FINAL ENVIRONMENTAL IMPACT REPORT

FOR THE

HOLLY SUGAR SPORTS PARK PROJECT

SCH# 2008122103

JUNE 2010

Prepared for:

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

Prepared by:

De Novo Planning Group
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De Novo Planning Group

A Land Use Planning, Design, and Environmental Firm

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FINAL EIR

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INTRODUCTION

The City of Tracy (City) determined that a project-level environmental impact report (EIR) was required for the proposed Holly Sugar Sports Park project pursuant to the requirements of the California Environmental Quality Act (CEQA).

A Project EIR is an EIR which examines the environmental impacts of a specific development project. This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction and operation. The Project EIR approach is appropriate for the Holly Sugar Sports Park project because it allows comprehensive consideration of the reasonably anticipated scope of the project, including development of the future expansion area, as described in greater detail below.

The proposed project encompasses separate phases of park development. In order to move forward with a specific development plan for the future expansion area, the City will be required to prepare a detailed site plan of the area. At that time, the City would prepare a site-specific analysis of the future expansion area's impacts, particularly with respect to that phase's compliance with the analysis set forth in the EIR (State CEQA Guidelines Sections 151662(a)(1)).

As stated in State CEQA Guidelines Section 15162(a)(1), *"When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:*

> *(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;"*

Additional environmental review under CEQA may be required and would be generally based on the future expansion area's consistency with the analysis in this EIR, as required under CEQA. If the improvements or activities would have no effects beyond those disclosed in this EIR, no further CEQA compliance would be required.

PROJECT DESCRIPTION

The proposed project consists of the construction and operation of an approximately 298-acre park, which would include an approximately 166-acre active sports park facility, approximately 86 acres of land south of the active sports park for passive recreational uses, and an approximately 46-acre area to the northwest of the active sports park site as a future expansion area. The project involves a General Plan Amendment, zoning designation, and annexation to the City limits of the entire 298 acres.

The proposed project has been designed to address the community's short-, medium-, and long-term needs for youth sports park facilities.

ACTIVE SPORTS PARK

The active sports park consists of approximately 166 acres located north of the 86-acre passive recreation area and southeast of the 46-acre future expansion area. The active sports park may ultimately include up to 14 soccer fields of various sizes for various age groups, up to 18 baseball fields of various sizes for various age groups, up to five softball fields of various sizes for various age groups, up to four football fields, and one football/soccer stadium. In addition to the proposed ball fields, the project would include up to four children's play areas. The play areas would include swings, slides, climbing apparatus, and other features commonly found on children's playgrounds. The project site will also include several restroom facilities, concession facilities, bleachers, and parking areas.

PASSIVE RECREATION AREA

The 86-acre passive recreation area to the south of the active sports park site would serve as a buffer between the more developed active park uses and the rural residences to the south of the park site. This area may be used for passive recreational activities including, but not limited to walking and biking trails, bocce ball, disc golf, or an arboretum. No structures or athletic fields are proposed for this area. There is no parking proposed for this area, nor is non-emergency vehicular access proposed.

FUTURE EXPANSION AREA

The 46-acre future expansion parcel to the northwest of the 166-acre active sports park site may be developed in the future as the demand for developed park facilities in the City of Tracy increases. A specific site plan for this area has not been developed, however, the City is currently contemplating several amenities and features that may be suitable for future development within the expansion area.

Refer to Section 2.0, Project Description of the Draft EIR, for a more comprehensive description of the details of the proposed project.

ALTERNATIVES TO THE PROPOSED PROJECT

Section 15126.6 of the CEQA Guidelines requires an EIR to describe a reasonable range of alternatives to the project or to the location of the project which would reduce or avoid significant impacts, and which could feasibly accomplish the basic objectives of the proposed project. The alternatives analyzed in this EIR include the following three alternatives in addition to the proposed Holly Sugar Sports Park project.

- No Project Alternative
- Active Sports Park Only Alternative
- Alternative Location Alternative (Alvarez Site)

Alternatives are described in detail in Section 5.0 of the Draft EIR, Alternatives to the Proposed Project. The Active Sports Park Only Alternative is considered the environmentally superior alternative. It is noted that the Active Sports Park Only Alternative would not meet all of the project objectives identified by the City, in that it would not provide for future expansion of the park facility to meet the projected parks needs at a location adjacent to the Holly Sugar Sports Park site.

COMMENTS RECEIVED

The Draft EIR addressed environmental impacts associated with the Holly Sugar Sports Park project that are known to the City, were raised during the Notice of Preparation (NOP) process, or raised during preparation of the Draft EIR. The Draft EIR discussed potentially significant impacts associated with aesthetics, agricultural resources, air quality, biological resources, cultural resources, geology and soils, hazards, hydrology and water quality, land use and planning, noise, public services, transportation/circulation, and utilities.

During the NOP process, the San Joaquin Valley Air Pollution Control District (SJVAPCD) provided recommendations for the preparation of the project's air quality impact analysis, including the discussion of toxic air contaminants, nuisance odors, and impacts related to global climate change. The SJVAPCD also indicated that the project is subject to the requirements of District rule 9510 (indirect source review). San Joaquin County indicated that the project would result in a conversion of agricultural land uses to non-agricultural land uses, and suggested mitigation measures to reduce this impact. Caltrans requested a copy of the Traffic Impact Study (TIS) and provided recommendations regarding the methodology for preparation of the TIS. Caltrans also indicated that any work done within a Caltrans right-of-way would require an encroachment permit. The California Public Utilities Commission (PUC) indicated that the Draft EIR should include an analysis of potential project-related rail safety concerns related to rail crossings on Tracy Boulevard and Corral Hollow Road. The PUC also requested a copy of the Traffic Impact Study for review. No other environmental issues were raised in the NOP and associated Initial Study, during the NOP period, including the scoping meetings, or during preparation of the Draft EIR.

During the Draft EIR review process, the SJVAPCD, Caltrans, California Department of Conservation, San Joaquin County Department of Public Works, Carol Dominguez, and Timothy Taron provided written comments on the Draft EIR. Additionally, public meetings to receive comments on the Draft EIR were held on September 23, 2009 with the City of Tracy Planning Commission and on October 1, 2009 with the City of Tracy Parks and Community Services Commission. Verbal comments from Commissioners and members of the public were received, and the transcripts from these meetings, including written responses are included in this Final EIR.

The comments received during the Draft EIR review process are addressed within this Final EIR.

RECIRCULATED DRAFT EIR

In light of a comment letter received from Caltrans on the original Draft EIR, the City of Tracy determined that the preparation and public distribution of a Recirculated Draft EIR was required. In accordance with Section 15088.5 of the CEQA Guidelines, portions of Section 3.12, Transportation and Circulation, of the Draft EIR were recirculated for public review. A lead agency is required to recirculate an EIR when significant new information is added to the EIR after it is circulated for public review but before its certification.

"Significant new information" requiring recirculation includes a disclosure that a new significant environmental impact would result from the project. The analysis in Section 3.12 of the original Draft EIR for the Holly Sugar Sports Park project incorrectly identified the existing lane configuration of the Westbound (WB) I-205 offramp at Tracy Boulevard. This error resulted in an incorrect significance determination at the intersections of the Westbound I-205 offramp at Tracy Boulevard under Near-Term (2015) and the Westbound and Eastbound 1-205 offramp intersections with Tracy Boulevard under Cumulative (2030) conditions. The revised analysis determines that the proposed project would result in Significant and Unavoidable impacts to these intersections. This change in impact determination resulted in the need for minor changes to the Executive Summary, and Section 4.0, Other CEQA Required Topics, of the Draft EIR. The Recirculated Draft EIR also includes Revised Synchro calculation worksheets from the Traffic Study (Appendix H of the original Draft EIR).

The City of Tracy published a public Notice of Availability (NOA) for the Recirculated Draft EIR on December 16, 2009, inviting comment from the general public, agencies, organizations, and other interested parties. The NOA was filed with the State Clearinghouse (SCH # 2008122103) and the County Clerk, and was published in the Tracy Press pursuant to the public noticing requirements of CEQA. The Recirculated Draft EIR was available for public review from December 16, 2009 through February 2, 2010.

Caltrans provided a comment letter on the Recirculated Draft EIR. No other comments on the Recirculated Draft EIR were received. Written responses to the comment letter received on the Recirculated Draft EIR are included in this Final EIR.

This Final Environmental Impact Report (FEIR) was prepared in accordance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (Section 15132). The City of Tracy is the lead agency for the environmental review of the Holly Sugar Sports Park project (project) and has the principal responsibility for approving the project. This FEIR assesses the expected environmental impacts resulting from approval of the project and associated impacts from subsequent development of the project, as well as responds to comments received on the Draft EIR and the Recirculated Draft EIR.

1.1 PURPOSE AND INTENDED USES OF THE EIR

CEQA REQUIREMENTS FOR A FINAL EIR

This Final Environmental Impact Report (FEIR) for the Holly Sugar Sports Park project has been prepared in accordance with the California Environmental Quality Act (CEQA) and State CEQA Guidelines. State CEQA Guidelines Section 15132 requires that an FEIR consist of the following:

- the Draft Environmental Impact Report (Draft EIR) or a revision of the draft;
- comments and recommendations received on the Draft EIR, either verbatim or in summary;
- a list of persons, organizations, and public agencies commenting on the Draft EIR;
- the responses of the lead agency to significant environmental concerns raised in the review and consultation process; and
- any other information added by the lead agency.

In accordance with State CEQA Guidelines Section 15132(a), the Draft EIR and the Recirculated Draft EIR are incorporated by reference into this Final EIR.

An EIR must disclose the expected environmental impacts, including impacts that cannot be avoided, growth-inducing effects, impacts found not to be significant, and significant cumulative impacts, as well as identify mitigation measures and alternatives to the proposed project that could reduce or avoid its adverse environmental impacts. CEQA requires government agencies to consider and, where feasible, minimize environmental impacts of proposed development, and an obligation to balance a variety of public objectives, including economic, environmental, and social factors.

PURPOSE AND USE

The City of Tracy, as the lead agency, has prepared this Final EIR to provide the public and responsible and trustee agencies with an objective analysis of the potential environmental impacts resulting from approval, construction and operation of the proposed Holly Sugar Sports Park project. Responsible and trustee agencies that may use the EIR are identified in Chapter 1.0 of the Draft EIR.

The environmental review process enables interested parties to evaluate the proposed project in terms of its environmental consequences, to examine and recommend methods to eliminate or

reduce potential adverse impacts, and to consider a reasonable range of alternatives to the project. While CEQA requires that consideration be given to avoiding adverse environmental effects, the lead agency must balance adverse environmental effects against other public objectives, including the economic and social benefits of a project, in determining whether a project should be approved.

This EIR will be used as the primary environmental document to evaluate all subsequent phases of development of the Holly Sugar Sports Park, including development of the "Future Expansion Area." All phases and components of the proposed project are identified in Chapter 2.0, Project Description, of the Draft EIR.

1.2 ENVIRONMENTAL REVIEW PROCESS

The review and certification process for the EIR has involved, or will involve, the following general procedural steps:

NOTICE OF PREPARATION AND INITIAL STUDY

The City of Tracy circulated a Notice of Preparation (NOP) of an EIR for the proposed project and an Initial Study on December 29, 2008 to trustee and responsible agencies, the State Clearinghouse, and the public. A public scoping meeting was held on January 15, 2009. Concerns raised in response to the NOP were considered during preparation of the Draft EIR. The NOP, Initial Study (IS), and responses to the NOP by interested parties are presented in Appendix A of the Draft EIR.

NOTICE OF AVAILABILITY AND DRAFT EIR

The City of Tracy published a public Notice of Availability (NOA) for the Draft EIR on August 31, 2009, inviting comment from the general public, agencies, organizations, and other interested parties. The NOA was filed with the State Clearinghouse (SCH # 2008122103) and the County Clerk, and was published in the Tracy Press pursuant to the public noticing requirements of CEQA. The Draft EIR was available for public review from August 31 through October 15, 2009, and public meetings to receive comments on the Draft EIR were held on September 23, 2009 with the City of Tracy Planning Commission and on October 1, 2009 with the City of Tracy Parks and Community Services Commission. The Draft EIR contains a description of the project, description of the environmental setting, identification of project impacts, and mitigation measures for impacts found to be significant, as well as an analysis of project alternatives, identification of significant irreversible environmental changes, growth-inducing impacts, and cumulative impacts. The Draft EIR identifies issues determined to have no impact or a less than significant impact, and provides detailed analysis of potentially significant and significant impacts. Comments received in response to the NOP were considered in preparing the analysis in the Draft EIR.

RECIRCULATED DRAFT EIR

In light of a comment letter received from Caltrans on the original Draft EIR, the City of Tracy determined that the preparation and public distribution of a Recirculated Draft EIR was required. In accordance with Section 15088.5 of the CEQA Guidelines, portions of Section 3.12, Transportation and Circulation, of the Draft EIR were recirculated for public review. A lead agency is required to recirculate an EIR when significant new information is added to the EIR after it is circulated for public review but before its certification.

"Significant new information" requiring recirculation includes a disclosure that a new significant environmental impact would result from the project. The analysis in Section 3.12 of the original Draft EIR for the Holly Sugar Sports Park project incorrectly identified the existing lane configuration of the Westbound (WB) I-205 offramp at Tracy Boulevard. This error resulted in an incorrect significance determination at the intersections of the Westbound I-205 offramp at Tracy Boulevard under Near-Term (2015) and the Westbound and Eastbound 1-205 offramp intersections with Tracy Boulevard under Cumulative (2030) conditions. The revised analysis determines that the proposed project would result in Significant and Unavoidable impacts to these intersections. This change in impact determination resulted in the need for minor changes to the Executive Summary, and Section 4.0, Other CEQA Required Topics, of the Draft EIR. The Recirculated Draft EIR also includes Revised Synchro calculation worksheets from the Traffic Study (Appendix H of the original Draft EIR).

The City of Tracy published a public Notice of Availability (NOA) for the Recirculated Draft EIR on December 16, 2009, inviting comment from the general public, agencies, organizations, and other interested parties. The NOA was filed with the State Clearinghouse (SCH # 2008122103) and the County Clerk, and was published in the Tracy Press pursuant to the public noticing requirements of CEQA. The Recirculated Draft EIR was available for public review from December 16, 2009 through February 2, 2010.

RESPONSE TO COMMENTS/FINAL EIR

The City of Tracy received four comment letters regarding the Draft EIR from public agencies, and two comment letters from private citizens. Oral comments were also received at the public meetings held on September 23, 2009 and October 1, 2009. These two public meetings included comments from members of the public and from the Planning Commission and Parks and Community Services Commission, respectively. Transcripts from the above referenced public meetings are included in Section 2.0 of this Final EIR.

The City of Tracy received on comment letter from a public agency on the Recirculated Draft EIR. No additional comments on the Recirculated Draft EIR were received.

In accordance with CEQA Guidelines Section 15088, this Final EIR responds to the written and oral comments received on both the Draft EIR and the Recirculated Draft EIR, as required by CEQA. The Final EIR also contains minor edits to the Draft EIR, which are included in Section 3.0, Errata. This document, as well as the Draft EIR and Recirculated Draft EIR, as amended herein, constitute the Final EIR.

CERTIFICATION OF THE EIR/PROJECT CONSIDERATION

The City of Tracy will review and consider the Final EIR. If the City finds that the Final EIR is "adequate and complete", the Tracy City Council may certify the Final EIR in accordance with CEQA. The rule of adequacy generally holds that an EIR can be certified if:

1) The EIR shows a good faith effort at full disclosure of environmental information; and

2) The EIR provides sufficient analysis to allow decisions to be made regarding the proposed project in contemplation of environmental considerations.

Upon review and consideration of the Final EIR, the Tracy City Council may take action to approve, revise, or reject the project. A decision to approve the Holly Sugar Sports Park, for which this EIR identifies significant environmental effects, must be accompanied by written findings in accordance with State CEQA Guidelines Sections 15091 and 15093. A Mitigation Monitoring Program, as described below, would also be adopted in accordance with Public Resources Code Section 21081.6(a) and CEQA Guidelines Section 15097 for mitigation measures that have been incorporated into or imposed upon the project to reduce or avoid significant effects on the environment. This Mitigation Monitoring Program will be designed to ensure that these measures are carried out during project implementation, in a manner that is consistent with the EIR.

1.3 ORGANIZATION OF THE FINAL EIR

This Final EIR has been prepared consistent with Section 15132 of the State CEQA Guidelines, which identifies the content requirements for Final EIRs. This Final EIR is organized in the following manner:

CHAPTER 1.0 – INTRODUCTION

Chapter 1 briefly describes the purpose of the environmental evaluation, identifies the lead, agency, summarizes the process associated with preparation and certification of an EIR, and identifies the content requirements and organization of the Final EIR.

CHAPTER 2.0 – COMMENTS ON THE DRAFT EIR AND RESPONSES

Chapter 2 provides a list of commentors, copies of written comments made on the Draft EIR and Recirculated Draft EIR (coded for reference), copies of meeting transcripts from the Planning Commission and Parks and Community Services Commission meetings to receive comments on the Draft EIR, and responses to those written and oral comments.

CHAPTER 3.0 - ERRATA

Chapter 3.0 consists of minor revisions to the Draft EIR in response to comments on the Draft EIR, as well as minor staff edits. The revisions to the Draft EIR do not change the intent or content of the analysis or mitigation.

CHAPTER 4.0 – FINAL MMRP

Chapter 4.0 consists of a Mitigation Monitoring and Reporting Program (MMRP). The MMRP is presented in a tabular format that presents the impacts, mitigation measure, and responsibility, timing, and verification of monitoring.

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2.1 INTRODUCTION

No new significant environmental impacts or issues, beyond those already covered in the Draft EIR and Recirculated Draft EIR for the Holly Sugar Sports Park, were raised during the comment period. Responses to comments received during the comment period do not involve any new significant impacts or "significant new information" that would require recirculation of the Draft EIR or Recirculated Draft EIR pursuant to CEQA Guidelines Section 15088.5.

2.2 LIST OF COMMENTERS

Table 2-1 lists the comments on the Draft EIR that were submitted to the City of Tracy. The assigned comment letter number, letter date, letter author, and affiliation, if presented in the comment letter or if representing a public agency, are also listed.

TABLE 2-1 LIST OF COMMENTERS ON DRAFT EIR

RESPONSE LETTER/ NUMBER	INDIVIDUAL OR SIGNATORY	AFFILIATION	DATE
A	Tom Dumas	California Department of Transportation (Caltrans)	10-14-2009
B	Dan Otis	California Department of Conservation, Division of Land Resource Protection	10-14-2009
C	Mark Hopkins	San Joaquin County, Department of Public Works	10-14-2009
D	David Warner and Arnaud Marjollet	San Joaquin Valley Unified Air Pollution Control District	10-14-2009
1	Carole Dominguez	Resident of Manteca, California	10-15-2009
2	Timothy D. Taron	Hefner Stark & Marois	11-18-2009
PC		Planning Commission Meeting Minutes – September 23, 2009	09-23-2009
PCSC		Parks & Community Services Commission Meeting Minutes – October 1, 2009	10-01-2009

TABLE 2-2 LIST OF COMMENTERS ON RECIRCULATED DRAFT EIR

RESPONSE LETTER/ NUMBER	INDIVIDUAL OR SIGNATORY	AFFILIATION	DATE
AA	Tom Dumas	California Department of Transportation (Caltrans)	01-29-2010

2.3 COMMENTS AND RESPONSES

REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

CEQA Guidelines Section 15088 requires that lead agencies evaluate and respond to all comments on the Draft EIR that regard an environmental issue. The written response must address the significant environmental issue raised and provide a detailed response, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, the written response must be a good faith and reasoned analysis. However, lead agencies need only to respond to significant environmental issues associated with the project and do not need to provide all the information requested by the commenter, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Section 15204).

CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible environmental impacts of the project and ways to avoid or mitigate the significant effects of the project, and that commenters provide evidence supporting their comments. Pursuant to CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

CEQA Guidelines Section 15088 also recommends that revisions to the Draft EIR be noted as a revision in the Draft EIR or as a separate section of the Final EIR. Chapter 3.0 of this Final EIR identifies all revisions to the Holly Sugar Sports Park Draft EIR.

RESPONSES TO COMMENT LETTERS

Written comments on the Draft EIR are reproduced on the following pages, along with responses to those comments. To assist in referencing comments and responses, the following coding system is used:

- Those comments received from government agencies are represented by a lettered response while comments received by individual or private firms are represented by a numbered response.
- Each letter is lettered (i.e., Letter A) and each comment within each letter is numbered (i.e., comment A-1, comment A-2).

Where changes to the Draft EIR text result from the response to comments, those changes are included in the response and identified with revision marks (<u>underline</u> for new text, ~~strike out~~ for deleted text).

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
P.O. BOX 2048, STOCKTON, CA 95201
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TTY California Relay Service (800) 735-2929

Flex your power!
Be energy efficient!

October 14, 2009

10-SJ-205-PM 5.8
SCH#2008122103
Holly Sugar Sports Center

Scott Claar
City of Tracy
520 Tracy Boulevard
Tracy, CA 95376

Dear Mr. Claar:

The California Department of Transportation (Department) appreciates the opportunity to have reviewed the Draft Environmental Impact Report (DEIR) for the construction and operation of the proposed Holly Sugar Sports Park to be located between Tracy Blvd. & Corral Hollow Road north of Larch Road, and south of Sugar Road. This facility is considered north of the Tracy city limits, within the City's sphere of influence. The project consists of the construction and operation of an approximately 298-acre park which would include an approximately 166-acre active sports park facility, approximately 86 acres of land south of the proposed sports park for passive recreation uses and an approximately 46-acre area to the northwest of the active sports park site as a future expansion area.

The Department has the following comments:

Traffic Operations

1. Please address the Synchro and Figure 2-4A Existing lane configuration. This does not match the actual field lane configuration. It appears your field review was conducted while this area was under construction and some assumptions were made. Please make appropriate corrections once the existing lane configurations are verified. A-1

2. Please provide the diagram for Near-Term Plus Project (2015) lane configurations. This diagram needs to show the number of lanes on the WB/EB ramps approaching the intersection. This will also show the volume of the ramps and the needed number of right-turn and left-turn lanes. Figure (5-1A), Cumulative (2030) intersection lane configuration and traffic control is provided in the report, however, near-term (2015) was not provided. A-2

3. Based on the near-term lane configurations, the ramps may need to be widened and the intersection configured to Caltrans' current design standard. We will continue the review A-3

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upon receipt of the correct near term plus project (2015) lane configurations at the ramps. A-3

4. Near-Term Plus Project PM/Saturday lane configurations in Synchro output show a dedicated EB right turn lane at the EB off ramp. Please explain why an EB right turn lane is needed when the project is located North of I-205 and the EB off ramp may require an EB left turn lane rather than an EB right turn lane. A-4

5. Figure 3.12-11A, Cumulative (2030) intersection lane configuration and traffic controls, do not show a dedicated WB left turn lane at the WB off ramp. Please explain why this WB left turn lane is mitigated when the project is North of I-205. A-5

6. Please provide a table and output to show the 95th percentile queuing, maximum queuing and storage length for each movement at the approach ramps intersections. The queuing and blocking output is needed to see how much traffic is queuing at the EB/WB ramps at the Tracy Blvd./I-205 interchange. A-6

7. Provide a Geometric Approved Drawing (GAD) to reflect comment number 6 to verify for adequate storage length and the deceleration length at the off ramps approach. A-7

At this time, based on the information provided, we are not able to determine if mitigation provided at the ramps is adequate. Please provide the information requested in the above seven items so that we can review the Traffic Impact Study. A-8

Travel Forecasting

1. Please be sure to accommodate STAA trucks when designing the intersections at Tracy Boulevard, Corral Hollow Road, Grant Line Road and West Eleventh Street and I-205. Please remember to provide full access for fire trucks and emergency vehicles when designing local road intersections and driveways at Tracy Boulevard, Corral Hollow Road, Grant Line Road and West Eleventh Street. A-9

2. A correction should be made to pages ES-6 through ES-29 in Table ES-2 under Executive Summary to show abbreviations S-Significant and SU-Significant and Unavoidable. A-10

3. The Cumulative Plus Project Saturday Peak Hour Traffic Volumes at I-205 between Mac Arthur Drive and Tracy Blvd. are 8895 in the EB and 6676 in the WB. Expected volumes will be high, so mitigation will be required to solve this congestion. A-11

4. Table 3.12.-6 on page 3.12-11 of Transportation and Circulation, shows two lanes in each direction of I-205; there are three lanes in each direction at this location. Please make this correction and update the table to reflect this. A-12

5. Please correct I-80 to I-580 in Table 3.12-12 on page 3.12-23 of the Transportation and Circulation. A-13

Mr. Claar
City of Tracy
Page 3

6. Traffic volume increases due to this proposed project will create congestion on I-205 and I-580. What mitigation measures are being proposed to solve this? A-14

Please forward a copy of all Final Conditions of Approval including any mitigation measures that are being proposed as well as any other documents and reports on this proposed project for our review, comment and records. If you have any questions or would like to discuss our comments in more detail, please contact Barbara Hempstead at (209) 948-3909 (e-mail: barbara_hempstead@dot.ca.gov) or me at (209) 941-1921.

Sincerely,

TOM DUMAS, **Chief**
Office of Intermodal Planning

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Response to Letter A Tom Dumas, California Department of Transportation

Response A-1: The comment states that the assumed Tracy Boulevard/I-205 ramp terminal intersections lane configurations are inconsistent with actual field conditions.

Field reconnaissance was conducted in February 2009 to obtain lane configurations at the study intersections. At that time, the I-205 ramps at Tracy Boulevard had been recently re-paved, but not striped. Therefore, the lane configurations at the westbound and eastbound ramp-terminal intersections at Tracy Boulevard were determined from observed traffic operations to be a shared through/left-turn lane and a dedicated right-turn lane.

Fehr & Peers conducted a field visit in October 2009 to verify the lane configurations at the Tracy Boulevard/I-205 ramp terminal intersections and determined that the off-ramp striping delineates a single shared through/left-turn/right-turn lane. The traffic operations analysis for the Tracy Boulevard/I-205 off-ramp terminal intersections has been updated with the revised lane configuration, and the results are shown in Table 2.0-1.

The Tracy Boulevard/I-205 off-ramp terminal intersections would continue to operate acceptably during Existing and Near-Term (2015) No Project conditions. With the addition of project traffic under Near-Term (2015) conditions, the intersection of Tracy Boulevard/I-205 Westbound off-ramps would degrade from LOS C to LOS F during Saturday peak hour conditions. This degradation of LOS during Saturday peak hour conditions would change the significance of this impact from less than significant to significant and unavoidable. As a result, as described previously in this Final EIR, a Recirculated Draft EIR was prepared and circulated for a 45-day public review period. The Recirculated Draft EIR included a revised analysis, as described below, which provided an analysis of project-related traffic impacts to the Tracy Boulevard/I-205 off-ramp terminal intersections in light of the corrections made to the existing lane configurations.

Widening the off-ramp to provide a shared through/left-turn lane and a dedicated right-turn lane would allow the intersection to operate at LOS D and mitigate the impact to a less-than-significant level. As described in the DEIR, the Saturday plus project peak hour scenario depicts a “full-use” situation which assumes tournament play on all sporting fields and full attendance at the proposed stadium. Tournament play in addition to full stadium attendance is unlikely to occur frequently, but it is analyzed in the DEIR in order to present a conservative traffic analysis.

