including fuels, paints, cleaners, solvents, etc., during construction. The approved SMP shall be posted and maintained onsite during construction activities and all construction personnel shall acknowledge that they have reviewed and understand the plan.*

Mitigation Measure 12*: Prior to bringing hazardous materials onsite, the applicant shall submit a Hazardous Materials Business Plan (HMBP) to San Joaquin County Environmental Health Division (CUPA) for review and approval. If during the construction process the applicant or his subcontractors generates hazardous waste, the applicant must register with the CUPA as a generator of hazardous waste, obtain an EPA ID# and accumulate, ship and dispose of the hazardous waste per Health and Safety Code Ch. 6.5. (California Hazardous Waste Control Law).*

Response c): No Impact. The Project site is not located within ¼ mile of an existing school. Jacobson Elementary School is located approximately 0.27 miles east of the Project site. Therefore, **no impact** would occur as a result of the proposed Project.

Response d): Less than Significant. According the California Department of Toxic Substances Control (DTSC) there are no Federal Superfund Sites, State Response Sites, or Voluntary Cleanup Sites on, or in the near vicinity of the Project site. The Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5. The nearest investigation sites include:

> ***Quality Cleaners, Tracy*** (site #60002170). This site is a strip mall that contains Quality Dry Cleaners. The site is a voluntary cleanup site and is active as of March 27, 2015. The site was investigated and had limited soil, indoor air, and soil samples taken. PDT/TCE has been found in the groundwater and indoor air.
>
> ***Old Valley Pipeline (Laurelbrook)*** (site #39460005). From the early 1900's to the late 1950's, the Old Valley Pipeline was used by Standard Oil Company (now Chevron) to transport heavy petroleum (crude oil) from Bakersfield to Richmond. The site is a voluntary cleanup site and was referred to the Regional Water Quality Control Board as of December 9, 2015. A Voluntary Cleanup Agreement dated October 23, 2002 outlined site characterization and human health activities. The site characteristic activities are ongoing.

Therefore, implementation of the proposed Project would result in a **less than significant** impact relative to this environmental topic.

Responses e), f): Less than Significant. The Federal Aviation Administration (FAA) establishes distances of ground clearance for take-off and landing safety based on such items as the type of aircraft using the airport.

The San Joaquin County Airport Land-Use Commission (ALUC) provides for the appropriate development of the areas surrounding the six public access airports in San Joaquin County. The Airport Land Use Compatibility Plan (ALUCP), provides guidance intended to minimize the public's exposure to excessive noise and safety hazards, as well as ensure that the approaches to airports are kept clear of structures and other conflicts that could pose an aviation safety hazard. Currently, the SJCOG Board of Directors serves as the designated body to carry out the functions of the ALUC. This includes establishing an ALUCP.

The Tracy Municipal Airport is the closest airport to the Project site, located approximately 4.4 miles south of the Project site. The Airport is a general aviation airport owned by the City and managed by the Public Works Department. Guidelines for Airport Land Use were developed by SJCOG Airport Land Use Commission in 2013. Furthermore, the City of Tracy adopted an Airport Master Plan in 1998, analyzing the impacts to safety on surrounding development from the Tracy Municipal Airport.

The probability of an aircraft accident is highest along the extended runway centerline, and within one mile of the runway end. According to SJCOG Guidelines there are seven zones in which land use restrictions apply due to proximity to the airport:

1. Zone 1 Runway Protection Zone (RPZ)
2. Zone 2 Inner Approach/Departure Zone (IADZ)
3. Zone 3 Inner Turning Zone (ITZ)
4. Zone 4 Outer Approach/Departure Zone (OADZ)
5. Zone 5 Sideline Safety Zone (SSZ)
6. Zone 7 Traffic Pattern Zone (TPZ)
7. Zone 8 Airport Influence Area (AIA)

Land use constraints in these zones become progressively less restrictive from the RPZ to the TPZ. The proposed Project is not located within any of the safety zones. The proposed Project is not located within one mile of the airport, nor along the extended runway centerline. Additionally, there are no private airstrips within the vicinity of the Project site. The proposed Project consists of two four-story structures, and does not propose any structures of substantial height that would protrude into active airspace. Building height would be consistent with surrounding uses. Therefore, safety hazards related to the Project's proximity to the Tracy Municipal Airport are **less than significant,** and no mitigation is required.

Response g): No Impact. The General Plan (Adopted February 1, 2011) includes policies that require the City to maintain emergency access routes that are free of traffic impediments (Goal SA-6, Objective SA-6.1, Policy P1 and Action A2). The proposed Project does not include any actions that would impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. The Project involves the development of hotel uses near similar commercial uses, and would not interfere with any emergency response or evacuation plans. Implementation of the proposed Project would result in **no impact** on this environmental topic.

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

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

The California Department of Forestry has designated the southwestern edge of the City as having a moderate wildland fire potential. This is predominately a result of the hills and grassland

habitat that persists. The identified moderate wildland fire potential area in and around Tracy does not include the Project site. Because the Project site is not located within a designated wildfire hazard area, this is a **less than significant** impact and no mitigation is required.

IX. HYDROLOGY AND WATER QUALITY -- WOULD THE PROJECT:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Violate any water quality standards or waste discharge requirements?		X		
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?		X		
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?		X		
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?		X		
f) Otherwise substantially degrade water quality?		X		
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?			X	
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?			X	
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			X	
j) Inundation by seiche, tsunami, or mudflow?			X	

RESPONSES TO CHECKLIST QUESTIONS

Responses a): Less than Significant with Mitigation. Wastewater generated by the proposed Project would be conveyed to the Tracy Wastewater Treatment Plant (WWTP) for treatment and disposal. The City's wastewater collection system consists of gravity sewer lines, pump stations and the WWTP. Wastewater flows toward the northern part of the City where it is treated at the WWTP and then discharged into the Old River in the southern Sacramento-San Joaquin Delta. The Project's potential to violate a water quality standard or waste discharge requirement is related to the treatment of wastewater generated by the Project, and the quality of stormwater runoff generated at the Project site. These two issues are addressed below.

In 2008 the City expanded its wastewater treatment capacity to 10.8 million gallons per day (mgd). The City's Wastewater Treatment Plant (WWTP) currently treats approximately 9.0 mgd of wastewater. The City's WWTP provides secondary-level treatment of wastewater followed by disinfection. Treated effluent from the WWTP is conveyed to a submerged diffuser for discharge into the Old River. The WWTP has an NPDES permit for discharge into the Old River from the State Regional Water Quality Control Board.

For this analysis, a per capita generation factor of 80 gallons per capita per day of wastewater was used.[8] Therefore, the proposed 94-rooms would generate up to 7,520 gallons per day of wastewater, or 0.00752 mgd of wastewater. The addition of 0.00752 of wastewater would not exceed the treatment capacity of the City's WWTP, or violate waste discharge requirements under the City's National Pollutant Discharge Elimination System (NPDES) permit. As such, the Project would not cause, or contribute to, a violation of wastewater quality standards or waste discharge requirements.

In order to ensure that stormwater runoff from the Project site does not adversely increase pollutant levels in adjacent surface waters and stormwater conveyance infrastructure, the application of BMPs to effectively reduce pollutants from stormwater leaving the site during both the construction and operational phases of the Project are required under Mitigation Measure 13, which requires the preparation of a SWPPP.

Through compliance with the NPDES permit requirements, and compliance with the SWPPP, the proposed Project would not result in a violation of any water quality standards or waste discharge requirements. Therefore, through compliance with the NPDES, and SWPPP requirements required by Mitigation Measure 13, impacts from the proposed Project would result in a **less than significant** impact relative to this environmental topic.

MITIGATION MEASURE(S)

Implement Mitigation Measure 13 (SWPPP).

Responses b): Less than Significant. The proposed Project would not result in the construction of new groundwater wells, nor would it increase existing levels of groundwater pumping. The

[8] Wastewater Flow and Loading Generation Factors Tracy Wastewater Master Plan (Per Capita Flow and Loading factors).

proposed Project would be served by the City's municipal water system. The City of Tracy uses several water sources, including the US Bureau of Reclamation, the South County Water Supply Project (SCWSP), and groundwater. As described in greater detail in the Utilities Section of this document, the City has adequate water supplies to serve the proposed Project without increasing the current rate of groundwater extraction.

Groundwater recharge occurs primarily through percolation of surface waters through the soil and into the groundwater basin. The addition of significant areas of impervious surfaces (such as roads, parking lots, buildings, etc.) can interfere with this natural groundwater recharge process. Upon full Project buildout, most of the Project site would be covered in impervious surfaces, which would limit the potential for groundwater percolation to occur on the Project site. However, given the relatively large size of the groundwater basin in the Tracy area, the areas of impervious surfaces added as a result of Project implementation will not adversely affect the recharge capabilities of the local groundwater basin. The proposed Project would result in **less than significant** impacts related to depletion of groundwater supplies and interference with groundwater recharge. No mitigation is required.

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

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

There are no rivers, streams, or water courses located on or immediately adjacent to the Project site. As such, there is no potential for the Project to alter a water course, which could lead to on or offsite flooding. Drainage improvements associated with the Project site would be located on the Project site, and the Project would not alter or adversely impact offsite drainage facilities.

Development of the Project site would place impervious surfaces on portions of the approximately 2.56-acre Project site. Development of the Project site would potentially increase local runoff production, and would introduce constituents into storm water that are typically associated with urban runoff. These constituents include heavy metals (such as lead, zinc, and

copper) and petroleum hydrocarbons. BMPs will be applied to the proposed site development to limit the concentrations of these constituents in any site runoff that is discharged into downstream facilities to acceptable levels. Stormwater flows from the Project site would be directed to the bioretention areas by a new stormwater conveyance system on the Project site, to be subsequently delivered to the drop inlets via the subdrains, overflow devices and drop inlet connections serving the bioretention areas. Stormwater runoff would not be allowed to discharge directly to the existing drop inlets on the north side of Grant Line Road without first discharging to the bioretention areas.

According to the Storm Drainage Assessment and Recommendations prepared for the proposed Project (Storm Water Consulting, Inc.) in January 2017, storm water quality treatment control measures will be required with the development of the proposed Project in conformance with the City's Stormwater Standards Manual. Using a site development impervious surfaces percentage of 90 percent for the proposed land use (per the Citywide Storm Drainage Master Plan), the storm water quality design volume (SDV) required for storm water quality treatment is estimated at approximately 4,379 cubic feet. Bioretention will need to be provided to achieve the SDV, and the sub-drains and overflow devices serving the bioretention areas should be connected to the existing drop inlets on the north side of Grant Line Road. The incorporation of bioretention facilities into the Project development in conformance with the Stormwater Standards Manual will mitigate the impact of the site development on downstream stormwater quality. Site design measures described in the Stormwater Standards Manual may be utilized to further augment storm water quality. Reducing the SDV requirement for the bioretention facilities is not recommended as flow attenuation will be needed in order for the site to be able to utilize the available drop inlets on the north side of Grant Line Road as the points of outfall for onsite drainage.

Additionally, the Project is subject to the requirements of Chapter 11.34 of the Tracy Municipal Code – Stormwater Management and Discharge Control. The purpose of this Chapter is to *"Protect and promote the health, safety and general welfare of the citizens of the City by controlling non-stormwater discharges to the stormwater conveyance system, by eliminating discharges to the stormwater conveyance system from spills, dumping, or disposal of materials other than stormwater, and by reducing pollutants in urban stormwater discharges to the maximum extent practicable."*

This chapter is intended to assist in the protection and enhancement of the water quality of watercourses, water bodies, and wetlands in a manner pursuant to and consistent with the Federal Water Pollution Control Act (Clean Water Act, 33 USC Section 1251 et seq.), Porter-Cologne Water Quality Control Act (California Water Code Section 13000 et seq.) and National Pollutant Discharge Elimination System ("NPDES") Permit No. CAS000004, as such permit is amended and/or renewed.

New development projects in the City of Tracy are required to provide site-specific storm drainage solutions and improvements that are consistent with the overall storm drainage infrastructure approach presented in the 2012 City of Tracy Citywide Storm Drainage Master Plan. Prior to approval of the Final Map, the Project applicant is required to submit a detailed

storm drainage infrastructure plan to the City of Tracy Development Services Department for review and approval. The Project's storm drainage infrastructure plans must demonstrate adequate infrastructure capacity to collect and direct all stormwater generated on the Project site within onsite retention/detention facilities to the City's existing stormwater conveyance system, and demonstrate that the Project would not result in on- or off-site flooding impacts. The Project is also required to pay all applicable development impact fees, which would include funding for offsite Citywide storm drainage infrastructure improvements identified in the 2012 City of Tracy Citywide Storm Drainage Master Plan.

In order to ensure that stormwater runoff from the Project site does not adversely increase pollutant levels in adjacent surface waters and stormwater conveyance infrastructure, or otherwise degrade water quality, Mitigation Measure 13 requires the preparation of a SWPPP, and structural BMPs. As described below, the SWPPP would require the application of BMPs to effectively reduce pollutants from stormwater leaving the site, which would ensure that stormwater runoff does not adversely increase pollutant levels, and would reduce the potential for disturbed soils and ground surfaces to result in erosion and sediment discharge into adjacent surface waters during construction and operational phases of the Project. The implementation of this mitigation measure would reduce this impact to a **less than significant** level.

In order to ensure that stormwater runoff generated at the Project site as a result of new impervious surfaces does not exceed the capacity of the existing or planned stormwater drainage system, Mitigation Measure 14 requires the Project applicant to submit a detailed storm drainage infrastructure plan to the City of Tracy Development Services Department for review and approval. The Project's storm drainage infrastructure plans shall, to the satisfaction of the City Engineer, demonstrate adequate infrastructure capacity to collect and direct all stormwater generated on the Project site within onsite retention/detention facilities to the City's existing stormwater conveyance system, and demonstrate that the Project would not result in on- or off-site flooding impacts. The implementation of this mitigation measure would reduce this impact to a **less than significant** level.

MITIGATION MEASURE(S)

Mitigation Measure 13*: The Project applicant shall prepare a Storm Water Pollution Prevention Plan (SWPPP) that includes specific types and sources of stormwater pollutants, determine the location and nature of potential impacts, and specify appropriate control measures to eliminate any potentially significant impacts on receiving water quality from stormwater runoff. The SWPPP shall require treatment Best Management Practices (BMPs) that incorporate, at a minimum, the required hydraulic sizing design criteria for volume and flow to treat projected stormwater runoff. The SWPPP shall comply with the most current standards established by the Central Valley RWQCB. BMPs shall be selected from the City's June 2015 Multi-Agency Post-Construction Stormwater Standards Manual according to site requirements and shall be subject to approval by the City Engineer and Central Valley RWQCB.*

Mitigation Measure 14*: Prior to approval of the building permit, the Project applicant shall submit a detailed storm drainage infrastructure plan to the City of Tracy Development Services Department for review and approval. The Project's storm drainage infrastructure plans shall, to the satisfaction of the City Engineer, demonstrate adequate infrastructure capacity to collect and direct all stormwater generated on the Project site within onsite bioretention areas to the City's existing stormwater conveyance system, and demonstrate that the Project would not result in on- or off-site flooding impacts. The Project shall also pay all applicable development impact fees, which would include funding for offsite Citywide storm drainage infrastructure improvements identified in the 2012 City of Tracy Citywide Storm Drainage Master Plan.*

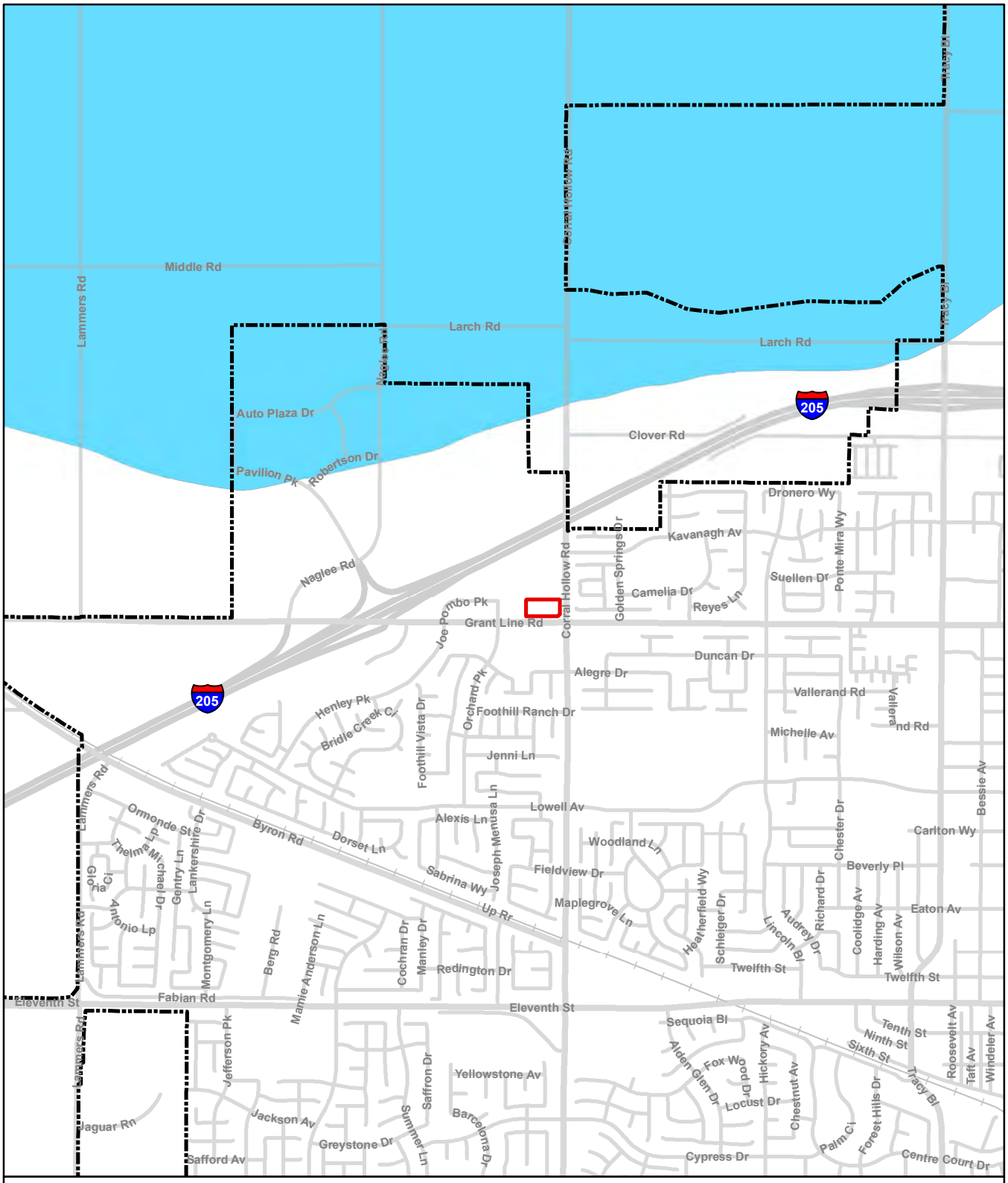
Responses g), h): Less than Significant. The 100-year floodplain denotes an area that has a one percent chance of being inundated during any particular 12-month period.