Under Cumulative (2030) conditions, the off-ramp terminal intersections would operate unacceptably with and without the Project, as presented in the DEIR. The Project would still result in significant impacts at both off-ramp terminal

intersections. The proposed Cumulative (2030) mitigation measures in the DEIR for the off-ramp terminal intersections would still apply and are summarized below:

The following mitigation measures would improve operations at the I-205 Westbound off-ramps/Tracy Boulevard intersection to an acceptable level:

- Widen northbound approach to provide a second left-turn lane
- Widen westbound approach to provide one left-turn lane, one shared through/left-turn lane, and one free right-turn lane

The following mitigation measures would improve operations at the I-205 Eastbound off-ramps/Tracy Boulevard intersection to an acceptable level:

- Widen northbound approach to provide a two through lanes and a right-turn lane
- Widen southbound approach to provide two through lanes and two left-turn lanes
- Widen eastbound approach to provide one left-turn lane, one shared through/right-turn lane, and one right-turn lane

TABLE 2.0-1
UPDATED PEAK HOUR I-205 RAMP TERMINAL INTERSECTION LEVELS OF SERVICE

	Intersection	Control[1]	Peak Hour	No Project		Plus Project	
				Delay (in seconds)	LOS	Delay (in seconds)	LOS
Existing Conditions							
5.	I-205 Westbound Ramps/Tracy Boulevard	Signal	PM SAT	20 21	B C	--	--
6.	I-205 Eastbound Ramps/Tracy Boulevard	Signal	PM SAT	11 12	B B	--	--
Near-Term (2015) Conditions							
5.	I-205 Westbound Ramps/Tracy Boulevard	Signal	PM SAT	20 21	C C	21 **>100**	C **F**
6.	I-205 Eastbound Ramps/Tracy Boulevard	Signal	PM SAT	11 12	B B	12 37	B D
Cumulative (2030) Conditions							
5.	I-205 Westbound Ramps/Tracy Boulevard	Signal	PM SAT	**>100** **>100**	**F** **F**	**>100** **>100**	**F** **F**
6.	I-205 Eastbound Ramps/Tracy Boulevard	Signal	PM SAT	**>100** **>100**	**F** **F**	**>100** **>100**	**F** **F**

Note: Results in **bold** represent unacceptable levels of service.

1. Signal = signalized intersection

Source: Fehr & Peers, 2009.

Response A-2: The comment states that a figure for Near-Term (2015) I-205/Tracy Boulevard interchange lane configuration was not provided in the Draft EIR. The comment is correct. However, as stated in the DEIR, Near-Term (2015) lane configurations were assumed to be the same as existing conditions, as shown in Figure 2-4A. These existing condition lane configurations were corrected and included in the Recirculated Draft EIR.

Response A-3: The comment states that Caltrans will complete the review of Near-Term (2015) conditions upon receipt of the correct Near-Term (2015) lane configurations at the off-ramps. The commenter is referred to Response A-2. Corrected Near-Term (2015) lane configurations were included in the Recirculated Draft EIR, which was provided directly to Caltrans for review and comment.

Response A-4: The comment questions why a dedicated right turn lane at the eastbound I-205 off-ramp at Tracy Boulevard was analyzed instead of a dedicated left-turn lane during Near-Term (2015) Plus Project conditions.

As stated in Response A-1, the lane configuration assumptions have been updated for the Tracy Boulevard/I-205 off-ramp terminal intersections, and these updated configurations and the corresponding analysis was included in the Recirculated Draft EIR, which was provided to Caltrans. It was determined that the westbound and eastbound off-ramp existing lane configuration consists of a single shared through/left-turn/right-turn lane. There are no future capacity improvements planned for the Tracy Boulevard/I-205 interchange, therefore all study scenarios assumed existing lane configurations at the off-ramp terminal intersections. The updated LOS results are presented in Table 2.0-1.

Response A-5: The comment questions why the left-turn lane at the I-205 westbound off-ramp is mitigated if the project is located north of I-205.

Intersection operations are based on the average delay for all vehicles entering and using the critical movements. Therefore, adding capacity to any critical movement will improve an intersection's operation. A project's mitigation measure may consist of improvements to critical movements that the project itself does not add traffic to.

Response A-6: The comment requests that a queuing analysis be included for the Tracy Boulevard/I-205 off-ramp terminal intersections to determine 95th percentile and maximum queuing for each movement.

Intersections are generally designed to accommodate 95th percentile queuing. Maximum queues are a one-time occurrence during the peak hour and are

typically not reported. Table 2.0-2 presents the queuing analysis for the Tracy Boulevard/I-205 off-ramp terminal intersections. Synchro 7 was used to determine 95th percentile queues. Table 2.0-3 presents the queuing analysis for the recommended mitigated improvements at the off-ramp terminal intersections.

TABLE 2.0-2
TRACY BOULEVARD/I-205 RAMP TERMINAL INTERSECTION QUEUING ANALYSIS

INTERSECTION	APPROACH [1]	MOVEMENT [2]	STORAGE LENGTH (FT)	NO PROJECT 95TH PERCENTILE QUEUE (FT)		PLUS PROJECT 95TH PERCENTILE QUEUE (FT)	
				PM PEAK HOUR	SAT PEAK HOUR	PM PEAK HOUR	SAT PEAK HOUR
EXISTING CONDITIONS							
5. I-205 WESTBOUND RAMPS/TRACY BOULEVARD	NB	L	100	115	180	N/A	
		T	300	75	65		
	SB	TR	550	140	135		
	WB	TLR	1,400	340	320		
6. I-205 EASTBOUND RAMPS/TRACY BOULEVARD	NB	TR	320	125	155	N/A	
	SB	L	100	90	90		
		T	300	80	95		
	EB	TLR	1,300	115	155		
NEAR-TERM (2015) CONDITIONS							
5. I-205 WESTBOUND RAMPS/TRACY BOULEVARD	NB	L	100	125	180	125	230
		T	300	75	65	100	160
	SB	TR	550	145	135	170	330
	WB	TLR	1,400	360	320	440	1,560
6. I-205 EASTBOUND RAMPS/TRACY BOULEVARD	NB	TR	320	125	155	190	365
	SB	L	100	90	90	110	505
		T	300	85	90	95	140
	EB	TLR	1,300	115	155	135	475
CUMULATIVE (2030) CONDITIONS							
5. I-205 WESTBOUND RAMPS/TRACY BOULEVARD	NB	L	100	505	630	505	630
		T	300	105	115	150	265
	SB	TR	550	660	645	795	1,100
	WB	TLR	1,400	1,250	1,465	1,295	2,600
6. I-205 EASTBOUND RAMPS/TRACY BOULEVARD	NB	TR	320	440	575	640	895
	SB	L	100	1,105	1,145	1,135	1,595
		T	300	170	165	205	220
	EB	TLR	1,300	645	870	705	1,200

NOTES:
1. NB = NORTHBOUND, SB = SOUTHBOUND, EB = EASTBOUND, WB = WESTBOUND

2. L = LEFT-TURN LANE, T = THROUGH LANE, TR = SHARED THROUGH-RIGHT TURN LANE, TRL = SHARED THROUGH-RIGHT-LEFT TURN LANE

SOURCE: FEHR & PEERS, 2009.

TABLE 2.0-3
MITIGATED TRACY BOULEVARD/I-205 RAMP TERMINAL INTERSECTION QUEUING ANALYSIS

INTERSECTION	APPROACH	MOVEMENT	STORAGE LENGTH (FT)	PLUS PROJECT 95TH PERCENTILE QUEUE (FT)	
				PM PEAK HOUR	SAT PEAK HOUR
NEAR-TERM (2015) CONDITIONS					
5. I-205 WESTBOUND RAMPS/TRACY BOULEVARD	NB	L	100	125	230
		T	300	100	160
	SB	TR	550	165	330
	WB	TL	1,400	275	320
		R	1,000	60	890
CUMULATIVE (2030) CONDITIONS					
5. I-205 WESTBOUND RAMPS/TRACY BOULEVARD	NB	L	100	195	225
		T	300	110	185
	SB	TR	550	545	820
	WB	L	250	210	190
		TL	1,400	210	190
		R	300	0	75
6. I-205 EASTBOUND RAMPS/TRACY BOULEVARD	NB	T	320	315	585
		R	150	65	140
	SB	L	100	295	575
		T	300	145	175
	EB	L	450	115	445
		TR	1,300	140	190
		R	200	140	190

NOTES:

1. NB = NORTHBOUND, SB = SOUTHBOUND, EB = EASTBOUND, WB = WESTBOUND
2. L = LEFT-TURN LANE, T = THROUGH LANE, R = RIGHT-TURN LANE, TR = SHARED THROUGH-RIGHT TURN LANE, TL = SHARED THROUGH-LEFT TURN LANE

SOURCE: FEHR & PEERS, 2009.

Response A-7: The comment requests that geometric approval drawings (GADs) be provided for the proposed Cumulative (2030) mitigated lane configurations at the Tracy Boulevard/I-205 off-ramp terminal intersections.

GADs will be submitted for review and approval by Caltrans design staff when the final mitigation measures are determined and designed.

Response A-8: The comment states that the information provided to Caltrans is not sufficient to make a determination regarding the adequacy of the proposed mitigation for the Tracy Boulevard/I-205 off-ramp terminal intersections.

After submittal of this letter to the City, Caltrans was provided with the additional requested information directly. Additionally, the analysis of these intersections was revised and included in the Recirculated Draft EIR, along with all supporting information. The Recirculated Draft EIR and all supporting information was provided directly to Caltrans and circulated through the State Clearinghouse for a 45-day public review period. Responses to Caltrans' comment letter on the Recirculated Draft EIR are provided below under Response AA.

Response A-9: Comment requests that STAA trucks be accommodated when designing the intersections at Tracy Boulevard, Corral Hollow Road, Grant Line Road, 11th Street, and I-205. Comment also requests that full emergency vehicle access be provided when designing local road intersections and driveways at Tracy Boulevard, Corral Hollow Road, Grant Line Road and 11th Street.

Comment noted. The City uses the appropriate design vehicle when designing intersections. The project site will be accessible to emergency vehicles.

Response A-10: Comment requests that the following abbreviations be used under the Executive Summary of the Draft EIR: S-Significant and SU-Significant and Unavoidable. The Executive Summary correctly used the abbreviation of S-Significant, but incorrectly used S-Significant and Unavoidable. The abbreviation for Significant and Unavoidable is now identified as SU. These changes have been made to Pages ES-6 through ES-29, and are shown in the Errata Section of this Final EIR.

Response A-11: The comment states that Cumulative Plus Project Saturday Peak Hour Traffic Volumes at I-205 between MacArthur Drive and Tracy Boulevard are high and therefore mitigation will be required to solve this congestion.

Table 2.0-4 below summarizes the Cumulative freeway analysis included in the DEIR. As shown in Table 2.0-4, the segment between MacArthur Drive and Tracy Boulevard operates at LOS D or better in the westbound direction under Cumulative No Project and Plus Project conditions. The eastbound direction operates at LOS E under Cumulative No Project conditions and continues to operate at LOS E with the addition of project traffic. According to the Final Regional Congestion Management Program (SJCOG, 2007), I-205 is a "grandfathered" segment with an LOS E standard between Tracy Boulevard and I-5 and an LOS F standard between the Alameda County line and Tracy Boulevard. The CMP legislation was adopted before the widening of I-205, therefore, the overall CMP standard of LOS D is the threshold used for the DEIR analysis.

According to the significance criteria in the DEIR, a traffic and circulation impact is considered significant if the addition of project traffic causes freeway segment operations to degrade from an acceptable level to an unacceptable level using SJCOG CMP standards or an increase in volume greater than 5 percent for a freeway segment operating at an unacceptable level. The project traffic will increase Cumulative No Project traffic volumes on eastbound I-205 by about 2% west of Tracy Boulevard and 3% east of Tracy Boulevard. According to the significance criteria, the Project is not anticipated to result in significant impacts on study segments of I-205 as its traffic contribution is less than 5%. Therefore, mitigation measures are not required for reducing congestion on I-205.

TABLE 2.0-4
CUMULATIVE (2030) FREEWAY SEGMENT LEVEL OF SERVICE

Segment	Direction of Travel	Peak Hour	# of Lanes	Without Project			Plus Project		
				Volume	Density[1]	LOS	Volume	Density[1]	LOS
I-205: West of Tracy Boulevard	Eastbound	PM SAT	4	8,060 8,100	**36.5** **35.5**	**E** **E**	**8,066** **8,259**	**36.5** **36.8**	**E** **E**
I-205: West of Tracy Boulevard	Westbound	PM SAT	4	4,740 5,480	19.2 22.1	C C	4,745 5,543	19.2 22.3	C C
I-205: East of Tracy Boulevard	Eastbound	PM SAT	4	8,630 8,610	**42.2** **40.2**	**E** **E**	**8,651** **8,895**	**42.5** **43.4**	**E** **E**
I-205: East of Tracy Boulevard	Westbound	PM SAT	4	5,140 5,950	20.8 24.0	C C	5,168 6,676	20.9 27.3	C D

Note:
1. Density measured in passenger cars per mile per lane
Source: Fehr & Peers, 2009.

Response A-12: The Comment requests that the existing conditions freeway analysis be revised to analyze I-205 as three lanes in each direction, instead of two, to reflect the recent widening of I-205 between 11th Street and I-5.

Table 2.0-5 below provides the updated Existing Conditions freeway analysis results assuming three lanes in each direction on I-205. As shown in Table 2.0-5, all study freeway segments operate at LOS B conditions during the weekday PM and Saturday peak hours.

TABLE 2.0-5
EXISTING FREEWAY SEGMENT LEVEL OF SERVICE

Segment	Direction of Travel	Peak Hour	# of Lanes	Volume	Density[1]	LOS
I-205: West of Tracy Boulevard	Eastbound	PM SAT	3	2,867 2,865	15.8 15.5	B B
I-205: West of Tracy Boulevard	Westbound	PM SAT	3	2,362 3,088	13.0 17.0	B B
I-205: East of Tracy Boulevard	Eastbound	PM SAT	3	3,018 2,983	16.6 16.1	B B
I-205: East of Tracy Boulevard	Westbound	PM SAT	3	2,627 3,227	14.5 17.7	B B

Note:
1. Density measured in passenger cars per mile per lane

Source: Fehr & Peers, 2009.

Response A-13: The comment requests that a correction be made to Table 3.12-12 in the Draft EIR to change the reference from I-80 to I-580. The reference should actually be changed from I-80 to I-205. This correction has been made and is shown in the Errata section of this Final EIR.

Response A-14: The comment states that traffic volume increases due to the proposed project will create congestion on I-205 and I-580, and requests proposed mitigation measures to alleviate congestion.

As stated in Response A-11, the project is not expected to have significant impacts on freeway operations on the study segments of I-205 and therefore does not propose mitigation measures to alleviate congestion.

Oct-14-2009 16:18 From-DIVISION OF LAND RESOURCE PROTECTION 19163273430 T-915 P.001/003 F-961

NATURAL RESOURCES AGENCY ARNOLD SCHWARZENEGGER, GOVERNOR

DEPARTMENT OF CONSERVATION

DIVISION OF LAND RESOURCE PROTECTION

801 K STREET • MS 18-01 • SACRAMENTO, CALIFORNIA 95814

PHONE 916 / 324-0850 • FAX 916 / 327-3430 • TDD 916 / 324-2555 • WEBSITE conservation.ca.gov

October 14, 2009

VIA FACSIMILE (209) 831-6439
Scott Claar
City of Tracy
333 Civic Center Plaza
Tracy, CA 95376

Subject: City of Tracy Holly Sugar Sports Park Draft Environmental Impact Report
SCH#: 2008122103

Dear Mr. Claar:

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Draft Environmental Impact Report (DEIR) for the referenced project. The Division monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act and other agricultural land conservation programs. We offer the following comments and recommendations with respect to the project's impacts on agricultural land and resources.

Project Description

The purpose of the Holly Sugar Sports Park project is the development of an approximately 298-acre active sports park. The project would include an approximately 166-acre active sports park facility, approximately 86 acres of land south of the active sports park for passive recreational uses, and an approximately 46-acre area to the northwest of the active sports park site as a future expansion area. The project site is located in San Joaquin County, between Tracy Boulevard and Corral Hollow Road, north of Larch Road, and south of Sugar Road (APN No. 212-15-001). There are no lands under Williamson Act contracts within the project site. However, the entire 298-acre project site is designated as Unique Farmland and will be converted to non-agricultural use. The impact to agricultural resources has been categorized as significant and unavoidable. Therefore, the Division recommends that any subsequent California Environmental Quality Act (CEQA) document address the following three areas to provide a comprehensive discussion of potential impacts of the project on agricultural land and activities:

Agricultural Setting of the Project

- Location and extent of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and other types of farmland adjacent to the project area.
- Current and past agricultural use of the project area. Please include data on the types of crops grown, and crop yields and farm gate sales values.

B-1

To help describe the full agricultural resource value of the soils on the site, the Department recommends the use of economic multipliers to assess the total contribution of the site's potential or actual agricultural production to the local, regional and state economies. Two sources of economic multipliers can be found at the University of California Cooperative Extension Service and the United States Department of Agriculture (USDA).

Project Impacts on Agricultural Land

- Type, amount, and location of farmland conversion resulting directly and indirectly from project implementation and growth inducement, respectively.
- Impacts on current and future agricultural operations; e.g., land-use conflicts, increases in land values and taxes, vandalism, etc.
- Incremental project impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely projects in the future.

B-2

Under California Code of Regulations §15064.7, impacts on agricultural resources may also be both quantified and qualified by use of established thresholds of significance. As such, the Division has developed a California version of the USDA Land Evaluation and Site Assessment (LESA) Model. The California LESA model is a semi-quantitative rating system for establishing the environmental significance of project-specific impacts on farmland. The model may also be used to rate the relative value of alternative project sites. The LESA Model is available on the Division's website at:

http://www.consrv.ca.gov/DLRP/qh_lesa.htm

Mitigation Measures

The loss of agricultural land represents a permanent reduction in the State's agricultural land resources. As such, the Department recommends the use of permanent agricultural conservation easements on land of at least equal quality and size as partial compensation for the direct loss of agricultural land. If Williamson Act contracts are terminated, or if growth inducing or cumulative agricultural impacts are involved, the Department recommends that this ratio of conservation easements to lost agricultural land be increased. Conservation easements will protect a portion of those remaining land resources and lessen project impacts in accordance with CEQA Guideline §15370. The Department highlights this measure because of its acceptance and use by lead agencies as an appropriate mitigation measure under CEQA and because it follows an established rationale similar to that of wildlife habitat mitigation.

B-3

Mitigation via agricultural conservation easements can be implemented by at least two alternative approaches: the outright purchase of easements or the donation of mitigation fees to a local, regional or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural conservation easements. The conversion of agricultural land should be deemed an impact of at least regional significance. Hence, the search for replacement lands should be conducted regionally or statewide, and not limited strictly to lands within the project's surrounding area.

B-3

The Department also has available a listing of approximately 30 "conservation tools" that have been used to conserve or mitigate project impacts on agricultural land. This compilation report may be requested from the Division at the email address or phone number below. General information about agricultural conservation easements, the Williamson Act, and provisions noted above is available on the Department's website:

http://www.conservation.ca.gov/dlrp/index.htm

Of course, the use of conservation easements is only one form of mitigation that should be considered. Any other feasible mitigation measures should also be considered.

Thank you for giving us the opportunity to comment on this DEIR. If you have questions regarding our comments, or require technical assistance or information on agricultural land conservation, please contact Elliott Lum, Environmental Planner, at 801 K Street, MS 18-01, Sacramento, CA 95814; phone: (916) 324-0869; email: Elliott.Lum@conservation.ca.gov.

Sincerely,

Brian Leahy
for

Dan Otis
Program Manager
Williamson Act Program

cc: State Clearinghouse

Response to Letter B: Dan Otis, California Department of Conservation, Division of Land Resource Protection

Response B-1: The commenter requests that the location of Prime Farmland, Farmland of Statewide importance, Unique Farmland, and other types of farmland adjacent to the project area be identified. DEIR Figure 3.2-1- Important Farmlands Map, identifies these types of farmlands that are adjacent to the project site. Additionally, Figure 3.2-2- Williamson Act Parcels Map, identifies parcels within the vicinity of the project site that are currently under Williamson Act contracts. These two figures were included in the Draft EIR, at the end of Section 3.2- Agricultural Resources.

Information on the current and past agricultural uses of the project site, including the types of crops grown, is described on Page 3.2-1 of the Draft EIR. As described on Page 3.2-1, the project site is currently being farmed with alfalfa, and has historically produced corn, winter wheat and alfalfa. Specific information regarding historic crop yields and farm gate sales values is not available to the City at the time of the preparation of this Final EIR.

Response B-2: The commenter requests information regarding the direct and indirect farmland conversion that would result from project implementation, information regarding land use conflicts with adjacent agricultural operations, and analysis of cumulative farmland conversion impacts. As described under Impact 3.2-1, on Page 3.2-6 of the Draft EIR, the entire 298-acre project site would be converted from agricultural uses to non-agricultural uses. This impact was determined to be Significant and Unavoidable. Impacts to adjacent agricultural operations and the indirect conversion of offsite agricultural uses to non-agricultural uses are addressed under Impact 3.2-2, on Page 3.2-7 of the Draft EIR. This impact was determined to be Less than Significant after implementation of Mitigation Measures 3.2-2, 3.2-3, and 3.2-4. Cumulative impacts to agricultural resources are described under Impact 4.2, on Page 4.0-5 of the Draft EIR. This impact was determined to be Cumulatively Considerable, and Significant and Unavoidable.

Section 3.2 of the Draft EIR includes a detailed and comprehensive analysis of the existing agricultural resources on the project site and in the vicinity of the project site. Mitigation Measures contained in this section require the City of Tracy to pay the appropriate agricultural mitigation offset fees, as specified in Chapter 13.28 of the Tracy Municipal Code. Additionally, Mitigation Measures included in the Draft EIR would further reduce potential land use conflicts with adjacent agricultural operations. No further analysis of this issue is required.

Response B-3: The commenter provides suggestions regarding appropriate mitigation techniques to offset the loss of agricultural land that would result from project implementation. One of the approaches suggested by the commenter is to pay fees to a local agency that would use these fees to purchase agricultural conservation easements. The City appreciates this comment, and notes that Mitigation Measure 3.2-1 requires the City of Tracy to pay agricultural mitigation fees into the City's agricultural conservation program, as required by Section 13.28 of the Tracy Municipal Code. Fees from this program will be used by the City of Tracy to purchase offsite agricultural conservation easements. No further analysis of this environmental issue is required.

October 14, 2009

City of Tracy
Scott Claar, Associate Planner
Department of Development and Engineering Services
333 Civic Center Plaza
Tracy, CA 95376

SUBJECT: Holly Sugar Sports Park

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

Transportation Planning Comments:

1. Page 3.12-10: Intersection #1, Larch Road/Corral Hollow Road is an offset intersection with approximately 200' between the east and west legs of Larch Road. Previous County Traffic Studies have analyzed these intersections separately; the County requests the same be done in this EIR, with any potential mitigations properly addressing this close spacing and potential associated queuing issues. C-1

2. Page 3.12-13 states that the 86 acre passive recreation site is not expected to generate additional project trips – this is not realistic. Appendix E of the traffic study uses ITE LU code 412, County Park, for the 26 acres of Park Area for the future expansion portion, as shown in Table 3.12-8; the same should be used for the 86 acres as well for consistency and for the most conservative analysis possible. C-2

3. Page 3.12-16: Under the San Joaquin County section, please note that the CMP is administered by the San Joaquin Council of Governments (SJCOG), not by San Joaquin County. C-3

4. Page 3.12-17: For an unsignalized County intersection, meeting a signal warrant is NOT required to consider an impact significant, only degradation from acceptable to unacceptable LOS. According to the most recent San Joaquin County Traffic Impact Study Guidelines, if this degradation occurs, all possible mitigations, including but not limited to signals (if warranted), roundabouts and channelization must be evaluated. In addition, the County does not have a 5% increase in volume rule – any increased delay at an intersection with an unacceptable LOS must have all possible mitigations examined. C-4

5. Impact 3.12-1: It is unclear how widening the westbound approach would improve the LOS – the westbound LOS for left turns would still be unacceptable, not fully mitigating the deficiency; remove this as a potential mitigation measure; in addition, classification of this location as Significant and Unavoidable solely due to its location outside of Tracy's City limits is unacceptable. The City should either construct this improvement or place the equivalent funding in an account toward a C-5

future County project (or City project in the event this location is annexed into the City in the future). C-5

6. Impact 3.12-2: As the intersection is in City jurisdiction (including all four intersection legs), classification of this location as Significant and Unavoidable is unacceptable. The only need for County review would be if construction on the eastbound approach of the intersection extended more than ~630' west of the intersection into County jurisdiction. The City should remove the unavoidable designation & construct this improvement. C-6

7. Impact 3.12-5: This intersection should either be signalized by the City as a mitigation for the near-term+project scenario and evaluated as such for additional mitigations, or fair share costs placed in an account toward a future County project (or City project in the event this location is annexed into the City in the future). C-7

8. Impact 3.12-6: As this intersection is entirely within City jurisdiction, the City should change the significant and unavoidable designation to less than significant with mitigation and re-evaluate accordingly. C-8

9. Impact 3.12-14: The County is currently updating the County master bike plan; the new plan designates Corral Hollow Road between Lammers Road and the City limits as a Class III bike route with the intent to connect Tracy and Stockton via Tracy Boulevard and Howard Road/Mathews Road. The city should consider extending the current Class II bike lane on Corral Hollow Road south of Grant Line Road north to connect to the County's planned Class III bike route. C-9

Community Infrastructure Comments:

Any development or significant redevelopment project that disturbs one (1) or more acres of land or that is part of a larger plan of common development (such as a subdivision) shall be subject to the following conditions:

10. Owner shall file a Notice of Intent (NOI) with the State Water Resources Control Board (SWRCB) and comply with the State "General Permit for Storm Water Discharges Associated with Construction Activity". C-10

11. The Waste Discharge Identification Number (WDID), issued by SWRCB, shall be submitted to San Joaquin County Public Works for file. Contact the SWRCB at (916) 341-5537 for further information. C-11

12. Owner shall submit a "Storm Water Pollution Prevention Plan" (SWPPP) to San Joaquin County Public Works for review. A SWPPP preparation guide is available at San Joaquin County Public Works. C-12

C-13

13. A copy of the SWPPP shall be maintained on the construction site and presented to any County, State or Federal employee on demand. The SWPPP onsite shall include all required records, updates, test results and inspections.

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

Sincerely,

Mark Hopkins
Environmental Coordinator

c: Jeff Levers, Interim Transportation Planning Division Manager
Alicia Albright, Engineering Program Manager
Alex Chetley, Senior Civil Engineer

Response to Letter C: Mark Hopkins, San Joaquin County Department of Public Works

Response C-1: The comment states that study intersection #1, Larch Road/Corral Hollow Road is an offset intersection with approximately 200 feet between the east and west legs of Larch Road. The comment requests that intersection #1 be analyzed as two closely-spaced intersections.

Field reconnaissance was conducted in February 2009 to obtain lane configurations at the study intersections. The east and west legs of Larch Road are offset by approximately 170 feet at Corral Hollow Road. Given the short distance between the east and west legs of Larch Road, it was determined that average intersection delay would be most accurately (and conservatively) calculated by modeling the off-set intersection as a single four-legged intersection. The intersection was re-evaluated as two separate unsignalized intersections. The updated levels of service for each study scenario are provided in Table 2.0-6.

As shown in Table 2.0-6, the side-street-stop controlled intersections of Larch Road at Corral Hollow Road are anticipated to operate at LOS A or B (acceptable levels) during existing and Near-Term (2015) No Project conditions. With the addition of project traffic, the two intersections are expected to continue to operate at overall LOS A or B under the Near-Term (2015) scenario with only one movement operating at LOS D during the Saturday peak hour conditions. LOS D is an acceptable level for intersections under the County's jurisdiction. Therefore the Project would not cause a significant impact to traffic operations at either intersection of Larch Road-west leg/Corral Hollow Road or Larch Road-east leg/Corral Hollow Road under Near-Term (2015) Plus Project conditions. The more-conservative analysis conducted for the DEIR identified a significant near-term project impact at this intersection.