Floodplain zones are determined by the Federal Emergency Management Agency (FEMA) and used to create Flood Insurance Rate Maps (FIRMs). These tools assist cities in mitigating flooding hazards through land use planning. FEMA also outlines specific regulations for any construction, whether residential, commercial, or industrial within 100-year floodplains.

As shown in Figure 12, the Project site is not located within the FEMA designated 100-year or 500-year floodplain. This is a **less than significant** impact and no mitigation is required.

Responses i), j): Less than Significant. Figure 13 shows the dam inundation areas within the vicinity of the Project site. As shown in the figure, the Project site is not located within an inundation risk area. The nearest inundation areas are at the northernmost parts of the city (approximately 0.35 miles north of the Project site) and are subject to inundation by the San Luis Reservoir and New Melones Dams. The safety of dams in California is stringently monitored by the California Department of Water Resources, Division of Safety of Dams (DSD). The DSD is responsible for inspecting and monitoring the dam in perpetuity. The proposed Project would not result in actions that could result in a higher likelihood of dam failure at San Luis Reservoir and New Melones Dams. There will always be a remote chance of dam failure that results in flooding of portions of the city. However, the Project site lies outside of this risk area. Given the regulations provided in the California Dam Safety Act, and the ongoing monitoring performed by the DSD, the risk of loss, injury, or death to people or structures from dam failure is considered **less than significant**.

There are no significant bodies of water near the Project site that could be subject to a seiche or tsunami. Additionally, the Project site and the surrounding areas are essentially flat, which precludes the possibility of mudflows occurring on the Project site. This is a **less than significant** impact and no mitigation is required.



Legend

Project Boundary

FEMA Designation

1% Annual Chance Flood Hazard (100-yr Flood Zone)

Area of Minimal Flood Hazard (Zone X)

N

0 500 1,000

Feet

1:24,000

Sources: FEMA's National Flood Hazard Layer (Official); San Joaquin County GIS. Map date: November 21, 2017.

HOME2SUITES BY HILTON PROJECT IS/MND

Figure 12. FEMA Flood Insurance Rate Map

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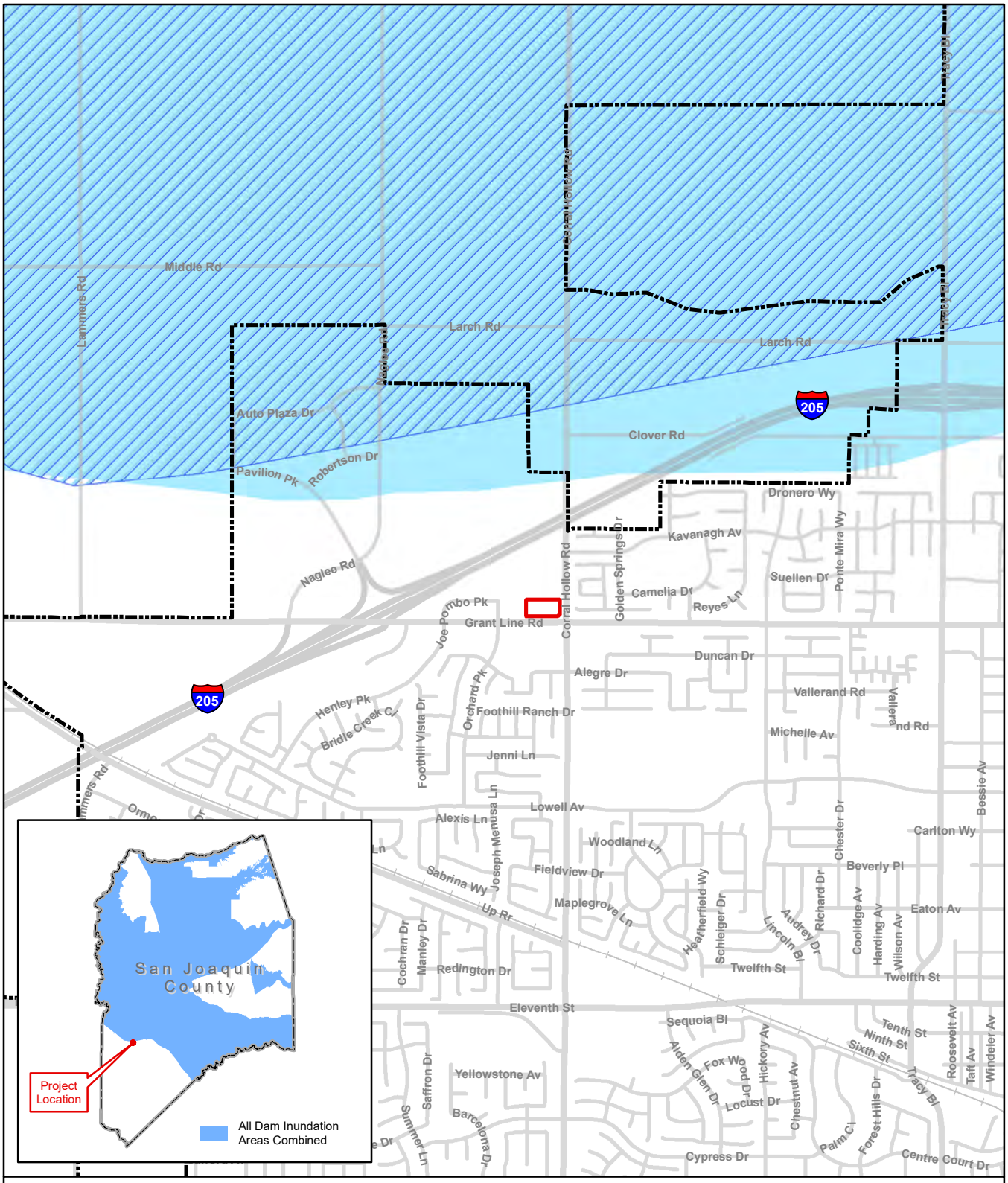

HOME2SUITES BY HILTON PROJECT IS/MND

Figure 13. Dam Inundation Map

Legend

- Project Boundary
- New Melones Dam Inundation Area
- San Luis Dam Inundation Area

N

0 500 1,000

Feet

1:24,000

Sources: San Joaquin County GIS. Map date: November 21, 2017.

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X. LAND USE AND PLANNING -- WOULD THE PROJECT:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Physically divide an established community?				X
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?			X	
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?		X		

RESPONSES TO CHECKLIST QUESTIONS

Responses a): No Impact. The Project site is surrounded by residential, commercial, and agricultural land uses. The Project site is located adjacent to existing commercial and office uses and would be consistent and compatible with the surrounding land uses. The Project would not physically divide any established community. Therefore, there is **no impact.**

Responses b): Less than Significant. The Project site is currently designated Office by the City of Tracy General Plan Land Use Designations Map and is zoned General Highway Commercial. The proposed Project includes a request for a General Plan Amendment for APN 214-020-35 from Office to Commercial.

The key planning documents that are directly related to, or that establish a framework within which the proposed Project must be consistent, include:

- City of Tracy General Plan
- City of Tracy Zoning Ordinance

The Project site is located in the Grant Line Road and Corral Hollow Road Area of Special Consideration. The vision for this area is for a medical office area that takes advantage of the proximity of the Kaiser Medical Center. The following General Plan policies apply to areas within the Grant Line Road and Corral Hollow Road Area of Special Consideration:

- 3a. Commercial uses that support the medical industry may be allowed in areas designated as Office.
- 3b. High density residential development, including projects for senior citizens, may be allowed on a case-by-case basis to take advantage of the close proximity to medical and retail services.

Additionally, the following standards apply to the O land use designation:

- Office (O). The purpose of this designation is to provide for the maintenance and expansion of the job and economic base of the City of Tracy and to provide more Tracy

residents with the potential to work in the City. The Office designation provides sites for office and research and development uses that accommodate high-tech, medical, hospital, legal, insurance, government and similar users. Office parcels may have a maximum floor-area-ratio (FAR) of 1.0.

The following standards apply to the proposed C land use designation:

- Commercial (C). The Commercial designation allows for a relatively wide range of uses but focuses primarily on retail and consumer service activities that meet the needs of Tracy residents and employees as well as pass-through travelers. Specific categories of commercial activity within this designation include general commercial, regional commercial and highway commercial. The specific location of each type of commercial use are provided in the zoning code. Commercially designated land may have a maximum FAR of 1.0

The Project site is currently zoned GHC. A Zoning Amendment would not be required for the Project. The City of Tracy Zoning Ordinance (Municipal Code Title 10) provides the following designations relevant to the proposed Project:

- General Highway Commercial (GHC). The purpose of the General Highway Commercial zone is to provide areas for commercial activities which are automobile-oriented or for those uses which seek independent locations outside shopping centers or other business clusters.

The proposed uses on the Project site are consistent with the purpose of the General Plan designation of Commercial, which allows for a relatively wide range of uses but focuses primarily on retail and consumer service activities that meet the needs of Tracy residents and employees as well as pass-through travelers. Approval of the requested General Plan Amendment (from O to C) would be required to ensure that the proposed Project is consistent with the Tracy General Plan. The Project site is currently zoned GHC, and a re-zone would not be required. The Project's consistency with other General Plan policies that provide environmental protections are addressed within the relevant sections of this document. This is a **less than significant** impact, and no mitigation is required.

Response c): Less than Signification with Mitigation. As described under the Biological Resources section of this document, the proposed Project is classified as Urban under the SJMSCP. As required by Mitigation Measure 6, prior to issuance of grading permits, the Project proponent will be required to coordinate with SJCOG and will be responsible for the appropriate coverage, permits, compensatory mitigation or fees, and Project-specific avoidance, minimization, and mitigation measures as defined within the SJMSCP. Implementation of Mitigation Measure 6 would ensure that the Project would not conflict with the implementation of the SJMSCP and has appropriate measures to ensure compliance with payment of mitigation fees. The implementation of Mitigation Measure 6 would reduce this impact to a **less than significant** level.

MITIGATION MEASURE(S)

Implement Mitigation Measure 6

XI. MINERAL RESOURCES -- WOULD THE PROJECT:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

RESPONSES TO CHECKLIST QUESTIONS

Responses a), b): No Impact. As described in the Tracy General Plan EIR, the main mineral resources found in San Joaquin County, and the Tracy Planning Area, are sand and gravel (aggregate), which are primarily used for construction materials such as asphalt and concrete. According to the California Geological Survey (CGS) evaluation of the quality and quantity of these resources, the most marketable aggregate materials in San Joaquin County are found in three main areas:

- In the Corral Hollow alluvial fan deposits south of Tracy
- Along the channel and floodplain deposits of the Mokelumne River
- Along the San Joaquin River near Lathrop

Figure 4.8-1 of the General Plan EIR identifies Mineral Resource Zones (MRZs) throughout the Tracy Planning Area. The Project site is located within an area designated as MRZ-1. The MRZ-1 designation applies to areas where adequate information indicates that no significant mineral deposits are present, or where there is little likelihood for their presence. There are no substantial aggregate materials located within the Project site. Therefore, the Project would not result in the loss of availability of a known mineral resource. There is **no impact**.

XII. NOISE -- WOULD THE PROJECT:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			X	
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X	
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				X

BACKGROUND

A noise study for the proposed Project was performed by J.C. Brennan & Associates, Inc. in February of 2017.

KEY NOISE TERMS

Acoustics The science of sound.

Ambient Noise The distinctive acoustical characteristics of a given area consisting of all noise sources audible at that location. In many cases, the term ambient is used to describe an existing or pre-project condition such as the setting in an environmental noise study.

Attenuation The reduction of noise.

A-Weighting A frequency-response adjustment of a sound level meter that conditions the output signal to approximate human response.

Decibel or dB Fundamental unit of sound, defined as ten times the logarithm of the ratio of the sound pressure squared over the reference pressure squared.

CNEL Community noise equivalent level. Defined as the 24-hour average noise level with noise occurring during evening hours (7 - 10 p.m.) weighted by a factor of three and nighttime hours weighted by a factor of 10 prior to averaging.

Frequency The measure of the rapidity of alterations of a periodic acoustic signal, expressed in cycles per second or Hertz.

Impulsive Sound of short duration, usually less than one second, with an abrupt onset and rapid decay.

L_{dn} Day/Night Average Sound Level. Similar to CNEL but with no evening weighting.

L_{eq} Equivalent or energy-averaged sound level. This section provides a general description of the existing noise sources in the project vicinity, a discussion of the regulatory setting, and identifies potential noise impacts associated with the proposed project. Project impacts are evaluated relative to applicable noise level criteria and to the existing ambient noise environment.

L_{max} The highest root-mean-square (RMS) sound level measured over a given period of time.

$L_{(n)}$ The sound level exceeded a described percentile over a measurement period. For instance, an hourly L_{50} is the sound level exceeded 50 percent of the time during the one hour period.

Loudness A subjective term for the sensation of the magnitude of sound.

Noise Unwanted sound.

SEL Sound exposure levels. A rating, in decibels, of a discrete event, such as an aircraft flyover or train passby, that compresses the total sound energy into a one-second event.

METHODOLOGY

The FHWA Highway Traffic Noise Prediction Model (FHWA-RD 77-108) was used to develop L_{dn} (24-hour average) noise contours for the primary Project-area roadways. The model is based upon the CALVENO noise emission factors for automobiles, medium trucks, and heavy trucks, with consideration given to vehicle volume, speed, roadway configuration, distance to the receiver, and the acoustical characteristics of the site. The FHWA Model predicts hourly L_{eq} values for free-flowing traffic conditions, and is generally considered to be accurate within 1.5 dB. To predict L_{dn} values, it is necessary to determine the hourly distribution of traffic for a typical 24-hour period.

Existing traffic volumes were obtained from the traffic consultant (Kimley Horn, February 8, 2017). Day/night traffic distributions were based upon file data for similar roadways and field-measured values where available. Using these data sources and the FHWA traffic noise prediction methodology, traffic noise levels were calculated for existing conditions.

Traffic noise levels are predicted at the sensitive receptors located at the closest typical setback distance along each Project-area roadway segments. In some locations, sensitive receptors may be located at distances which vary from the assumed calculation distance and may experience shielding from intervening barriers or sound walls. However, the traffic noise analysis is believed to be representative of the majority of sensitive receptors located closest to the Project-area

roadway segments analyzed in this report. Where sound walls occur, a -5 dB offset was applied to account for typical acoustic shielding provided by a 6-foot tall sound wall.

The actual distances to noise level contours may vary from the distances predicted by the FHWA model due to roadway curvature, grade, shielding from local topography or structures, elevated roadways, or elevated receivers.

A community noise survey was conducted to document existing ambient noise levels at the Project site. The data collected included the hourly average (L_{eq}), median (L_{50}), and the maximum level (L_{max}) during the measurement period.

Community noise monitoring equipment included a Larson Davis Laboratories (LDL) Model 820 precision integrating sound level meter equipped with an LDL ½" microphone. The measurement system was calibrated using a LDL Model CAL200 acoustical calibrator before and after testing. The measurement equipment meets all of the pertinent requirements of the American National Standards Institute (ANSI) for Type 1 (precision) sound level meters.

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant with Mitigation.

Exterior Noise Impacts

The proposed Project is located in an area consisting predominately of commercial and office land uses. The primary sources of noise currently present in the Project area are from vehicle traffic along I-205, Grant Line Road, and Corral Hollow Road.