Under Cumulative (2030) conditions, the intersections of Larch Road-west leg/Corral Hollow Road and Larch Road-east leg/Corral Hollow Road would operate unacceptably with and without the Project. The proposed Cumulative (2030) mitigation measures in the DEIR for the Larch Road/Corral Hollow Road would still apply and are summarized below:

- Widen eastbound approach to provide 1 left-turn lane, 2 through-lanes and 1 right-turn lane
- Widen westbound approach to provide 1 left-turn lane, 1 through-lane and 1 shared through/right-turn lane

- Widen northbound approach to provide 2 left-turn lanes, 1 through lane and 1 right-turn lane
- Widen southbound approach to provide 1 left-turn lane and 1 shared through/right-turn lane
- Signalize intersection and optimize timings

The Cumulative (2030) mitigation measure also includes realigning the intersections into one intersection. As described in the DEIR, the improvements listed above are necessary to support planned Cumulative (2030) traffic growth in that area; the addition of project traffic would not require additional improvements.

TABLE 2.0-6
UPDATED PEAK HOUR INTERSECTION LEVELS OF SERVICE

Intersection		Control[1]	Peak Hour	No Project		Plus Project	
				Delay[2] (in seconds)	LOS	Delay[2] (in seconds)	LOS
Existing Conditions							
1a.	Larch Road-west leg/Corral Hollow Road	SSSC	PM SAT	5 (9) 4 (9)	A (A) A (A)	--	--
1b.	Larch Road-east leg/Corral Hollow Road	SSSC	PM SAT	4 (12) 5 (11)	A (B) A (B)	--	--
Near-Term (2015) Conditions							
1a.	Larch Road-west leg/Corral Hollow Road	SSSC	PM SAT	5 (10) 5 (9)	A (A) A (A)	5 (10) 2 (12)	A (B) A (B)
1b.	Larch Road-east leg/Corral Hollow Road	SSSC	PM SAT	5 (13) 5 (11)	A (B) A (B)	5 (15) 14 (29)	A (B) B (D)
Cumulative (2030) Conditions							
1a.	Larch Road-west leg/Corral Hollow Road	SSSC	PM SAT	**>50 (>50)** **>50 (>50)**	**F (F)** **F (F)**	**>50 (>50)** **>50 (>50)**	**F (F)** **F (F)**
1b.	Larch Road-east leg/Corral Hollow Road	SSSC	PM SAT	**>50 (>50)** **>50 (>50)**	**F (F)** **F (F)**	**>50 (>50)** **>50 (>50)**	**F (F)** **F (F)**

Note: Results in **bold** represent unacceptable levels of service.

2. SSSC = side-street stop controlled intersection
3. For side-street stop-controlled intersections, delay is reported as: Intersection average (worst case approach)

Source: Fehr & Peers, 2009.

Response C-2: The comment states it is not realistic to assume that the 86 acre passive recreation area will not generate additional project trips. The comment suggests using ITE land use code 412, County Park, to estimate trips generated by the passive-recreation site.

The purpose of the 86 acre passive recreation area is to function as a buffer zone between the active sports park and the residential community south of the project site and may be used for activities such as walking and biking trails, disc golf and/or an arboretum. The passive recreation area has been described and designed to not result in additional vehicle trips. Plus, the traffic estimates for the active sports park are sufficiently conservative to account for any traffic that would be generated by use of the passive recreation area. No further analysis of this environmental issue is required.

Response C-3: The comment states that the San Joaquin County Congestion Management Plan (CMP) is administered by the San Joaquin Council of Governments (SJCOG), not by San Joaquin County. This comment is noted, and changes to the Draft EIR text are shown in the Errata section of this Final EIR.

Response C-4: The comment states that for an unsignalized County intersection, only degradation from acceptable to unacceptable LOS is considered a significant impact, and meeting a signal warrant is not part of the criterion. In addition, the County does not have a 5% increase in volume rule for intersections already operating acceptably. Any increase in delay at an intersection with an unacceptable LOS must have all possible mitigations examined.

LOS at an unsignalized intersection is calculated for both the intersection as a whole and for the controlled movements. In the DEIR, the operations of the controlled movements (not the whole intersection) were used to identify impacts. It is possible for a movement to have a small volume of traffic and to operate at an unacceptable level of service. According to the County's comment, any increase in traffic (one vehicle) could be assessed as a significant impact requiring mitigation (widening an approach to provide two lanes). Traffic signal installation is not recommended by the MUTCD for intersections that do not meet signal warrants. Therefore, the signal warrant criterion was provided to determine whether the impact was significant as traffic signals are a likely mitigation measure. The 5 percent increase in volume was added to minimize situations where a small increase in traffic would trigger mitigation that could have secondary impacts. The Final Environmental Impact Report (FEIR) reflects the appropriate San Joaquin County significance criteria. This change does not alter the conclusions of the EIR.

The following changes will be made to the significance criteria:

- A traffic and circulation impact is considered significant if implementation of the Project would cause an unsignalized County intersection operations to:

- degrade from an acceptable level based on County of San Joaquin standards (LOS D or better) to an unacceptable level (LOS E or F), or
- the project increases the volume by at least one vehicle to an intersection operating at an unacceptable level

Response C-5: The comment states that it is unclear how widening the westbound approach at the intersection of Corral Hollow Road/Larch Road would be a potential mitigation measure for Near-Term (2015) conditions as the left-turns would still operate at an unacceptable level. The comment also states that classification of the impact at the intersection as Significant and Unavoidable solely due to its location of Tracy's City limits is unacceptable.

Due to Comment C-1, the method of analyzing the offset intersection of Larch Road/Corral Hollow Road has been updated and is instead analyzed as two separate intersections. Based on the updated analysis approach, the addition of project traffic would not degrade Near-Term (2015) intersection operations to LOS E or worse. Therefore the Project would not impact traffic operations at either intersection of Larch Road-west leg/Corral Hollow Road or Larch Road-east leg/Corral Hollow Road under Near-Term (2015) Plus Project conditions and near-term mitigation measures would not be required. This impact analysis has been revised in the Errata Section of this Final EIR, and it is now concluded that impacts to this intersection would be less than significant, as further described under Response C-1.

Response C-6: The comment states that intersection #4, Larch Road/Tracy Boulevard, is in City of Tracy jurisdiction, not the County of San Joaquin. The comment also states that the impact classification as Significant and Unavoidable at this location is unacceptable. The commenter is correct. Intersection #4 is located within the City of Tracy. MM 3.12-2 indicates that the installation of a traffic signal would improve intersection operations to an acceptable level of service. The City of Tracy shall install the traffic signal, consistent with the requirements of MM 3.12-2. This correction and implementation of this mitigation measure would reduce this impact to a less than significant level. The text changes to Section 3.12 of the DEIR have been reflected in the Errata section of this Final EIR.

Response C-7: The comment states that the intersection of Larch Road/Corral Hollow Road should either be signalized by the City as a mitigation measure for the Near-Term (2015) Plus Project scenario or the City should place fair share costs in an account for a future County project (or City project in the event that the locations is annexed into the City in the future).

Due to Comment C-1, the method of analyzing the offset intersection of Larch Road/Corral Hollow Road has been revised to be analyzed as two separate intersections. Based on the revised analysis approach, the addition of project traffic would not degrade Near-Term (2015) intersection operations to LOS E or worse. Therefore the Project would not impact traffic operations at either intersection of Larch Road-west leg/Corral Hollow Road or Larch Road-east leg/Corral Hollow Road under Near-Term (2015) Plus Project conditions and near-term mitigation measures would not be required.

Response C-8: The comment states that intersection #4, Larch Road/Tracy Boulevard, is in City of Tracy jurisdiction, not the County of San Joaquin and therefore the impact classification as Significant and Unavoidable is not appropriate. The commenter is referred to Response C-6 above.

Response C-9: The comment states that the City should consider extending the current Class II bike lanes on Corral Hollow Road south of Grant Line Road north to connect to the County's planned Class III bike route.

The City of Tracy appreciates this comment and remains committed to extending bike lanes in the project vicinity and throughout the City as funding becomes available for such a project.

Response C-10: The comment states that the project must comply with the State "General Permit for Storm Water Discharges Associated with Construction Activity". This comment has been noted, and the City of Tracy will ensure that all project construction activities correctly comply with applicable State laws related to water quality.

Response C-11: The comment states that the Waste Discharge Identification Number (WDID), issued by SWRCB, shall be submitted to San Joaquin County Public Works for file. This comment has been noted, and no further response is required.

Response C-12: The comment states that the project requires a Stormwater Pollution Prevention Plan (SWPPP). This comment has been noted, and is included as a requirement under Mitigation Measure 3.8-3, on Page 3.8-18 of the Draft EIR.

Response C-13: The comment states that a copy of the SWPPP shall be maintained on the construction site and presented to any County, State or Federal employee on demand. The commenter is referred to Response C-12.

October 14, 2009

Scott Claar
City of Tracy
Department of Development and Engineering Services
333 Civic Center Plaza
Tracy, CA 95376

Subject: Comments on Proposed Project

Project: Holly Sugar Sports Park DEIR SCH#2008122103

District Reference No: 20090037

Dear Mr. Claar:

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the Draft Environmental Impact Report (DEIR) for the Holly Sugar Sports Park. The proposed project would include 298-acre park that consists of a 166-acre active sports park facility, 86 acres for passive recreational uses, and 46 acres as a future expansion area. The District offers the following comments:

District Comments

1) The DEIR states that Rule 9510 (Indirect Source Review) applies to projects which upon full build-out will include 50 or more residential units and identifies the proposed project being subject to the rule due to being greater than 20,000 square feet of recreational space upon full build-out. The District would like to clarify that Rule 9510 contains several rule applicability thresholds in addition to the 50 or more residential units threshold. The list of rule applicability thresholds can be found at http://www.valleyair.org/ISR/do_i_need_an_application.htm#ProgramApplicability

D-1

2) Regarding Mitigation Measure 3.3-3, the District appreciates the City's commitment to show that the project meets the requirements of District Rule 9510 prior to awarding the contract to construct the project. Due to timing issues with verification,

D-2

the District recommends that it be rephrased to express that proposed mitigation measures be verified to have the potential to satisfy the requirements of Rule 9510. D-2

3) The District also recommends that demonstration of compliance with District Rule 9510 be required prior to the issuance of the first building/grading permit as a condition of project approval. D-3

4) Operational emissions were calculated assuming that 4 motorized lawn movers would be used a maximum of 8 hours each on the maximum day, and that 5 other maintenance equipment/vehicles would be used 4 hours. The District recommends incorporation, as a condition of project approval, limiting operating activities to 8-hrs per day and to 4-hrs per day to applicable maintenance equipments. D-4

5) Compliance with District Regulation VIII (Fugitive PM10 Prohibition) will reduce construction related fugitive dust, i.e. particulate matter (PM10), impacts to a level considered less than significant. However, compliance with Regulation VIII does not reduce PM10 impacts associated with equipment exhaust. D-5

6) The DEIR states under Mitigation Measure 3.3-1 that District shall be responsible for monitoring the implementation of the construction emissions reduction plan. The District appreciates the requirements and measures required in addition to those required to meet District Regulation VIII. However, the District does not have statutory responsibility to impose and enforce those measures beyond District rules and regulation. If the City is requiring those measures, it is recommended that the City be responsible. D-6

7) The risks from potential toxic emissions from the project were not quantified and the potential risks from nearby toxic emission sources was not identified. Specific comments on addressing both types of risks are given below: D-7

   a) There are likely to be some small number of diesel trucks that will be used to supply the concession stands and the portable restrooms. The number of these trucks and the diesel particulate matter emissions from these trucks should be quantified. There may also be some portable diesel engines that are used on-site. The concession stands may have toxic emissions from charbroilers. Once emissions are quantified, the risks should be assessed using a prioritization technique. If significant risks are estimated using the prioritization technique, a more refined risk assessment should be performed.

   b) The following are potential sources of toxic emissions that are located nearby:

      - Holly Sugar Corporation. The company has permits for a natural gas-fired boiler, bulk sugar loading, and a gasoline dispensing operation.
      - There is a light industrial park southeast of the proposed location. There appear to be a number of surface coating operations (including an

autobody painting operation), a millwork, and a proposed emergency diesel engine in this industrial park.
- Interstate 205 is not far from the southern boundary of the proposed facility.

D-7

c) An analysis should be performed to quantify emissions from all the nearby sources identified above and any others that can be identified. The previous health risk assessment that was performed for two other proposed sites could be used to estimate the potential risks from these types of sources.

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

D-8

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

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

D-9

District staff is available to meet with you and/or the applicant to further discuss the regulatory requirements that are associated with this project. If you have any questions or require further information, please call Patia Siong at (559) 230-5930 and provide the reference number at the top of this letter.

Sincerely,

David Warner
Director of Permit Services

Arnaud Marjollet
Permit Services Manager

DW: ps

cc: File

Response to Letter D: David Warner and Arnaud Marjollet, San Joaquin Valley Unified Air Pollution Control District

Response D-1: The comment provides clarification on the applicability of SJVAPCD Rule 9510. This comment has been noted, and no changes to the Draft EIR or the air quality mitigation is required.

Response D-2: The comment notes that the District recommends that Mitigation Measure 3.3-3 be rephrased to express that proposed mitigation measures be verified to have the potential to satisfy the requirements of Rule 9510. The City appreciates this comment, and notes that the current wording of Mitigation Measure 3.3-3 accomplishes this goal and meets the requirements of District Rule 9510. No changes to the Draft EIR are required.

Response D-3: The comment notes that The District also recommends that demonstration of compliance with District Rule 9510 be required prior to the issuance of the first building/grading permit as a condition of project approval. This comment has been noted. The Draft EIR requires compliance with District Rule 9510 prior to the issuance of a grading permit, and approval of the project would be accompanied by adoption a Mitigation Monitoring and Reporting Program, which will include this requirement, as specified in Mitigation Measure 3.3-3. No changes to the Draft EIR are required.

Response D-4: The comment states that operational emissions were calculated assuming that 4 motorized lawn mowers would be used a maximum of 8 hours each on the maximum day, and that 5 other maintenance equipment/vehicles would be used 4 hours. The District recommends incorporation, as a condition of project approval, limiting operating activities to 8-hrs per day and to 4-hrs per day to applicable maintenance equipments.

The assumptions regarding the use of maintenance equipment and lawnmowers were developed through staff discussions with parks maintenance staff. Based on field maintenance activities at other Tracy parks facilities, the assumptions generated for this analysis represent a conservative "worst-case" scenario regarding the frequency and duration of maintenance activities and the use of emissions-generating equipment. Emissions associated with field maintenance activities were calculated using the 2007 URBEMIS air quality modeling software. No changes to the Draft EIR are required.

Response D-5: The comment states that compliance with District Regulation VIII (Fugitive PM10 Prohibition) will reduce construction related fugitive dust, i.e. particulate matter (PM10), impacts to a level considered less than significant. However, compliance

with Regulation VIII does not reduce PM10 impacts associated with equipment exhaust.

This comment has been noted. Mitigation Measure 3.3-1, on Page 3.3-16 of the Draft EIR includes numerous measures that must be in place prior to the commencement of construction activities. These measures include the use of diesel particulate filters, which would reduce PM10 impacts associated with equipment exhaust. No changes to the Draft EIR are required.

Response D-6: The comment states that the District does not have statutory responsibility to impose and enforce the measures identified in Mitigation Measure 3.3-1 beyond District rules and regulation. If the City is requiring those measures, it is recommended that the City be responsible.

This comment has been noted. As the City is the project applicant for this project, the City shall ensure that all contractors hired by the City to work on this project comply with the aspects of this mitigation measure that are not included in the District's rules and regulations.

Response D-7: The comment states that the risks from potential toxic emissions from the project were not quantified and the potential risks from nearby toxic emission sources were not identified. The comment suggests that potential onsite sources of toxic emissions may include diesel trucks, charbroilers and portable generators. The comment states that potential offsite sources of toxic emissions include the Holly Sugar Corporation, a light industrial park and I-205.

The potential toxic emissions generated onsite by the proposed project are extremely minimal and do not warrant quantification in this EIR. It is not expected that commercial-scale diesel trucks will ever be used to deliver supplies and food to the concession stands after the project has been constructed. It is anticipated that non-diesel fueled gasoline powered vehicles will be used to deliver concession materials, and that these delivery trips will be infrequent. Concession services at the park site would not be commercial in nature. Most of the goods and food sold at the concession stands would be transported to the site by parents and volunteers, and the scale of the onsite concession facilities and limited food storage resources do not warrant the use of large diesel trucks to make deliveries.

The comment also states that emissions may be generated by the use of charbroilers at the onsite concession stands. The SJVAPCD has adopted Rule 4692, which regulates the use of commercial charbroilers. The City of Tracy anticipates that most of the onsite food concession cooking activities will involve common residential-scale gas and charcoal barbecues, and would be limited to a

maximum of a few days per week during peak summertime use of the sports park. Due to the nature of the project and the infrequent use of barbecues at the project site to gill hotdogs, hamburgers, etc., the project is not subject to the requirements of SJVAPCD Rule 4692. The occasional use of barbecues at concession stands at the Holly Sugar Sports Park would not pose a significant risk of exposure to toxic emissions by park users or residents in the vicinity of the project site. A quantified analysis of potential emissions from these sources is not warranted and no changes to the Draft EIR or mitigation measures are required.

With respect to the potential for existing off-site sources of toxic emissions to impact the proposed project, the San Joaquin Valley Air Pollution Control District stated in their comment letter that the previous Health Risk Assessment (HRA) that was prepared on behalf of the City of Tracy by Tetra-Tech in June 2006 could be used to estimate potential risks from off-site sources. The June 2006 HRA addressed potential health risks at the Antenna Farm site, which is located in an unincorporated area to the west of the city's boundary in the Interstate 580 corridor. The HRA also addressed potential health risks at the Chrisman Field site, which is located in eastern Tracy in the urban-agricultural interface. These two site locations were previously considered by the City of Tracy as suitable locations for development of a youth sports park facility.

As described in Letter D, submitted by the SJVAPCD, there are three potential nearby sources of toxic emissions in the vicinity of the Holly Sugar Sports Park site, the Holly Sugar Corporation, the nearby industrial park, and I-205.

The Holly Sugar Corporation has facilities located approximately .75 miles to the east of the project site. These facilities include a natural gas fired boiler, bulk sugar loading facilities, and a gasoline dispensing operation. The Holly Sugar Corporation operations are addressed in the SJVAPCD 2007 Annual Report on the District's Toxic Air Program (Annual Report). According to the Annual Report, the District collects and compiles toxic emissions data for industrial and commercial facilities as required by the State Air Toxics Hot Spots Information and Assessment Act. Although this process was completed for most Valley facilities during the early years of the Air Toxics Hot Spots program (1989-1991), approximately 200 of the highest emitting operations are still required to provide updates to their emissions reports every four years. In 2007, the District reviewed and approved toxic emissions inventory reports and updates for 50 Valley facilities. New data from these reports was entered into the California Emission Inventory Data and Reporting System (CEIDARS).

The State Air Toxics "Hot Spots" Act requires the District to compile an inventory of toxic emissions from Valley facilities, prioritize facilities for health risk assessment, evaluate public health risks for facilities ranked as high priority, and notify individuals who may be impacted by any significant health risks. Although the Hot Spots program is primarily a public notification program, the public awareness achieved through the Hot Spots program has led many Valley businesses to voluntarily reduce their toxic emissions to ease community concerns. After the approval of a facility's Toxic Emission Inventory Report, if there has been a significant increase in emissions since the facility's previous report was submitted, the District performs a prioritization and ranks the health risk posed by the facility as "low", "intermediate", or "high" priority. Facilities ranked as high priority are required to perform health risk assessments. District personnel perform the prioritizations using computerized spreadsheets and database programs.

According to the 2007 Annual Report, there were eight facility prioritizations performed within the Valley. The Holly Sugar facility received a prioritization rank of "low" and had the lowest numerical prioritization calculation of the eight facilities prioritized in the 2007 Annual Report.

The potential sources of toxic air emissions in the vicinity of the Holly Sugar Sports Park site are similar and comparable in nature and distance to the potential sources of toxic air emissions in the vicinity of the Antenna Farm site, which was analyzed in the 2006 HRA prepared by Tetra Tech. That 2006 HRA determined that implementation of a youth sports park facility, similar to the one proposed for the Holly Sugar site, would not expose park users or children to unsafe exposure levels of toxic emissions. The full 2006 HRA is available for review at the City of Tracy Department of Development and Engineering Services, as well as the City of Tracy's website. Based on the similarities between the two project sites and the similarities between the potential sources of emissions in the vicinity of the Holly Sugar site and the two alternative site locations addressed in the HRA, the City of Tracy concludes that implementation of the proposed project would not subject park users to unsafe levels of exposure to toxic air emissions, and that additional quantification of this issue is not warranted. No additional mitigation measures or analysis in the Draft EIR are required.

Response D-8: The comment notes that the proposed project may require District permits. Prior to the start of construction the project proponent should contact the District's Small Business Assistance Office to determine if an Authority to Construct (ATC) is required. This comment has been noted. The City will comply

with all applicable District permit requirements. No changes to the Draft EIR are required.

Response D-9: The comment notes that the proposed project may be subject to additional District permit requirements. This comment has been noted, and the commenter is referred to Response D-8. No changes to the Draft EIR are required.

Carole Dominguez
1580 Hearthsong Dr
Manteca CA 95337
Ph 209-834-6299

October 15, 2009

City of Tracy
Attn: Scott Claar
Associate Planner
333 Civic Center Plaza
Tracy CA 95376

RE: Comments on Holly Sugar Sports Park DEIR

Dear Mr. Claar,

Please review and forward my comments on the Holly Sugar Sports Park DEIR as follows to the appropriate City of Tracy staff members, Tracy Parks and Community Services Commissioners, Planning Commissioners and Tracy City Council Members as well as the preparers of the DEIR, De Novo Planning Group.

My interest in the Holly Sugar Sports Park is not only one of concern for the health and safety of my son who still plays competitive soccer for Tracy Futbol League, but also a concern for the children of Tracy and beyond. Historically, the City of Tracy has failed to provide adequate youth sports facilities for its residents. The most recently proposed project at the City owned Schulte site should have been instructional to those entrusted with providing recreational locations. Instead the lessons that should have been learned from the pursuit of the dangerous Schulte site are all but ignored in the DEIR for the Holly Sugar site.

Until the following comments have been adequately answered the health and safety of the entire community is at considerable risk.

Thank you for your attention I hope that our children and those from other communities will be the foremost concern of everyone who works on the project.

Sincerely,

Carole Dominguez

Comments on the DEIR for Holly Sugar Sports Park

Submitted by: Carole Dominguez

2.1 Project Description

The Holly Sugar site comprises 1200 acres of farmland. The project description and analysis fail to include and identify impacts from the proposed motor sports park which City Staff is negotiating with JME Motor Sports and Lakeside Capital Investments which is also to be located on the 1200 acres.[1] The project description and analysis fails to include and identify impacts from the wetlands park that has been proposed for the 1200 acre site.[2] The project description and analysis fails to include the current farming operations occurring on the 1200 acre site. CEQA requires the preparation of an environmental impact report prior to approving any project, which may have a significant impact on the environment. For the purposes of CEQA, the term "project" refers to the whole of an action, which has the potential for resulting in a direct physical change or a reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 15378[a]). Therefore the preparer and the City of Tracy must consider these issues related to the project. 1-1

2.2 Project Background

The DEIR refers to an organization named YSAT (Youth Sports Alliance of Tracy) as a project partner or participant. It fails to review the organization's legitimacy and the financial as well as functional feasibility of actual construction and maintenance of the fields. The Tracy City Council and City of Tracy staff members have consistently promoted the concept of this organization building and maintaining the fields at the Youth Sports facility and entering into a Memorandum of Understanding. The organization known as YSAT has been for years now and is currently listed in **suspended** status with the State of California Secretary of State. Included with these comments is the listing of suspended status as of October 9, 2009 printed from the California Secretary of State website. Even if the organization was still active, the president and Agent for Service Frederick C. Kruger jeopardized the non-profit, 501(c)(3) status in the 2006 Mayor and City Councilmember elections by endorsing Brent Ives, Evelyn Tolbert and Suzanne Tucker in a letter to the editor to the Tracy Press. The preparers of the DEIR have relied on needs analysis by YSAT and Beals Alliance prepared many years ago. The question now is the relevance and durability of the analysis and whether or not it still applies to current and future needs. 1-2

3.3 Air Quality

Construction and Maintenance emissions

Mitigation Measure 3.3-1 states:

***Mitigation Measure 3.3-1**: 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* 1-3

[1] Council minutes http://www.ci.tracy.ca.us/uploads/fckeditor/File/city_council/agendas/2008/11/18/minutes.pdf page 13,14

[2] http://www.ci.tracy.ca.us/uploads/fckeditor/File/city_council/meetings/2008/02/19-08.pdf Item 8

1

that meets the requirements of SJVAPCD Rule VIII. The construction emissions reductions plan shall be submitted to the SJVAPCD for review and approval. The City of Tracy shall ensure that all required permits from the SJVAPCD have been issued prior to commencement of grading activities. The construction emissions reduction plan should include the following requirements and measures:

1-3

Emission estimates are based on licensed contractors performing the grading and construction activities according to SJVUAPCD Regulation VIII but the City Council has made it clear that members of the sport leagues will be responsible for the construction and maintenance of the park. [3] Please inform commenter on how this obvious conflict will be resolved. Will the City then contract and oversee maintenance of the sports park or will in fact volunteers from the sports leagues construct and maintain the facilities?

Windborne Particulate Matter

1-4

The project site is regarded by locals and farmers who use the site as a known wind tunnel. During windy episodes the project site will be inundated with fugitive dust from nearby farming and fallowed land. Particulate matter monitoring should be performed since the City intends to use the site for children. Since the city does not intend to begin construction for several years it should be no problem to do pre-construction monitoring to examine the extent of the particulate problem at the site. Mitigation in the form of landscaping such as Italian cypress at the west end of the facility would filter much of the wind borne particulate and may reduce the impact to insignificant.

Operational Emissions

1-5

http://www.ci.tracy.ca.us/modules/dms/file_retrieve.php?function=view&obj_id=778

Schulte Road EIR page 4.5-11

[3] http://www.ci.tracy.ca.us/uploads/fckeditor/File/city_council/agendas/2009/07/07/07.pdf page 2

http://www.ci.tracy.ca.us/uploads/fckeditor/File/city_council/agendas/2009/07/07/07.pdf Page 3

http://www.ci.tracy.ca.us/uploads/fckeditor/File/city_council/agendas/2008/09/02/minutes.pdf page 8 City Council Minutes September 2, 2008

2

TABLE II: PROJECT WEEKDAY PM PEAK HOUR TRIP GENERATION

Project Phasing	Vehicle Trips	
	In	Out
With Phase I completion	225	225
With Phase II completion	506	506
Total	731	731

With the completion of Phase I, the project site is proposed to have three football fields, ten baseball/softball fields, and thirteen soccer fields. For the baseball and softball fields, 30 players (15 per team) are assumed to use each ball field. Assuming two overlaps with 30 players arriving and leaving during the p.m. peak hour, a total of 60 participants (2 X 30=60) are expected for each ball field. In addition to 60 participants per field, a total of 15 spectators, officials, and staff would result in a total of 75 field users for each softball/baseball field. For the football fields, 50 players (25 per team) are assumed to use each ball field. A total of 100 participants assuming two overlaps (2 X 50=100) are expected for each ball field. In addition to 100 participants per field, a total of 25 spectators would result in a total of 125 field users for each football field. For the soccer fields, 28 players (14 per team) are assumed to use each ball field. A total of 56 participants assuming two overlaps (2 X 28=56) are expected for each ball field. In addition to 56 participants per field, a total of 14 spectators would result in a total of 70 field users for each soccer field. For the football stadium, 80 players (40 per team) are assumed to use each ball field. A total of 160 participants assuming two overlaps (2 X 80=160) are expected for the stadium. In addition to 160 participants per stadium, a total of 600 spectators would result in a total of 760 field users for the football stadium. 1-5

Considering the concurrent operation of various fields during different times of the year, the months of July and August are expected to experience peak weekday utilization (p.m. peak hour) during Phase I with three football fields and seven baseball/softball fields operating concurrently. During this peak period, the three football fields and seven baseball/softball fields are expected to have a total of 900 field users (75 users per softball/baseball field and 125 users per football field) with 225 cars assuming a vehicle occupancy rate of four persons per car. Thus, the Phase I build out of the project is expected to generate 225 inbound and 225 outbound trips during the p.m. peak hour of a typical weekday.