The City of Tracy General Plan establishes allowable noise exposure levels for hotel land uses. As described under Goal N-1, Objective N-1.1, Policy P.8 of the Tracy General Plan, "Measures to attenuate exterior and/or interior noise levels to acceptable levels shall be incorporated into all development projects. Acceptable, conditionally acceptable and unacceptable noise levels are presented in Figure 9-3." According to Figure 9-3 of the City of Tracy General Plan, new hotel development shall not exceed 65 dB L_{dn} (day/night average noise level) for exterior noise.

The FHWA traffic noise prediction model was used to predict Cumulative (Year 2035) Plus Project traffic noise levels at the proposed outdoor uses associated with Project, including the outdoor pool area and building facade. Table 4 shows the predicted traffic noise levels at the proposed outdoor areas. It should be noted that the future traffic volume shown for I-205 is based upon the Caltrans 2014 traffic count of 97,000 adjusted to represent an estimated 2040 traffic volume by adding 1% per year increase in traffic.

TABLE 4: CUMULATIVE + PROJECT TRANSPORTATION NOISE LEVELS AT PROPOSED PROJECT

Roadway	Receptor Description	Approximate Residential Setback, feet[1]	ADT	Predicted Traffic Noise Levels, L_{dn}				
				No Wall	6' Wall	7' Wall	8' Wall	9' Wall
I-205	Swimming Pool Area	980	125,640	67 dB	62	61	60	58
I-205	Building Facade	950	125,640	70 dB	N/A	N/A	N/A	N/A
Grant Line Rd.	Building Facade	150	36,320	66 dB	N/A	N/A	N/A	N/A
Corral Hollow Rd.	Building Facade	145	25,900	66 dB	N/A	N/A	N/A	N/A

[1] *SETBACK DISTANCES ARE MEASURED IN FEET FROM THE CENTERLINES OF THE ROADWAYS TO THE CENTER OF RESIDENTIAL BACKYARD.*

SOURCE: FHWA-RD-77-108 WITH INPUTS FROM ABRAMS ASSOCIATES, AND J.C. BRENNAN & ASSOCIATES, INC. 2017.

The Table 4 data indicate that a 6-foot tall sound wall would be required for the hotel pool area. This wall is predicted to reduce exterior noise levels to 65 dB L_{dn}, or less, which is the City's normally acceptable exterior noise level standard for hotel uses.[9] Figure 14 shows the recommended wall location.

Interior Noise Impacts

Modern construction typically provides a 25 dB exterior-to-interior noise level reduction with windows closed. Therefore, sensitive receptors exposed to exterior noise of 70 dB L_{dn}, or less, will typically comply with the City of Tracy 45 dB L_{dn} interior noise level standard. Additional noise reduction measures, such as acoustically rated windows are generally required for exterior noise levels exceeding 70 dB L_{dn}.

The proposed Project is predicted to be exposed to a maximum exterior noise level of 70 dB L_{dn}. Based upon a 25 dB exterior-to-interior noise level reduction, interior noise levels are predicted to be 45 dB L_{dn}. This interior noise levels would meet the City of Tracy 45 dB L_{dn} interior noise level standard and no interior noise mitigation would be required.

Conclusion

As described above, the proposed Project would be subjected to vehicle roadway noise in excess of 65 dBA in exterior areas. The following mitigation measure will minimize noise impacts resulting from transportation noise impacts on the proposed Project site. Implementation of the following mitigation measure will ensure consistency with the City's noise standards, and will reduce this potentially significant impact to a **less than significant** level.

MITIGATION MEASURE(S)

Mitigation Measure 15: *A 6-foot tall sound wall shall be constructed along the northern edge of the outdoor swimming pool area. The wall may include a combination of earthen*

[9] Existing Plus Project are lower than Cumulative (Year 2035) Plus Project noise levels. The sound wall would more than mitigate for the Existing Plus Project noise condition.

berm and concrete masonry to achieve the overall required wall height (e.g. 3-foot wall on 3-foot berm).

Response b): Less than Significant. No major stationary sources of groundborne vibration were identified in the Project area that would result in the long-term exposure of proposed onsite land uses to unacceptable levels of ground vibration. The primary vibration-generating activities associated with the proposed Project would occur during construction when activities such as grading, utilities placement, and roadway construction occur. Sensitive receptors which could be impacted by construction related vibrations, especially vibratory compactors/rollers, are located approximately 200 feet or further from the Project site. At this distance construction vibrations are not predicted to exceed acceptable levels. Additionally, construction activities would be temporary in nature and would likely occur during normal daytime working hours.

Construction vibration impacts include human annoyance and building structural damage. Human annoyance occurs when construction vibration rises significantly above the threshold of perception. Building damage can take the form of cosmetic or structural. Table 5 shows the typical vibration levels produced by construction equipment.

TABLE 5: REPRESENTATIVE VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

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

SOURCE: FTA TRANSIT NOISE AND VIBRATION IMPACT ASSESSMENT GUIDELINES, 2006.

As indicated in Table 5, predicted vibration levels are not anticipated to exceed recommended criteria for structural damage and human annoyance (0.2 and 0.1 in/sec ppv, respectively) at nearby land uses. As a result, short-term groundborne vibration impacts would be considered **less than significant** and no mitigation is required.

Response c): Less than Significant. Generally, a project may have a significant noise effect on the environment if it will substantially increase the ambient noise levels for adjoining areas or expose people to severe noise levels. In practice, more specific professional standards have been developed. These standards state that a noise impact may be considered significant if it would generate noise that would conflict with local planning criteria or ordinances, or substantially increase noise levels at noise-sensitive land uses.

The proposed Project would not directly generate increased noise beyond those activities commonly found in commercial developments (i.e., landscaping noise, leaf blowers, automobile use etc.). The noise directly generated by the Project would not differ from the existing ambient noises currently generated by the surrounding commercial and office land uses.

However, the proposed Project may indirectly increase ambient noise levels in the Project vicinity through the introduction of additional vehicle trips to area roadways. To describe future noise levels due to traffic, the Federal Highway Administration Highway Traffic Noise Prediction Model (FHWA RD-77-108) was used. Inputs to the model included traffic volumes provided by Kimley Horn. The FHWA model is based upon the Calveno reference noise factors for automobiles, medium trucks and heavy trucks, with consideration given to vehicle volume, speed, roadway configuration, distance to the receiver, and the acoustical characteristics of the site. The FHWA model was developed to predict hourly L_{eq} values for free-flowing traffic conditions. To predict L_{dn}/CNEL values, it is necessary to determine the day/night distribution of traffic and adjust the traffic volume input data to yield an equivalent hourly traffic volume.

Table 6 shows the noise levels associated with traffic on the local roadway network under the Existing and Existing + Project traffic conditions. Table 7 shows the noise levels under Existing + Background and Existing + Background Plus Project conditions.

TABLE 6: EXISTING TRAFFIC NOISE LEVELS VS. EXISTING + PROJECT TRAFFIC NOISE LEVELS

Roadway	Segment	Noise Levels (L_{dn}, dB)			Distance to Plus Project Traffic Noise Contours, feet[1]		
		No Project	Plus Project	Change (dB)	70 dB L_{dn}	65 dB L_{dn}	60 dB L_{dn}
Weekday							
Grant Line Rd.	East of Corral Hollow Rd.	60.3	60.3	0.0	18	39	84
Corral Hollow Rd.	North of Grant Line Rd.	62.2	62.3	0.1	23	49	106
Corral Hollow Rd.	South of Grant Line Rd.	60.9	60.9	0.0	20	43	92
Saturday							
Grant Line Rd.	East of Corral Hollow Rd.	60.2	60.3	0.1	18	39	83
Corral Hollow Rd.	North of Grant Line Rd.	62.1	62.3	0.2	23	49	107
Corral Hollow Rd.	South of Grant Line Rd.	61.4	61.4	0.0	22	46	100

[1] *DISTANCES TO TRAFFIC NOISE CONTOURS ARE MEASURED IN FEET FROM THE CENTERLINES OF THE ROADWAYS. ACTUAL DISTANCES MAY VARY DUE TO SHIELDING FROM EXISTING NOISE BARRIERS OR INTERVENING STRUCTURES. TRAFFIC NOISE LEVELS MAY VARY DEPENDING ON ACTUAL SETBACK DISTANCES AND LOCALIZED SHIELDING.*

SOURCE: FHWA-RD-77-108 WITH INPUTS FROM KIMLEY HORN AND J.C. BRENNAN & ASSOCIATES, INC., 2017.

As indicated by Table 6 and Table 7, the related noise level increases from development of the proposed Project are predicted to range between 0.0 to 0.2 dB. The traffic noise from the Proposed Project is not expected to produce noise levels that would exceed City standards. Increased Project related traffic would increase traffic noise levels by less than the City's 3-5 dB test of significance at existing sensitive receptors. As such, this is a **less than significant** impact and no mitigation is required.

TABLE 7: EXISTING PLUS BACKGROUND TRAFFIC NOISE LEVELS VS. EXISTING PLUS BACKGROUND + PROJECT TRAFFIC NOISE LEVELS

Roadway	Segment	Noise Levels (L_{dn}, dB)			Distance to Plus Project Traffic Noise Contours, feet[1]		
		No Project	Plus Project	Change (dB)	70 dB L_{dn}	65 dB L_{dn}	60 dB L_{dn}
Weekday							
Grant Line Rd.	East of Corral Hollow Rd.	60.8	60.9	0.1	20	42	91
Corral Hollow Rd.	North of Grant Line Rd.	62.3	62.4	0.1	32	50	108
Corral Hollow Rd.	South of Grant Line Rd.	61.5	61.5	0.0	22	47	100
Saturday							
Grant Line Rd.	East of Corral Hollow Rd.	60.8	60.9	0.1	20	42	91
Corral Hollow Rd.	North of Grant Line Rd.	62.3	62.4	0.1	23	50	108
Corral Hollow Rd.	South of Grant Line Rd.	62.0	62.0	0.0	23	50	109

[1] DISTANCES TO TRAFFIC NOISE CONTOURS ARE MEASURED IN FEET FROM THE CENTERLINES OF THE ROADWAYS. ACTUAL DISTANCES MAY VARY DUE TO SHIELDING FROM EXISTING NOISE BARRIERS OR INTERVENING STRUCTURES. TRAFFIC NOISE LEVELS MAY VARY DEPENDING ON ACTUAL SETBACK DISTANCES AND LOCALIZED SHIELDING.

SOURCE: FHWA-RD-77-108 WITH INPUTS FROM KIMLEY HORN AND J.C. BRENNAN & ASSOCIATES, INC., 2017.

Response d): Less than Significant. Construction activities at the Project site would result in temporary increases in noise levels that could expose adjacent residences to increased noise levels and noise nuisances. Activities involved in Project construction would typically generate maximum noise levels ranging from 85 to 90 dB at a distance of 50 feet. The nearest residential receptors would be located approximately 200 feet or more from the majority of Project construction activities.

As stated above, noise sensitive receptors near the construction site would, at times, experience elevated noise levels from construction activities; however, construction-related noise generally would occur during daytime hours only. General Plan Noise Element Policy 4 (Goal N-1.2) establishes the following construction requirements:

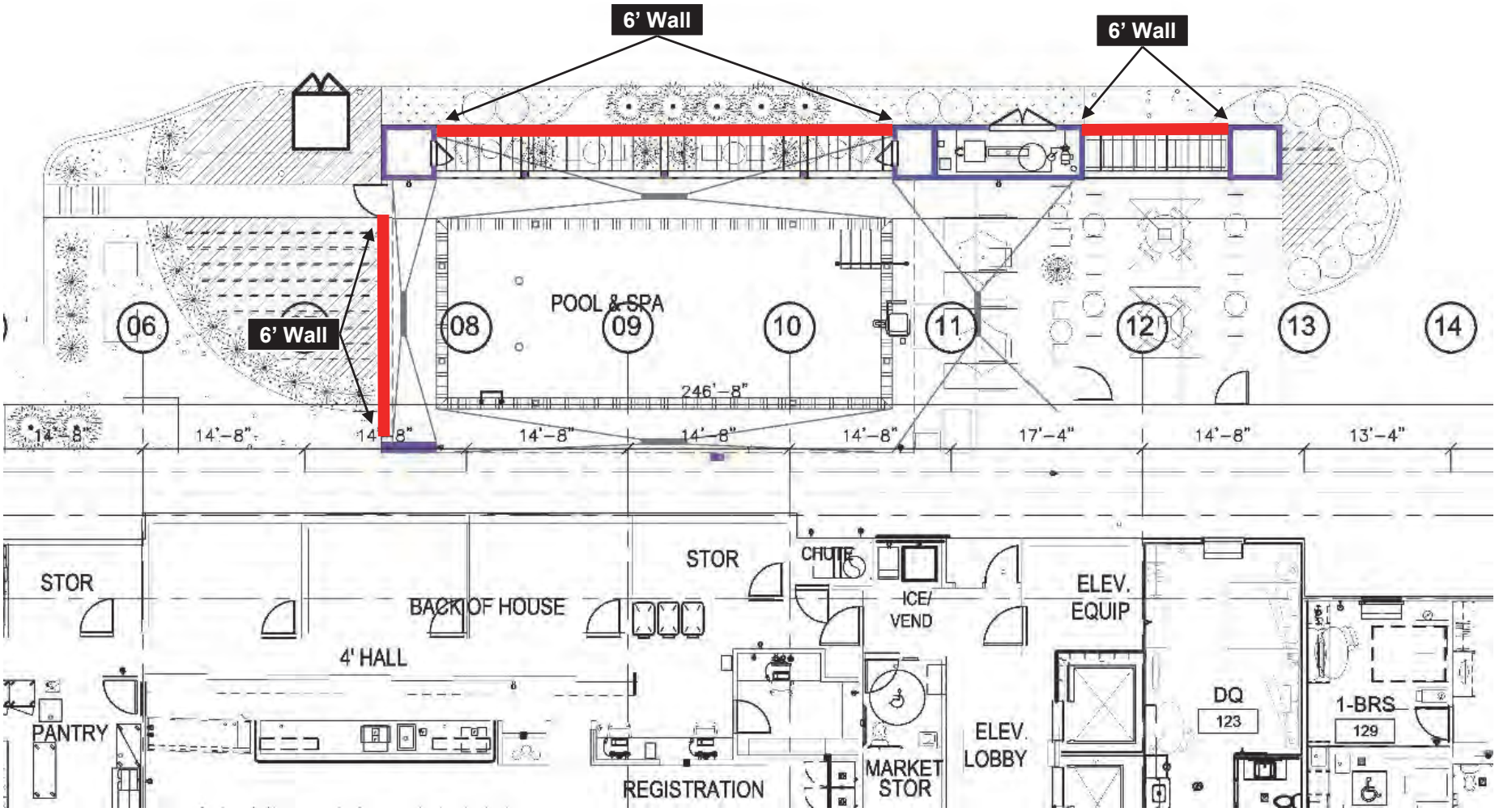
> *All construction in the vicinity of noise sensitive land uses, such as residences, hospitals, or convalescent homes, shall be limited to daylight hours or 7:00 a.m. to 7:00 p.m. In addition, the following construction noise control measures shall be included as requirements at construction sites to 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 stationary noise sources where technology exists.*

Implementation of these required measures (i.e., engine muffling, placement of construction equipment, and strategic stockpiling and staging of construction vehicles), and compliance with the City Municipal Code requirements, would serve to further reduce exposure to construction noise levels. Adherence to City General Plan, City Municipal Code Title 4.12, Article 9 (Noise Control Ordinance), would minimize any impacts from noise during construction. Requirements stated above are adopted by the City as Conditions of Approval (COAs) for all new development projects prior to project approval. Therefore, no additional noise control measures would be required and this impact would be considered **less than significant**.

Response e): Less than Significant. The Tracy Municipal Airport, located approximately 4.4 miles south, is the closest airport to the Project site. The Airport is a general aviation airport owned by the City and managed by the Public Works Department. The City of Tracy adopted an Airport Master Plan in 1998, analyzing the impacts to safety on surrounding development from the Tracy Municipal Airport.

The San Joaquin County Airport Land Use Plan establishes noise contours surrounding the Tracy Municipal Airport. The Project site is located outside of both the 65 dB CNEL and the 60 dB CNEL noise contours for the Tracy Municipal Airport. As such, the Project site would not be exposed to excessive noise from the Tracy Municipal Airport. This is a **less than significant** impact, and no mitigation is required.

Response f): No Impact. The Project site is not located in the vicinity of a private airstrip. Therefore, there is **no impact**.



Home2 Suites by Hilton

Figure 14: Recommended Noise Barrier Location

j.c. brennan & associates
consultants in acoustics

Rev. 02/22/17

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XIII. POPULATION AND HOUSING -- WOULD THE PROJECT:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?			X	
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant. Implementation of the Project would result in the construction of a 94-room hotel on the Project site. The proposed Project is located near the northern edge of an existing urbanized area of the City. There is existing infrastructure (roads, water, sewer, etc.) in the immediate vicinity of the Project site. While the Project would extend these services onto the site to serve the proposed development, the Project would not extend infrastructure beyond an area of the City not currently served. Therefore, while the Project may induce population growth through the provision of a 94-room hotel in the short-term, the Project would not indirectly induce population growth in other areas of the City of Tracy.