In addition to the fields built in Phase I, thirteen baseball/softball fields, one sports/football stadium, one football field, two soccer fields, and a general park/recreational use (50 acres) will be constructed as part of Phase II build out of the project. Again, similar to Phase I conditions, the project with full build out (Phase I + Phase II) is expected to experience peak weekday utilization during the months of July and August with four football fields, twenty baseball/softball fields, and one football stadium operating concurrently. During this peak period, the thirteen additional baseball/softball fields, one additional football field, and one sports/football stadium are expected to generate a total of 1,860 field users (75 users per softball/baseball field, and 760 users for the stadium) with 465 cars assuming a vehicle occupancy rate of four persons per car. The general park use is expected to have a total of 165 users consisting of 100 general recreational users, 40 picnic area users, and 25 playgrounds users. Assuming four persons per car and estimating conservatively, the general park is expected to generate 41 inbound and 41 outbound trips during the p.m. peak hour. Thus, the Phase II build out of the project is expected to generate 506

3

(=465+41) inbound and 506 (=465+41) outbound trips during the p.m. peak hour of a typical weekday. Table H summarizes the project trip generation assumptions.

Project Trip Generation

The proposed Tracy Youth Sports Park is expected to generate approximately a total of 1,462 p.m. peak hour trips (731 inbound and 731 outbound) with Phase I and Phase II developments generating 450 trips (225 inbound and 225 outbound) and 1,012 trips (516 inbound and 516 outbound), respectively.

Urbemis 2002

Holly sugar phase 1

It is anticipated that the active sports park will be used for practices during the weekday evenings and that games will be held throughout the day on weekends. The near-term (2015) peak hour trip generation estimates are presented in Appendix E and summarized in Table 3.12-7. Overall, the project would generate 310 new weekday PM peak hour trips and 1,820 new Saturday peak hour trips. 1-5

DEIR page 3.12-12

Table 3.12-7
Peak Hour Trip Generation for Near-Term Conditions

Individual Use	Amount	Weekday PM[1]			Saturday[1]		
		In	Out	Total	In	Out	Total
Soccer Facilities	14 Fields	199	90	289	448	448	896
Soccer/Football Stadium	1 Field	14	7	21	840	84	924
Total	15 Fields	213	97	310	1,288	532	1,820

Notes:
1. Refer to Appendix H for trip generation rates and assumptions

Source: *Trip Generation (8th Edition)*, ITE, 2008; and Fehr & Peers, 2009.

Holly sugar Phase 2

Table 3.12-8 summarizes the trip generation estimates for the project during cumulative (2030) conditions. (See Appendix H for detailed information.) Overall, the project would generate 594 new weekday PM peak hour trips and 2,162 new Saturday peak hour trips.

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Table 3.12-8
Peak Hour Trip Generation for Cumulative Conditions

Individual Use	Amount	Weekday PM[1]			Saturday[1]		
		In	Out	Total	In	Out	Total
Soccer Facilities	14 Fields	199	90	289	448	448	896
Soccer/Football Stadium	1 Field	14	7	21	840	84	924
Recreation Center	45 ksf	31	52	83	26	22	48
Library	25 ksf	88	95	183	90	79	169
Skate Park	11 ksf	4	4	8	22	12	34
BMX Park	11 ksf	4	4	8	22	12	34
Park Area[2]	26 acres	1	1	2	34	23	57
Total	--	341	253	594	1,482	680	2,162

Notes:
1. Refer to Appendix E for trip generation rates and assumptions
2. Park area includes the paintball course, bocce ball courts, basketball courts, spray park, and the unmarked grass fields.

Source: *Trip Generation (8th Edition)*, ITE, 2008; and Fehr & Peers, 2009.

1-5

Greenhouse Gases

The DEIR indicates that the project will have a significant and unavoidable impact because of the production of greenhouse gases especially from automobile travel. Mitigations measures and alternatives to the project are available.

TABLE 4.5-3
PROJECT AUTO AND MAINTENANCE EQUIPMENT EMISSIONS (TONS PER YEAR)

	ROG	NOx	PM10
Phase 1 (2007)			
Auto Emissions	2.39	3.69	3.07
Maintenance Equip.	0.89	1.79	0.14
Total	3.28	5.58	3.21
Buildout (2010)			
Auto Emissions	4.13	6.45	6.91
Maintenance Equip.	1.44	2.88	0.22
Total	5.57	9.33	7.13
SJVUAPCD Significance Thresholds	10.00	10.00	15.00

1-6

5

Odors

The DEIR states:

"With respect to odors, the human nose is the sole sensing device. The ability to detect odors varies considerably among the population and overall is quite subjective. Some individuals have the ability to smell minute quantities of specific substances; others may not have the same sensitivity but may have sensitivities to odors of other substances. In addition, people may have different reactions to the same odor; in fact, an odor that is offensive to one person (e.g., from a fast-food restaurant) may be perfectly acceptable to another. It is also important to note that an unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. This is because of the phenomenon known as odor fatigue, in which a person can become desensitized to almost any odor and recognition only occurs with an alteration in the intensity.

"Once operational, the Holly Sugar Sports Park will attract visitors and users from Tracy and the surrounding areas. As described above, the land uses surrounding the project site are primarily agricultural in nature, with rural residences located to the south of the project site. The surrounding agricultural uses include various types of row crops, which are not significant odor producers. ***Agricultural operations such as cattle feed lots, poultry and hog farms can create significant objectionable odors that may impact surrounding land uses. However, the agricultural uses in the vicinity of the project site do not include livestock operations, and odors on the project site generated from the surrounding land uses are anticipated to be minimal. This is a less than significant*** *impact and no mitigation is required."*

1-7

The DEIR statement that *"odors on the project site generated from surrounding land uses are anticipated to be minimal"* ignores the presence of the wastewater treatment plant adjacent to the project site. Odors from the treatment plant are quite strong especially when winds are slight. As the DEIR states: *" It is also important to note that an unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. This is because of the phenomenon known as odor fatigue, in which a person can become desensitized to almost any odor and recognition only occurs with an alteration in the intensity. Once operational, the Holly Sugar Sports Park will attract visitors and users from Tracy and the surrounding areas."* You don't have to be from out of town to know that Tracy wastewater plant has exceptionally foul and strong odors. Construction of a wetlands using the wastewater effluent is sure to make the problem that much worse."

Cumulative Air Quality Impacts

The project description and analysis fails to include and identify air quality impacts from the proposed motor sports park which City Staff is negotiating with JME Motor Sports and Lakeside Capital Investments which is also to be located on the 1200 acres.[4] The project description and analysis fails to include and identify impacts from the wetlands park that has been proposed for the 1200 acre site.[5]

1-8

Further the City has approved the Winco Project and the Super Wall Mart Projects within close proximity to the proposed Holly sport Park and those impacts must be included in a cumulative analysis which quantifies the cumulative air quality impacts from all the nearby proposed projects

[4] Council minutes http://www.ci.tracy.ca.us/uploads/fckeditor/File/city_council/agendas/2008/11/18/minutes.pdf page 13,14

[5] http://www.ci.tracy.ca.us/uploads/fckeditor/File/city_council/meetings/2008/02/19/08.pdf Item 8

approved. After these impacts are quantified they must be compared to background conditions to see if any ambient air quality standards are violated. CEQA provides that a proposed project may have a significant effect on the environment when the possible effects on the environment are individually limited but "cumulatively considerable." (Pub. Resources Code, §21083(b); Cal. Code Regs., tit. 14, §15065.) "'Cumulatively considerable' means that the incremental effects of an individual 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." (Cal. Code Regs., tit. 14, §15065,emphasis added.)

1-8

Water supply

Based on the analysis described herein, this WSA demonstrates that the City's existing and additional (future, not yet firmly assured) potable water supplies are sufficient to meet the City's existing and projected future potable water demands, including the potable water demands associated with the proposed project, to the year 2030 under all hydrologic conditions. Also, this WSA demonstrates that available existing and additional non-potable water supplies will be sufficient to meet the non-potable water demands associated with the proposed project to the year 2030 under all hydrologic conditions.

1-9

http://www.ci.tracy.ca.us/uploads/fckeditor/File/city_council/agendas/2009/07/07/01f.pdf page 2

Agricultural Resources

Mitigation Measure 3.2-1: *Prior to site grading activities for each phase of project construction, the City shall determine and pay the appropriate Agricultural Mitigation Fee to offset the loss of Unique Farmland, as specified in Chapter 13.28 of the Tracy Municipal Code.*

The DEIR identifies under the Agriculture Resources section that conversion of farmland would be a significant impact and defines the mitigation as payment of the City of Tracy Agriculture Mitigation Fee. This is woefully inadequate at $2,000.00 per acre. Since the site is in San Joaquin County not within the Tracy City Limits and even if the City is successful at annexation, the County of San Joaquin Agriculture Mitigation Fee of $8,675.00 per acre should be paid. The project will be removing agricultural lands from the County **not** the City. Property will be subject to San Joaquin county farmland mitigation fees since it is located in the county.

1-10

County Right to Farm Ordinance

The development of a regular timeframe when sports activities are not scheduled to occur, which would be suitable times for the application of pesticides and fertilizers on adjacent properties (i.e. weekday mornings during the non-summer months). This timeframe should be developed cooperatively with adjacent agricultural land owners. Pre-notification to adjacent agricultural operations by phone, mail or email prior to holding organized sporting events.

1-11

EIR page 3.29

Hazards and Hazardous Materials

The DEIR fails to identify the hazards related to the 12 inch natural gas line that runs below the property. A safety plan should be developed for the gas line especially since the City is proposing

1-12

7

to use volunteer labor to grade and prepare the fields. In the Notice of Preparation the following words appear on page 1, para 3, under title "Project Location and Setting":

"The western portion of the project site is traversed by PG&E power transmission lines with towers, and a 12-inch diameter underground gas pipeline."

Although the Notice of Preparation identified the 12-inch diameter underground gas pipeline and stated that the transport of hazardous materials posed a significant possible impact, the DEIR fails to explore, identify and assign risk and impact findings and mitigations for the 12-inch natural gas pipeline. Further, the State and Federal agencies as well as the pipeline operator have not been notified of the project. Those agencies would be the Federal Department of Transportation PHMSA (Pipeline Hazardous Materials Safety Administration), California Public Utilities Commission Consumer Protection and Safety Division Pipeline Safety Branch (the Rail Transit and Crossing Branch is not the appropriate CPUC office for pipeline oversight), California State Fire Marshall and PG&E Pipeline Safety Division. Of additional concern the Notice of Preparation includes a letter from the Tracy Fire Department's Fire Marshall Jake T. Tomlin stating that Tracy Fire Department will meet with the preparers of the DEIR, De Novo Planning Group prior to the publication of the DEIR to discuss project impacts and mitigations. Tracy Fire would likely be the first responders to a pipeline incident at the site and yet nothing in the DEIR shows discussion of a potential incident or Tracy Fire Department response, evacuation plan or other mitigation. The preparers of the DEIR have failed to gather basic information on the pipeline, for example: 1-12

1) Age and composition
2) Depth of the pipeline
3) PSIG
4) Inspection records
5) Incident reports and/or failures
6) Pipeline compliance with current Federal regulations for class locations
7) Consideration of a passive use corridor straddling the 12-inch pipeline
8) Pipeline Safety plan in coordination with PG&E, City of Tracy and any other project partners or participants since the City is proposing to use volunteer labor
9) Map of the location of the electrical transmission lines and pipeline
10) Easements for pipeline and electrical transmission lines
11) Additional pipeline markers and fencing to restrict access to the pipeline

Included are four documents that should be utilized to assess health and safety risk relative to the 12-inch pipeline that traverses the Holly Sugar site as follows:

1. April, 2009 PIPA (Pipelines and Informed Planning Alliance) Draft Final Report

2. April, 2009 PIPA Appendices which contains a sample pipeline ordinance for communities that are planning projects near transmission pipelines

3. High Consequence Areas & Pipeline Assessment Intervals
   Presented at the National Pipeline Safety Trust Annual Conference November, 2008
   By: Terry Boss, Sr VP Environmental Safety and Operations Interstate Natural Gas Association of America

4. Tracy Sports Field Appeal before the CPUC, September 1, 2007
   By: Alvin Greenberg, Ph.D., QEP, REA

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Commenter requests that all communications with PG&E and appropriate agencies be documented in writing rather than a "word of mouth" exchange. The response to this comment should be one that is well documented instead of the preparer of the DEIR relating a phone call with PG&E for the purpose of responding to this comment as was employed by the preparer of the Ellis EIR. 1-12

Chemicals Storage and Transportation

The Holly sugar site is located near the Tracy Wastewater Treatment plant. The plant uses and transports large amount of chemicals which pose a threat to health and safety. For example on August 17, 2008 6:28 p.m. an employee at the Wastewater Treatment Plant, 3900 Holly Drive, reported a sulfur dioxide gas leak blowing to the east at 10 parts per million. Please respond to the consequences of this type of incident and what type of evacuation plan would be employed. 1-13

Traffic and Transportation

The Holly sports park traffic impacts would be a continuation of the degradation of Tracy Blvd and Corral hollow Road. The City continues to site large commercial and now recreation projects without completing needed improvements. The cumulative traffic impact study is inadequate because it fails to include two large reasonably foreseeable projects; the Winco Store and the Super Wal-Mart both approved by the City of Tracy with overriding considerations. In addition the Ellis residential Project was also approved with overriding considerations to the intersections surrounding the Corral Hollow area. Reliance on build out conditions related to the General Plan ignores a primary tenant of CEQA. When projects are clustered as the City is proposing here the environmental impacts of approved and projects under review must be considered. For example in the Winco EIR Cumulative impacts TRA-9 states that addition of project traffic would increase traffic delay from 35-42 seconds and that is a significant and unavoidable impact. 1-14

f. Intersection 5: Grant Line Road/Corral Hollow Road

Cumulative Impact TRA-9: The addition of project traffic would increase the average delay at the Grant Line Road/Corral Hollow Road intersection from 35 to 42 seconds, degrading operations to LOS D. The City of Tracy level of service standard for this intersection is LOS C. This would be a *significant* impact. There are environmental and development constraints associated with construction of a SPUI at this intersection, and the City intends on making a finding that the mitigation is not feasible, therefore the impact is *significant and unavoidable.*[6]

The Winco DEIR Cumulative impacts TRA-10 states that the Winco project would add another 3 seconds to the intersection of Eleventh Street and Corral Hollow Road.

g. Intersection 7: Eleventh Street/Corral Hollow Road

[6] Winco DEIR page 4.3-65http://www.ci.tracy.ca.us/modules/dms/file_retrieve.php?function=view&obj_id=121

7 Winco DEIR page 4.3-65 II http://www.ci.tracy.ca.us/modules/dms/file_retrieve.php?function=view&obj_id=121

9

Cumulative Impact TRA-10: The addition of project traffic to Eleventh Street/Corral Hollow Road intersection in the Cumulative plus Project scenario would add traffic to an already deficient intersection. The additional traffic would add 3 seconds of delay to the intersection. This would be a *significant* impact, there are environmental and development constraints associated with construction of a SPUI at this intersection, and the City intends on making a finding that the mitigation is not feasible, therefore the impact is *significant and unavoidable.*[7]

1-14

Winco DEIR page 4.3-65 ll
http://www.ci.tracy.ca.us/modules/dms/file_retrieve.php?function=view&obj_id=121

Wal Mart

The Wal Mart DEIR states that traffic impacts would be significant and unavoidable at the intersections of Corral Hollow and Grant line Road and Corral Hollow and 11th Street:

Cumulative plus Project traffic volumes were obtained by adding the trips generated by the Wal-Mart Expansion to the Cumulative background traffic volumes. Using these volumes and the intersections with cumulative improvements identified in **Table 4.4-8**, AM and PM peak hour service levels for the study intersections were calculated. The calculated LOS for the study intersections is reported in **Table 4.4-16** below. With the addition of project traffic, the following intersections would operate at unacceptable conditions in the PM peak hour:

- The Grant Line Road/Corral Hollow Road intersection delay increases to 42 seconds, an unacceptable LOS D

- The Eleventh Street/Corral Hollow Road intersection delay increases to 49 seconds, an unacceptable LOS D

1-15

All other intersections would continue to operate at acceptable levels of service with the cumulative intersection improvements in place as shown in **Table 4.4-8**. Cumulative plus Project traffic volumes and lane configurations are shown on **Figure 4.4-12**.

http://www.ci.tracy.ca.us/modules/dms/file_retrieve.php?function=view&obj_id=123

4.4-50

Substantially Increase Hazards Due to Design Features

Impact 4.4.5 The addition of project traffic, along with other cumulative development traffic, to Grant Line Road/Corral Hollow Road intersection in the Cumulative plus Project scenario will add delay to an intersection that is already operating at a deficient level of service. This is considered a **significant impact.**

With the addition of project traffic, the delay at the Grant Line Road/Corral Hollow Road intersection is projected to increase from 41 seconds to 42 seconds, but the level of service will remain LOS D. The City of Tracy level of service standard for this intersection is LOS C. Although the City does not have a policy on determining what constitutes a project impact when an intersection is currently deficient, the additional 1-second of delay caused by the project would be considered to be a **significant impact**.

10

Mitigation Measures

MM 4.4.5 Construction of a single-point urban interchange (SPUI) is recommended, along with the through traffic being grade separated allowing for free-flow along Grant Line Road. By grade separation of Grant Line Road, the average intersection delay would be reduced to an acceptable 22 seconds.

The City intends on making a finding that this mitigation is infeasible, therefore, the impacts will be **significant and unavoidable.**

Page 4.4-58

Impact 4.4.6 The proposed Project, along with other Cumulative development traffic, would add traffic to the Eleventh Street/Corral Hollow Road intersection in the Cumulative plus Project scenario, contributing to an already deficient level of service at this intersection. This is considered a **significant impact.** 1-15

With the addition of Project traffic, the delay at the Eleventh Street/Corral Hollow Road intersection is projected to remain at 49 seconds. The City of Tracy level of service standard for this intersection is LOS C. Although the City does not have a policy on determining what constitutes a project impact when an intersection is currently deficient, the additional traffic caused by the Project would be considered a **significant impact.**

Mitigation Measures

MM 4.4.6 Construction of a single-point urban interchange (SPUI) is recommended along with the through traffic being grade separated allowing for free-flow along Eleventh Street. By grade separation of Corral Hollow Road, the average intersection delay would be reduced to an acceptable 27 seconds (LOS C). The City intends on making a finding that this mitigation is infeasible, therefore, the impacts will be **significant and unavoidable.**

4.4-59 Wal Mart DEIR

Result in Inadequate Emergency Access **Impact 4.4.8** The proposed project would not result in inadequate emergency access. This would be a **less than significant** impact. The project site is proposed to expand and modify an existing Wal-Mart. The site design incorporates would comply with all City of Tracy emergency vehicle access codes. Therefore, this would be a **less than significant** impact

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Response to Letter 1: Carole Dominguez

Response 1-1: The commenter asserts that the Draft EIR fails to consider potential impacts associated with two offsite projects that have been discussed at previous City Council meetings. The commenter references a potential future motor sports park and a potential future wetland preserve area.

The City of Tracy owns the approximately 1,200-acre Holly Sugar site. The proposed project covers approximately 298 acres of this larger area of land owned by the City. The actions proposed by the City of Tracy (the project applicant) that are addressed in the Draft EIR relate only to the development of the proposed sports park. Future development or restoration plans that may occur on other nearby lands owned by the City are outside of the scope of this EIR, and approval of the proposed sports park project would not approve any actions beyond those addressed in the EIR within the 298-acre Holly Sugar Sports Park project area. It is currently unknown at this time whether or not the potential future motor sports park or the wetland preserve area would proceed with a formal application and development permit request from the City of Tracy. In the event that those projects materialize in the future, they would be subject to their own independent review, as required by CEQA. Approval of the proposed sports park project would in no way grant any type of approvals for any future projects located offsite from the sports park location.

It is further noted that a potential future motor sports park was listed in Table 4.0-2, on Page 4.0-3, of the Draft EIR as a potential future or pending project, and was considered in the cumulative impact analysis of the Draft EIR. Section 15130(b) of the CEQA Guidelines identifies the elements required for an adequate analysis of potential cumulative impacts of a project. There are two approaches to identifying cumulative projects and the associated impacts. The list approach identifies individual projects known to be occurring or proposed in the surrounding area in order to address potential cumulative impacts. The projection approach uses a summary of projections in adopted General Plans or related planning documents to identify potential cumulative impacts. This EIR uses a combination of the list approach and the projection approach for the cumulative analysis and considers the development anticipated to occur upon buildout of the Tracy General Plan in addition to the two individual projects identified in Table 4.0-2.

No changes to the Draft EIR analysis are required.

Response 1-2: The commenter provides statements regarding the Youth Sports Alliance of Tracy (YSAT).

The City of Tracy has identified a need for additional sports park resources to serve the existing and projected needs of the community. The financial status of the YSAT is not relevant to the proposed project, and a discussion of the assertions made by the commenter is not appropriate for inclusion in the EIR. The City is proposing to construct and maintain the proposed sports park project consistent with the analysis and usage assumptions presented in the EIR, and any future maintenance or park usage arrangements with community entities that maintain consistency with the use assumptions in this EIR are outside of the scope of CEQA. The comment has no bearing on the adequacy of the environmental analysis in the EIR, and no further response is required.

Response 1-3: The commenter references Mitigation Measure 3.3-1, which includes requirements for compliance with SJVAPCD construction emissions reduction methods, and questions how these measures would be implemented.

As stated in MM 3.3-1, the contractors hired by the City of Tracy to construct the sports park will be subject to the requirements of this mitigation measure. Future maintenance of the facilities would be conducted and overseen by the City of Tracy. Implementation of this mitigation measure is consistent with SJVAPCD rules and regulations, and would reduce short-term construction related air quality impacts to a less than significant level. No further environmental analysis is required.

Response 1-4: The commenter states that the project site may be subject to windborne particulate matter from nearby agricultural operations, and suggests that pre-construction monitoring be conducted. The commenter further suggests that vegetative landscaping could assist in reducing windborne particulate matter.

As part of the design of the park site, the City will prepare a landscaping plan, which will include trees and other forms of vegetation throughout the site, including areas of the site perimeter. The City appreciates this comment, and will consider the merits and necessity of conducting pre-construction particulate matter monitoring prior to operation of the project. No changes to the Draft EIR are required.

Response 1-5: The commenter has included text and tables from the 2005 Schulte Road Sports Park EIR as well as text and tables from the Holly Sugar Sports Park EIR in this comment. However, there are no additional comments, questions or descriptions of the applicability, relevance, or context of the text including in this comment, and the City is not clear what points or issues are being raised by the commenter. No further response is required, as this comment does not address the adequacy of the environmental analysis in this EIR.

Response 1-6: The commenter states that the Draft EIR concluded that project impacts related to greenhouse gasses would be significant and unavoidable. The commenter also states that mitigation measures and alternatives to the proposed project are available, but provides no further explanation. The commenter has also included a table from an unrelated project EIR.

The commenter is correct that the EIR concludes that cumulative impacts related to greenhouse gasses would be significant and unavoidable. The Draft EIR includes Mitigation Measure 3.3-4, which will assist in reducing the severity of this impact, but not a less than cumulatively considerable level. The Draft EIR also includes a full analysis of project alternatives in Section 5.0. It is not clear why the commenter included a table of criteria air pollutants from another EIR in this comment. No changes to the EIR are required.

Response 1-7: The commenter provides text from the Odors discussion included in Section 3.3 of the Draft EIR and states that the analysis in the Draft EIR does not account for odors generated by the Tracy Wastewater Treatment Plant.

The Draft EIR analysis correctly focuses on the potential for the proposed project to generate odors, as required by Appendix G of the State CEQA Guidelines. The existing operations at the Tracy Wastewater Treatment Plant may generate odors that would be noticeable at the proposed park site, however, this constitutes an existing environmental condition that would not be worsened as a result of project implementation. There are no residences or commercial uses proposed as part of the project that would result in persons experiencing a prolonged exposure to odors that may be present at the project site. Users of the sports park will generally only be at the site for a few hours at a time, and would not be subjected to prolonged exposure to unpleasant odors. This comment has been forwarded to the Tracy City Council for their consideration prior to possible approval of the proposed project. No changes to the Draft EIR are required.

Response 1-8: The commenter states that the cumulative air quality impact analysis did not account for recently approved and pending projects in the City of Tracy.

The commenter is referred to Response 1-1, which describes the cumulative setting assumptions used in the cumulative analysis in the Draft EIR. As described in Section 4.0 of the Draft EIR, the cumulative analysis assumed full buildout of the Tracy Planning Area, as described in the Tracy General Plan, and also included the potential future motor sports park and the Ellis Specific Plan projects in the cumulative analysis. The analysis under Impact 3.3-2, on Page 3.3-18 of the Draft EIR provides a detailed quantification of the emissions that would result from full buildout of the proposed project. As indicated in Table 3.3-3 of the Draft EIR, the

project-generated emissions are below the thresholds of significance established by the SJVAPD. Cumulative air quality impacts are addressed under Impact 4.3, on Page 4.0-6 of the Draft EIR. As described in this analysis, the cumulative setting area for air quality impacts includes the San Joaquin Valley Air Basin (the boundaries of which are shown in Figure 3.3-1). The cumulative air quality impact analysis has properly accounted for emissions impacts associated with buildout of the Tracy Planning Area, which includes the Winco and Super Walmart projects referenced by the commenter. The cumulative analysis also accounts for the approved/pending projects listed in Table 4.0-2 of the Draft EIR. The levels of cumulative development assumed for the cumulative analysis are further described in Table 4.0-1, on Page 4.0-2 of the Draft EIR. This table indicates the assumed number of dwelling units and employment levels within the City of Tracy and the Sphere of Influence upon full buildout of the General Plan. No changes to the Draft EIR analysis are required.

Response 1-9: The commenter states that the Water Supply Assessment (WSA) prepared for the project indicates that there are sufficient potable and non-potable water supplies available to meet the demands of the proposed project as well as the existing and projected demands for water through 2030 under all hydrologic conditions.

This statement made by the commenter is correct, and no changes to the Draft EIR are required.

Response 1-10: The commenter states that the project should be subject to the San Joaquin County Agriculture Mitigation Fee, rather than the City of Tracy's Agriculture Mitigation Fee.

The project site is currently located in the City's SOI, which is within the jurisdictional boundary of San Joaquin County. The City is proposing to annex the site into the City of Tracy prior to the conversion of the site to non-agricultural uses. Upon annexation, the project site would be subject to the Agriculture Mitigation Fee program established and implemented by the City. The payment of these fees would assist in mitigating the impact of the loss of agricultural lands, however, as described under Impact 3.2-1, on Page 3.2-6 of the Draft EIR, this impact would remain significant and unavoidable. No changes to the Draft EIR are required.