This impact is **less than significant**, as demonstrated throughout this document. No additional mitigation is required.

Responses b), c): Less than Significant. There are no residential structures located on the Project site. Development of the Project would not create or remove housing. Therefore, the Project would not displace substantial numbers of people or existing housing, and would have a **less than significant** impact in this respect.

XIV. PUBLIC SERVICES

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
• Fire protection?		X		
• Police protection?			X	
• Schools?			X	
• Parks?			X	
• Other public facilities?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a.i) Fire Protection: Less than Significant with Mitigation. On September 16, 1999, the City of Tracy Fire Department merged with the Tracy Rural Fire Protection District, forming the South County Fire Authority (SCFA). The SCFA was created to provide fire protection services to the entire jurisdictional area of both the corporate city limits and surrounding rural community. Employees of the Tracy Rural Fire Protection District became employees of the City of Tracy with the City of Tracy maintaining day to day administrative control of the department. Both the Tracy Rural Fire Protection District and the City of Tracy contract with the SCFA to receive fire protection services. The SCFA in turn contracts with the City of Tracy to provide employees and administrative services.

The SCFA/Tracy Fire Department provides emergency medical services to citizens located within the San Joaquin Emergency Medical Services Agency (SJEMSA) Zone C. Ambulance transport is provided by private provider, American Medical Response (AMR) under contract with the SJEMSA. The SCFA currently operates six fire stations and an administrative office. Twenty-four hour-per-day staffing is provided with six paramedic engine companies and one ladder truck company. Four fire stations are within the incorporated area of the City of Tracy, and two are in the surrounding rural Tracy area.

The Tracy Fire Department conducted a Standards of Response Coverage study in late 2007. Findings of the study indicated that the Department had challenges in meeting its established response time objectives in the areas of the West Valley Mall and Downtown Tracy utilizing existing resources. The Project site is located approximately 0.25 miles southeast of the West Valley Mall. Two new facilities were opened in June 2014, to replace Fire Stations 92 and

96. The new facilities allow the Fire Department to serve the greater community of Tracy (including the West Valley Mall) more effectively within the established response time standard of 6.5 minutes.

The nearest fire station, Station 96, is located approximately 0.15 miles southeast of the Project site. The City of Tracy Public Safety Master Plan identifies this fire station that will permanently serve the Project area as Station "96" (Figure 22).

Response time and fire department effectiveness once units arrive are critical considerations in mitigating emergencies. The response time standard is defined as total reflex time (1:30 call processing, 1:00 turn-out time, and 4:00 travel-time). In addition, the Fire Department performance standard to measure effectiveness is to confine moderate risk structure fires to the room of origin or less 90 percent of the time in the City. In order to successfully mitigate emergencies, it is essential the Fire Department assemble an adequate number of personnel to perform critical tasks at the scene once the unit(s) arrive.

Recognizing the potential need for increases in fire protection and emergency medical services, the City's General Plan includes policies to ensure that adequate related facilities are funded and provided to meet future growth (Objective PF-1.1, P1). This policy is implemented through the review of all new projects with the City's Sphere of Influence, prior to development, and through the collection of development impact fees for the funding of facilities.

Impact fees from new development are collected based upon projected impacts from each development. The adequacy of impact fees is reviewed on an annual basis to ensure that the fee is commensurate with the service facility and equipment needs.

Payment of the applicable impact fees by the Project applicant, and ongoing revenues that would come from property taxes, sales taxes, participation in the Community Facilities District or similar funding mechanism, and other revenues generated by the Project, would fund capital and labor costs associated with fire protection services.

All construction plans and development proposals are evaluated to determine fire protection needs. The Fire Prevention Division works closely with other City departments to ensure appropriate design and construction standards, including adequate fire protection water flows and that fire-resistant building materials are met within new development projects.

As noted in Section XVIII, Utilities and Service Systems, the hydraulic modeling analysis completed for the proposed Project confirms that the existing system can meet the Project water demands while maintaining City's design criteria for average day, maximum day, maximum day demand with fire flow, and peak hour demands at the Project and throughout the existing water system. Based on the modeling results, the City's existing potable water system is adequate to deliver average day, maximum day demands, maximum day plus fire flow, and peak hour demands for the Project. It is recommended that the looped private fire service on the Project site be an 8-inch diameter pipeline and a public fire hydrant be constructed along the Project frontage along W. Grant Line Road. The aforementioned recommendations are included in Mitigation

Measure 17 in Section XVIII. Therefore, with implementation of the following mitigation measure, this impact is considered **less than significant**.

MITIGATION MEASURE(S)

Implement Mitigation Measure 17

a.ii) Police Protection: Less than Significant. The Tracy Police Department provides police protection services to the City of Tracy. Its headquarters are located at 1000 Civic Center Drive, approximately 2.2 miles southeast of the Project site. There are no satellite offices or plans to construct any in the near future.

The Department divides calls into three categories, Priority 1, 2, and 3 calls. Priority 1 calls are defined as life threatening situations. Priority 2 calls are not life threatening, but require immediate response. Priority 3 calls cover all other calls received by the police. Average response time for Priority 1 calls within city limits is approximately six to eight minutes. Response time for Priority 2 and 3 calls is, on average, 22 minutes.

The Tracy Police Department provides mutual aid to the San Joaquin County Sheriff's office, and vice versa, when a situation exceeds the capabilities of either department. Mutual aid is coordinated through the San Joaquin County Sheriff.

The City of Tracy General Fund provides approximately 96% of the Police Department's budget. The remaining 4% comes from various grants, fees, and assessments. The Police Department operates on a pre-approved annual budget, based on a fiscal year. New service demands are assessed when budget proposals are reviewed. Supplemental budget requests are considered on a case-by-case basis during the fiscal year.

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

a.iii) Schools: Less than Significant. The proposed Project includes development of a 94-room hotel in an area adjacent to existing commercial uses.

The Tracy Unified School District (TUSD) collects impact fees from new developments under the provisions of SB 50. Payment of the applicable impact fees by the Project applicant, and ongoing revenues that would come from taxes, would fund capital and labor costs associated with school services. The adequacy of fees is reviewed on an annual basis to ensure that the fee is commensurate with the service. Payment of the applicable impact fees by the Project applicant, and ongoing revenues that would come from property taxes, sales taxes, and other revenues generated by the Project, would fund improvements associated with school services. Under the provisions of SB 50, a project's impacts on school facilities are fully mitigated via the payment of

the requisite new school construction fees established pursuant to Government Code Section 65995. As such, the Project's impacts to school services are **less than significant**.

a.iv) Parks. Less than Significant. Potential Project impacts to parks and recreational facilities are addressed in the following Recreation section of this document.

a.v) Other Public Facilities: Less than Significant. Other public facilities in the City of Tracy include libraries, hospitals, and cultural centers such as museums and music halls. The proposed Project would increase demand on these facilities. The City of Tracy General Plan requires new development to pay its fair share of the costs of public buildings by collecting the Public Buildings Impact Fee. The Public Buildings Impact fee is used by the City to expand public services and maintain public buildings, including the Civic Center and libraries in order to meet the increased demand generated by new development. The collection of fees and determined fair share fee amounts are adopted by the City as Conditions of Approval (COAs) for all new development projects prior to Project approval. Payment of the applicable impact fees by the Project applicant, and ongoing revenues that would come from taxes, would ensure that Project impacts to libraries and public buildings are **less than significant.**

XV. RECREATION

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	

RESPONSES TO CHECKLIST QUESTIONS

Responses a), b): Less than Significant. The proposed Project would increase demand for parks and recreational facilities within the City of Tracy, and would increase the use of the City's existing parks and recreation system. Patrons of the proposed hotel may visit existing park and recreational facilities within the City. As described in the Tracy General Plan, the City maintains 48 mini-parks, 15 neighborhood parks, and eight community parks, providing approximately 256 acres at 71 sites. The City is also in the process of constructing the Holly Sugar Sports Park at the northern edge of the City, which will provide an additional 166 acres of sports parks, 86 acres of passive recreation area, and a 46-acre future expansion area for additional park facilities.

The City strives to maintain a standard of 4 acres of park land for every 1,000 persons. In order to maintain this standard, the City requires new development projects to either include land dedicated for park uses, or to pay in-lieu fees towards the City's parks program. Chapter 13.12 of the Tracy Municipal Code states that, *"all development projects shall be required to maintain the City standard of four (4) acres of park land per 1,000 population. All development projects, as a condition of approval of any tentative parcel map or tentative subdivision map, or as a condition of approval of any building permit, shall dedicate land to the City or pay a fee in lieu thereof, or a combination of both, in order to maintain this City standard. The precise obligation of any development project to dedicate land or pay a fee pursuant to this section shall be incorporated in the implementing resolution for the park fee applicable to the development project."*

The City of Tracy requires the payment of the Project's fair share in-lieu parks fees, as required by the City's General Plan. The collection of fees and determined fair share fee amounts are adopted by the City as Conditions of Approval (COAs) for all new development projects prior to Project approval. Fees paid aid in the development of new park-space and maintenance as required, to ensure continued high quality park facilities for all city residents. Additionally, given that the City maintains an ample and diverse range of park sites and park facilities, and collects fees from new development to fund the construction of new parks and the maintenance of existing parks, the additional demand for parks generated by the proposed Project would not result in the physical deterioration of existing parks and facilities within Tracy. As such, this is a **less than significant** impact and no mitigation is required.

XVI. TRANSPORTATION AND CIRCULATION -- WOULD THE PROJECT:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.?		X		
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?		X		
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?			X	
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
e) Result in inadequate emergency access?			X	
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a), b): Less than Significant with Mitigation. In order to determine potential impacts related to traffic generated by the proposed Project, a Traffic Impact Assessment (TIA) was prepared by Kimley-Horn and Associates in February 2017. The following existing and planned intersections have the greatest potential to be impacted by the proposed Project:

- Corral Hollow Road / Grant Line Road
- Southeast (SE) Project Driveway / Grant Line Road – New Intersection
- Northeast (NE) Project Driveway / Grant Line Road – New Intersection

This TIA was based on the following development conditions:

- **Project Characteristics**: Project Characteristics include descriptions of Project trip generation, distribution, and assignment. To determine the level of the Project's impact

at each of the study locations, an analysis was performed with Project-generated trips added to the baseline conditions.

The transportation system was analyzed for the following scenarios:

- **Existing Conditions**: Existing Conditions represent existing peak-hour traffic volumes on the existing roadway network. Existing traffic volumes were obtained from peak hour traffic counts at the study intersections.
- **Existing Plus Project Conditions**: Existing Plus Project Conditions represent existing traffic plus trips associated with the proposed Project. This scenario discusses traffic operations of the study locations under Existing Conditions with the addition of Project traffic. The roadway network for this scenario would remain the same as Existing Conditions except for roadways required to provide Project access driveways.
- **Existing Plus Background Traffic Conditions**: Existing Plus Background Traffic Conditions are based on existing traffic volumes added to traffic from approved projects in the study area (provided by the Tracy Grant Line TIA and the Tracy Harvest TIA).
- **Existing Plus Background Traffic Plus Project Conditions**: Existing Plus Background Traffic Plus Project Conditions are based on existing traffic volumes added to traffic from approved projects in the study area and traffic generated by the proposed Project.
- **Cumulative (Year 2035) Conditions**: Cumulative (Year 2035) Conditions represent build out of the City of Tracy Transportation Master Plan (TMP). Traffic volumes for 2035 were forecasted using the most recent update to the City of Tracy Travel Demand Model (TDM), which were also used in the *Tracy Grant Line Apartments TIA Consistency Memorandum*.[10] This scenario addresses cumulative intersection and roadway operations on the future transportation network as discussed in the City's TMP.
- **Cumulative (Year 2035) Plus Project Conditions**: Cumulative (Year 2035) Plus Project Conditions analyzes the addition of Project trips to the Cumulative (Year 2035) Conditions baseline traffic volumes and roadway network.

Analysis of potential environmental impacts at intersections is based on the concept of Level of Service (LOS). The LOS of an intersection is a qualitative measure used to describe operational conditions. LOS ranges from A (best), which represents minimal delay, to F (worst), which represents heavy delay and a facility that is operating at or near its functional capacity. LOS for the TIA were determined using methods defined in the *Highway Capacity Manual, 2010* (HCM) and Synchro 9 traffic analysis software. Because the HCM 2010 methodology within Synchro 9 does not support the analysis of U-turns, vehicles making a U-turn were coded in Synchro as left turning vehicles.

The HCM 2010 methodologies include procedures for analyzing side-street stop-controlled (SSSC), all-way stop-controlled (AWSC), and signalized intersections. The SSSC procedure defines LOS as a function of average control delay for each minor street approach movement. Conversely, the AWSC and signalized intersection procedures define LOS as a function of average control

[10] Tracy Grant Line Apartments TIA Consistency Memorandum, Kimley-Horn, July 30, 2014.

delay for the intersection as a whole. Table 8 relates the operational characteristics associated with each LOS category for signalized and unsignalized intersections.

TABLE 8: INTERSECTION LOS CRITERIA

LOS	*Description*	*Average Control Delay Per Vehicle (Seconds)*	
		Signalized Intersections	*Unsignalized Intersections*
A	Free flow with no delays. Users are virtually unaffected by others in the traffic stream.	≤ 10.0	≤ 10.0
B	Stable traffic. Traffic flows smoothly with few delays.	> 10.0 to 20.0	> 10.0 to 15.0
C	Stable flow but the operation of individual users becomes affected by other vehicles. Modest delays.	> 20.0 to 35.0	> 15.0 to 25.0
D	Approaching unstable flow. Operation of individual users becomes significantly affected by other vehicles. Delays may be more than one cycle during peak hours.	> 35.0 to 55.0	> 25.0 to 35.0
E	Unstable flow with operating conditions at or near the capacity level. Long delays and vehicle queuing.	> 55.0 to 80.0	> 35.0 to 50.0
F	Forced or breakdown flow that causes reduced capacity. Stop and go traffic conditions. Excessive long delays and vehicle queuing.	> 80.0	> 50.0

SOURCE: HIGHWAY CAPACITY MANUAL, TRANSPORTATION RESEARCH BOARD, 2010.

Project impacts were determined by comparing conditions without the proposed Project to those with the proposed Project. Significant impacts for intersections are created when traffic from the proposed Project causes the LOS to fall below the LOS threshold and causes any impacted intersections to deteriorate further. Significant impact criteria are discussed further below.

Study Intersections

The proposed Project will generate new vehicular trips that will increase traffic volumes on the City street network. To assess changes in traffic conditions associated with the proposed Project, the following intersections were selected based on the City criteria for evaluation in the TIA:

1. Corral Hollow Road / Grant Line Road
2. SE Project Driveway / Grant Line Road
3. NE Project Driveway / Corral Hollow Road

A qualitative assessment was also conducted at the intersection of Grant Line Road / I-205 Eastbound (EB) Ramps. This assessment utilizes the LOS results from the *Harvest in Tracy Draft Transportation Impact Study*.[11]

Study Segments

The proposed Project will generate new vehicular trips that will increase traffic volumes on the nearby street network. To assess changes in traffic conditions associated with the proposed Project, the roadway segments evaluated in the TIA include:

[11] Harvest in Tracy Draft Transportation Impact Study, SNG & Associates, Inc., January 2017.

1. Corral Hollow Road (SB) – I-205 to Grant Line Road
2. Corral Hollow Road (NB) – Grant Line Road to I-205
3. Grant Line Road (EB) – I-205 to Corral Hollow Road
4. Grant Line Road (WB) – Corral Hollow Road to I-205

Freeway Facilities

The TIA determined the Project would add 0.1% or less of the peak hour trips onto either I-205 immediately west of the Project site or I-580 under Cumulative (Year 2035) Conditions. This addition is insignificant. The Project applicant would pay Traffic Impact Fess to SJCOG and the City to offset incremental cumulative impacts as stated in the TIA. Therefore, impacts to freeway facilities will not be further evaluated.

Thresholds of Significance

Significance criteria are used to identify Project impacts. Currently, the City, SJCOG, and the County specify LOS thresholds that are utilized for roadways under their respective jurisdictions. The following significance criteria were used for the Project's TIA and are consistent with the thresholds from the 2011 General Plan Update, SJCOG criteria, San Joaquin County criteria, and Appendix G of the CEQA Guidelines. Accordingly, the Project would have a significant traffic impact under the jurisdiction of each of the following agencies if any of the criteria discussed below are met.

SAN JOAQUIN COUNCIL OF GOVERNMENTS

The Congestion Management Program (CMP) system for Project condition analysis includes Grant Line Road and Corral Hollow Road. Per the 2016 SJCOG CMP, the intersection LOS threshold is D.