Response 1-11: The commenter has included text from Mitigation Measure 3.2-4. No additional comments describing the relevance of the inclusion of this text is provided. No further response is required.

Response 1-12: The commenter states that the Draft EIR fails to analyze potential hazards and safety impacts associated with the 12-inch natural gas pipeline that traverses the western portion of the project site.

The above referenced PG&E natural gas pipeline traverses the western portion of the Active Sports Park site, running diagonally across the western edge of the site in a southwest-northeast direction. The pipeline is located directly below, and within the "footprint" of the overhead transmission lines that traverse this western portion of the project site. There are no ballfields, play structures, concession stands, parking areas, restrooms or other facilities proposed to be located below the power lines or above the natural gas pipeline. The only site improvement that would be located above the natural gas pipeline is a limited portion of the future access road that would connect the Active Sports Park site to Corral Hollow Road.

Prior to the selection of the Holly Sugar Site as the preferred location for the construction of the proposed project, the City of Tracy prepared an EIR to address environmental impacts associated with the construction of a similar youth sports park facility at the Schulte Road site in the City of Tracy. As part of this environmental review process, the City commissioned the preparation of a Pipeline Safety Assessment (Tetra Tech, December 2007). The Pipeline Safety Assessment (PSA) addressed potential hazards and safety impacts associated with the construction and operation of a youth sports park facility on a site that is traversed by a 36-inch natural gas pipeline and a 26-inch natural gas pipeline, both of which are owned, operated and maintained by PG&E. As stated above, the pipeline that traverses the Holly Sugar Site is a 12-inch natural gas pipeline that is owned, operated and maintained by PG&E.

According to the 2007 PSA, the conclusions of the study for the Schulte Road sports park site are that the existing pipelines traversing that site would not pose a risk to park users and that implementation of the sports park project at the Schulte Road site would not result in significant impacts related to safety.

The following discussion is derived from the 2007 PSA prepared by Tetra Tech for the Schulte Road sports park site. The entire report is available for review at the City of Tracy Department of Development and Engineering Services.

California is the second largest natural gas consuming state in the United States. The natural gas used in California is transported through more than 120,000 miles of pipeline that run under every metropolitan area. These pipelines run under, and in close proximity to, residences, schools, parks, hospitals, and businesses of all types and generally range from between 2 and 42 inches in diameter.

Approximately 200 schools and 200 hospitals are within 300 feet of natural gas transmission pipelines maintained by PG&E.

The U.S. Department of Transportation (DOT) Office of Pipeline Safety (OPS) is the chief regulatory entity responsible for enforcement of pipeline management and safety regulations. Several regulatory agencies within the state of California assist OPS in providing inspections and enforcement on the regional and local level. The primary body of federal regulations that are applicable to natural gas pipeline management and safety are found in Title 49 Code of Federal Regulations (CFR) Parts 190-192. These parts are summarized as follows:

- Part 190 describes the procedures used by OPS in carrying out their regulatory duties. This part authorizes OPS to inspect pipelines and describes the procedures by which OPS can enforce regulations. This part also describes the legal rights and options that the operating companies have in response to OPS enforcement actions.

- Part 191 describes requirements on operators of gas pipelines (including gas gathering, transmission, and distribution systems) for reporting of incidents, safety-related conditions, and annual summary data.

Based on past incidents related to gas line failure, specific subparts of these regulations were developed to avoid typical root causes for pipeline failure. Some of these important and applicable subparts are discussed below.

- Title 49 CFR Part 192 Subpart E – welding of steel in pipelines identifies proper procedures to weld steel materials in natural gas pipelines. This subpart also establishes criteria that require all workers who create critical pipe joints be properly trained and qualified.

- Title 49 CFR Sections (§) 192.451 though 192.491 require the following criteria for internal corrosion program as related to responding to an incident of identified corrosion:

  - A monitoring program will be established to ensure selected mitigation measures are effectively addressing the identified corrosion problem. Internal corrosion mitigation should continue until monitoring and testing determines that the source of corrosion has been removed or other actions have rendered the gas stream non-corrosive. An effective program will monitor for water and other corrosives entering the pipeline by accident or contaminants that may gradually accumulate in low spots despite gas quality monitoring that shows adherence to standards. An effective internal corrosion-monitoring program includes sampling and analysis of liquid, gas, and solid materials.

- Subpart I, § 192.453, General – the corrosion control procedures required by § 192.605(b)(2), including those for the design, installation, operation, and maintenance of cathodic protection systems, must be carried out by, or under the direction of, a person qualified in pipeline corrosion control methods.

- § 192.475, Internal Corrosion Control, General – Corrosive gas may not be transported by pipeline, unless the corrosive effect of the gas on the pipeline has been investigated and steps have been taken to minimize internal corrosion.

  Whenever any pipe segment is removed from a pipeline for any reason, the internal surface must be inspected for evidence of corrosion. If internal corrosion is found, (1) the adjacent pipe must be investigated to determine the extent of internal corrosion; (2) replacement must be made to the extent required by the applicable paragraphs of §§ 192.485, 192.487, or 192.489; and (3) steps must be taken to minimize the internal corrosion.

- Title 49 CFR §§ 192.613 and 192.617 require that gas pipeline system operators have procedures in place for monitoring the performance of their gas systems. These procedures must cover surveillance of gas system failures and leakage history, analysis of failures, submission of failed samples for laboratory examination (to determine the causes of failure), and minimizing the possibility of future recurrences.

- Title 49 CFR § 192.614(c) provides that each pipeline operator must establish a damage prevention program that requires periodic inspection of pipelines that could be damaged by third-party excavators. These inspections must be done both during and after excavation to ensure the integrity of the pipeline.

- Title 49 CFR § 192.615(a) requires that each pipeline operator must have a written emergency plan that establishes procedures for minimizing the hazards resulting from a natural gas pipeline emergency. The plan must address shutdown and pressure reduction in any section of the pipeline necessary to minimize hazards to life and property and elimination of those hazards.

- Title 49 CFR § 192.616 requires that pipeline operators establish a continuing education program to enable the public to recognize a gas pipeline emergency and report it to public health officials.

A key component to Part 192 is the DOT Operator Qualification (OQ) program codified in 49 CFR §§ 192.801 through 192.809. The OQ requires organizations to develop a written qualification program, an evaluation of operators against the qualification criteria, and a review of the operators' performance history.

There are other applicable federal regulations such as Title 29 CFR that address Occupational Safety and Health Administration requirements. Specifically, § 1926.651 establishes excavation requirements to prevent damage to pipelines by establishing locations of underground installations prior to drilling and digging. There is also a safety recommendation that excavators contact the pipeline operators if the work damages a pipeline and call 911 if a release is detected.

The state of California pipeline management and safety approach, like most states, is focused on enforcing federal law codified in 49 CFR Parts 190-192. The OPS regulates and enforces interstate gas and liquid pipeline safety requirements in California. OPS also inspects interstate gas pipeline safety requirements in California. Through certification by OPS, the CPUC Utilities Safety and Reliability Branch performs this role for the intrastate pipelines in California. The CPUC regularly audits interstate pipeline companies, including PG&E, to verify that operators are complying with CFR 49 Part 192.

Since 1997, 25 injuries and 10 fatalities have occurred in California due to pipeline failures for all types of pipelines, including those transmitting natural gas. These fatalities were primarily caused by poor excavation practices that resulted in ruptures.

In the last 10 years (1997-2006), 23 significant incidents related to natural gas transmission pipelines have occurred in the state. A significant incident is defined as a release that results in a death or in-hospital injury, greater than $50,000 in damages (in 1984 dollars), or an unintentional fire or explosion. In 12 of these incidents, poor excavation practices were identified as the root cause of the incident. Natural forces were identified as the cause in four incidents, while material failure was identified in three incidents and corrosion in one incident. The remaining three incidents were attributed to “other causes”. These 23 significant incidents have resulted in a total of two fatalities and four injuries, or an average of one death every 5 years and one injury every 2.5 years.

From these data, Tetra Tech calculated the probabilities of significant incidents and other endpoints for the network of California natural gas transmission lines. An estimate of the number of incidents that have occurred per mile of pipeline per year is calculated by dividing the total number of incidents by the length of pipeline and the number of years over which the incidents occurred. As shown in Table 3.1 of the 2007 PSA, during the 10-year period from 1997 to 2006 there was only one (1) significant incident due to pipeline corrosion and zero (0) deaths or injuries due to corrosion of natural gas pipelines in California.

Natural gas pipelines are found throughout most areas of California, including parks, schools, urban areas and residential areas. As stated above, the vast majority of pipeline incidents are a result of improper excavation practices in the vicinity of a pipeline, and not the failure of the pipeline as a result of corrosion.

Any grading or excavation that would be done in close proximity to the onsite natural gas pipeline would be completed by trained professional contractors in full compliance with all applicable federal and state regulations related to pipeline safety. Additionally, any grading or excavation activities that may occur in the future in the vicinity of the onsite pipeline would not occur while the park is in use or children are present. The construction and operation of the proposed Holly Sugar Sports Park would not create a significant hazard to park users or the general public related to natural gas pipelines. There are no applicable federal, state or local safety regulations that prohibit the placement of a youth sports park facility in close proximity to a natural gas pipeline, and PG&E is required by law to continue to monitor the safety and integrity of all of its natural gas pipelines throughout the State, including the project site. No additional mitigation measures to address this issue are required, and no changes to the Draft EIR are required.

Response 1-13: The commenter states that the Tracy Wastewater Treatment Plant uses and transports hazardous materials in the project vicinity, and that historical releases of such materials have occurred. The commenter has inquired about the type of evacuation plan that would be put in place in the event of another such incident.

The City of Tracy Wastewater treatment plant follows OSHA and EPA regulations regarding accidental chemical release prevention and emergency response procedures. The WWTP handles and stores both chlorine and sulfur dioxide for the purpose of disinfection of treated wastewater. The wastewater plant chemical storage tanks are housed in a building designed to contain chemical spills along with a chemical scrubber. The chemical scrubber located adjacent to the chemical building is designed and tested to ensure chlorine or sulfur dioxide-contaminated air will have a negligible discharge concentration before being discharged to the atmosphere. In addition, the City of Tracy Fire Dept is the primary responder if a chemical leak develops at the wastewater treatment plant. The Tracy Fire Department has personnel trained to the level of hazardous materials first responder, Hazardous Materials Technician and Hazardous Materials Specialist. The department's twelve technicians and specialists further participate as members of the San Joaquin County Joint Hazardous Materials Team which is available to respond upon request. The department houses a hazardous materials unit out of Fire Station 96, 301 W. Grant Line Road.

Additionally, the Tracy Fire Department was consulted during preparation of this Draft EIR, and it was determined that the proposed project site access points shown in the conceptual plan were adequate for emergency vehicle access. The internal project roadways provide at least 26-feet of roadway width, adequate for emergency vehicle access. Given these considerations, the project provides sufficient emergency access in the event of an emergency that requires evacuation of the project site.

Response 1-14: The commenter states that the cumulative traffic analysis in the EIR fails to account for traffic generated by recently approved projects in the area, specifically the Winco and Super Walmart projects. The commenter provides text citations from the previously prepared Winco EIR.

The cumulative traffic analysis in this EIR properly accounts for traffic impacts associated with the above referenced projects. The cumulative traffic analysis assumes that under cumulative no-project conditions, traffic generated by the above referenced projects would be present, and these projects were accounted for in the cumulative traffic level assumptions. The commenter is also referred to Response 1-1, which describes how buildout of the General Plan Planning Area and the projects listed in Table 4.0-2 were included in the cumulative analysis for this project. The EIR identifies numerous mitigation measures which require roadway and intersection improvements in the project vicinity to reduce the severity of project-generated traffic impacts under near-term and cumulative conditions. In some cases, the implementation of these mitigation measures would reduce project related traffic impacts to less than significant levels, while in other cases, these impacts would remain significant and unavoidable after mitigation.

The cumulative land use scenario was developed in consultation with City staff. Within the Tracy Planning Area, the development assumptions used are consistent with the City's General Plan envisioned development through 2030. Outside of the Tracy Planning Area, the development assumptions used in preparing the traffic forecasts are consistent with the 2030 scenario of the SJCOG traffic model, as updated for the 2007 Regional Transportation Plan. With City direction, motor sport race tracks that potentially may be developed on City property just north of the project site were included in the cumulative scenario, and traffic volumes generated from the recently approved Ellis Specific Plan project were also included in this analysis.

Cumulative No Project intersection forecasts were developed by adding the model growth between the base year City of Tracy General Plan Traffic Model and the adjusted 2030 model to the existing intersection counts. Cumulative No Project weekday PM and Saturday peak hour turning movement and freeway volumes

were developed using the three-step process used for the Near-Term No Project forecasts. Cumulative No Project forecasts are shown on Figure 3.12-12 in the Draft EIR. No changes to the Draft EIR analysis are required.

Response 1-15: The commenter has provided text from a Walmart Draft EIR related to the traffic analysis in that document. There is no additional information provided by the commenter as to how or why this information relates to the environmental analysis in this EIR. No further response is required.

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November 18, 2009

VIA E-MAIL & US MAIL

Mr. Bill Dean
Planning Manager, City of Tracy
333 Civic Center Drive
Tracy, CA 95376

RE: Comments on Draft Environmental Impact Report – City of Tracy, Holly Sugar Sports Park

Dear Bill:

As you know, our firm represents the Tracy Hills project. Our client is happy to see the City is making progress on the Holly Sports Park. However, we do have some comments on the Draft Environmental Impact Report ("DEIR") and Water Supply Analysis ("WSA") for the proposed Sports Park.

Table 10 of the WSA is presented as Table 3.13-4 in the DEIR. This table depicts current and planned projects, their projected water demand, and the City's water supply. The Planned Future Uses section of the table has two categories of projects: 1) Currently Approved Projects that are not yet completed (defined in text and footnotes as "Includes Tracy Gateway…Ellis Specific Plan, and Downtown Specific Plan)", and 2) Currently Anticipated Development Projects (defined in text and notes as "projects in the planning stage and those for which specific plans have been prepared"). The calculation of available water versus demand, and the determination that the City has adequate supply is made using only these uses.

A subsequent category is added labeled "2030" (includes Existing Users, Planned Future Uses, the Proposed Project, and other Future Projects). Other Future Projects are defined in the text and notes as:

> "Other Future Projects includes the future projects within the Urban Reserve Areas (such as Tracy Hills) which are anticipated to develop by 2030, but which are not included in Planned Future Uses. Water Demand Projections based on 2005 UWMP future projections through 2025 and extrapolated to 2030."

The DEIR incorrectly classifies the Tracy Hills Project in the "2030" category. Tracy Hills is not an Urban Reserve in the General Plan. Tracy Hills is identified in the General plan as an Area of Special Consideration which recognizes the approved Specific Plan, land use

2-1

designations, and the fact that the Project is within City Limits. Clearly, by the City's own definition ("projects in the planning stage and those for which specific plans have been prepared"), Tracy Hills is a Currently Anticipated Development Project. Therefore, the DEIR should include the Tracy Hills water demand in the Currently Anticipated Development Project category. 2-1

Additionally, after inquiry with City Staff, we learned the Soucheck, Kagehiero, and Castro properties are included in Currently Anticipated Development Projects categories. These projects are within City Limits, but they have only an Urban Reserve land use designation and have no specific plans in process or approved. Additionally, the Saddlebrook and Filios Projects are included in this category, and neither of these projects are in City Limits and they have Urban Reserve land use designations. These projects should not be included in the Currently Anticipated Development Projects, and their water demand should be reclassified accordingly. 2-2

Under Thresholds of Significance on Page 3.13-16 of the DEIR, the following is stated:

> "Consistent with Appendix G of the CEQA Guidelines, the proposed project may have a significant impact on the environment associated with Utilities if it would: 1) Have insufficient water supplies available to serve the project from existing entitlements and resources, or if new or expanded entitlements are needed."

The DEIR goes on to determine that based on the WSA and specifically Table 3.13-4, the City has the water to serve the Project, therefore the impact of the Project is less than significant. 2-3

The conclusion that the City has sufficient water to serve the Sports Park Project is clearly based on the analysis in the WSA which incorrectly accounts for Tracy Hills water demand and incorrectly classifies the water demand of other projects.

We request that the FEIR properly reflect the status of the various Projects and account for their water demands, and mitigate this Project according to the properly calculated demands. 2-4

Very truly yours,

HEFNER, STARK & MAROIS, LLP

By
Timothy D. Taron

TDT:dan

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Response to Letter 2: Timothy D. Taron

Response 2-1: The comment states that the Draft EIR incorrectly classifies the Tracy Hills Project in the "2030" category with respect to the Water Supply Analysis. The commenter suggests that the Tracy Hills Project should be classified as a "Currently Anticipated Development Project" with respect to the Water Supply Analysis. The commenter further states that the Tracy Hills Project area is identified in the General Plan as an Area of Special Consideration.

The City of Tracy acknowledges receipt of this comment letter on the Holly Sugar Sports Park Draft EIR.

The City further acknowledges that Tracy Hills is identified in the General Plan as an Area of Special Consideration.

The Tracy Hills project is estimated to have a large water demand of approximately 3,000 to 4,500 acre-feet per year. Because of this large water demand, and as proposed by the project proponents, the City anticipates the Tracy Hills project to provide a separate water supply from those currently available to the City. This approach has been consistent since the project was initially proposed. Furthermore, the City received funding from the Tracy Hills developer in April 2010 for beginning work on a water supply assessment for the Tracy Hills project utilizing the Byron Bethany Irrigation District pre-1914 water supply. The City entered into a professional services agreement with West Yost Associates for this work on April 29, 2010.

The currently proposed water supply for Tracy Hills is the Byron Bethany Irrigation District pre-1914 water rights. This supply is included in the Water Supply Assessment for the Holly Sugar Sports Park in the various water supply tables. This water supply is projected to commence deliveries to Tracy Hills between 2010 and 2015.

Response 2-2: The comment identifies five properties that are included in the Currently Anticipated Project Category and suggests that these properties are incorrectly categorized in the Water Supply Assessment.

The City of Tracy acknowledges this comment. The Water Supply Assessment correctly categorizes these projects in the Currently Anticipated Projects category. Inclusion of the listed properties in the Currently Anticipated Projects does not represent a water supply commitment to these properties, but rather only a listing of potential future water demands. Furthermore, the Currently Anticipated Projects category has been used for many years and has been included in previous City staff prepared Water Inventory Reports. The listing of Anticipated Projects was last included in the Water Inventory Report that was

approved by City Council on August 1, 2006. No changes to the Draft EIR analysis are required.

Response 2-3: The comment states that the conclusions of the Water Supply Assessment that determine that there are adequate water supplies to meet the demand of the proposed project were made in error, based on Comments 2-1 and 2-2.

The Commenter is referred to Response 2-1 and Response 2-2. The conclusions in the Draft EIR and Water Supply Assessment are correct, and no changes are required.

Response 2-4: The comment requests that the Final EIR properly reflect the status of various projects and accounts for their water demand.

This comment has been noted. The commenter is referred to Responses 2-1 through 2-3. The Draft EIR and Water Supply Assessment correctly categorized all of the projects referenced in this comment letter, and correctly addressed the potential impacts to existing and future water supplies as a result of project implementation. No changes to the Draft EIR water supply analysis are required.

2. NEW BUSINESS

A. PUBLIC MEETING TO RECEIVE PUBLIC COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE HOLLY SUGAR SPORTS PARK

Scott Claar, Associate Planner provided the report. Mr. Claar stated that Council had selected the Holly Sugar site as the preferred site to satisfy the needs of the community for a youth sports facility on July 1, 2008. Mr. Claar indicated that in October 2008, Council hired De Novo Planning to prepare the Environmental Impact Report (EIR), and in the following month, Council approved the Conceptual Site Plan. Mr. Claar stated that currently the item was in the middle of a 45 day public review period for the Draft EIR which would end on October 15, 2009. Mr. Claar indicated that the document was available for review on the website, at the library and DES counter. Mr. Claar further indicated that the document was available for purchase electronically and in hard copy at the DES counter. Mr. Claar stated that there would be a second hearing to receive public comments at the Parks Commission meeting the following Thursday. Mr. Claar introduced the consultant Ben Ritchie of De Novo Planning Group.

Mr. Ritchie provided an electronic presentation. Mr. Ritchie outlined the timeline of the CEQA review of the project. Mr. Ritchie provided a summary of the proposed project. Mr. Ritchie stated that the proposed project is on 298 acres of City owned land outside the City limits, within the Sphere of Influence. Mr. Richie indicated the active sports park portion of the project would include up to 16 soccer fields, 18 baseball fields, 5 softball fields, 4 football fields, a football/soccer stadium and various supporting facilities for use by the public. Mr. Ritchie stated that the 86 acre passive use area, which could include uses such as walking and biking trails, bocce ball, and disc golf. Mr. Ritchie further stated that the primary function of the passive use area was to serve as a buffer between the residential land and the active sports park. Mr. Ritchie indicated that the 46 acre future expansion area could include a variety of uses. Mr. Ritchie stated that the significant and unavoidable impacts for the proposed projects would be in the areas of Aesthetics and Visual Resources; Agricultural Resources; Climate Change; Noise; and Transportation and Circulation. Mr. Ritchie stated that aesthetically, the project would change the visual character of the site and surrounding area, and would add nighttime lighting to the area. Mr. Ritchie indicated that currently the site is designation is unique farmland, and conversion to a park would result in loss of farmland. Mr. Ritchie further indicated that essentially the project would contribute to climate change would result from additional car trips to the site. Mr. Ritchie stated that generally the site would not be a noisy area, however when the stadium was being utilized, there would be an increase in noise as well as additional noise from increased traffic to the site. Mr. Ritchie further stated that the project would result in unacceptable levels of service to the intersection of Larch and Corral Hollow Road and Larch Road and Tracy Boulevard. Mr. Ritchie indicated the comments to the Draft EIR would be compiled and responses would be made in the Final EIR.

Commissioner Alexander asked for clarification of the present use of the land. Mr. Ritchie stated that the City owned the land; however it was contracted out for farming, and was currently producing alfalfa. Commissioner Alexander asked what the economic impact of the project would be on agriculture in the area. Mr. Ritchie stated that the property was relatively small, and the impact would be minimal, as the area was less than 300 acres. Bill Dean, Assistant Director of Development and Engineering Services added that the economic impact may be larger to the individual farming the land; however on the big picture level it was a very small impact.

PC-1

Commissioner Manne asked for confirmation that the City owned that land. Mr. Ritchie stated that was correct. Commissioner Manne asked for clarification on who maintained the streets which would be affected by the project. Mr. Ritchie stated that because the property is located on the northern boundary of the City limits, some of the intersections affected are either wholly or partially within the county. Commissioner Manne asked if there would be a need for agreements due to the impact of buses traveling to the site on county maintained roads. Mr. Dean stated that the comment would be recorded, and responded to in the Final EIR. Mr. Dean further stated that his initial response was that for the purposes of CEQA, a number of intersections lie within San Joaquin County, and unless there is a clearly identified program in which the County would mitigate the impacts, there is no guarantee that the improvements would be completed. Mr. Dean indicated that roadway mitigation was also related to the project budget which may or may not be able to mitigate intersections in the county. Mr. Dean stated that to the degree that it has an impact on bus routing, staff would have a discussion with traffic staff and Parks Department, which manages the Tracer system. Commissioner Manne asked to expand the discussion to include improvements for bike routes on county roads and intersections. Mr. Dean stated that the comment would be researched and responded to in the Final EIR.

PC-2

Commissioner Alexander asked how the green house gases resulting from additional traffic to the site would be mitigated. Mr. Ritchie stated that the consultant had taken a very conservative approach when quantifying the green house gases from traffic to the site. Mr. Ritchie stated that they had considered every trip to the park as new traffic trips, when in reality, many of the people traveling to the site were currently traveling to other parks within the City, and would now simply be traveling to a different facility. Mr. Ritchie further stated that other than providing alternative modes of transportation, there are no other measures of mitigation available to the City. Commissioner Alexander asked if there were any examples of mitigation measures for green house gases provided by the State. Mr. Ritchie stated that the consultant had looked into guidelines from various agencies; however most of the guidelines completely ignore sports park complexes.

PC-3

Vice Chair Mitracos asked if the landscape and trees added at the site would mitigate any of the emissions. Mr. Ritchie stated that the affect of the trees and vegetation is negligible. Vice Chair Mitracos stated that the property is owned by the City, and there had been a proposed wetland, and if that was included in the analysis, it might provide a different impact. Mr. Dean stated that City's are encouraged to look at green house gases in a City-wide approach. Mr. Dean further stated that currently there was a rapidly changing environment as it pertains to greenhouse gases, and the City was trying as best it could to create a plan for global warming that would have a broad applicability.

PC-4

Vice Chair Mitracos asked if the Golden Valley Parkway that he had heard mention of in the past was still being planned. Mr. Dean stated that the comment would be responded to in the Final EIR. Mr. Dean stated that the proposal was a function of regional traffic planning, and San Joaquin COG was responsible for creating. Mr. Dean indicated that staff would look into whether or not it was still a planned roadway.

PC-5

Chair Shishido asked how the land was used when it was owned by Holly Sugar. Mr. Dean stated that he was not sure, and it would be researched and responded to in the Final EIR. Chair Shishido stated that he had heard that may have used as a water discharge area, and he was concerned that there may be an effect of such a use. Chair Shishido further stated that another site was looked at for this project which had underground pipelines, and asked if there were such pipelines at this site. Mr. Ritchie stated that soils samples had been taken relating to stability, and the soil on the site was found to be stable. Mr. Ritchie stated that the primary concern of the soil at the site was that it lies within the 100 year flood plain, and there are mitigation measures in which the base pads of construction need to be elevated to avoid damage from a flood. Mr. Ritchie added that the soil was tested and was free of hazards and contaminants. Mr. Ritchie stated that there are no petroleum pipelines at the site; there was a PG&E power transmission line which has an underground natural gas pipeline within the right of way of the line towers. Mr. Ritchie stated that the towers would remain in place, and there were no proposed fields near the towers. Mr. Ritchie further stated that the natural gas pipelines do not pose the threat that petroleum pipelines do.

PC-6

Chair Shishido stated that he had heard that there had been a proposal for a motor park in that area. Mr. Dean stated that to the north of the proposed sports park there was a concept that had been discussed and Council had approved staff negotiating with a citizen regarding the potential development; although no formal project had been fully described. Chair Shishido asked if such a project could be go forward if the Proposed Sports Park were to be approved. Mr. Dean stated that there would be many approvals that would need to gained

PC-7

before such a project could go forward, and they would require Commission and Council approval.

Vice Chair Mitracos stated that the County had been in talks with the City regarding purchasing a portion of the property for a park. Mr. Dean stated that he had not attended the Council meeting, and did not know the status of the proposal. Mr. Sartor added that negotiations were ongoing. PC-8

Commissioner Alexander asked if there were residents on the land. Mr., Dean answered there were not. PC-9

Chair Shishido opened the public meeting.

Adrian Anthony, 54 East Seventh Street, addressed the Commission. Ms. Anthony asked if any solar or wind support was considered for the project to offset emissions, or if recycled materials had been considered for the building of the project. Ms. Anthony asked for clarification of the location of the property in the regards to the City limits, and if annexation of the county intersections could be done at the same time as the subject property. A map of the location was provided on the screen. Mr. Dean stated that the property was City owned, however not in the City limits. Ms. Anthony asked if there had ever been an attempt to annex the property between the proposed site, and the City limits. Chair Shishido stated that there had been several attempts which were voted down by the voters. PC-10

Javier Zamora, 1812 Alcott Place, addressed that Commission. Mr. Zamora asked if the City had the funds needed for the project. Mr. Zamora also asked if other sites had been considered for the sports park. Mr. Zamora stated that he was concerned about losing the farmland in an area which had such rich soil. Mr. Zamora stated that he felt the road improvements should be completed before the park is built. Mr. Dean stated that the comments would be taken in and responses will be made after information is gathered. PC-11

Chair Shishido closed the public hearing. No action was required for the item.

Response to PC: Planning Commission Meeting Minutes – September 23, 2009

Response PC-1: Commissioner Alexander asked for clarification of the present land use of the site, and inquired about the potential economic impact related to the loss of the agricultural land on the project site. A full response to this question was provided at the Planning Commission meeting, and is included above under Comment PC-1. There is no further information to provide at this time.

Response PC-2: Commissioner Manne inquired about the maintenance of streets affected by the project and the need for agreements with San Joaquin County to maintain streets that are not within City jurisdiction. Commissioner Manne further inquired about coordination with the County related to bus services and the expansion of bike routes on County roadways.

The Draft EIR includes numerous roadway and intersection improvement measures that would be required to reduce project related traffic impacts. In some instances, the affected roadway or intersection is in the jurisdiction of the County, and in some instances the affected roadway or intersection is within the City limits. The mitigation program in the EIR identifies the various improvements that would be required in order to reduce project-related traffic impacts to less than significant levels. However, in some cases, the needed improvements are located on County-controlled roadways, and as such, the City of Tracy cannot ensure that these improvements will be fully implemented. Roadways and intersections that are within the City of Tracy will continue to be the responsibility of the City with respect to maintenance and the implementation and financing of needed improvements. Similarly, roadways and intersections that are currently located within the County will continue to be the responsibility of the County with respect to maintenance. The City will coordinate with the County to explore the feasibility of implementation of the roadway and intersection improvements identified in the EIR to reduce project-related traffic impacts. If the County is amenable to the proposed improvements, the City would be required to pay its fair-share of improvement fees to cover the portion of the impact that results from implementation of this project.

Bicycle facilities are currently non-existent in the areas adjacent to the project site. The conceptual site plan provides no bicycle facilities along the project site frontage on Tracy Boulevard and Corral Hollow Road. Neither the City nor County have developed plans that would potentially provide bicycle facilities on the segments of Tracy Boulevard and Corral Hollow Road adjacent to the project site. According to the City of Tracy 2005 *Bikeways Master Plan*, a Class III bicycle

route is planned near the project site on Tracy Boulevard between Twelfth Street and Clover Road, but would not extend north of I-205. Mitigation Measure 3.12-14 states that when roadway improvements are made to the frontage on Tracy Boulevard and Corral Hollow that extend to Larch Road, the City shall provide sidewalks along project site as funding becomes available. In addition, pedestrian access points that provide direct access to the active sports park, future expansion area, and the passive-recreation area should be provided on Tracy Boulevard and Corral Hollow Road. Additionally, the City shall provide a Class III bike route along Tracy Boulevard that would connect to the planned Class III bike route at Clover Road when that bike route is constructed in the future. The recommended Class III route would also provide access to the existing Class III route on Larch Road, east of Tracy Boulevard. The City shall also provide bicycle parking spaces at each of the surface parking lots that equate to five percent of the number of provided vehicle parking spaces. Overall, the site should provide a total of at least 147 bicycle parking spaces. Bicycle parking stalls should conform to City Code design standards and should be located near the sport field facilities.

Regarding coordination of local and regional bus routes and services, the SJRTD operates one fixed-route bus line (Route 26) that serves the City of Tracy. This line connects the City of Tracy to Stockton and Lathrop along Interstate 5. Within the City of Tracy, Route 26 extends along Grant Line Road and East Street and provides service to locations such as Downtown Tracy on weekdays as well as Wal-Mart (south of Grant Line Road) and the West Valley Mall on the weekends. From Monday through Friday this route operates from 5:00 am to 9:30 pm with headways ranging between 120 and 145 minutes. On the weekends and holidays this route operates from 8:00 am to 6:00 pm on 150-minute headways. The City would monitor the demands for bus service in the project area, once the sports park is constructed, and expand services to the area as needed. The City will also coordinate with SJRTD to expand services to the project areas as-needed.

Response PC-3: **Commissioner Alexander asked how greenhouse gasses attributable to the project would be mitigated.** A response to this question was provided at the Planning Commission meeting, aand is included above under Comment PC-3. Additionally, the EIR includes Mitigation Measure 3.3-4, which would assess the demand for a route stop at the project site by the City's Tracer bus system. The City is also committed to extending bike lanes near the project site as funding becomes available for such an expansion and other City bike lane priorities have been met. There is no further information to provide at this time.

Response PC-4: Vice Chair Mitracos asked if the landscaping and trees added to the site would assist in mitigating greenhouse gas impacts. A full response to this question was provided at the Planning Commission meeting, and is included above under Comment PC-4. There is no further information to provide at this time.

Response PC-5: Vice Chair Mitracos asked if the Golden Valley Parkway was still being planned. The Golden Valley Parkway is no longer being planned.

Response PC-6: Chair Shishido asked how the land was used when it was owned by Holly Sugar. The subject property has been in continuous agricultural use since the beginning of the 1900's.

Response PC-7: Chair Shinshido inquired about the potential motor sports park that may be proposed in the project area. A full response to this question was provided at the Planning Commission meeting, and is included above under Comment PC-7. There is no further information to provide at this time.

Response PC-8: Vice Chair Mitracos stated that the County had been in talks with the City regarding purchasing a portion of the property for a park. A full response to this question was provided at the Planning Commission meeting, and is included above under Comment PC-8. There is no further information to provide at this time.

Response PC-9: Commissioner Alexander asked if there were residents on the land. A full response to this question was provided at the Planning Commission meeting, and is included above under Comment PC-9. There is no further information to provide at this time.

Response PC-10: Resident Adrian Anthony asked if any solar or wind support was considered for the project to offset emissions, or if recycled materials had been considered for the building of the project. Mr. Anthony asked for, and received clarification on the location of the project site.

Energy used by the proposed project would be supplied by PG&E, and would have the same ratio of solar and wind related energy sources as the rest of the electricity provided to businesses and residents in the City of Tracy. The City does not currently have a solar or wind energy program in place that would allow the City to directly provide electricity to the site from these sources. Additionally, as part of its ongoing commitment to the preservation of natural resources, the City will consider the use of recycled building materials at the project site, if the use of such materials is deemed feasible.

Response PC-11: Resident Javier Zamora asked if the City had the funds needed for the project, if other sites had been considered for the project, stated concerns regarding the

loss of farmland, and stated that he felt roadway improvements should be completed before the project is constructed.

The City of Tracy currently has some funding available for the initial phases of the project. Future phases of the project will be constructed over time as additional funding becomes available and the need for park services in the community increases.

A number of alternative locations were considered for the proposed sports park. These alternative locations include the Plan B Site, the Alvarez Site, the Bright Site, and the Schulte Road Site. These alternative sites are described in greater detail on Pages 2.0-2 and 2.0-3 of the Draft EIR. The Alvarez Site was also addressed as an Alternative to the proposed project in Section 5.0 of the Draft EIR.

Section 3.2 of the Draft EIR includes a detailed analysis regarding the loss of agricultural land that would occur as a result of project implementation. Mitigation Measure 3.2-1 requires the City to pay fees into the City's Agriculture Mitigation Fee Program to help offset the loss of agricultural lands. The fees from this program are used by the City to purchase agricultural easements in offsite locations. However, even with this mitigation measure in place, the loss of agricultural lands remains a significant and unavoidable impact. The Draft EIR also includes Mitigation Measures 3.2-2, 3.2-3 and 3.2-4 which include requirements that will reduce potential land use conflicts between the project site and the adjacent agricultural operations.

Traffic impacts associated with the proposed project are addressed in detail in Section 3.12 of the Draft EIR. The mitigation measures in this section identify which roadways and intersections will be impacted by project-generated traffic, and identifies mitigation measures that would reduce these impacts. Impact 3.12-4 includes a discussion of the number of fields and facilities that may be constructed at the site before any significant impacts to the study area roadways or intersections occur. The City will implement the traffic improvement measures over time, as the various phases of the park are constructed, in order to reduce impacts to the surrounding roadway network.

These questions and responses will be forwarded to the City Council for their consideration, however, no changes to the Draft EIR are required.

PARKS & COMMUNITY SERVICES COMMISSION

REGULAR MEETING MINUTES
October 1, 2009

EXCERPT

8. NEW BUSINESS:

a. Receive a presentation on the Holly Sugar Sports Park Draft EIR, provide comments to staff, and accept public input:

Scott Claar, Associate Planner for the City of Tracy Development and Engineering Services Department, stated The City of Tracy is proposing to construct a Sports Park Facility on approximately 298 acres of City-owned land immediately north of the City limits to address the long-term needs for youth sports facilities. The City of Tracy is serving as the "Lead Agency" for CEQA review of the project. De Novo Planning Group has been retained by the City to complete the EIR and associated technical studies. In November 2008, City Council approved the conceptual site plan. As part of the 45 day public review period,staff is holding two public meetings to receive input from the community on the potential environmental impacts. The first meeting was held before the Planning Commission and the second meeting is being held before the Parks Commission. Comments can be submitted to the City until October 15, 2009. No formal Commission action is being requested. Commissioners were invited to make comments after the presentation. Claar introduced Ben Richie of DeNovo Planning as the principal planner who drafted the Holly Sugar EIR.

Ben Richie detailed the EIR process, the CEQA Process, and provided a project summary. He stated that since the project site falls outside of the city limits, but inside the sphere of influence, the site will need to be annexed into the city limits. Site amenities will be constructed in phases, from east to west. Each component of the project was described. Richie defined "Significant Unavoidable Environmental Impacts" as those impacts that could not be reduced below a certain category. They include aesthetics/visual resources; agricultural resources; climate change; noise; and transportation/circulation.

The public is invited to comment on the accuracy of the EIR, however, this meeting is not the forum to debate the merits of the program at this time. All comments received will be responded to in writing in the final EIR. Once the comment period closes, the final EIR will be prepared incorporating the draft and any changes. Discussion was opened to the Commission.

Comments from the Commission:

- Commissioner Jimenez asked about the process to evict burrowing owls from the site. Richie stated California Fish and Game oversees the specific protocol for certified biologists to flush them from their nests. They are not physically removed from the site. The site falls within the SJCOG Conservation Plan and ensures impacts are mitigated elsewhere in other locations. PCSC-1
- Commissioner Jimenez asked about the process to preserve any cultural artifacts found on the site. Richie stated local area tribes were already notified under SB18 and they would be included in the disposition of any found artifacts. PCSC-2

- Commissioner Jayne asked about annexation surrounding the Larch Clover area. Richie stated the project provides for 300 feet of contiguous border surrounding the site which is consistent with LAFCO annexation policies. PCSC-3
- Commissioner Gouveia asked if lanes or stop lights would be added at Larch and Clover Roads. Richie stated a number of roadway improvements are included in this project and the EIR describes the various intersection improvements required. PCSC-4
- Chairman Atkins asked if the City would incur fees to mitigate wildlife habitats. Richie responded that the City participates in the SJCOG Interspecies Mitigation and pays fees to provide for pooled resources to provide for conservation land elsewhere. No other species were seen on site. PCSC-5
- Commissioner Saltzman had no comments.
- Commissioner Birk had no comments.

Comments from the Public: There were no comments from the public and the comment period was closed.

Response to PCSC: Parks & Community Services Commission Meeting Minutes – October 1, 2009

Response PCSC-1: Commissioner Jimenez inquired about the process to evict burrowing owls from the site. A full response to this question was provided at the Parks and Community Services Commission meeting, and is included above under Comment PCSC-1. There is no further information to provide at this time.

Response PCSC-2: Commissioner Jimenez inquired about the process to preserve any previously undiscovered cultural resources that may be found on the site. A full response to this question was provided at the Parks and Community Services Commission meeting, and is included above under Comment PCSC-2. There is no further information to provide at this time.

Response PCSC-3: Commissioner Jayne inquired about annexation surrounding the Larch Clover area. A full response to this question was provided at the Parks and Community Services Commission meeting, and is included above under Comment PCSC-3. There is no further information to provide at this time.

Response PCSC-4: Commissioner Gouveia asked if additional lanes or stop lights would be added to the intersection of Larch Road/Corral Hollow Road. Mitigation Measure 3.12-1 in the Draft EIR indentifies that project related traffic impacts to this intersection would be mitigated under cumulative conditions by either widening the westbound approach to provide a shared left-turn/through lane and a right-turn lane, or; installing a traffic signal.

Response PCSC-5: Chairman Atkins asked if the City would incur fees to mitigate impacts to wildlife habitat. A full response to this question was provided at the Parks and Community Services Commission meeting, and is included above under Comment PCSC-5. There is no further information to provide at this time.

Jan. 28. 2010 1:51PM No. 0263 P. 2

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
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January 29, 2010

10-SJ-205-PM 5.8
SCH#2008122103
Holly Sugar Sports Center

Scott Claar
City of Tracy
520 Tracy Boulevard
Tracy, CA 95376

Dear Mr. Claar:

The California Department of Transportation (Department) appreciates the opportunity to have reviewed the re-circulated Draft Environmental Impact Report (DEIR) for the construction and operation of the proposed Holly Sugar Sports Park to be located between Tracy Blvd. & Corral Hollow Road north of Larch Road, and south of Sugar Road. Based on additional information provided to the Department, the project documents were re-circulated to our functional units for review.

The Department has the following additional comments:

Traffic Operations

1. We noted Table 3.12-18, Study Intersections 5 & 6, Lane Geometry and Traffic Control Changes did not match Mitigation Measure 3.12-8 and Mitigation Measure 3.12-9 for both I-205 WB ramps/Tracy Blvd. and I-205 EB Ramps/Tracy Blvd. Also, these mitigation measures in Figure 3.12-11A do not correspond with your Cumulative 2030 Mitigation Measures. Please be sure your Traffic Impact Analysis Report reflects the electronic file, the figures and tables and all are consistent with each other. AA-1

2. Please provide in an electronic format and hard copy Synchro/Simtraffic Analysis for the I-205 E/B and W/B ramps/Tracy Blvd. Please include Figures and Tables to verify the LOS, Delay, Lane Configuration, Demand Volume, Queuing/blocking, and 95th percentile queue to check proper storage length at the turn lanes. AA-2

3. The I-205 E/B and W/B ramps/Tracy Blvd is a very highly used Surface Transportation Assistance Act (STAA) intersection. Please be sure the turn radius will accommodate STAA Long for all movements at the intersection. Also, please include the percentage of trucks using the ramps and the intersection in the analysis. AA-3

"Caltrans improves mobility across California"

4. Cumulative condition also indicates the addition of a left turn lane NB and SB Tracy Blvd. to W/B and E/B ramps. Please be sure your analysis provides for a dual receiving lane on both W/B and E/B ramps

AA-4

Travel Forecasting

As indicated in Section 3.12 of the re-circulated DEIR, the project would have significant and unavoidable impacts on the W/B I-205 off-ramp intersection with Tracy Blvd under near-term (2015) and the westbound and eastbound I-205 off-ramp intersections with Tracy Boulevard under cumulative (2030) conditions. Mitigation measures have been proposed to improve the operation at these intersections. We recommend implementation of all proposed mitigation measures and full collection from the project sponsor for all mitigation measures. An adequate portion of income generated from the proposed project should be used to maintain and improve the local roadways and I-205 to and from the project location.

AA-5

Please forward a **copy of all Final Conditions of Approval** including any mitigation measures being proposed as well as any other documents and reports on this proposed project for our review, comment and records. If you have any questions or would like to discuss our comments in more detail, please contact Barbara Hempstead at (209) 948-3909 (e-mail: barbara_hempstead@dot.ca.gov) or me at (209) 941-1921.

Sincerely,

for Barbara Hempstead

TOM DUMAS, **Chief**
Office of Intermodal Planning

Response to Letter AA Tom Dumas, California Department of Transportation

Response AA-1: The comment states that the lane geometry and traffic control changes noted in Table 3.12-18 of the Recirculated Draft EIR are inconsistent with Mitigation Measure 3.12-8 and Mitigation Measure 3.12-9 for both I-205 WB off-ramps/Tracy Boulevard and I-205 EB off-ramps/Tracy Boulevard. The comment also states that Figure 3.12-11A does not correspond with Cumulative 2030 Mitigation Measure at the I-205/Tracy Boulevard off-ramp terminal intersections.

The purpose Recirculated Draft EIR Table 3.12-18 is to present the intersection lane configurations and traffic control device changes to accommodate cumulative traffic growth consistent with build out of the General Plan prior to the addition of project traffic, as required by the City of Tracy. The addition of project traffic requires different intersection lane configurations to mitigate service levels within acceptable thresholds at intersections. Figure 3.12-11A in the Recirculated Draft EIR shows the un-mitigated off-ramp terminal intersection lane configurations and traffic controls assumed for Cumulative (2030) No Project and Plus Project Conditions. The mitigated Cumulative lane configuration and traffic controls for the I-205/Tracy Boulevard off-ramp terminal intersections are described under Mitigation Measure 3.12-8 and Mitigation Measure 3.12-9 in the Recirculated Draft EIR.

Response AA-2: The comment requests that figures and tables be provided to verify LOS, delay, lane configuration, demand volume, queuing analysis to check proper storage length at the turn lanes for the I-205/Tracy Boulevard off-ramp terminal intersections. The comment also requests both electronic and hard copy of the Synchro/Simtraffic analysis be provided.

Table 2.0-7 (presented below) shows the queuing analysis for the Tracy Boulevard/I-205 off-ramp terminal intersections. Synchro 7 was used to determine 95th percentile queues. Table 2.0-8 presents the queuing analysis for the recommended mitigated improvements at the off-ramp terminal intersections.

Existing Conditions intersection lane configurations, traffic controls and demand volumes are shown in Recirculated Draft EIR Figure 3.12-4; the resulting LOS is summarized in Table 3.11-4 of the Recirculated Draft EIR. Existing lane configurations and traffic controls are used for the Near-Term (2015) Conditions are shown in Figure 3.12-4. The Near-Term intersection

demand volumes are provided in Figures 3.12-9 and 3.12-10; the resulting LOS is summarized in Table 3.12-11 of the Draft EIR. Cumulative (2030) Conditions intersection lane configuration and traffic controls are shown on Figure 3.12-11, the demand volumes are shown on Figures 3.12-12 and 3.12-13, and the resulting LOS, are summarized in Table 3.12-19. Recommended mitigated intersection lane configurations and resulting LOS at the I-205/Tracy Boulevard off-ramp terminal intersections are described under Mitigation Measure 3.12-3 for Near-Term (2015) Conditions and under Mitigation Measure 3.12-8 and 3.12-9 for Cumulative (2030) Conditions.

An electronic copy of all analysis files plus a hard copy of all output analysis worksheets will be submitted to Caltrans.

TABLE 2.0-7
TRACY BOULEVARD/I-205 OFF-RAMP TERMINAL INTERSECTION QUEUING ANALYSIS

Intersection	Approach[1]	Movement[2]	Storage Length (ft)	No Project 95th Percentile Queue (ft)		Plus Project 95th Percentile Queue (ft)	
				PM Peak Hour	SAT Peak Hour	PM Peak Hour	SAT Peak Hour
Existing Conditions							
5. I-205 Westbound Off-Ramps/Tracy Boulevard	NB	L	100	115	180	n/a	
		T	300	75	65		
	SB	TR	550	140	135		
	WB	TRL	1,400	340	320		
6. I-205 Eastbound Off-Ramps/Tracy Boulevard	NB	TR	320	125	155	n/a	
	SB	L	100	90	90		
		T	300	80	95		
	EB	TRL	1,300	115	155		
Near-Term (2015) Conditions							
5. I-205 Westbound Off-Ramps/Tracy Boulevard	NB	L	100	120	175	125	230
		T	300	75	65	100	160
	SB	TR	550	145	135	170	330
	WB	TRL	1,400	360	320	440	1,560
6. I-205 Eastbound Off-Ramps/Tracy Boulevard	NB	TR	320	125	155	190	365
	SB	L	100	90	90	110	505
		T	300	85	90	95	140
	EB	TRL	1,300	115	150	135	475
Cumulative (2030) Conditions							
5. I-205 Westbound Off-Ramps/Tracy Boulevard	NB	L	100	505	630	505	630
		T	300	105	115	150	265
	SB	TR	550	660	645	795	1,100
	WB	TRL	1,400	1,250	1,465	1,295	2,600
6. I-205 Eastbound Off-Ramps/Tracy Boulevard	NB	TR	320	440	575	640	895
	SB	L	100	1,105	1,145	1,135	1,595
		T	300	170	165	205	220
	EB	TRL	1,300	645	870	705	1,200

Notes:

3. NB = northbound, SB = southbound, EB = eastbound, WB = westbound
4. L = left-turn lane, T = through lane, TR = shared through/right turn lane, TRL = shared through/right/left turn lane

Source: Fehr & Peers, 2010.

TABLE 2.0-8
MITIGATED TRACY BOULEVARD/I-205 OFF-RAMP TERMINAL INTERSECTION QUEUING ANALYSIS

Intersection	Approach	Movement	Storage Length (ft)	Plus Project 95th Percentile Queue (ft)	
				PM Peak Hour	SAT Peak Hour
Near-Term (2015) Conditions					
5. I-205 Westbound Off-Ramps/Tracy Boulevard	NB	L	100	100	170
		T	300	80	145
	SB	TR	550	140	375
	WB	TRL	1,400	320	585
		R	500	50	420
Cumulative (2030) Conditions					
5. I-205 Westbound Off-Ramps/Tracy Boulevard	NB	L	100	195	275
		T	300	110	185
	SB	TR	550	545	770
	WB	TL	1,400	510	440
		R	500	0	75
6. I-205 Eastbound Off-Ramps/Tracy Boulevard	NB	T	320	315	585
		R	150	65	140
	SB	L	100	295	575
		T	300	145	175
	EB	L	450	115	445
		TR	1,300	140	190
		R	200	140	190

Notes:

3. NB = northbound, SB = southbound, EB = eastbound, WB = westbound
4. L = left-turn lane, T = through lane, R = right-turn lane, TR = shared through/right turn lane, TL = shared through/left turn lane, TRL = shared through/right/left-turn lane

Source: Fehr & Peers, 2009.

Response AA-3: The comment states that the I-205/Tracy Boulevard off-ramp terminal intersections are very highly used Surface Transportation Assistance Act (STAA) intersections and therefore should accommodate STAA classified trucks for all movements at the intersections. Comment also requests that the intersection analysis incorporate truck percentage for the study.

This comment has been noted. The City of Tracy uses the appropriate design vehicle when designing intersections. Vehicle classification data was collected with the peak period turning movement intersection counts and the truck percentages for each approach were included in the intersection analysis models for Existing, Near-Term, and Cumulative conditions. Table 2.0-9 summarizes the collected truck percentages at the

I-205/Tracy Boulevard off-ramp terminal intersections. These truck percentages were used in the analysis.

TABLE 2.0-9
EXISTING TRUCK PERCENTAGES

Intersection	Approach[1]	PM Peak Hour Truck %	Saturday Peak Hour Truck %
5. I-205 Westbound Off-Ramps/Tracy Boulevard	WB	4%	1%
	NB	4%	1%
	SB	5%	1%
6. I-205 Eastbound Off-Ramps/Tracy Boulevard	EB	6%	1%
	NB	2%	1%
	SB	3%	1%

Notes:
1. NB = northbound, SB = southbound, EB = eastbound, WB = westbound

Source: Fehr & Peers, 2010.

Response AA-4: The comment states that under Cumulative (2030) Conditions, Mitigation Measure 3.12-8 recommends the addition of a northbound left-turn lane and Mitigation Measure 3.12-9 recommends the addition of a southbound left-turn lane, and the analysis should therefore provide dual receiving lanes at the westbound and eastbound on-ramp, respectively.

This comment has been noted. The Cumulative intersection analysis for recommended mitigated improvements does assume two receiving lanes at the westbound and eastbound on-ramps.

Response AA-5: The comment states that all of the proposed mitigation measures in the Recirculated Draft EIR should be implemented, and that the project sponsor should arrange for the payment of fair share fees for these recommended improvements.

The study intersections are under the exclusive jurisdiction of Caltrans (Streets and Highways Code, Section 90). As such, the City intends on making a finding that these mitigation measures can and should be adopted by Caltrans. Additionally, the City is not aware of any plan, enforceable by the City, that would insure funding of these mitigation measures. Therefore, these impacts are considered to be significant and unavoidable.

This section includes minor edits to the EIR. These modifications resulted from responses to comments received during the DEIR public review period as well as City staff initiated edits to clarify language and implementation of mitigation measures.

Revisions herein do not result in new significant environmental impacts, do not constitute significant new information, nor do they alter the conclusions of the environmental analysis that would warrant recirculation of the DEIR pursuant to State CEQA Guidelines Section 15088.5. changes are provided in revision marks with underline for new text and ~~strike out for deleted text~~.

There are no revisions made to the Recirculated Draft EIR. Therefore, all of the revisions identified below relate to the original Draft EIR prepared for this project.

3.1 REVISIONS TO THE DRAFT EIR

EXECUTIVE SUMMARY

The following changes are made to the table footer on pages ES-5 through ES-29 of the Executive Summary:

SU– significant and unavoidable

1.0 INTRODUCTION

No changes were made to Section 1.0 of the DEIR.

2.0 PROJECT DESCRIPTION

The following text changes are made to page 2.0-6 of the Project Description:

Landscape Irrigation (Non-potable) Water: Initially, the project ~~would~~ may receive landscaping and irrigation water from untreated surface water from Sugar Cut Slough, which has been used to irrigate the project site since at least 1912. In the near-term, the project may also receive landscaping and irrigation water from a newly constructed onsite well that would pump untreated groundwater for use on the project site. In the future, landscape irrigation water could be recycled water from City Of Tracy Wastewater Plant. The irrigation distribution system (independent of potable distribution system) will be designed using "purple pipe" for later connection to City of Tracy recycled water distribution system. The details of this potential future connection have not been developed at this time.

The following text changes are made to page 2.0-7 of the Project Description:

ANNEXATION, GENERAL PLAN AMENDMENT AND PRE-ZONING

As described previously, the project site is currently located outside of the Tracy City limits, within the City's Sphere of Influence (SOI). In addition to the development of the proposed park facilities, the City is also proposing to establish a Park (P) zone, pre-zone the project site to Park~~s~~ (P) to accommodate the proposed park uses and to annex the site into the City of Tracy. The area

proposed for annexation includes the 166-acre active sports park site, the 46-acre future expansion area, and the 86-acre passive recreation area, as shown in Figure 2-2. Upon annexation of the site into the City of Tracy, the City would amend the General Plan Land Use Map to designate the project site Park~~s~~ (P), and amend the Zoning Ordinance and Zoning Map to designate the project site Park~~s~~ (P).

3.1 AESTHETICS

No changes were made to Section 3.1 of the DEIR.

3.2 AGRICULTURE

No changes were made to Section 3.2 of the DEIR.

3.3 AIR QUALITY

No changes were made to Section 3.3 of the DEIR.

3.4 BIOLOGICAL RESOURCES

No changes were made to Section 3.4 of the DEIR.

3.5 CULTURAL RESOURCES

No changes were made to Section 3.5 of the DEIR.

3.6 GEOLOGY AND SOILS

No changes were made to Section 3.6 of the DEIR.

3.7 HAZARDS AND HAZARDOUS MATERIALS

No changes were made to Section 3.7 of the DEIR.