CITY OF TRACY

The City has established LOS D, where feasible, as the minimum acceptable LOS for roadways and overall intersection operations (for roadways with a volume-to-capacity [v/c] ratio of 0.80 to 0.89 = LOS D). However, there are certain locations where this standard does not apply. The following provides a list and description of exceptions to the LOS D standard:

- LOS E or lower shall be allowed on streets and at intersections within ¼-mile of any freeway to discourage inter-regional traffic from using City streets.
- In the Downtown and Bowtie area of the City of Tracy, LOS E shall be allowed in order to create a pedestrian-friendly urban design character and densities necessary to support transit, bicycling, and walking.
- The City may allow individual locations to fall below the City's LOS D standard at intersections where construction of improvements is not feasible, prohibitively expensive, significantly impact adjacent properties or the environment, or have a significant adverse impact on the character of the community, including pedestrian mobility, crossing times, and comfort/convenience. Intersections may be permitted to fall below their adopted LOS standard on a temporary basis when the improvements

necessary to preserve the LOS standard are in the process of construction or have been designed and funded but not yet constructed.

Signalized Intersections

- Signalized intersections operating at an acceptable level (LOS D or better if located more than ¼-mile from a freeway) degrade to an unacceptable LOS E or F.
- Addition of Project trips causes a delay increase of more than four seconds to an intersection already operating at an unacceptable level.

Un-signalized Intersections

- Un-signalized intersections operating at LOS D or better degrade to an unacceptable LOS E or under (outside ¼-mile of a freeway), and LOS E or better degrade to an unacceptable LOS F (within ¼-mile of a freeway), and a traffic signal warrant is met.
- Addition of Project trips causes a volume increase of more than 10 percent at an intersection operating at an unacceptable level and meeting a signal warrant.

Existing Intersection and Roadway Network

To determine potential significant impacts related to the proposed Project, existing intersection and roadway segments were selected for analysis based on the City criteria. All intersections were analyzed for weekday AM and PM peak periods and Saturday peak periods, which are the peak periods during which the Project will generate the most trips onto the City road network.

Weekday and Saturday intersection turning movement volumes for the intersection of Corral Hollow Road and Grant Line Road were collected in January 2017. Volumes for the intersection were collected during the AM and PM peak periods of 7:00-9:00 AM and 4:00-6:00 PM, respectively, and during the Saturday peak period. Traffic counts taken during the weekday occurred when local schools were in session and the weather was fair.

Corral Hollow Road / Grant Line Road is a signalized intersection with marked crosswalks. It has two lanes in each direction on Corral Hollow Road, three lanes in each direction west of Grant Line Road, and two lanes in each direction east of Grant Line Road. This intersection has three 90-foot left turn bays and one 220-foot right turn bay in the northbound direction; two 240-foot left turn bays and one 265-foot right turn bay in the southbound direction; one 275-foot left turn bay and one 435-foot right turn bay in the eastbound direction; and two 170-foot left turn bays in the westbound direction.

Existing LOS at Study Intersections

Traffic operations were evaluated at the study intersections under Existing Conditions. Results of the analysis are presented in Table 9. As shown in Table 9, the intersection of Grant Line Road / Corral Hollow Road currently operates at LOS E during the Saturday peak hour, which is below the City's LOS D standard. The intersection of Grant Line Road / I-205 EB Ramps operates at a LOS C in the AM peak hour and LOS D in the PM peak hour, as reported in the *Harvest in Tracy Draft Transportation Impact Study*.

TABLE 9: EXISTING CONDITION LOS

#	Intersection	Control Type	Existing Condition								
			AM Peak Hour			PM Peak Hour			Saturday Peak Hour		
			Move-ment	Delay	LOS	Move-ment	Delay	LOS	Move-ment	Delay	LOS
1	Corral Hollow Rd. / Grant Line Rd.	Signal	Overall	26.1	C	Overall	52.0	D	**Overall**	**58.7**	**E**
2	SE Project Driveway / Grant Line Rd.	N/A	-	-	-	-	-	-	-	-	-
3	NE Project Driveway / Corral Hollow Rd.	N/A	-	-	-	-	-	-	-	-	-

NOTES: N/A = NOT APPLICABLE (FUTURE INTERSECTION)

1. ANALYSIS PERFORMED USING HCM 2010 METHODOLOGIES.

2. DELAY INDICATED IN SECONDS/VEHICLE.

3. OVERALL LOS STANDARD FOR THE CITY IS D.

4. INTERSECTIONS THAT FALL BELOW CITY STANDARD ARE SHOWN IN ***BOLD.***

5. THE AVERAGE CONTROL DELAY IS REPORTED FOR SIGNALIZED INTERSECTIONS. THE DELAY FOR THE WORST MOVEMENT IS REPORTED FOR SIDE-STREET STOP-CONTROLLED (SSSC) INTERSECTIONS)

SOURCE: KIMLEY-HORN AND ASSOCIATES, 2017.

Existing LOS at Study Intersections

Traffic operations were evaluated at the study roadway segments under Existing Conditions. Results of the analysis are presented in Table 10. As shown in Table 10, all study roadway segments function at an acceptable LOS per City and CMP requirements.

TABLE 10: EXISTING CONDITION ROADWAY SEGMENT ANALYSIS

Street	Segment	Existing Capacity (vph)	Existing Condition					
			Volume (vph)			V/C		
			AM	PM	Sat.	AM	PM	Sat.
Corral Hollow Rd. (SB)	I-205 to Grant Line Rd.	1,350	386	529	521	0.286	0.392	0.386
Corral Hollow Rd. (NB)	Grant Line Rd. to I-205	1,350	429	615	620	0.318	0.456	0.459
Grant Line Rd. (EB)	I-205 to Corral Hollow Rd.	2,025	522	1,471	1,382	0.258	0.726	0.682
Grant Line Rd. (WB)	Corral Hollow Rd. to I-205	2,025	1,321	1,104	1,345	0.625	0.545	0.664

NOTES: VPH = VEHICLES PER HOUR. VOLUMES DERIVED FROM THE 2017 INTERSECTION COUNTS. CAPACITIES DERIVED FROM THE CITY OF TRACY 2035 TRAVEL DEMAND MODEL. V/C RATIOS ARE CORRELATED WITH LOS AS FOLLOWS: <0.60 = LOS A; 0.60-0.69 = LOS B; 0.70-0.79 = LOS C; 0.80-0.89 = LOS D; 0.90-0.99 = LOS E; ≥1.00 = LOS F.

SOURCE: KIMLEY-HORN AND ASSOCIATES, 2017.

Project Trip Generation

Trip generation for the Project was calculated using the rates from the Institute of Transportation Engineer's (ITE's) publication *Trip Generation 9th Edition*[12], which is a standard reference used by jurisdictions throughout the County for the estimation of trip generation. A trip is defined in *Trip Generation* as a single or one-directional vehicle movement with either the origin or

[12] *Trip Generation, 9th Edition*, Institute of Transportation Engineers, 2012.

destination at the Project site. In other words, a trip can be either "to" or "from" the site. In addition, a single customer visit to a site is counted as two trips (i.e., one to and one from the site).

For purposes of determining the worst-case impacts of traffic on the surrounding street network, the trips generated by a proposed development are typically estimated between the hours of 7:00-9:00 AM and 4:00-6:00 PM on weekdays and the peak hour generator on Saturdays. Trip generation calculations prepared per ITE methodology are based on the number of hotel guest rooms. Additionally, because the Project is single use hotel, no internal capture, linked trip, or pass-by trip reductions were considered. Table 11 shows trips generated during weekdays and Table 12 shows trips generated during Saturdays by the proposed Project.

TABLE 11: PROJECT TRIP GENERATION (WEEKDAY)

Land Use	ITE Land Use Code	Size	Daily		AM Peak Hour				PM Peak Hour			
			Rate	Trips	Rate	In	Out	Total	Rate	In	Out	Total
Hotel[1]	310	94 Rooms	8.17	768	0.53	30	20	50	0.60	29	27	56
Net New Project Trips[2]			**-**	**768**	**-**	**30**	**20**	**50**	**-**	**29**	**27**	**56**

NOTES:

1. ITE CODE 310, BASED ON AVERAGE RATE.

2. EXISTING PROJECT SITE IS VACANT. NO TRIP REDUCTIONS OR PASS-BY TRIPS ASSUMED.

SOURCE: KIMLEY-HORN AND ASSOCIATES, 2017.

TABLE 12: PROJECT TRIP GENERATION (SATURDAY)

Land Use	ITE Land Use Code	Size	Daily	Peak Hour of Generator				
			Rate	Rate	Rate	In	Out	Total
Hotel[1]	310	94 Rooms	8.19	770	0.72	38	30	68
Net New Project Trips[2]			**-**	**770**	**-**	**38**	**30**	**68**

NOTES:

1. ITE CODE 310, BASED ON AVERAGE RATE.

2. EXISTING PROJECT SITE IS VACANT. NO TRIP REDUCTIONS OR PASS-BY TRIPS ASSUMED.

SOURCE: KIMLEY-HORN AND ASSOCIATES, 2017.

As illustrated in Table 4, during weekdays, the proposed Project is anticipated to generate 768 daily trips, 50 AM peak hour trips, and 56 PM peak hour trips. As illustrated in Table 5, during Saturdays, the proposed Project is anticipated to generate 770 daily trips with a total of 68 peak hour of generator trips.

Project Trip Distribution and Assignment

Trip distribution is a process that determines in what proportion vehicles would travel between a Project site and various destinations outside the Project study area. The process of trip assignment determines the various routes that vehicles would take from the Project site to each destination using the calculated trip distribution.

Due to the nature of the proposed Project, most guests staying at the proposed hotel are expected to travel predominantly to the west where they will have access to the regional highway, I-205. The remaining guests are anticipated to travel to the north, south, and east where retail land use

and downtown Tracy are located. The trip distribution was determined by the directional distribution provided by the Tracy Grant Line TIA.

Existing Plus Project Conditions

From the Corral Hollow Road / Grant Line Road intersection, approximately 40 percent of the Project trips would distribute westwards along Grant Line Road to I-205 and 20 percent would distribute eastwards to retail areas. Additional retail areas are located north of the proposed Project site where 15 percent of Project trips are distributed towards and the remaining 25 percent is distributed southward towards downtown Tracy.

In the AM peak hour, 50 peak hour trips will be generated, of which 30 trips will enter the site and 20 trips will exit the site. In the afternoon peak, 56 trips will be generated, of which 29 trips will enter the site and 27 trips will exit the site. In the Saturday peak, 68 trips will be generated, of which 38 trips will enter the site and 30 trips will exit the site.

EXISTING PLUS PROJECT INTERSECTION LOS

Traffic operations were evaluated at the study intersections under Existing Plus Project conditions for AM, PM, and Saturday peak hours. Project trips were added to Existing conditions volumes. Results of the analysis are presented in Table 13.

TABLE 13: EXISTING PLUS PROJECT CONDITION LOS

#	Intersection	Control Type	Existing Plus Project Condition									Delay Increase or Volume Increase?
			AM Peak Hour			PM Peak Hour			Saturday Peak Hour			
			Move-ment	Delay	LOS	Move-ment	Delay	LOS	Move-ment	Delay	LOS	
1	Corral Hollow Rd. / Grant Line Rd.	Signal	Overall	28.6	C	Overall	56.0	E	**Overall**	**63.2**	**E**	**Yes**
2	SE Project Driveway / Grant Line Rd.	SSSC	SSSC	-	-	SSSC	-	-	SSSC	-	-	-
		Worst Approach	*Worst Approach*	15.7	C	*Worst Approach*	14.1	B	*Worst Approach*	16.1	C	-
3	NE Project Driveway / Corral Hollow Rd.	SSSC	SSSC	-	-	SSSC	-	-	SSSC	-	-	-
		Worst Approach	*Worst Approach*	9.5	A	*Worst Approach*	10.0	B	*Worst Approach*	10.0	B	-

NOTES: DELAY INCREASE IS GREATER THAN 4 SECONDS/VEHICLE FOR SIGNALIZED INTERSECTIONS, OR VOLUME INCREASE IS GREATER THAN 10% FOR STOP CONTROLLED INTERSECTIONS.

1. ANALYSIS PERFORMED USING HCM 2010 METHODOLOGIES.

2. DELAY INDICATED IN SECONDS/VEHICLE.

3. OVERALL LOS STANDARD FOR THE CITY IS D.

*4. INTERSECTIONS THAT FALL BELOW CITY STANDARD ARE SHOWN IN **BOLD.***

SOURCE: KIMLEY-HORN AND ASSOCIATES, 2017.

As shown in Table 13, all the intersections would operate at acceptable LOS, except for Grant Line Road / Corral Hollow Road. In the Existing Plus Project scenario, this intersection operates with a LOS E during the PM peak hour and Saturday peak hour with the addition of the Project traffic. The addition of the Project traffic increases the delay by more than 4 seconds per vehicle

(sec/veh) (the City significance threshold), and thus the Project would result in a significant impact at this intersection.

In addition, a qualitative assessment of the intersection of Grant Line Road and the I-205 EB Ramps was performed based on data and findings from the *Harvest in Tracy Draft Transportation Impact Study*. The Existing conditions showed that this intersection operated at a LOS C in the AM peak hour and LOS D in the PM peak hour. The proposed Project would add less than 12 vehicle trips in each direction in the AM and PM peak hours to this intersection and, therefore, this should not worsen the LOS to an unacceptable LOS F.

EXISTING PLUS PROJECT ROADWAY SEGMENT LOS

Traffic operations were evaluated at the study roadway segments under Existing Plus Project conditions. Results of the analysis are presented in Table 14. As shown in Table 14, all study roadway segments would function at an acceptable LOS per City requirements.

TABLE 14: EXISTING PLUS PROJECT CONDITION ROADWAY SEGMENT ANALYSIS

Street	Segment	Existing Capacity (vph)	Existing Plus Project Condition					
			Volume (vph)			V/C		
			AM	PM	Sat.	AM	PM	Sat.
Corral Hollow Rd. (SB)	I-205 to Grant Line Rd.	1,350	398	545	540	0.295	0.404	0.400
Corral Hollow Rd. (NB)	Grant Line Rd. to I-205	1,350	0.258	0.726	0.682	0.327	0.464	0.470
Grant Line Rd. (EB)	I-205 to Corral Hollow Rd.	2,025	534	1,483	1,397	0.264	0.732	0.690
Grant Line Rd. (WB)	Corral Hollow Rd. to I-205	2,025	1,335	1,117	1,363	0.659	0.552	0.673

NOTES: VPH = VEHICLES PER HOUR. VOLUMES DERIVED FROM THE 2017 INTERSECTION COUNTS. CAPACITIES DERIVED FROM THE CITY OF TRACY 2035 TRAVEL DEMAND MODEL. V/C RATIOS ARE CORRELATED WITH LOS AS FOLLOWS: <0.60 = LOS A; 0.60-0.69 = LOS B; 0.70-0.79 = LOS C; 0.80-0.89 = LOS D; 0.90-0.99 = LOS E; ≥1.00 = LOS F.
SOURCE: KIMLEY-HORN AND ASSOCIATES, 2017.

Existing Plus Background Conditions

Under Existing Plus Background conditions, it is anticipated that the intersection of Grant Line Road / Corral Hollow Road will change in lane geometry. In the near-term, the northbound left turn pocket of the intersection will be lengthened to provide additional left turn storage for northbound vehicles along Corral Hollow Road. This roadway improvement is associated with the Grant Line Apartments project as part of their mitigation. The mitigation also proposes to close the median along Corral Hollow Road, south of Grant Line Road. This will prohibit southbound left turn vehicles from entering the Rite Aid shopping center.

EXISTING PLUS BACKGROUND TRAFFIC VOLUMES

Approved project volumes from the Tracy Grant Line TIA and Tracy Harvest TIA were used to determine approved projects volumes that would be included in the Existing Plus Background scenario. These two projects are the only projects anticipated to generate traffic through the Project study area by opening year.

EXISTING PLUS BACKGROUND INTERSECTION LOS

Existing Plus Background volumes were evaluated at the study intersections. Results of the analysis are presented in Table 15. As shown in Table 15, the intersection of Grant Line Road and Corral Hollow Road would operate at LOS F during both the PM peak hour and Saturday peak hour, which is an unacceptable LOS.

TABLE 15: EXISTING PLUS BACKGROUND CONDITIONS

#	Intersection	Control Type	Existing Plus Background Condition								
			AM Peak Hour			PM Peak Hour			Saturday Peak Hour		
			Move-ment	Delay	LOS	Move-ment	Delay	LOS	Move-ment	Delay	LOS
1	Corral Hollow Rd. / Grant Line Rd.	Signal	Overall	33.6	C	**Overall**	**103.1**	**F**	**Overall**	**112.3**	**F**
2	SE Project Driveway / Grant Line Rd.	N/A	-	-	-	-	-	-	-	-	-
3	NE Project Driveway / Corral Hollow Rd.	N/A	-	-	-	-	-	-	-	-	-

NOTES: N/A = NOT APPLICABLE (FUTURE INTERSECTION)

1. ANALYSIS PERFORMED USING HCM 2010 METHODOLOGIES.

2. DELAY INDICATED IN SECONDS/VEHICLE.

3. OVERALL LOS STANDARD FOR THE CITY IS D.

*4. INTERSECTIONS THAT FALL BELOW CITY STANDARD ARE SHOWN IN **BOLD.***

5. THE AVERAGE CONTROL DELAY IS REPORTED FOR SIGNALIZED INTERSECTIONS. THE DELAY FOR THE WORST MOVEMENT IS REPORTED FOR SIDE-STREET STOP-CONTROLLED (SSSC) INTERSECTIONS)

SOURCE: KIMLEY-HORN AND ASSOCIATES, 2017.

EXISTING PLUS BACKGROUND LOS AT ROADWAY SEGMENTS

Traffic operations were evaluated at the study roadway segments under Existing Plus Background traffic conditions. Results of the analysis are presented in Table 16. As shown in Table 16, all study roadway segments function at an acceptable LOS per City requirements.

TABLE 16: EXISTING PLUS BACKGROUND CONDITION ROADWAY SEGMENT ANALYSIS

Street	Segment	Existing Capacity (vph)	Existing Plus Background Condition					
			Volume (vph)			V/C		
			AM	PM	Sat.	AM	PM	Sat.
Corral Hollow Rd. (SB)	I-205 to Grant Line Rd.	1,350	393	544	537	0.291	0.403	0.398
Corral Hollow Rd. (NB)	Grant Line Rd. to I-205	1,350	436	627	633	0.323	0.464	0.469
Grant Line Rd. (EB)	I-205 to Corral Hollow Rd.	2,025	681	1,755	1,687	0.336	0.867	0.833
Grant Line Rd. (WB)	Corral Hollow Rd. to I-205	2,025	1,437	1,411	1,672	0.710	0.697	0.826

NOTES: VPH = VEHICLES PER HOUR. VOLUMES DERIVED FROM THE 2017 INTERSECTION COUNTS. CAPACITIES DERIVED FROM THE CITY OF TRACY 2035 TRAVEL DEMAND MODEL. V/C RATIOS ARE CORRELATED WITH LOS AS FOLLOWS: <0.60 = LOS A; 0.60-0.69 = LOS B; 0.70-0.79 = LOS C; 0.80-0.89 = LOS D; 0.90-0.99 = LOS E; ≥1.00 = LOS F.

SOURCE: KIMLEY-HORN AND ASSOCIATES, 2017.

EXISTING PLUS BACKGROUND PLUS PROJECT INTERSECTION LOS

Existing Plus Background Plus Project conditions were evaluated at the study intersections. Results of the analysis are presented in Table 17. As shown in Table 17, the intersection of Grant Line Road and Corral Hollow Road would operate at LOS F during both the PM peak hour and Saturday peak hour, which is an unacceptable LOS. The addition of the Project traffic increases the delay by more than 4 sec/veh and, therefore, the Project has a significant impact at this intersection.

TABLE 17: EXISTING PLUS BACKGROUND PLUS PROJECT CONDITION LOS

#	Intersection	Control Type	Existing Plus Background Plus Project Condition									Delay Increase or Volume Increase?
			AM Peak Hour			PM Peak Hour			Saturday Peak Hour			
			Move-ment	Delay	LOS	Move-ment	Delay	LOS	Move-ment	Delay	LOS	
1	Corral Hollow Rd. / Grant Line Rd.	Signal	Overall	38.6	D	**Overall**	**107.6**	**F**	**Overall**	**117.6**	**F**	**Yes**
2	SE Project Driveway / Grant Line Rd.	SSSC	SSSC	-	-	SSSC	-	-	SSSC	-	-	-
		Worst Approach	*Worst Approach*	16.8	C	*Worst Approach*	16.5	C	*Worst Approach*	19.3	C	-
3	NE Project Driveway / Corral Hollow Rd.	SSSC	SSSC	-	-	SSSC	-	-	SSSC	-	-	-
		Worst Approach	*Worst Approach*	9.5	A	*Worst Approach*	10.1	B	*Worst Approach*	10.1	B	-

NOTES: DELAY INCREASE IS GREATER THAN 4 SECONDS/VEHICLE FOR SIGNALIZED INTERSECTIONS, OR VOLUME INCREASE IS GREATER THAN 10% FOR STOP CONTROLLED INTERSECTIONS.

1. ANALYSIS PERFORMED USING HCM 2010 METHODOLOGIES.

2. DELAY INDICATED IN SECONDS/VEHICLE.

3. OVERALL LOS STANDARD FOR THE CITY IS D.

*4. INTERSECTIONS THAT FALL BELOW CITY STANDARD ARE SHOWN IN **BOLD.***

SOURCE: KIMLEY-HORN AND ASSOCIATES, 2017.

A qualitative assessment of the intersection of Grant Line Road and the I-205 EB Ramps was not performed because the Harvest in Tracy Draft Transportation Impact Study did not study the Existing Plus Background conditions. However, the proposed Project is adding less than 12 vehicle trips in each direction in the AM and PM peak hours to this intersection and, therefore, the Project's potential impact should be minimal.

EXISTING PLUS BACKGROUND PLUS PROJECT LOS AT ROADWAY SEGMENTS

Traffic operations were evaluated at the study roadway segments under Existing Plus Background Plus Project conditions. Results of the analysis are presented in Table 18. As shown in Table 18, all study roadway segments function at an acceptable LOS per City requirements.

TABLE 18: EXISTING PLUS BACKGROUND PLUS PROJECT CONDITION ROADWAY SEGMENT ANALYSIS

Street	Segment	Existing Capacity (vph)	Existing Plus Background Condition					
			Volume (vph)			V/C		
			AM	PM	Sat.	AM	PM	Sat.
Corral Hollow Rd. (SB)	I-205 to Grant Line Rd.	1,350	405	560	556	0.300	0.415	0.412
Corral Hollow Rd. (NB)	Grant Line Rd. to I-205	1,350	448	639	648	0.332	0.473	0.480
Grant Line Rd. (EB)	I-205 to Corral Hollow Rd.	2,025	0.693	1,767	1,702	0.342	0.873	0.840
Grant Line Rd. (WB)	Corral Hollow Rd. to I-205	2,025	1,451	1,424	1,690	0.717	0.703	0.835

NOTES: VPH = VEHICLES PER HOUR. VOLUMES DERIVED FROM THE 2017 INTERSECTION COUNTS. CAPACITIES DERIVED FROM THE CITY OF TRACY 2035 TRAVEL DEMAND MODEL. V/C RATIOS ARE CORRELATED WITH LOS AS FOLLOWS: <0.60 = LOS A; 0.60-0.69 = LOS B; 0.70-0.79 = LOS C; 0.80-0.89 = LOS D; 0.90-0.99 = LOS E; ≥1.00 = LOS F.
SOURCE: KIMLEY-HORN AND ASSOCIATES, 2017.

Cumulative (Year 2035) Condition

Traffic operations were evaluated under the following cumulative conditions:

- Cumulative (Year 2035) Conditions
- Cumulative (Year 2035) Plus Project Conditions

Results of the analysis are presented in the following sections.

CUMULATIVE (YEAR 2035) INTERSECTION AND ROADWAY SEGMENT IMPROVEMENTS

The Tracy TMP includes several improvements to City of Tracy intersections, primarily signalizing and incorporating additional turn pockets and through lanes where projected traffic is forecasted to increase substantially. Within the study area, additional turn pockets are projected at the intersection of Grant Line Road and Corral Hollow Road. TMP improvements have been identified along Corral Hollow Road from I-205 to Schulte Road. Additionally, the Tracy TMP includes several improvements to the City of Tracy roadway network that includes, but is not limited to, the roadway widening of Corral Hollow Road to six lanes from I-205 to Schulte Road. An additional southbound left turn pocket is proposed at the intersection of Grant Line Road and Corral Hollow Road.

CUMULATIVE (YEAR 2035) CONDITION LOS AT STUDY INTERSECTIONS

Traffic operations were evaluated at the study intersections under Cumulative (Year 2035) traffic conditions. Results of the analysis are presented in Table 19. As shown in Table 19, a would operate at an acceptable LOS per City requirements.

A qualitative assessment of the intersection of Grant Line Road and the I-205 EB Ramps was performed based on data and findings from the *Harvest in Tracy Draft Transportation Impact Study*. The Cumulative (Year 2035) Plus Project conditions showed that this intersection will operate at a LOS E in the AM peak hour and LOS F in the PM peak hour.

TABLE 19: CUMULATIVE (YEAR 2035) CONDITION LOS

#	Intersection	Control Type	Cumulative Condition								
			AM Peak Hour			PM Peak Hour			Saturday Peak Hour		
			Move-ment	Delay	LOS	Move-ment	Delay	LOS	Move-ment	Delay	LOS
1	Corral Hollow Rd. / Grant Line Rd.	Signal	Overall	30.1	C	Overall	41.0	D	Overall	46.4	D
2	SE Project Driveway / Grant Line Rd.	N/A	-	-	-	-	-	-	-	-	-
3	NE Project Driveway / Corral Hollow Rd.	N/A	-	-	-	-	-	-	-	-	-

NOTES: N/A = NOT APPLICABLE (FUTURE INTERSECTION)

1. ANALYSIS PERFORMED USING HCM 2010 METHODOLOGIES.

2. DELAY INDICATED IN SECONDS/VEHICLE.

3. OVERALL LOS STANDARD FOR THE CITY IS D.

4. INTERSECTIONS THAT FALL BELOW CITY STANDARD ARE SHOWN IN ***BOLD.***

5. THE AVERAGE CONTROL DELAY IS REPORTED FOR SIGNALIZED INTERSECTIONS. THE DELAY FOR THE WORST MOVEMENT IS REPORTED FOR SIDE-STREET STOP-CONTROLLED (SSSC) INTERSECTIONS).

SOURCE: KIMLEY-HORN AND ASSOCIATES, 2017.

CUMULATIVE (YEAR 2035) LOS AT ROADWAY SEGMENTS

Traffic operations were evaluated at the study roadway segments under Cumulative (Year 2035) traffic conditions. Results of the analysis are presented in Table 20. As shown in Table 20, the segment of Grant Line Road between I-205 and Corral Hollow Road would operate at a deficient v/c in the eastbound direction during the PM and Saturday peak hours and in the westbound direction during the Saturday peak hour.

TABLE 20: CUMULATIVE (YEAR 2035) CONDITION ROADWAY SEGMENT ANALYSIS

Street	Segment	Existing Capacity (vph)	Cumulative Condition					
			Volume (vph)			V/C		
			AM	PM	Sat.	AM	PM	Sat.
Corral Hollow Rd. (SB)	I-205 to Grant Line Rd.	1,350	1,013	1,440	1,427	0.500	0.711	0.705
Corral Hollow Rd. (NB)	Grant Line Rd. to I-205	1,350	1,037	1,122	1,198	0.512	0.554	0.592
Grant Line Rd. (EB)	I-205 to Corral Hollow Rd.	2,025	708	1,963	1,895	0.350	**0.969**	**0.936**
Grant Line Rd. (WB)	Corral Hollow Rd. to I-205	2,025	1,222	1,621	1,999	0.603	0.800	**0.987**

NOTES: VPH = VEHICLES PER HOUR. CAPACITIES DERIVED FROM THE CITY OF TRACY 2035 TRAVEL DEMAND MODEL. V/C RATIOS ARE CORRELATED WITH LOS AS FOLLOWS: <0.60 = LOS A; 0.60-0.69 = LOS B; 0.70-0.79 = LOS C; 0.80-0.89 = LOS D; 0.90-0.99 = LOS E; ≥1.00 = LOS F. SEGMENTS THAT FALL BELOW CITY STANDARD ARE SHOWN IN ***BOLD.***

SOURCE: KIMLEY-HORN AND ASSOCIATES, 2017.

CUMULATIVE (YEAR 2035) PLUS PROJECT CONDITION LOS AT STUDY INTERSECTIONS

Trips generated by the Project were added to the Cumulative (Year 2035) conditions to assess the Cumulative (Year 2035) Plus Project traffic volumes. Cumulative (Year 2035) Plus Project conditions were evaluated at study intersections and are presented in Table 21. As shown in Table 21, Intersection #1 – Grant Line Road / Corral Hollow Road would operate at an unacceptable LOS E for the Saturday peak hour with the addition of the Project traffic. The

addition of the Project traffic worsens the intersection from an acceptable LOS D to an unacceptable LOS E and, thus, the Project would result in a significant impact at this intersection.

TABLE 21: CUMULATIVE (YEAR 2035) PLUS PROJECT CONDITION LOS

#	Intersection	Control Type	Cumulative Plus Project Condition									Delay Increase or Volume Increase?
			AM Peak Hour			PM Peak Hour			Saturday Peak Hour			
			Move-ment	Delay	LOS	Move-ment	Delay	LOS	Move-ment	Delay	LOS	
1	Corral Hollow Rd. / Grant Line Rd.	Signal	Overall	35.2	D	Overall	49.7	D	**Overall**	**58.5**	**E**	**Yes**
2	SE Project Driveway / Grant Line Rd.	SSSC	SSSC	-	-	SSSC	-	-	SSSC	-	-	-
		Worst Approach	*Worst Approach*	15.0	C	*Worst Approach*	18.8	C	*Worst Approach*	23.9	C	-
3	NE Project Driveway / Corral Hollow Rd.	SSSC	SSSC	-	-	SSSC	-	-	SSSC	-	-	-
		Worst Approach	*Worst Approach*	13.5	B	*Worst Approach*	16.9	C	*Worst Approach*	16.9	C	-

NOTES: DELAY INCREASE IS GREATER THAN 4 SECONDS/VEHICLE FOR SIGNALIZED INTERSECTIONS, OR VOLUME INCREASE IS GREATER THAN 10% FOR STOP CONTROLLED INTERSECTIONS.

1. ANALYSIS PERFORMED USING HCM 2010 METHODOLOGIES.

2. DELAY INDICATED IN SECONDS/VEHICLE.

3. OVERALL LOS STANDARD FOR THE CITY IS D.

*4. INTERSECTIONS THAT FALL BELOW CITY STANDARD ARE SHOWN IN **BOLD.***

SOURCE: KIMLEY-HORN AND ASSOCIATES, 2017.

A qualitative assessment of the intersection of Grant Line Road and the I-205 EB Ramps was performed based on data and findings from the *Harvest in Tracy Draft Transportation Impact Study*. The Cumulative Plus Project conditions showed that this intersection will operate at a LOS E (with 59.4 seconds of delay) in the AM peak hour and LOS F (with 282.1 seconds of delay) in the PM peak hour. The proposed Project is adding less than 12 vehicle trips in each direction in the AM and PM peak hours to this intersection and, therefore, this should not worsen the LOS in the AM peak hour to LOS F (at least 80 seconds of delay). However, in the PM peak hour, the intersection is already failing and, therefore, the Project would worsen the intersection slightly. No mitigations were proposed in the *Harvest in Tracy Draft Transportation Impact Study*.

CUMULATIVE (YEAR 2035) PLUS PROJECT LOS AT ROADWAY SEGMENTS

Traffic operations were evaluated at the study roadway segments under Cumulative (Year 2035) Plus Project traffic conditions. Results of the analysis are presented in Table 22. As shown in Table 22, the segment of Grant Line Road between I-205 to Corral Hollow Road would operate a deficient v/c in the eastbound direction during the PM and Saturday peak hours and in the westbound direction during the Saturday peak hour. However, the Project increases the v/c by less than 0.01 and, therefore, this is not a significant impact.

TABLE 22: CUMULATIVE (YEAR 2035) PLUS PROJECT CONDITION ROADWAY SEGMENT ANALYSIS

Street	Segment	Existing Capacity (vph)	Cumulative Plus Project Condition					
			Volume (vph)			V/C		
			AM	PM	Sat.	AM	PM	Sat.
Corral Hollow Rd. (SB)	I-205 to Grant Line Rd.	1,350	1,025	1,456	1,446	0.506	0.719	0.714
Corral Hollow Rd. (NB)	Grant Line Rd. to I-205	1,350	1,049	1,134	1,213	0.518	0.560	0.599
Grant Line Rd. (EB)	I-205 to Corral Hollow Rd.	2,025	720	1,975	1,910	0.356	**0.975**	**0.943**
Grant Line Rd. (WB)	Corral Hollow Rd. to I-205	2,025	1,236	1,634	2,017	0.610	0.807	**0.996**

NOTES: VPH = VEHICLES PER HOUR. CAPACITIES DERIVED FROM THE CITY OF TRACY 2035 TRAVEL DEMAND MODEL. V/C RATIOS ARE CORRELATED WITH LOS AS FOLLOWS: <0.60 = LOS A; 0.60-0.69 = LOS B; 0.70-0.79 = LOS C; 0.80-0.89 = LOS D; 0.90-0.99 = LOS E; ≥1.00 = LOS F. SEGMENTS THAT FALL BELOW CITY STANDARD ARE SHOWN IN ***BOLD.***
SOURCE: KIMLEY-HORN AND ASSOCIATES, 2017.

Conclusion

The intersection of Grant Line Road and Corral Hollow Road operates at an unacceptable LOS in the Existing Plus Project, Existing Plus Background Plus Project, and the Cumulative (Year 2035) Plus Project scenarios. For the Existing Plus Project scenario, optimizing the cycle length would mitigate the significant impact to less than significant. In both the PM and Saturday peak hours, the LOS would improve from an unacceptable LOS E to an acceptable LOS C. For the Existing Plus Background Plus Project scenario, optimizing the cycle length would mitigate the significant impact to less than significant. In both the PM and Saturday peak hours, the LOS would improve from an unacceptable LOS F to an acceptable LOS D. For the Cumulative (Year 2035) Plus Project scenario, changing the northbound left turn phase to a lagging phase would mitigate the significant impact to less than significant. In the Saturday peak hour, the LOS would improve from an unacceptable LOS E to an acceptable LOS D. Table 23 illustrates the LOS at Grant Line Road / Corral Hollow Road with the proposed mitigations.