3.8 HYDROLOGY AND WATER QUALITY

The following text changes are made to Impact 3.8.4 on pages 3.8-20 and 3.8-21 of the DEIR:

Impact 3.8.4: Implementation of the project may result in impacts to groundwater supplies or interfere with groundwater recharge (Less than Significant)

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, the majority of the Holly Sugar Sports Park site will be covered with grass and natural fields, which will not interfere with groundwater recharge. The project will include areas of impervious surfaces, such as the proposed roadways, parking lots and various structures. 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.

As described in the WSA (Appendix F), the primary water demand at the proposed project will be for turf and landscape irrigation, and will be met using non-potable water supplies. However, following preparation of the WSA, the City has determined that groundwater from a new well at the project site will likely be used to supply landscaping and irrigation (non-potable) water for the project. The estimated total non-potable water demand for the proposed project is 482 af/yr. ~~The recommended water supply to meet this non-potable water demand will initially be untreated surface water diverted from Sugar Cut Slough (which has historically and is currently being used to irrigate the agricultural crop being grown at the project site), and,~~ In the future, tertiary-treated recycled water delivered from the City's wastewater treatment plant may be used to supply non-potable water to the project site. ~~The use of non-potable water supplies for landscape and turf irrigation will not result in increased groundwater pumping or extraction as a result of project implementation.~~

As described in the WSA, the estimated total potable water demand for the proposed project is approximately 47 af/yr. This potable water demand will be met using potable water supplies from the City's water system and could include the following uses:

- Active Sports Park Site: proposed concession and restroom buildings.
- Passive Recreation Area: potential restroom building.
- Future Expansion Area: interior water uses at the potential future recreation center and library, potential concession and restroom buildings, and the water supply for the potential future children's "spray park".

If groundwater is used to provide irrigation for landscaping and ballfields on the project site, the total amount of groundwater used by the project at full buildout would be approximately 529 af/yr.

Based on the analysis described in the attached Water Supply Assessment, the City's existing and additional (future, not yet firmly assured) potable water supplies are sufficient to meet the City's existing and projected future potable water demands, including the potable water demands and non-potable groundwater demands associated with the proposed project, to the year 2030 under all hydrologic conditions. Also, the Water Supply Assessment demonstrates that available existing and additional (future, not yet firmly assured) non-potable water supplies will be sufficient to meet the non-potable water demands associated with the proposed project to the year 2030 under all hydrologic conditions.

As shown in Table 3.8-1, the City's historical rate of groundwater pumping has been declining steadily over the past 7 years.

The City's 2005 UWMP addressed the sufficiency of the City's groundwater supplies, in conjunction with the City's other existing and additional water supplies, to meet the City's existing and planned

future uses. Based on the information provided in the WSA and that included in the City's 2005 UWMP, the City's groundwater supply is sufficient to meet the water demands of the proposed project, in addition to the City's existing and planned future uses. As discussed in Section 3.8 of the DEIR, the City's use of groundwater over the last few years has declined, primarily due to the availability of new high-quality surface water supplies from the SCWSP. In the future, although the City can sustainably extract up to 9,000 af/yr of groundwater, the City's use of groundwater is anticipated to decrease even further, as additional high-quality surface water supplies become available. As shown in Table 13 of the attached Water Supply Assessment, in the future, assuming normal year hydrologic conditions, annual groundwater use is anticipated to be as low as 2,500 af/yr by 2015.

This anticipated future groundwater pumpage is significantly below the City's historical groundwater pumpage (see Table 3.8-1) and the average annual operational yield of 9,000 af/yr.

By reducing groundwater extraction on an average annual basis, the City will recharge the underlying aquifer, effectively increasing the availability of groundwater during a drought or emergency condition (i.e., the City will effectively be "banking" its groundwater); and increase the overall quality of its drinking water, thus increasing customer satisfaction and reducing system maintenance and repair caused by the lower-quality groundwater.

The demand for potable and non-potable water supplies to serve the proposed Holly Sugar Sports Park project ~~will not~~ may result in additional groundwater pumping. However, even if an additional 529 af/yr of groundwater were pumped annually to provide potable and non-potable water supplies for the proposed project, the City would remain significantly below the sustainable pumping threshold level of 9,000 ac/ft per year. Therefore, the proposed project would have a **less than significant** impact on groundwater supplies and resources. No mitigation is required.

3.9 LAND USE

No changes were made to Section 3.9 of the DEIR.

3.10 NOISE

No changes were made to Section 3.10 of the DEIR.

3.11 PUBLIC SERVICES

No changes were made to Section 3.11 of the DEIR.

3.12 TRANSPORTATION AND CIRCULATION

As previously mentioned, the City prepared a Recirculated Draft EIR for the proposed project that addressed changes to the traffic analysis in the original Draft EIR. The Recirculated Draft EIR included a new impact discussion and new mitigation measure that were not included in the original Draft EIR (Impact 3.12-3 was added to the Recirculated Draft EIR). The addition of this new impact discussion and mitigation measure caused the numbering for Impacts 3.12-3 through 3.12-16 in the original Draft EIR to change. For example, what was previously Impact 3.12-3 in the

original Draft EIR is now Impact 3.12-4, and what was once Impact 3.12-16 in the original Draft EIR is now Impact 3.12-17, etc. The revised numbering for the traffic impacts and mitigation measures is correctly reflected in the attached Mitigation Monitoring and Reporting Program (MMRP).

The following text changes are made to page 3.12-1:

Interstate 205 provides regional access to Tracy. This freeway extends between I-580 and I-5 and runs east-west through the northern portion of the City of Tracy. Interchanges are provided at West Eleventh Street, Grant Line Road, Tracy Boulevard and MacArthur Drive. West of Eleventh Street, I-205 has six lanes (three lanes in each direction). The remaining sections of I-205 also have ~~two~~ three lanes in each direction. ~~Construction is currently underway to widen I-205 to three lanes in each direction east of Eleventh Street.~~ The posted speed limit on I-205 is 70 miles per hour east of Tracy and 65 miles per hour through Tracy and to the west.

Corral Hollow Road is a north-south arterial that extends from the San Joaquin/Alameda County border south of I-580 to north of I-205. In the study area, Corral Hollow Road is a two-lane roadway north of Grant Line Road and a four-lane roadway south of Grant Line Road, with a posted speed limit that varies between ~~35 and 40~~ 30 and 50 miles per hour.

The following text changes are made to page 3.12-10:

EXISTING PEAK HOUR TRAFFIC SIGNAL WARRANTS

To assess consideration for signalization of stop-controlled intersections, the *Manual of Uniform Traffic Control Devices* (MUTCD) (Federal Highway Administration, ~~2000~~ 2006), presents eight signal warrants.

The following text changes are made to page 3.12-16:

San Joaquin County

The San Joaquin County Congestion Management Plan (CMP), a state-mandated program, is a mechanism employing growth management techniques, including traffic level of service requirements, development mitigation programs, transportation systems management, and capital improvement programming, for the purpose of controlling and/or reducing the cumulative regional impacts of development. The CMP is administered by the San Joaquin Council of Governments (SJCOG).

The following text changes are made to the Thresholds of Significance on page 3.12-17:

- Unsignalized Tracy intersection operations to:
    - degrade from an acceptable level based on City of Tracy standards (LOS C or better for intersections more than ¼ mile from a freeway or LOS D or better for those within ¼ mile of a freeway) to an unacceptable level, ~~and~~ or a traffic signal warrant to be met, or

- a volume increase of more than 10 percent to an intersection operating at an unacceptable level and meeting a traffic signal warrant

- ~~Unsignalized County intersection operations to:~~
  - ~~degrade from an acceptable level based on County of San Joaquin standards (LOS D or better) to an unacceptable level (LOS E or F), and a traffic signal warrant to be met, or~~
  - ~~a volume increase of more than 5 percent to an intersection operating at an unacceptable level and meeting a traffic signal warrant~~
- A traffic and circulation impact is considered significant if implementation of the Project would cause an unsignalized County intersection operations to:
  - degrade from an acceptable level based on County of San Joaquin standards (LOS D or better) to an unacceptable level (LOS E or F), or
  - the project increases the volume by at least one vehicle to an intersection operating at an unacceptable level

The following text changes are made to Table 3.12-12 on page 3.12-23:

Table 3.12-12
Near-Term (2015) Freeway Segment Level of Service

Segment	Direction of Travel	Peak Hour	# of Lanes	No Project			Plus Project		
				Volume	Density[1]	LOS	Volume	Density[1]	LOS
I-~~80~~ 205:: West of Tracy Boulevard	Eastbound	PM SAT	3	2,870 2,870	15.8 15.5	B B	2,874 3,024	15.8 16.4	B B
I-~~80~~ 205:: West of Tracy Boulevard	Westbound	PM SAT	3	2,370 3,090	13.1 17.0	B B	2,372 3,149	13.1 17.3	B B
I-~~80~~ 205:: East of Tracy Boulevard	Eastbound	PM SAT	3	3,020 2,990	16.7 16.2	B B	3,028 3,259	16.7 17.6	B B
I-~~80~~ 205: East of Tracy Boulevard	Westbound	PM SAT	3	2,640 3,230	14.6 17.7	B B	2,657 3,933	14.7 21.6	B C

Note:
1. Density measured in passenger cars per mile per lane
Source: Fehr & Peers, 2009.

The following text changes are made on page 3.12-23 and 3.21-24:

Impact 3.12-1: Project implementation would not result in unacceptable levels of service at the intersection of Larch Road/Corral Hollow Road (Intersection #1) ~~(Significant and Unavoidable)~~ (Less than Significant)

The addition of project traffic would cause the westbound approach of the Larch Road/Corral Hollow Road intersection to degrade from LOS B to LOS ~~E~~ D, ~~as well as cause the intersection to meet the peak hour signal warrant~~.

Original field reconnaissance was conducted in February 2009 to obtain lane configurations at the study intersections. The east and west legs of Larch Road are offset by approximately 170 feet at Corral Hollow Road. Given the short distance between the east and west legs of Larch Road, it was initially determined that average intersection delay would be most accurately (and conservatively) calculated by modeling the off-set intersection as a single four-legged intersection. At the request of San Joaquin County Public Works staff, the intersection was re-evaluated as two separate unsignalized intersections. The updated levels of service for each study scenario are provided in Table 2.0-6.

TABLE 2.0-6
UPDATED PEAK HOUR INTERSECTION LEVELS OF SERVICE

	Intersection	Control[1]	Peak Hour	No Project		Plus Project	
				Delay[2] (in seconds)	LOS	Delay[2] (in seconds)	LOS
Existing Conditions							
1a.	Larch Road-west leg/Corral Hollow Road	SSSC	PM SAT	5 (9) 4 (9)	A (A) A (A)	--	--
1b.	Larch Road-east leg/Corral Hollow Road	SSSC	PM SAT	4 (12) 5 (11)	A (B) A (B)	--	--
Near-Term (2015) Conditions							
1a.	Larch Road-west leg/Corral Hollow Road	SSSC	PM SAT	5 (10) 5 (9)	A (A) A (A)	5 (10) 2 (12)	A (B) A (B)
1b.	Larch Road-east leg/Corral Hollow Road	SSSC	PM SAT	5 (13) 5 (11)	A (B) A (B)	5 (15) 14 (29)	A (B) B (D)
Cumulative (2030) Conditions							
1a.	Larch Road-west leg/Corral Hollow Road	SSSC	PM SAT	**>50 (>50)** **>50 (>50)**	**F (F)** **F (F)**	**>50 (>50)** **>50 (>50)**	**F (F)** **F (F)**
1b.	Larch Road-east leg/Corral Hollow Road	SSSC	PM SAT	**>50 (>50)** **>50 (>50)**	**F (F)** **F (F)**	**>50 (>50)** **>50 (>50)**	**F (F)** **F (F)**

Note: Results in **bold** represent unacceptable levels of service.

1. SSSC = side-street stop controlled intersection
2. For side-street stop-controlled intersections, delay is reported as: Intersection average (worst case approach)

Source: Fehr & Peers, 2009.

As shown in Table 2.0-6, the side-street-stop controlled intersections of Larch Road at Corral Hollow Road are anticipated to operate at LOS A or B (acceptable levels) during existing and Near-

Term (2015) No Project conditions. With the addition of project traffic, the two intersections are expected to continue to operate at overall LOS A or B under the Near-Term (2015) scenario with only one movement operating at LOS D during the Saturday peak hour conditions. LOS D is an acceptable level for intersections under the County's jurisdiction. Therefore the Project would not cause a significant impact to traffic operations at either intersection of Larch Road-west leg/Corral Hollow Road or Larch Road-east leg/Corral Hollow Road under Near-Term (2015) Plus Project conditions. The more-conservative analysis conducted for the DEIR identified a significant near-term project impact at this intersection.

This is a **less than significant impact**.

MITIGATION MEASURES

None required.

~~***Mitigation Measure 3.12-1**: The following mitigation measures would improve operations at the Larch Road/Corral Hollow Road intersection to an acceptable level:*~~

- ~~*Widen the westbound approach to provide a shared left-turn/through lane and a right-turn lane. Or*~~
- ~~*Install traffic signal. Optimize signal timings to allow for split eastbound and westbound signal phasing. An evaluation of all applicable signal traffic warrants should be conducted and additional factors (e.g., congestion, approach conditions, driver confusion) should be considered before the decision to install a signal is made.*~~

~~*The study intersection is under San Joaquin County jurisdiction. The City of Tracy would be responsible for the intersection improvement, acquisition of right-of-way, , and the construction. However, the County of San Joaquin would need to approve the design and construction of proposed intersection improvements.*~~

~~SIGNIFICANCE AFTER MITIGATION~~

~~If the County approves the proposed improvements identified above, then this would be a less than significant impact. The intersection would operate at LOS C with 16 seconds of delay for the westbound approach during the PM peak hour and at LOS D with 25 seconds of delay for the eastbound approach during the Saturday peak hour as a side-street stop controlled intersection. If the intersection becomes signalized, it would operate at LOS B during the PM and Saturday peak hours, with 13 and 17 seconds of delay, respectively. However, at the time of preparation of this EIR, it is not known if the County would approve the intersection improvements identified above. Due to the fact that implementation of these measures is beyond the control of the City of Tracy, this impact is considered to be **significant and unavoidable**.~~

The following text changes are made on pages 3.12-24 and 3.12-25:

Impact 3.12-2: Project implementation would result in unacceptable levels of service at the intersection of Larch Road/Tracy Boulevard (Intersection #4) (~~Significant and Unavoidable~~Less than Significant with Mitigation)

The addition of project traffic would cause the intersection of Larch Road/Tracy Boulevard to degrade from LOS B to LOS F during the Saturday peak hour, as well as cause the intersection to meet the peak hour signal warrant. This is a **significant impact.**

MITIGATION MEASURES

Mitigation Measure 3.12-2*: The following mitigation measures would improve operations at the Larch Road/Tracy Boulevard intersection to an acceptable level:*

- *Install traffic signal and optimize signal timings during the PM and Saturday peak hour. Optimization of traffic signal timings shall include determination of green time allocation for each intersection approach relative to the approach traffic volumes.*

~~The study intersection is partially under San Joaquin County jurisdiction~~. The City of Tracy ~~would~~ shall be responsible for the intersection improvement, acquisition of right-of-way, and the construction of this improvement prior to full buildout of the Active Sports Park site. ~~However, the County of San Joaquin would need to approve the design and construction of proposed intersection improvements.~~

SIGNIFICANCE AFTER MITIGATION

~~If the County approves the proposed improvements identified above, then this would be a less than significant impact.~~ Upon implementation of MM 3.12-2 the intersection would operate at LOS B with 14 seconds of average delay during the PM peak hour and at LOS D with 42 seconds of average delay during the Saturday peak hour. Implementation of this mitigation measure would reduce this impact to a **less than significant** level. ~~However, at the time of preparation of this EIR, it is not known if the County would approve the intersection improvements identified above. Due to the fact that implementation of these measures is beyond the control of the City of Tracy, this impact is considered to be **significant and unavoidable**.~~

The following text changes are made on page 3.12-39:

Impact 3.12-~~9~~10: Under cumulative conditions project implementation would contribute to unacceptable levels of service at the intersection of Larch Road/Holly Drive (Intersection #8)(Less than Significant with Mitigation)

The eastbound approach of the intersection of Larch Road/Holly Drive would operate at LOS D during the PM peak hour and at LOS C during the Saturday peak hour under Cumulative No Project Conditions. With the addition of project traffic, the eastbound approach operates at LOS F. This is

a **significant impact** because the project would degrade the service level from LOS D to LOS F in the PM peak hour and LOS C to LOS F during the Saturday peak hour. The intersection also satisfies the peak hour signal warrant under Cumulative No Project and Plus Project Conditions.

MITIGATION MEASURES

Mitigation Measure 3.12-~~9~~10*: The following mitigation measures would improve operations at the Larch Road/Holly Drive intersection to an acceptable level:*

- *Install traffic signal and optimize signal timings during the PM and Saturday peak hour. Optimization of traffic signal timings shall include determination of green time allocation for each intersection approach relative to the approach traffic volumes.*

SIGNIFICANCE AFTER MITIGATION

~~The proposed project would fund its fair share of the improvements. The City of Tracy would be responsible for determining fair share responsibilities. The weekday PM and Saturday peak hour project traffic volume contributions at this intersection are:~~

	~~PM Peak Hour~~	~~Saturday Peak Hour~~
~~Existing Traffic~~	~~341~~	~~207~~
~~Project Traffic~~	~~83~~	~~145~~
~~Cumulative Background Growth~~	~~719~~	~~743~~

The City of Tracy shall implement this mitigation measure. Upon implementation of this measure, the intersection would operate at LOS A during the PM and at Saturday peak hours with 9 and 10 seconds of average delay, respectively. The implementation of MM 3.12-9 would reduce this cumulative impact to **less than significant**.

The following text changes are made on page 3.12-41:

Consultant Recommendation 6-3:

Maintain landscaping in areas near driveways and along major frontage streets to a height of less than 2 feet and tree braches trimmed to heights greater than ~~6~~ 8 feet to provide sight distance visibility for drivers.

3.13 UTILITIES

The following text changes are made to the second full paragraph on page 3.13-17 of the DEIR:

The recommended non-potable water supply to meet the non-potable water demand of 482 af/yr will initially be ~~untreated surface water diverted from Sugar Cut (which has historically and is currently being used to irrigate the project site)~~ groundwater pumped for a new well located on

the project site, and, in the future, tertiary-treated recycled water delivered from the City's wastewater treatment plant.

4.0 OTHER CEQA SECTIONS

The following text changes are made to Table 4.0-2 on page 4.0-3:

TABLE 4.0-2: APPROVED ~~AND~~/~~OR~~ PENDING/POTENTIAL FUTURE PROJECTS

PROJECT	*LOCATION*	*CHARACTERISTICS*	*STATUS*
Ellis Specific Plan	Located within the City's SOI, near the southwestern border of the City limits within the Ellis Specific Plan area.	• 321-acre project site • 2,250 residential units • Village Center • Open Space • 180,000 sq. ft. commercial space • Additional recreational amenities	Approved on Dec. 16, 2008
Altamont Motorsports Park	Located within the City's SOI, approximately 0.25 miles northeast of the Holly Sugar Sports park site. Project site is located on City-owned land.	• 3.7 mile road course for stockcars, sports cars, open wheel cars, kart and endurance racing • ½ mile dirt motocross course for motorcycle racing • 1 mile Dirt Rallycross course for off-road and 4x4 trucks and cars, motorcycles and buggies • 1/6 mile dirt bicycle course for BMX events	The City received a letter from the project proponent ~~applicant~~ on Nov. 7, 2008 requesting consideration of the project. Formal application has not been submitted.

SOURCE: CITY OF TRACY, 2009

The following text changes are made to the second full paragraph on page 4.0-11:

~~As further described under Impacts 3.12-7 through 3.12-11, the proposed project would have less than cumulatively considerable impacts on all other study roadways, intersections and freeway segments after implementation of the mitigation measures included in Section 3.12 of this EIR.~~

As described under Impacts 3.12-8 and 3.12-9 in the Recirculated Draft EIR, under cumulative conditions, the intersections of Eastbound I-205 ramp/Tracy Boulevard and Westbound I-205 ramp/Tracy Boulevard would operate at LOS F during the PM and Saturday peak hours under both Cumulative No Project and Cumulative Plus Project Conditions. These are significant impacts because the project would increase the overall intersection control delay by more than four seconds during the PM and Saturday peak hours for each intersection.

Mitigation Measure 3.12-8 and 3.12-9 in the Recirculated Draft EIR identify improvements that would reduce these impacts to a less than significant level. However, as described in greater detail in the Recirculated Draft EIR, these intersections are under the jurisdiction of Caltrans, and the City of Tracy cannot guarantee that the recommended improvements will be implemented. Therefore,

the project's contribution to these cumulative intersection impacts is considered **cumulatively considerable and significant and unavoidable.** There is no additional feasible mitigation available to reduce the significance of these impacts.

The following text changes are made on page 4.0-16:

- ~~Impact 3.12-1: Project implementation would result in unacceptable levels of service at the intersection of Larch Road/Corral Hollow Road (Intersection #1)~~
- Impact 3.12-3: Project implementation would result in unacceptable levels of service at the intersection of I-205 Westbound Ramps/Tracy Boulevard
- Impact 3.12-8: Under cumulative conditions project implementation would contribute to unacceptable levels of service at the intersection of Westbound I-205 ramp/Tracy Boulevard
- Impact 3.12-9: Under cumulative conditions project implementation would contribute to unacceptable levels of service at the intersection of Eastbound I-205 ramp/Tracy Boulevard

5.0 ALTERNATIVES

No changes were made to Section 5.0 of the DEIR.

This document is the Final Mitigation Monitoring and Reporting Program (FMMRP) for the Holly Sugar Sports Park project. This FMMRP has been prepared pursuant to Section 21081.6 of the California Public Resources Code, which requires public agencies to "adopt a reporting and monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." A FMMRP is required for the proposed project because the EIR has identified significant adverse impacts, and measures have been identified to mitigate those impacts.

The numbering of the individual mitigation measures follows the numbering sequence as found in the EIR, which were revised after the Recirculated Draft EIR was prepared. These numbering revisions are explained in Section 3 of the Final EIR. All revisions to mitigation measures that were necessary as a result of responding to public comments and incorporating staff-initiated revisions have been incorporated into this FMMRP.

4.1 MITIGATION MONITORING AND REPORTING PROGRAM

The FMMRP, as outlined in the following table, describes mitigation timing, monitoring responsibilities, and compliance verification responsibility for all mitigation measures identified in this Final EIR.

The City of Tracy will be the primary agency responsible for implementing the mitigation measures and will continue to monitor mitigation measures that are required to be implemented during the operation of the project.

The FMMRP is presented in tabular form on the following pages. The components of the FMMRP are described briefly below:

- **Mitigation Measures**: The mitigation measures are taken from the Draft EIR and the Recirculated Draft EIR, in the same order that they appear in the Draft EIR and Recirculated Draft EIR.
- **Mitigation Timing**: Identifies at which stage of the project mitigation must be completed.
- **Monitoring Responsibility**: Identifies the agency that is responsible for mitigation monitoring.
- **Compliance Verification**: This is a space that is available for the monitor to date and initial when the monitoring or mitigation implementation took place.

TABLE 4.0-1: MITIGATION MONITORING AND REPORTING PROGRAM

ENVIRONMENTAL IMPACT	*MITIGATION MEASURE*	*MONITORING RESPONSIBILITY*	*TIMING*	*VERIFICATION (DATE/INITIALS)*
AESTHETICS				
Impact 3.1-1: Project implementation may result in substantial adverse effects on scenic vistas and resources or substantial degradation of visual character.	*Mitigation Measure 3.1-1: The City shall install trees, vegetation and other landscaping to shield parking and maintenance areas that are visible from Tracy Boulevard and Corral Hollow Road to shield these uses from the roadways.*	City of Tracy	During construction of site improvements for the Active Sports Park site.	
Impact 3.1-2: Project implementation may result in light and glare impacts	*Mitigation Measure 3.1-2: A lighting plan shall be prepared prior to the installation of the project's lighting for each phase. The lighting plan shall demonstrate that the stadium and field 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;* • *Where it is not feasible to fully shield light fixtures from light pollution, such as the stadium lights, the lighting shall be directed downward and of the minimum wattage and height suitable for illuminating the playing surfaces and immediately surrounding areas.* • *Lighting for each playfield, parking area, and structure shall have control boxes that allow operation of specific areas of lighting in order to only illuminate the field(s) and parking area(s) in use at any given time.* • *Lights shall be turned off when the fields, parking areas, and structures are not in use.*	City of Tracy	Prior to the installation of on-site lighting for each phase of project development.	
AGRICULTURAL RESOURCES				
Impact 3.2-1: Project	*Mitigation Measure 3.2-1: Prior to site grading activities for each phase of*	City of Tracy	Prior to grading	

ENVIRONMENTAL IMPACT	*MITIGATION MEASURE*	*MONITORING RESPONSIBILITY*	*TIMING*	*VERIFICATION (DATE/INITIALS)*
implementation would result in the conversion of Farmlands, including Prime Farmland, Unique Farmland, and Farmland of Statewide Importance, to non-agricultural uses.	*project construction, the City shall determine and pay the appropriate Agricultural Mitigation Fee to offset the loss of Unique Farmland, as specified in Chapter 13.28 of the Tracy Municipal Code.*		activities for each phase of project development.	
Impact 3.2-2: Project implementation may conflict with existing zoning for agricultural use or a Williamson Act Contract or otherwise result in land use conflicts with adjacent agricultural lands, which may lead to the indirect conversion of agricultural lands to non-agricultural uses.	*Mitigation Measure 3.2-2: The City of Tracy shall enact measures to reduce the potential for park users to enter into the agricultural lands located north of the project site. Such measures may include, but are not limited to:* • *Permanent or temporary barrier fencing;* • *Signage indicating that trespassing is prohibited; or* • *Restricted access to the existing irrigation canals that currently separate the project site from lands to the north.* *Mitigation Measure 3.2-3: The project shall include a 50-foot buffer to physically separate the facility from directly adjacent agricultural uses that may pose compatibility problems for land applications of herbicides and pesticides. The 50-foot buffer shall be measured from the edge of the proposed playing fields within the sports park to the edge of active agricultural operations within the adjacent parcels.* *Mitigation Measure 3.2-4: The City shall coordinate with landowners and operators of adjacent agricultural parcels to ensure that the application of pesticides and fertilizers on adjacent agricultural lands does not occur during the organized use of the Holly Sugar Sports Park. Such coordination measures may include, but are not limited to:* • *The development of a regular timeframe when sports activities are not scheduled to occur, which would be suitable times for the application of pesticides and fertilizers on adjacent properties (i.e. weekday mornings during the non-summer months). This timeframe should be developed cooperatively with adjacent agricultural land owners. Pre-notification to adjacent agricultural operations by phone, mail or email prior to holding organized sporting events.*	City of Tracy	The 50-foot buffer shall be incorporated into the site plan prior to final design approval. Barrier fencing shall be maintained throughout the operational life of the project. Coordination with adjacent agricultural operations shall occur throughout the operational life of the project.	