The Project applicant would be required to pay SJCOG, County of San Joaquin, and City of Tracy Traffic Impact Fees. The fees will be utilized to pay a proportionate fair share towards lengthening the northbound left turn pocket and shortening the bay taper to provide additional left turn storage from northbound Corral Hollow Road onto Grant Line Road, and also contribute towards Citywide cumulative incremental impacts and closing the median south of Grant Line Road to allow for the lengthening of the northbound left turn pocket. Based on the Saturday peak hour, the Project's fair share percentage is two percent. Implementation of the following mitigation measure would ensure that the Project would have a **less than significant** impact related to the intersection of Grant Line Road and Corral Hollow Road.

TABLE 23: IMPROVED CONDITIONS LOS

#	Intersection	Control Type	Without Project Conditions									Plus Project Conditions (Mitigated)								
			AM Peak Hour			PM Peak Hour			Saturday Peak Hour			AM Peak Hour			PM Peak Hour			Saturday Peak Hour		
			Move-ment	Delay	LOS	Move-ment	Delay	LOS	Move-ment	Delay	LOS	Move-ment	Delay	LOS	Move-ment	Delay	LOS	Move-ment	Delay	LOS
Existing Conditions and Existing Plus Project Conditions																				
1	Corral Hollow Rd. / Grant Line Rd.	Signal	Over-all	26.1	C	Over-all	52.0	D	**Over-all**	**58.7**	**E**	Over-all	26.1	C	Over-all	30.0	C	Over-all	31.6	C
Existing Plus Background Conditions and Existing Plus Background Plus Project Conditions																				
1	Corral Hollow Rd. / Grant Line Rd.	Signal	Over-all	33.6	C	**Over-all**	**103.1**	**F**	**Over-all**	**112.3**	**F**	Over-all	37.5	D	Over-all	40.3	D	Over-all	40.6	D
Cumulative (Year 2035) Conditions and Cumulative (Year 2035) Plus Project Conditions																				
1	Corral Hollow Rd. / Grant Line Rd.	Signal	Over-all	30.1	C	Over-all	41.0	D	Over-all	46.4	D	Over-all	35.1	D	Over-all	49.5	D	Over-all	54.5	D

NOTES:

1. ANALYSIS PERFORMED USING HCM 2010 METHODOLOGIES.

2. DELAY INDICATED IN SECONDS/VEHICLE.

3. OVERALL LOS STANDARD FOR THE CITY IS D.

*4. INTERSECTIONS THAT FALL BELOW CITY STANDARD ARE SHOWN IN **BOLD.***

SOURCE: KIMLEY-HORN AND ASSOCIATES, 2017.

MITIGATION MEASURE(S)

Mitigation Measure 16: *Prior to the issuance of a building permit, the applicant shall pay all applicable SJCOG, County of San Joaquin, and City of Tracy Traffic Impact Fees. The payment of Traffic Impact Fees would satisfy the obligation of the Project towards the cost to improve the intersection of Grant Line Road and Corral Hollow Road. The improvements include lengthening the northbound left turn pocket and shortening the bay taper to provide additional left turn storage from northbound Corral Hollow Road onto Grant Line Road, and would also contribute towards Citywide cumulative incremental impacts and closing the median south of Grant Line Road to allow for the lengthening of the northbound left turn pocket. Fair share cost of the Project shall be determined by the City Engineer. Based on the Saturday peak hour, the Project's fair share percentage may be two percent.*

Response c): Less than Significant. The Tracy Municipal Airport is the closest airport to the Project site, located approximately 4.4 miles south of the site. The Airport is a general aviation airport owned by the City and managed by the Public Works Department. As discussed previously in the Hazards and Hazardous Materials section, the Project site is not located within any of the safety restriction zones or within the airport influence area as designated by SJCOG. The proposed Project includes one four-story hotel structure that would not protrude into active airspace, or disrupt aviation patterns. The distance, and development characteristics precludes the possibility of the proposed Project altering aviation patterns or creating aviation hazards. Additionally, the addition of a 94-room hotel would not be expected to significantly increase air travel demand. Therefore, Implementation of the proposed Project would not result in any needed changes to airport operations or air travel patterns at the Tracy Municipal Airport. This impact is **less than significant,** and no mitigation is required.

Responses d) and e): **Less than Significant.** Based on the preliminary site plan, two driveway access points to the site will be provided: one driveway off West Grant Line Road and one shared driveway connecting the Project site to the adjacent commercial parcel to the west. As part of the Project's TIA, on-site circulation was evaluated at the Project's internal intersections and all internal intersections shall be SSSC.

Vehicle queuing for each proposed study intersection/driveway was analyzed using the 2010 HCM methodology. The 95th percentile queue length was compared to the turn pocket storage length to determine if queues would exceed the storage length. Only left turn queues were evaluated for operational deficiencies. The analysis showed that queuing storage deficiencies would occur at the intersection of Grant Line Road and Corral Hollow Road for the eastbound right approach due to the proposed Project in the Cumulative (Year 2035) Plus Project scenario.

The effects of vehicle queuing were analyzed and the 95th percentile queue is reported for the intersection of Grant Line Road / Corral Hollow Road. The 95th percentile queue length represents a condition where 95 percent of the time during the peak hour, traffic volumes will be less than or equal to the queue length determined by the analysis. This is referred to as the "95th percentile queue."

Queues that exceed the turn pocket length can create potentially hazardous conditions by blocking or disrupting through traffic in adjacent travel lanes. However, these potentially hazardous queues are generally associated with left turn movements. Locations where the right turn pocket storage is exceeded are not typically considered potentially hazardous because the right turn movement progresses at the same time as the through movement and the additional vehicles that spill out of the turn pocket are less likely to hinder or disrupt the adjacent through traffic.

As congestion increases, it is common for traffic at intersections to form lines of stopped (or queued) vehicles. Queue lengths were determined for each turn lane and measure the distance that vehicles will back up in each direction approaching an intersection. The 95th percentile queue is used to account for fluctuations in traffic and represents a condition where 95 percent of the time during the peak period, traffic volumes will be less than or equal to the queue determined by the analysis. It is used as a benchmark for determining deficiencies as a standard transportation engineering practice. A typical vehicle length of 25 feet was used in the queuing analysis. Because there are no defined thresholds for vehicle queues, an operational deficiency was assumed to occur if the queue increases by one or more vehicles and the vehicle queue exceeds the turn pocket length.

The queuing analysis showed that several existing turn bay storage lengths are exceeded, but these are all pre-existing deficiencies. The northbound left turn lane queue of 180 feet, 240 feet, and 342 feet in the AM, PM, and Saturday peak hours, respectively, in the Existing condition exceed the 90-foot turn pocket length. The Project would not add more than one vehicle length (i.e., 25 feet) to the queue and, therefore, this is not an operational deficiency due to the proposed Project.

In the Existing Plus Background Plus Project condition, the northbound left turn storage pocket length is extended as a mitigation for the Grant Line Apartments project. The length of the turn pocket lane is not specified. Nonetheless, the proposed Project would not add more than a vehicle to the queue length. With the mitigation of optimizing the cycle length at this intersection to address the LOS impact, the northbound left turn lane queue is 380 feet.

The proposed site plan provides adequate access to the Project site, which would adequately accommodate emergency vehicles. Implementation of the proposed Project would have a less than significant impact related to emergency access, and would not interfere with an emergency evacuation plan. Overall, this is a **less than significant** impact and no mitigation is required.

Response f): Less than Significant. The guests and employees of the proposed Project will have the option of driving, taking transit, walking or bicycling to and from the proposed Project. As part of the Project's TIA, the proposed Project was evaluated to determine if it would likely conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks) or generate pedestrian, bicycle, or transit travel demand that would not be accommodated by existing transit, bicycle, or pedestrian facilities and plans.

Transit

Those taking transit from the Project site may utilize Route 90 of the County Hopper service that operates along Grant Line Road, with a stop at the intersection of Grant Line Road and Orchard Parkway. This is the only transit route that runs adjacent to the Project site along Grant Line Road and Corral Hollow Road. The Project would likely not conflict with existing or planned transit facilities. Because the number of options for transit to and from the site is limited due to the proximity to the site, the Project will likely add few transit riders and, therefore, not degrade the transit operations. Because the Project does not conflict with existing or planned transit facilities and there are adequate facilities for pedestrian and bicycles to access transit stops, the Project will have a **less than significant** impact on transit services.

Pedestrian

Sidewalks currently exist along the Project site's frontage on Corral Hollow Road and on Grant Line Road. The Project is proposing to close the existing sidewalk gap on the north side of Grant Line Road fronting the proposed Project. It is anticipated that pedestrians would use these sidewalks along the Project site's frontages to access the adjacent land uses and the transit stop nearby. At the intersection of Corral Hollow Road and Grant Line Road, there are striped crosswalks for each direction, allowing pedestrians to more safely cross the adjacent roadways. The Project will have a **less than significant** impact on pedestrian service.

Bicycle

Bicyclists will have direct access to the Project site using bicycle lanes on Grant Line Road and Corral Hollow Road. These bicycle lanes provide access to the Project site and other bicycle facilities throughout the City. The Project is proposing to extend the curb return for the southbound right turn movement at the intersection of Grant Line Road and Corral Hollow Road. In addition, the Project proposes to restrict right turns on red for the southbound right turn movement. This improvement should improve bicycle movement because westbound bicycle riders at this intersection would not be conflicted with southbound right turning vehicles making the right turn on red when the westbound approach has the green light.

The proposed Project does not impact the safety of bicyclists or have any hazardous design features impeding the use of bicycles facilities. Because the proposed Project does not conflict with any adopted policies or plans related to bicycle activity, the proposed Project will have a **less than significant** impact on bicycle service.

Conclusion

Overall, Project implementation would assist the City in providing connections and access to alternative transportation in the Project area by closing existing sidewalk gaps, improving the pedestrian facilities on adjacent roadways, and improving bicycle movement by restricting right turns on red for the southbound right turn movement. Therefore, the Project would have a **less than significant** impact on public transit, bicycle, or pedestrian facilities.

XVII. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?		X		
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resources to a California Native American tribe.		X		

BACKGROUND

Assembly Bill 52 (AB 52) requires a lead agency, prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project, to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if: (1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe, and (2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation. The City of Tracy has not received any requests from California Native American tribes to be informed through formal notification of proposed projects in the City's geographic area.

RESPONSES TO CHECKLIST QUESTIONS

Responses a-b): Less than Significant with Mitigation. The City of Tracy General Plan and subsequent EIR does not identify the site as having prehistoric period cultural resources. Additionally, there are no known unique cultural resources known to occur on, or within the immediate vicinity of the Project site. The site has previously been used for agricultural uses. No instances of cultural resources or human remains have been unearthed on the Project site. Based on the above information, the Project site has a low potential for the discovery of prehistoric, ethnohistoric, or historic archaeological sites that may meet the definition of Tribal Cultural Resources. Although no Tribal Cultural Resources have been documented in the Project site, the Project is located in a region where cultural resources have been recorded and there remains a potential that undocumented archaeological resources that may meet the Tribal Cultural Resource definition could be unearthed or otherwise discovered during ground-disturbing and

construction activities. Examples of significant archaeological discoveries that may meet the Tribal Cultural Resources definition would include villages and cemeteries.

Due to the possible presence of undocumented Tribal Cultural Resources within the Project site, construction-related impacts on tribal cultural resources would be potentially significant. Implementation of the Mitigation Measure 7 would require appropriate steps to preserve and/or document any previously undiscovered resources that may be encountered during construction activities, including human remains. Implementation of this measure would reduce this impact to a **less than significant** level.

MITIGATION MEASURE(S)

Implement Mitigation Measure 7

XVIII. UTILITIES AND SERVICE SYSTEMS -- WOULD THE PROJECT:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			X	
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?		X		
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?		X		
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments?			X	
f) Be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs?			X	
g) Comply with federal, state, and local statutes and regulations related to solid waste?			X	

RESPONSES TO CHECKLIST QUESTIONS

Responses a), b) and e): Less than Significant. Wastewater generated by the proposed Project would be conveyed to the Tracy Wastewater Treatment Plan (WWTP) for treatment and disposal. The City's wastewater collection system consists of gravity sewer lines, pump stations and the WWTP. Wastewater flows toward the northern part of the City where it is treated at the WWTP and then discharged into the Old River in the southern Sacramento-San Joaquin Delta.

The City's WWTP provides secondary-level treatment of wastewater followed by disinfection. Treated effluent from the WWTP is conveyed to a submerged diffuser for discharge into the Old River. The WWTP has an NPDES permit for discharge into the Old River from the State Regional Water Quality Control Board. The City of Tracy expanded the treatment capacity to 10.8 mgd in 2008 as part of Phase 1 of the expansion. The current wastewater flow, because of water conservation during the prolonged drought, is 9.0 mgd. Funds are currently being collected through development impact fees to expand the WWTP to the Phase 2 capacity of 12.0 mgd. The

expansion also will result in improvements to the quality of the effluent discharged from the Plant by upgrading the facility from secondary to tertiary treatment.

The Phase 2 expansion would likely take a year to design and two years to construct the improvements. Design plans for the Phase 2 expansion have not yet started and development of the design plans will be based on future growth within the City. Design plans on Phase 2 of the expansion are estimated to commence within the next five years.

The City's WWTP currently treats approximately 9.0 mgd of wastewater. City residents generated an average dry weather flow (ADWF) of 7.6 million gallons per day (mgd). The City's wastewater treatment plant (WWTP), has an ADWF design capacity of 10.8 mgd.[13] For this analysis, a per capita generation factor of 80 gallons per capita day of wastewater was used.[14] Therefore, the proposed 94-rooms would generate up to 7,520 gallons per day of wastewater, or 0.00752 mgd of wastewater. The addition of 0.00752 mgd of wastewater would not exceed the current treatment capacity of the City's WWTP, and the addition of Project-generated wastewater would not result in any RWQCB violations related to effluent treatment or discharge. As of January 2015, the City had an unused capacity of approximately 4,200 EDU's (Equivalent Dwelling Units, equal the wastewater demand generated by a single-family residence) within its wastewater treatment plant (WWTP), available to new development within the City on a first-come, first-served basis. These EDU's are currently available to serve the proposed Project.

As other development projects within the City come forward, and building permits are issued, this remaining capacity will be reduced. Accordingly, as noted above and to ensure that capacity at the WWTP is available and sufficient to respond to planned future development demands, the City is proceeding with the next phase of expansion of the WWTP, which has been approved by the City and subject to comprehensive environmental review under the California Environmental Quality Act, as documented in that certain environmental impact report certified by the City in November 2002 under State Clearinghouse Number 2000012030.

The development of the 94-room hotel would be required to pay sewer impact fees at time of building permit issuance, ensuring fair-share contribution towards the future WWTP expansion project. With this condition of approval, impacts related to City sewer services will be **less than significant**.

Response d): Less than Significant with Mitigation. Potable water for the proposed Project would be supplied from the City's municipal water system. The City of Tracy obtains water from both surface water and groundwater sources. The amount of water that Tracy uses from each of its water supply sources to make up its total water use varies from year to year based on contractual agreements, annual precipitation, and City policies about how to expand, utilize, and manage its water resources. As described in the 2011 City of Tracy Urban Water Management Plan, Tracy's maximum annual water supply amounts to over 31,500 acre feet per year (AFY)

[13] Source: http://www.ci.tracy.ca.us/documents/Tracy_Wastewater_Master_Plan.pdf (does not take into account increased capacity with upgrades).

[14] Wastewater Flow and Loading Generation Factors Tracy Wastewater Master Plan (Per Capita Flow and Loading factors).

from its various supply sources. Future agreements may increase the City's available potable water supply to over 49,500 AFY.

Water infrastructure to serve the Project includes: 2-inch diameter pipelines for domestic service to the hypothetical building pad on APN 214-020-34 and irrigation service via connections to existing 2-inch diameter service laterals from the existing water main at W. Grant Line Road; 4-inch diameter pipelines for domestic service to the proposed hotel building via a connection to an existing 6-inch service lateral from the 12-inch water main at N. Corral Hollow Road; and a 6-inch diameter looped fire service line with connections to the existing 16-inch water main in W. Grant Line Road and existing 12-inch diameter water main in N. Corral Hollow Road. The proposed hotel would be equipped with a sprinkler system for fire protection. The Project includes the installation of three on-site fire hydrants.

The Water Distribution System Hydraulic Network Analysis prepared for the proposed Project (Blackwater Consulting Engineers, Inc.) in February 2017 includes the estimated Project water demands and hydraulic steady-state analysis. Both subjects are discussed in detail below.

Estimated Project Water Demands

Water demands for the Project were estimated based on the unit water demand factors adopted in the December 2012 City of Tracy Citywide Water System Master Plan (2012 Water Master Plan). The total annual potable water demand for the Project is approximately 23 AFY based on a unit water demand factor of 150 gallons per day per dwelling unit for the very high density residential land use, 1.5 AFY for the office land use, and 4.0 AFY for irrigation land use (approximately 15 percent of the total gross acreage). Maximum day demands are estimated to be 200 percent of average day demands, and peak hour demands are estimated to be 340 percent of average day demands. Table 24 summarizes the estimated water demands for the Project. Table 25 summarizes the calculations to estimate average day demands, maximum day demands, and peak hour demands used in the water model.