ENVIRONMENTAL IMPACT	*MITIGATION MEASURE*	*MONITORING RESPONSIBILITY*	*TIMING*	*VERIFICATION (DATE/INITIALS)*
	• *The City of Tracy, or operator contracted to operate the sports park facility, should distribute additional notice of scheduled games added during the year that are known in advance.*			
AIR QUALITY				
Impact 3.3-1: Construction of the proposed project would result in temporary dust and vehicle emission impacts in the project vicinity during site preparation and construction activities.	*Mitigation Measure 3.3-1: 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 City of Tracy shall ensure that all required permits from the SJVAPCD have been issued prior to commencement of grading activities. The construction emissions reduction plan should include the following requirements and measures:* • *Properly and routinely maintain all construction equipment, as recommended by manufacturer's manuals, to control exhaust emissions.* • *Shut down equipment when not in use for extended periods of time, to reduce exhaust emissions associated with idling engines.* • *Encourage ride-sharing and of use transit transportation for construction employees commuting to the project site.* • *Use electric equipment for construction whenever possible in lieu of fossil fuel-powered equipment.* • *Curtail construction during period of high ambient pollutant concentrations.* • *Construction equipment shall operate no longer than eight cumulative hours per day.* • *All construction vehicles shall be equipped with proper emission control equipment and kept in good and proper running order to reduce NOx emissions.* • *On-road and off-road diesel equipment shall use aqueous diesel fuel if permitted under manufacturer's guidelines.* • *On-road and off-road diesel equipment shall use diesel particulate*	San Joaquin Valley Air Pollution Control District (SJVAPCD)	Prior to the grading activities and throughout all grading and construction activities for all phases of project construction.	

ENVIRONMENTAL IMPACT	*MITIGATION MEASURE*	*MONITORING RESPONSIBILITY*	*TIMING*	*VERIFICATION (DATE/INITIALS)*
	filters if permitted under manufacturer's guidelines. • *On-road and off-road diesel equipment shall use cooled exhaust gas recirculation (EGR) if permitted under manufacturer's guidelines.* • *Use of Caterpillar pre-chamber diesel engines or equivalent shall be utilized if economic and available to reduce NOx emissions.* • *All construction activities within the project site shall be discontinued during the first stage smog alerts.* • *Construction and grading activities shall not be allowed during first stage ozone alerts. (First stage ozone alerts are declared when ozone levels exceed 0.20 ppm for the 1-hour average.)* *Implementation of this mitigation shall occur during all grading or site clearing activities. The SJVAPCD shall be responsible for monitoring.* *Mitigation Measure 3.3-2: The following mitigation measures, in addition to those required under Regulation VIII of the SJVAPCD, shall be implemented by the City's contractor during all phases of project grading and construction to reduce fugitive dust emissions:* • *Water previously disturbed exposed surfaces (soil) a minimum of three-times/day or whenever visible dust is capable of drifting from the site or approaches 20 percent opacity.* • *Water all haul roads (unpaved) a minimum of three-times/day or whenever visible dust is capable of drifting from the site or approaches 20 percent opacity.* • *All access roads and parking areas shall be covered with asphalt-concrete paving or water sprayed regularly.* • *Dust from all on-site and off-site unpaved access roads shall be effectively stabilized by applying water or using a chemical stabilizer or suppressant.* • *Reduce speed on unpaved roads to less than 15 miles per hour.* • *Install and maintain a trackout control device that meets the specifications of SJVAPCD Rule 8041 if the site exceeds 150 vehicle trips per day or more than 20 vehicle trips be day by vehicles with three or more axles.*			

ENVIRONMENTAL IMPACT	*MITIGATION MEASURE*	*MONITORING RESPONSIBILITY*	*TIMING*	*VERIFICATION (DATE/INITIALS)*
	• *Stabilize all disturbed areas, including storage piles, which are not being actively utilized for construction purposes using water, chemical stabilizers or by covering with a tarp, other suitable cover or vegetative ground cover.* • *Control fugitive dust emissions during land clearing, grubbing, scraping, excavation, leveling, grading or cut and fill operations with application of water or by presoaking.* • *When transporting materials offsite, maintain a freeboard limit of at least six inches and over or effectively wet to limit visible dust emissions.* • *Limit and remove the accumulation of mud and/or dirt from adjacent public roadways at the end of each workday. (Use of dry rotary brushes is prohibited except when preceded or accompanied by sufficient wetting to limit visible dust emissions and the use of blowers is expressly forbidden.)* • *Remove visible track-out from the site at the end of each workday.* • *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.*			
Impact 3.3-2: Project implementation may conflict with, or obstruct, the applicable air quality plan, cause a violation of air quality standards, contribute substantially to an existing air quality violation, or result in a cumulatively considerable net increase of a criteria pollutant in a non-attainment area.	*Mitigation Measure 3.3-3: Prior to the award of the contract to construct the project, the City of Tracy shall coordinate with the SJVAPCD to verify that the project meets 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 City shall coordinate with SJVAPCD to develop measures and strategies*	City of Tracy and the SJVAPCD	Prior to grading and construction activities for all stages of project construction.	

ENVIRONMENTAL IMPACT	*MITIGATION MEASURE*	*MONITORING RESPONSIBILITY*	*TIMING*	*VERIFICATION (DATE/INITIALS)*
	to reduce operational emissions from the proposed project. If feasible measures are not available to meet the emissions reductions targets outlined above, then the City 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 City shall coordinate with the SJVAPCD to calculate the amount of the fees required to off-set project impacts.			
Impact 3.3.6 Project implementation could result in cumulative effects on climate change and global warming.	*Mitigation Measure 3.3-4: As operation of the Holly Sugar Sports Park commences, the City should assess the demand for a route stop by the City-operated Tracer bus system. The demand for such a route stop should continue to be monitored, until such time that a route stop is considered justified. Once a route stop is justified, the City should arrange for the Holly Sugar Sports Park site to be included as a route stop by the City-operated Tracer bus system. The City shall be responsible for monitoring the implementation of this measure.*	City of Tracy	Ongoing throughout all stages of project operation.	
BIOLOGICAL RESOURCES				
Impact 3.4-3: Project implementation may result in direct or indirect effects on special-status bird species..	*Mitigation Measure 3.4-1: The City of Tracy shall comply with measures contained within the SJMSCP and shall consult with SJCOG biologists and the TAC prior to any site disturbing activities. The City shall implement the requirements of the SJMSCP to ensure that impacts to burrowing owls are avoided. The details of the avoidance measures shall be dictated by the TAC, and may include the following:* • *To the extent feasible, construction should be planned to avoid the burrowing owl breeding season.* • *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)* • *During the breeding season (February 1 through August 31) occupied burrows shall not be disturbed and shall be provided with a 75 meter protective buffer until and unless the 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*	City of Tracy and the San Joaquin Council of Governments (SJCOG)	Prior to grading and construction activities for all stages of project construction.	

ENVIRONMENTAL IMPACT	*MITIGATION MEASURE*	*MONITORING RESPONSIBILITY*	*TIMING*	*VERIFICATION (DATE/INITIALS)*
	independent survival. Once the fledglings are capable of independent survival, the burrow can be destroyed. *Implementation of this mitigation shall occur prior to grading or site clearing activities. The City of Tracy shall be responsible for monitoring and a qualified biologist shall conduct surveys and relocate owls as required.*			
Impact 3.4-5: Project implementation may result in direct or indirect effects on special-status plant species.	*Mitigation Measure 3.4-2: Prior to any activities that would result in disturbance to the irrigation ditches, the City shall consult with the SJCOG TAC to determine the appropriate mitigation measures that must be implemented to comply with requirements of the SJMSCP and avoid impacts to special status plant species. If it is determined that the irrigation ditches contain special status plants that are covered by the SJMSCP, the City shall secure an authorization for an incidental take by remitting all appropriate fees to the San Joaquin Council of Governments and incorporating all Incidental Take Minimization Measures into the project design and construction phase. If it is determined that the irrigation ditches contain special status plants that are not covered by the SJMSCP, the City shall either avoid the project area, or seek consultation with the appropriate regulatory agency (CDFG or USFWS) for the appropriate permits and mitigation measures. If it is determined that the irrigation ditches do not contain special status plants then no additional action is necessary.* *Implementation of this mitigation shall occur prior to grading or site clearing activities. The City of Tracy shall be responsible for monitoring and a qualified botanist shall conduct surveys as required.*	City of Tracy and the SJCOG	Prior to any grading or other site disturbing activities.	
Impact 3.4-8: Project implementation may result in adverse effects on protected wetlands through direct removal, filling, hydrological interruption, or other means.	*Mitigation Measure 3.4-3: Prior to any activities that would result in removal, fill, or hydrologic interruption of the irrigation ditches, a formal wetland delineation shall be performed by a qualified biologist and submitted to the USACE for verification. If the USACE determines that the irrigation ditches are jurisdictional and that the project activities would result in a fill, the City shall secure an authorization of the fill through the Section 404 permit process.* *Mitigation Measure 3.4-4: Prior to any activities that would result in removal, fill, or hydrologic interruption of the irrigation ditches, the City shall consult with the CDFG to determine if the activities are subject to Section 1601 of the Fish and Game Code. If the CDFG determines that the project activities are subject to these regulations, the City shall secure an*	City of Tracy	Prior to any activities that would result in removal, fill, or hydrologic interruption of the irrigation ditches.	

ENVIRONMENTAL IMPACT	*MITIGATION MEASURE*	*MONITORING RESPONSIBILITY*	*TIMING*	*VERIFICATION (DATE/INITIALS)*
	authorization of the activities through a Streambed Alteration Agreement.			
CULTURAL RESOURCES				
Impact 3.5-1: Project implementation may cause a substantial adverse change to a significant historical or archaeological resource, or directly or indirectly destroy or disturb a unique paleontological resource or human remains.	*Mitigation Measure 3.5-1: If any prehistoric or historic artifacts, or other indications of archaeological 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.*	City of Tracy	During all stages of project grading and construction activities.	
GEOLOGY AND SOILS				
Impact 3.6-3: The proposed project would be located on a geologic unit or soil that is unstable, or that would become unstable as a result of project	*Mitigation Measure 3.6-1: In accordance with the California Building Code (Title 24, Part 2) Section 18O4A.3 and A.5, and the requirements of Tracy General Plan Objective SA-1.1, Policy 1, liquefaction and seismic settlement potential shall be addressed in the design level geotechnical engineering investigations. The City's Building Division of the Development and*	City of Tracy	Prior to issuance of Building Permits.	

ENVIRONMENTAL IMPACT	*MITIGATION MEASURE*	*MONITORING RESPONSIBILITY*	*TIMING*	*VERIFICATION (DATE/INITIALS)*
implementation, and potentially result in liquefaction.	*Engineering Services Department shall ensure that all the pertinent sections of the California Building Code shall be adhered to in the construction of buildings and stadiums on site, and that all appropriate measures are implemented in order to reduce the risk of liquefaction and seismic settlement prior to the issuance of a Building Permit.*			
Impact 3.6-4: The proposed project would be located on expansive soil creating substantial risks to life or property	*Mitigation Measure 3.6-2: During excavation activities and prior to the placement of fill on the site, a certified geotechnical engineer shall be retained by the City to evaluate subgrade soils for the extent of their expansive potential in areas where buildings or stadium seating are proposed. For areas found to contain soft, potentially expansive clays, the soil shall be removed (i.e., over excavated) and/or stabilized prior to the placement and compaction of fill. Stabilization techniques include, but are not limited to, the placement of 18 inches of ½-inch to ¾-inch crushed rock over stabilization fabric (such as Mirafi 500X or equivalent), placement of larger, angular stabilization rock (1-inch to 3-inch, clean) and use of chemical treatments such as lime to reduce the soil's expansive potential. In addition, building construction alternatives, such as the use of alternative foundation types (i.e., post-tension, piles, etc.) versus end-bearing foundations, shall be considered and implemented where appropriate. Final techniques shall be (a) developed by a certified geotechnical engineer or engineering geologist and (b) reviewed and approved by the City prior to issuance of building permits for each stage of project construction.*	City of Tracy	During excavation activities and prior to the placement of fill on the site.	
HAZARDS AND HAZARDOUS MATERIALS				
Impact 3.7-1: Project implementation could result in impacts from the transport, use, disposal, release, emission, or handling of hazardous materials, or from being included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.	*Mitigation Measure 3.7-1: All wells located on the project site shall be properly abandoned under the San Joaquin County guidelines if they will not be used any longer. Prior to any grading activities, the City shall sample and test the soils for possible persistent pesticide residuals.*	City of Tracy and San Joaquin County	Prior to the abandonment of any on-site wells.	
Impact 3.7-4: Project implementation may expose people or structures to a risk of	*Mitigation Measure 3.7-2: The City shall ensure that the Passive Recreation Area is mowed on a regular basis in order to maintain a 4-inch mow-height of the vegetation within 50 feet of the adjacent residential parcels to the*	City of Tracy	Throughout all stages of project	

ENVIRONMENTAL IMPACT	*MITIGATION MEASURE*	*MONITORING RESPONSIBILITY*	*TIMING*	*VERIFICATION (DATE/INITIALS)*
loss, injury or death from wildland fires.	*south of the project site. The mowing schedule and maintenance of the fire break shall be coordinated with, and approved by the Tracy Fire Department. The City shall also ensure that the Passive Recreation Area remains accessible to emergency vehicles.*		operation throughout the life of the project.	
HYDROLOGY AND WATER QUALITY				
Impact 3.8-1: Implementation of the project may significantly increase storm water runoff rates generated within the project site when compared with existing conditions	*Mitigation Measure 3.8-1: Prior to ground disturbing activities, the City of Tracy shall prepare a detailed site drainage and stormwater detention plan. The Plan shall include calculations regarding the anticipated volume of stormwater runoff generated by the project, and shall include plans for the retention/detention of stormwater runoff on the project site. Calculations shall be consistent with the current version of the City's Manual of Stormwater Quality Control Standards for New Development and Redevelopment. The stormwater detention facilities shall be designed with adequate capacity to ensure that that stormwater generated on the project site during a peak storm event is retained at a rate that will ensure that discharges from the site do not exceed pre-construction levels. All detention facilities shall be developed in conformance with the City's standards, including the standards identified in the City's Manual of Stormwater Quality Control Standards for New Development and Redevelopment. The Plans and Specifications of the proposed retention facilities should meet the standards of the City of Tracy Development and Engineering Services Department as an adequate engineering product.* *The construction of stormwater detention facilities may be phased to correspond with development of the project site over time, provided that adequate detention is provided at all times to ensure that runoff from the site does not exceed pre-construction levels.*	City of Tracy	Prior to ground disturbing activities.	
Impact 3.8-2: Implementation of the project would introduce constituents and pollutants typically associated with urban development into storm water runoff generated within the project site, which may impact surface water quality in the project area.	*Mitigation Measure 3.8-2: Construction: The City shall ensure that the development of the project site shall incorporate the construction of one or more on-site retention basins to capture site runoff in conformance with City Design Standards as described in MM 3.8-1. In addition, site construction and maintenance practices shall adhere to any and all applicable provisions and ordinances resulting from the City's implementation of its SWMP, to the extent to which they exist at the time of construction and/or maintenance activities. The following list is intended as an outline summary and the City may impose additional requirements:* • *Non-Structural BMPs*	City of Tracy	Plans shall be prepared prior to any grading or construction activities. BMPs and site cleaning activities shall be maintained throughout the	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	• *Minimizing Disturbance* • *Preserving Natural Vegetation (where possible)* • *Good Housekeeping, e.g., daily clean-up of construction site* • *Structural BMPs* • *Erosion Controls* • *Mulch* • *Grass* • *Stockpile Covers* • *Sediment Controls* • *Silt Fence* • *Inlet Protection* • *Check Dams* • *Stabilized Construction Entrances* • *Sediment Traps* *Mitigation Measure 3.8-3: Post-Construction: The project 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 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. Best Management Practices shall be selected from the City's Manual of Stormwater Quality Control Standards for New Development and Redevelopment according to site requirements and shall be subject to approval by the City Engineer and Central Valley RWQCB.* *At least 85 to 90 percent of annual average stormwater runoff from the site shall be treated per the standards in the 1003 California Stormwater Best Management Practice New Development and Redevelopment Handbook. Drainage from all paved surfaces, including streets, parking lots, driveways,*		operational life of the project.	

ENVIRONMENTAL IMPACT	*MITIGATION MEASURE*	*MONITORING RESPONSIBILITY*	*TIMING*	*VERIFICATION (DATE/INITIALS)*
	and roofs shall be routed either through swales, buffer strips, or sand filters or treated with a filtering system prior to discharge to the storm drain system. Landscaping shall be designed to effect some treatment, along with the use of a Stormwater Management filter to permanently sequester hydrocarbons, if necessary. Roofs shall be designed with down spouting into landscaped areas, bubbleups, or trenches. Driveways shall be curbed into landscaping so runoff drains first into the landscaping. Permeable pavers and pavement shall be utilized to construct the facilities, where appropriate. *Mitigation Measure 3.8-4: Post-Construction: :After project completion, the City or successor shall properly maintain parking lots and other paved areas, by sweeping or other appropriate means, to prevent the majority of litter from washing into storm drains.*			
Impact 3.8-3: Implementation of the project would place new structures within the 100-year floodplain.	*Mitigation Measure 3.8-5: Design of the project shall be consistent with the requirements of Chapter 9.52, Floodplain Regulations, of the Municipal Ordinance. Project design is anticipated to include the following:* • *All structures are required to be one foot above the base flood as determined by the appropriate FEMA FIRM Map.* • *Soils suitable for building pad construction (as determined by a qualified engineer), shall be imported to the project site as-needed in order to ensure that all building and structure pads are elevated to levels necessary to meet City requirements.*	City of Tracy	Prior to design approval.	
NOISE				
Impact 3.10-1: Short-term construction-generated noise levels associated with the proposed project could result in a substantial temporary increase in ambient noise levels at nearby noise-sensitive land uses. Short-term increases in ambient noise levels may result in increased levels of annoyance and activity interference at nearby noise-sensitive land uses.	*Mitigation Measure 3.10-1: The following mitigation measures shall be implemented:* *a) Construction activities (excluding activities that would result in a safety concern to the public or construction workers) shall be limited to between the hours of 7:00 a.m. and 7:00 p.m. Construction activities shall be prohibited on Sundays and federal holidays.* *b) Construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations.* *c) Construction equipment staging areas shall be located at the furthest*	City of Tracy	During all grading and construction activities throughout all stages of site development.	

ENVIRONMENTAL IMPACT	*MITIGATION MEASURE*	*MONITORING RESPONSIBILITY*	*TIMING*	*VERIFICATION (DATE/INITIALS)*
	distance possible from nearby noise-sensitive land uses.			
Impact 3.10-2: Noise associated with the proposed onsite recreational uses would exceed applicable noise standards at nearby residential land uses.	*Mitigation Measure 3.10-2: The following mitigation measures shall be implemented:* *a) Prior to the issuance of an electrical permit for an public address systems proposed for playing fields within the project site, the City of Tracy shall test the sound system to ensure that it does not generate noise levels in excess of 75dB Leq at the property lines.* *b) Onsite exterior recreational activities shall be limited to between the hours of 7:00 a.m. and 10:00 p.m.* *c) Landscape maintenance activities shall be limited to between the hours of 7:00 a.m. and 10:00 p.m., Monday through Saturday. Landscape maintenance activities shall be prohibited on Sundays and federal holidays.*	City of Tracy	Prior to issuance of an electrical permit for the public address system. Hours of operation restrictions shall apply throughout the operational life of the project.	
Impact 3.10-5: Projected on-site transportation noise levels at proposed on-site recreational uses would not exceed the City's "normally acceptable" noise exposure standards for land use compatibility. However, depending on final site design of the proposed future expansion area, it is conceivable that noise sensitive land uses, such as a potential library, could be located within the projected future 60 dBA CNEL/L_{dn} noise contour of Corral Hollow Road, which would exceed the City's "normally acceptable" noise criteria for land use compatibility.	*Mitigation Measure 3.10-5: The following mitigation measures shall be implemented:* *a) Noise sensitive uses, such as a library, shall be located in excess of 70 feet from the roadway centerline of Corral Hollow Road; or,* *Future noise sensitive land uses, such as a library, shall be designed to ensure that predicted background interior noise levels would not exceed a "normally acceptable" interior noise level of 45 dBA CNEL/L_{dn}.*	City of Tracy	Prior to the construction of on-site noise sensitive uses (i.e., library).	

ENVIRONMENTAL IMPACT	*MITIGATION MEASURE*	*MONITORING RESPONSIBILITY*	*TIMING*	*VERIFICATION (DATE/INITIALS)*
PUBLIC SERVICES				
Impact 3.11-1: Implementation of the proposed project would not result in impacts to fire protection services and would not require the construction of new fire protection facilities.	*Mitigation Measure 3.11-1: Prior to City approval of the final infrastructure plans and construction documents for the Holly Sugar Sports Park, the City shall include the location and specifications of all fire hydrants, to the satisfaction of the Tracy Fire Department. The final infrastructure plans and construction documents for the project shall include hydrants with adequate fire-flow that are spaced appropriately throughout the project site, to the satisfaction of the Tracy Fire Department.*	City of Tracy	Prior to approval of final infrastructure plans. Improvements noted on all construction documents	
TRANSPORTATION AND CIRCULATION				
Impact 3.12-2: Project implementation would result in unacceptable levels of service at the intersection of Larch Road/Tracy Boulevard (Intersection #4).	*Mitigation Measure 3.12-2: The following mitigation measures would improve operations at the Larch Road/Tracy Boulevard intersection to an acceptable level:* • *Install traffic signal and optimize signal timings during the PM and Saturday peak hour. Optimization of traffic signal timings shall include determination of green time allocation for each intersection approach relative to the approach traffic volumes.* *The City of Tracy shall be responsible for the intersection improvement, acquisition of right-of-way, and the construction of this improvement.*	City of Tracy	Prior to completion of the Active Sports Park site.	
Impact 3.12-3: Project implementation would result in unacceptable levels of service at the intersection of I-205 Westbound Ramps/Tracy Boulevard (Intersection #5)	*Mitigation Measure 3.12-3: The following mitigation measures would improve operations at the I-205 westbound Ramps/Tracy Boulevard intersection to an acceptable level:* • *Widen westbound approach to provide one shared through/right-turn/left-turn lane and one right-turn lane.* • *Optimize signal timings.* *The study intersection is under the exclusive jurisdiction of Caltrans (Streets and Highways Code, Section 90). As such, the City intends on making a finding that these mitigation measures can and should be adopted by Caltrans. Additionally, the City is not aware of any plan, enforceable by the City, that would insure funding of these mitigation measures.*	Caltrans	Prior to completion of the Active Sports Park site.	

ENVIRONMENTAL IMPACT	*MITIGATION MEASURE*	*MONITORING RESPONSIBILITY*	*TIMING*	*VERIFICATION (DATE/INITIALS)*
Impact 3.12-6: Under cumulative conditions project implementation would contribute to unacceptable levels of service at the intersection of Larch Road/Corral Hollow Road (Intersection #1).	*Mitigation Measure 3.12-5: The following mitigation measures would improve operations at the Larch Road/Corral Hollow Road intersection to an acceptable level:* *Provide intersection improvements needed to accommodate cumulative background growth; these improvements are listed in Table 3.12-18. The addition of project traffic would not require additional improvements, aside from those listed in Table 3.12-18, to meet the LOS D standard.*	City of Tracy	Prior to buildout of the Future Expansion Area.	
Impact 3.12-7: Under cumulative conditions project implementation would contribute to unacceptable levels of service at the intersection of Larch Road/Tracy Boulevard (Intersection #4).	*Mitigation Measure 3.12-7: The following mitigation measures would improve operations at the Larch Road/Tracy Boulevard intersection to an acceptable level:* • *Provide intersection improvements needed to accommodate cumulative background growth; these improvements are listed in Table 3.12-18. The addition of project traffic would require additional improvements, aside from those listed in Table 3.12-18, to meet the LOS D standard:* o *Widen the eastbound approach to provide one left-turn lane, two through lanes with a 400 foot receiving/acceleration lane on eastbound Larch Road, and a free-right turn lane.* o *Widen the northbound approach to provide two left-turn lanes, two through lanes with a 400 foot receiving/acceleration lane on northbound Tracy Boulevard, and a right-turn lane.* o *Optimize signal timings.*	City of Tracy	Prior to buildout of the Future Expansion Area.	
Impact 3.12-8: Under cumulative conditions project implementation would contribute to unacceptable levels of service at the intersection of I-205 Westbound Ramps/Tracy Boulevard (Intersection #5).	*Mitigation Measure 3.12-8: The following mitigation measures would improve operations at the I-205 westbound Ramps/Tracy Boulevard intersection to an acceptable level:* • *Widen northbound approach to provide a second left-turn lane.* • *Widen westbound approach to provide one shared through/left-turn lane and one free right-turn lane with a receiving/acceleration lane greater than 100 feet in length on northbound Tracy Boulevard.* • *Optimize signal timings.*	Caltrans	Prior to buildout of the Future Expansion Area.	

ENVIRONMENTAL IMPACT	*MITIGATION MEASURE*	*MONITORING RESPONSIBILITY*	*TIMING*	*VERIFICATION (DATE/INITIALS)*
Impact 3.12-9: Under cumulative conditions project implementation would contribute to unacceptable levels of service at the I-205 Eastbound Ramps/Tracy Boulevard (Intersection #6).	*Mitigation Measure 3.12-9: The following mitigation measures would improve operations at the I-205 eastbound Ramps/Tracy Boulevard intersection to an acceptable level:* • *Widen northbound approach to provide two through lanes and a right-turn lane.* • *Widen southbound approach to provide two through lanes and two left-turn lanes.* • *Widen eastbound approach to provide one left-turn lane, one shared right-through lane, and one right-turn lane.* • *Optimize signal timings.*	Caltrans	Prior to buildout of the Future Expansion Area.	
Impact 3.12-15: The proposed project does not include plans for pedestrian and bicycle access.	*Mitigation Measure 3.12-15: The following mitigation measures would improve pedestrian and bicycle access to the project site:* • *When roadway improvements are made to the frontage on Tracy Boulevard and Corral Hollow that extend to Larch Road, the City shall provide sidewalks along project site as funding becomes available. In addition, pedestrian access points that provide direct access to the active sports park, future expansion area, and the passive-recreation area should be provided on Tracy Boulevard and Corral Hollow Road.* • *The City shall provide a Class III bike route along Tracy Boulevard that would connect to the planned Class III bike route at Clover Road when that bike route is constructed in the future. The recommended Class III route would also provide access to the existing Class III route on Larch Road, east of Tracy Boulevard.* • *The City shall provide bicycle parking spaces at each of the surface parking lots that equate to five percent of the number of provided vehicle parking spaces. Overall, the site should provide a total of at least 147 bicycle parking spaces. Bicycle parking stalls should conform to City Code design standards and should be located near the sport field facilities.*	City of Tracy	Sidewalks shall be constructed concurrent with improvements to the frontage on Tracy Boulevard and Corral Hollow Road. Bicycle parking shall be installed during parking lot construction for all phases of project development.	

ENVIRONMENTAL IMPACT	*MITIGATION MEASURE*	*MONITORING RESPONSIBILITY*	*TIMING*	*VERIFICATION (DATE/INITIALS)*
Impact 3.12-17: Construction traffic may result in temporary impacts to roadway and intersection operations.	*Mitigation Measure 3.12-17: The following mitigation measures would reduce impacts from construction related traffic:* *The City shall require the preparation and implementation of construction traffic management plans for the proposed project. The construction traffic management plans should include the following items:* • *A map documenting material and equipment staging and storage locations for all phases of construction* • *A map documenting worker parking locations for all phases of construction* • *A construction schedule that outlines days and hours of construction to limit noise impacts* • *Signage plans relating to any temporary lane closures on public streets* • *Notification procedures for adjacent businesses, residents, and public safety personnel for all major deliveries, detours, and street closures that will affect traffic in the vicinity of the development* • *Provisions for monitoring surface streets designated as truck routes so that any damage and debris attributed to the trucks can be identified and corrected* • *Signage plans documenting any detours for bicycle and pedestrian traffic* *Additionally, all staging and parking related to construction shall take place on-site. The City should also water down the site to reduce dust due to construction vehicles. The City will develop a construction management plan prior to any construction activities on-site.*	City of Tracy	Prior to construction activities for all phases of project development.	

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