TABLE 24: ESTIMATED PROJECT WATER DEMANDS

Land Use Designation	*Gross Acreage*	*Dwelling Units*	*Landscaped Area (Acres)*	*Unit Potable Water Demand*		*Annual Potable Water Demand (AFY)*
				gpd/du	*AFY*	
Residential – Very High Density	2.55	114	-	150	-	19.2
Office	0.64	-	-	-	1.5	1.0
Irrigation	-	-	0.38	-	4.0	1.5
UAFW[1]	-	-	-	-	-	1.6
Total	**3.19**	**114**	**0.38**	**-**	**-**	**23.3**

NOTES: THESE CALCULATIONS ARE BASED ON THE 2012 WATER MASTER PLAN. CONSISTENT WITH THE ASSUMPTIONS IN THE MASTER PLAN, 15 PERCENT OF THE GROSS ACRES ARE ASSUMED TO BE LANDSCAPED.

[1] UNACCOUNTED-FOR WATER (UAFW) IS EQUAL TO 7.5 PERCENT OF TOTAL WATER DEMAND.

SOURCE: BLACKWATER CONSULTING ENGINEERS, INC., 2017.

TABLE 25: SUMMARY OF AVERAGE DAY DEMANDS, MAXIMUM DAY DEMANDS, AND PEAK HOUR DEMANDS

Average Day Demand		*Maximum Day Demand[1]*		*Peak Hour Demand[2]*	
gpm	***mgd***	***gpm***	***mgd***	***gpm***	***mgd***
14	0.02	29	0.04	49	0.07

NOTES: GPM = GALLONS PER MINUTE, MGD = MILLION GALLONS PER DAY.

[1] MAXIMUM DAY DEMAND IS 2.0 TIMES THE AVERAGE DAY DEMAND, PER THE 2012 WATER MASTER PLAN.

[2] PEAK HOUR DEMAND IS 3.4 TIMES THE AVERAGE DAY DEMAND, PER THE 2012 WATER MASTER PLAN.

SOURCE: BLACKWATER CONSULTING ENGINEERS, INC., 2017.

It is noted that no office buildings are currently proposed for the hypothetical building pad on APN 214-020-34. Approval of the proposed hotel Project would not result in any entitlements or approvals to construct office uses on the western portion of the Project site. Additionally, the above water demands assume that the hotel would have 114 rooms, while the proposed Project includes 94 rooms. Therefore, the above water demand estimates are considered conservative as the estimates.

Water Distribution System Hydraulic Network Analysis

Water system performance design criteria and analyses requirements for new development are summarized in Table 26.

TABLE 26: DESIGN CRITERIA AND REQUIREMENTS

Component	*Criteria*
Fire Flow Requirements	
Commercial/Office Fire Flow (Sprinklered)[1]	3,500 gpm
Water Distribution Line Sizing (Pipes Less than 18-Inches in Diameter)	
Average Day Demand Condition	--
Minimum Pressure / Maximum Pressure	40 psi / 80 psi
Maximum Headloss	7 ft / kft
Maximum Velocity	6 fps
Maximum Day with Fire Flow Demand Condition	--
Minimum Pressure (at fire node)	30 psi (single event)
Maximum Headloss	10 ft / kft
Maximum Velocity	12 fps
Peak Hour Demand Condition	--
Minimum Pressure	40 psi
Maximum Headloss	7 feet / kft
Maximum Velocity	8 fps
Minimum Pipe Diameter	8 inches
Hazen/Williams "C" Factor	130
Pipeline Material	Ductile Iron

NOTES: GPM = GALLONS PER MINUTE, FPS = FEET PER SECOND, PSI = POUNDS PER SQUARE INCH.

[1] INCLUDES COMMERCIAL, OFFICE, MOTEL/HOTEL, AND MIXED USE.

SOURCE: BLACKWATER CONSULTING ENGINEERS, INC., 2017.

The results of the existing potable water system hydraulic steady-state analysis are provided for the following potable water demand scenarios:

- Average Day Demand – An average day demand condition was simulated for the water distribution facilities to evaluate the system's capability to meet the average day demand scenario for the Project. Average day demands are met by the combined supply from treated surface water, storage tanks, and groundwater.
- Maximum Day Demand – A maximum day demand condition was simulated for the water distribution facilities to evaluate the system's capability to meet the maximum day demand scenario for the Project. Maximum day demands are met by the combined supply from treated surface water, storage tanks, and groundwater.
- Maximum Day Demand plus Fire Flow – To evaluate the potable water system during the maximum day demand with fire flow scenario for the Project, individual fire flow demands were simulated at locations along the project where fire service connections are proposed. The maximum day demand scenario is evaluated during the simulated fire flow event at the specified model junction to evaluate that the required minimum pressures are met and maximum velocity requirements are not exceeded. Maximum day plus fire flow demands are met by the combined supply from treated surface water, storage tanks, and groundwater.
- Peak Hour Demand – A peak hour flow condition was simulated for the water distribution facilities to evaluate the system's capability to meet the peak hour demand scenario for the Project. Peak hour demands are met by the combined supply from treated surface water, storage tanks, and groundwater.

The Project water distribution system is evaluated based on meeting minimum pressures and maximum velocities, consistent with the criteria in Table 26, for each scenario. The Project water distribution system is evaluated based on meeting minimum pressures and maximum velocities, consistent with the criteria in Table 26, for each scenario. The maximum day demand with fire flow scenario is evaluated first, as this is the highest demands scenario.

MAXIMUM DAY WITH FIRE FLOW DEMAND SCENARIO

System pressures at the Project are approximately 45 pounds per square inch (psi) with a maximum velocity of six feet per second (fps) for the maximum day demand with fire flow scenario with an applied fire flow demand of 3,500 gallons per minute (gpm) at the location identified as having the least available fire flow, J-1-5400. The existing potable water system adequately delivers maximum day demand with fire flow to the Project while meeting the City's minimum pressure criterion of 30 psi and maximum velocity criterion of 12 fps at the Project site and throughout the existing water system.

PEAK HOUR DEMAND SCENARIO

System pressures at the service connections to the Project are approximately 64 psi with a maximum velocity of less than one fps for the peak hour demand scenario. The existing potable water system adequately delivers peak hour demands to the Project site while meeting the City's

minimum pressure criterion of 40 psi and maximum velocity criterion of eight fps at the Project site and throughout the existing water system.

MAXIMUM DAY DEMAND SCENARIO

The system pressures at the service connections to the Project are approximately 60 psi for the maximum day demand scenario with a maximum velocity of less than one fps. The existing potable water system adequately delivers maximum day demands to the Project site while meeting the City's minimum pressure criterion of 40 psi and maximum velocity criterion of 6 fps at the Project site and throughout the existing water system.

AVERAGE DAY DEMAND SCENARIO

System pressures at the service connections to the Project are approximately 70 psi for the average day demand scenario with a maximum velocity of one fps. The existing potable water system adequately delivers average day demands to the Project site while meeting the City's minimum and maximum pressure criterion of 40 psi and 80 psi, respectively, and a maximum velocity criterion of 3 fps at the Project site and throughout the existing water system.

System Deficiencies and Recommended Improvements

The hydraulic modeling analysis confirms that the existing system can meet the Project demands while maintaining City's design criteria for average day, maximum day, maximum day demand with fire flow, and peak hour demands at the Project and throughout the existing water system. Based on review of the proposed utility plan and modeling results, the following improvements are recommended:

- Although the analysis did not include modeling of the proposed private on-site infrastructure, the utility plan proposes a 6-inch diameter pipeline for fire service. The minimum pipeline diameter required and recommended for fire serviced is 8-inches.
- An off-site public fire hydrant shall be constructed on W. Grant Line Road.

This analysis assumes the recommended Capital Improvement Project (CIP) Pipeline Improvements 1a, 1b, and 2 to the City's water system as described in Chapter 10 of the 2012 Water Master Plan have been completed. These improvements are recommended to be completed in order to serve the development. Any changes or modifications to the proposed Project or water system layout will require additional hydraulic evaluation.

Conclusion

Based on the modeling results, the City's existing potable water system is adequate to deliver average day, maximum day demands, maximum day plus fire flow, and peak hour demands for the Project. It is recommended that the looped private fire service on the Project site be an 8-inch diameter pipeline and a public fire hydrant be constructed along the Project frontage along W. Grant Line Road. The aforementioned recommendations are included in Mitigation Measure 17. With implementation of the following mitigation, this impact would be **less than significant**.

MITIGATION MEASURE(S)

Mitigation Measure 17: *Prior to the issuance of a building or grading permit, the Project applicant shall submit the utility plans to the City of Tracy for review and approval. The utility plans shall show that the looped private fire service water lines shall have a minimum 8-inch diameter and that a public fire hydrant shall be constructed along the Project frontage along W. Grant Line Road. The plan shall comply with the recommendations of the Water Distribution System Hydraulic Network Analysis prepared for the proposed Project (Blackwater Consulting Engineers, Inc.) in February 2017.*

Responses c): Less than Significant with Mitigation. Development of the Project site would place impervious surfaces on the approximately 2.56-acre Project site. Development of the Project site would potentially increase local runoff production, and would introduce constituents into storm water that are typically associated with urban runoff. These constituents include heavy metals (such as lead, zinc, and copper) and petroleum hydrocarbons. BMPs will be applied to the proposed site development to limit the concentrations of these constituents in any site runoff that is discharged into downstream facilities to acceptable levels.

According to the Storm Drainage Assessment and Recommendations prepared for the proposed Project (Storm Water Consulting, Inc.) in January 2017, the proposed Project is located within the "Westside Channel Area" served by provisions of the 2010 Drainage Agreement Between the City of Tracy and the West Side Irrigation District (WSID). As such, the proposed development may drain to an existing 72-inch storm drain (WSID) on the south side of Grant Line Road that ultimately discharges to the WSID Main Drain canal to the west.

There are two existing 12-inch storm drain laterals with drop inlets on the north side of Grant Line Road adjacent to the proposed Project. These 12-inch laterals extend to the south underneath the roadway and connect with the existing 72-inch storm drain (WSID). One drop inlet is located just west of the Corral Hollow Road intersection and the second drop inlet is located at the "common entrance" at the west end of the proposed Project site. The existing 12-inch storm drain laterals are the most viable points of connection for onsite drainage and will not require trench cutting across Grant Line Road (which is considered to be undesirable).

Storm water quality treatment control measures will be required with the development of the proposed Project in conformance with the City's Stormwater Standards Manual. Using a site development impervious surfaces percentage of 90 percent for the proposed land use (per the Citywide Storm Drainage Master Plan), the storm water quality design volume (SDV) required for storm water quality treatment is estimated at approximately 4,379 cubic feet. Bioretention will need to be provided to achieve the SDV, and the sub-drains and overflow devices serving the bioretention areas should be connected to the existing drop inlets on the north side of Grant Line Road. The incorporation of bioretention facilities into the Project development in conformance with the Stormwater Standards Manual will mitigate the impact of the site development on downstream stormwater quality. Site design measures described in the Stormwater Standards Manual may be utilized to further augment storm water quality. Reducing the SDV requirement for the bioretention facilities is not recommended as flow attenuation will be needed in order for

the site to be able to utilize the available drop inlets on the north side of Grant Line Road as the points of outfall for onsite drainage.

No onsite runoff should be allowed to discharge directly to the existing drop inlets on the north side of Grant Line Road without first discharging to the bioretention areas, to be subsequently delivered to the drop inlets via the subdrains, overflow devices and drop inlet connections serving the bioretention areas. This approach will mitigate the impact of the site development on downstream stormwater quantity.

Per information provided in the Citywide Storm Drainage Master Plan, segments of the existing 72-inch storm drain (WSID) in Grant Line Road will become surcharged during storms approaching a 10-year 24-hour storm and larger storms, including adjacent to the Project site, under fully developed conditions for the contributing watershed. The finished floor elevations for proposed site buildings should be elevated a minimum of one foot above the highest top of curb elevation along the frontage of Grant Line Road adjacent to the Project to provide flood protection for the site in the event that surcharging occurs. Drainage should also be directed away from the proposed building.

All or most of this property is identified as an "infill property" in the Storm Drainage Analysis – Infill Properties Final Technical Report. As such, the proposed Project would be required to pay the current Storm Drainage Impact Fees and Outfall Fees established by the City of Tracy for Infill Properties.

All of the storm drainage facilities required for the proposed Project would be located on the Project site. As such, there is no potential for the Project to result in environmental impacts associated with the construction of off-site drainage facilities. The environmental impacts associated with the construction of onsite drainage facilities fall within the Project "footprint" and have been addressed throughout this environmental document.

The following mitigation measures requires the Project applicant to pay the City's Storm Drainage Impact Fees and Outfall Fees, install a drainage system that complies with the recommendations of the m Drainage Assessment and Recommendations prepared for the proposed Project (Storm Water Consulting, Inc.) and, prior to issuance of grading permits, provide a drainage plan and report to the City of Tracy for review and approval. With the implementation of the following mitigation measures, drainage impacts would be reduced to **less than significant**.

MITIGATION MEASURE(S)

Mitigation Measure 18: *Prior to the issuance of a building or grading permit, the Project applicant shall submit a drainage plan to the City of Tracy for review and approval. The plan shall include an engineered storm drainage plan that demonstrates attainment of pre-Project runoff requirements prior to release and describes the volume reduction measures and treatment controls used to reach attainment consistent with the Tracy Citywide Storm Drain Master Plan. The plan shall also comply with the recommendations of the Storm*

Drainage Assessment and Recommendations prepared for the proposed Project (Storm Water Consulting, Inc.) in January 2017.

Mitigation Measure 19: *Prior to the issuance of a building or grading permit, the Project applicant shall pay the current Storm Drainage Impact Fees and Outfall Fees established by the City of Tracy for Infill Properties. The Project's fees shall be determined by the City Engineer.*

Responses f) and g): Less than Significant. The City of Tracy has an exclusive franchise agreement with Tracy Disposal Service for solid waste collection and disposal and recycling collection. Solid waste is collected and taken to the 40-acre Tracy Material Recovery Facility (MRF) and Transfer Station on South MacArthur Drive before being sent to the Foothill Sanitary landfill, 48 miles northeast of Tracy, off of Shelton Road east of Linden, California. The MRF is operated by Tracy Material Recovery and Solid Waste Transfer, Inc., and has capacity of approximately 1,000 tons per day, but averages approximately 350 tons per day, of which 85 percent is generated in Tracy. Approximately 175,000 tons of solid waste is generated in Tracy each year, of which approximately 27 percent is residential garbage.

The approximately 800-acre Foothill landfill, owned by San Joaquin County, is the primary disposal facility accepting the City's solid waste. The Foothill landfill receives approximately 810 tons per day. The landfill is permitted to accept up to 1,500 tons per day, and has a permitted capacity of 138 million cubic yards, of which approximately 125 million cubic yards of capacity remains.[15] It is estimated that the Foothill landfill will have the capacity to accept solid waste from the City of Tracy until 2054.

The proposed Project would not generate significant volumes of solid waste, beyond levels normally found in hotel developments. The proposed Project would not generate hazardous waste or waste other than common commercial solid waste. As described above, there is adequate landfill capacity to serve the proposed Project, and the Project will comply with all applicable statutes and regulations related to solid waste. This is a **less than significant** impact.

[15] California Integrated Waste Management Board, Solid Waste Information System (SWIS). Available at: http://www.calrecycle.ca.gov/SWFacilities/Directory/Search.aspx.

XVIV. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X	
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant. As described throughout the analysis above, the proposed Project would not result in any significant impacts that would substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal to the environment. All potentially significant impacts related to plant and animal species would be mitigated to a less than significant level. The proposed Project would be required to implement mitigation measures aimed at reducing stormwater pollutants and runoff through Mitigation Measure 13, as well as through compliance of various state, regional and local standards. Specifically related to ensuring the continued sustainability of biological resources through adaptive management, Mitigation Measure 6 requires the SJMSCP Monitoring Plan an Annual Report process, Biological Monitoring Plan, SJMSCP Compliance Monitoring Program, and the SJMSCP Adaptive Management Plan. The Project proponent shall seek coverage under the SJMSCP to mitigate for habitat impacts to covered special status species that would reduce any potentially significant impacts to a less than significant level. Through the full mitigation of biological impacts, the Project would not result in any cumulative impacts, related to biological resources. These are **less than significant** impacts.

Response b): Less than Significant. As described throughout the analysis above, the proposed Project would not result in any significant individual or cumulative impacts that would not be mitigated to less than significant levels. Therefore, these are **less than significant** impacts.

Response c): Less than Significant. As described throughout the analysis above, the proposed Project would not result in any significant impacts that would have environmental effects which will cause substantial adverse effects on humans. The analysis in the relevant sections above provides standards and mitigation measures to reduce any potentially significant impacts on humans to less than significant levels. A variety of mitigation measures including those related to aesthetics and light and glare, GHG and air quality, cultural resources, hazardous materials, seismic hazards, water pollution and water quality, and noise, ensure any adverse effects on humans are reduce to an acceptable standard. Therefore, these are **less than significant** impacts.

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