

MEMORANDUM

To: **Tina Wehrmeister**
Senior Manager, Land Use & Entitlements
Kaiser Foundation Health Plan, Inc.

From: **Elizabeth Chau, PE**
Kimley-Horn and Associates, Inc.

Date: June 2, 2025

Subject: Kaiser Manteca ED Expansion – Transportation Evaluation – Manteca, CA

This memorandum discusses the results of a transportation evaluation of a proposed emergency department (ED) expansion (the “Project”) at the existing Kaiser Permanente Medical Center (“Kaiser Manteca”) located at 1777 W. Yosemite Avenue in the City of Manteca (the “City”), California. The “Project Site” is defined in the Initial Study/Mitigated Negative Declaration (IS MND) to be located on the northwest corner of W. Yosemite Avenue and St. Dominics Drive and is bound by the Manteca Park Golf Course to the north; a leased Kaiser Permanente medical office building and vacant land entitled for apartment use to the east; W. Yosemite Avenue to the south; and residential and vacant land uses to the west. Within the Project Site, the Project would construct a new 27,450 square-foot emergency department building in what is defined as the “Site Development Area.”. The new building would replace an existing 4,000 square-foot emergency department space within the hospital, which is planned to be renovated with imaging and support space for a separate tenant improvement project. The Site Development Area would have a total of four access points, including three unsignalized driveways on W. Yosemite Avenue and one unsignalized driveway on St. Dominics Drive.

The transportation evaluation discusses the Project’s potential transportation impacts in accordance with California Environmental Quality Act (CEQA) guidelines, including checking for consistency with local programs, plans, ordinances, and policies; vehicle miles traveled (VMT) impacts; a substantial increase in hazards related to geometric design of the Project; and inadequate emergency access.

The transportation evaluation concludes the following:

1. The Project **would not** conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
2. The Project **would not** conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).
3. The Project **would not** substantially increase hazards due to a geometric design feature (e.g., sharp curve or dangerous intersections) or incompatible uses (e.g., farm equipment).
4. The Project **would not** result in inadequate emergency access.

Background

Figure 1 shows the Site Development Area at 1777 W. Yosemite Avenue in Manteca, California. The Site Development Area is surrounded by the existing medical campus to the north and east and mostly undeveloped land to the south and west.

Site plans of the Site Development Area and the Project Site are available in **Attachment A** and **Attachment B**, respectively. Kaiser Permanente proposes to construct an approximately 27,450 square-foot ED expansion to its existing hospital facility. The expanded ED would be located to the south of the existing hospital, parallel to W. Yosemite Avenue. The ED expansion would include 34 treatment bays, a relocated ambulance drop-off on W. Yosemite Avenue, a new walk-in emergency waiting area and drop-off with access from St. Dominics Drive, a new magnetic resonance imaging (MRI) imaging trailer, and a relocated existing computed tomography (CT) trailer. In addition, the current 4,000 square-foot, 11-bay ED would be renovated to include additional imaging and support space as part of a separate tenant improvement project after completion of the Project. The Site Development Area will have a total of four access points, including three unsignalized driveways on W. Yosemite Avenue and one unsignalized driveway on St. Dominics Drive.

In addition, the Project will construct several Offsite Improvements, including a raised median with bicycle lanes along the Site Development Area’s frontage with W. Yosemite Avenue, signalization of W. Yosemite Avenue & St. Dominics, the construction of the Center Street extension through the Project Site, and extensions of St. Dominics Drive and West Project Driveway north to the Center Street extension.



Figure 1. Site Development Area Location

CEQA Analysis

Per the State CEQA Guidelines (also known as “Appendix G”) and the City’s CEQA Transportation Thresholds, the Project would have significant transportation related impact if it would:

1. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
2. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curve or dangerous intersections) or incompatible uses (e.g., farm equipment).
4. Result in inadequate emergency access.

Each of the items above are discussed below.

Conflict with a Transportation Program, Plan, Ordinance, or Policy

The Project would have a significant impact if it would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The following are applicable regulations, plans, and standards for the Project:

1. City of Manteca:
 - a. General Plan Circulation Element
 - b. Active Transportation Plan
 - c. Local Road Safety Plan
2. Department of Transportation Standards, Guidelines, and Resources

City General Plan Circulation Element

The Circulation element of the general plan provides framework for Manteca’s transportation system which includes roadway, pedestrian, bicycle, and transit. Relevant adopted goals and polices are listed below:

Goal C-1 Provide for a complete multimodal circulation system design for the safe, balanced movements of all users, including children, persons with disabilities, seniors, and underserved populations and goods and services to destinations inside and outside of Manteca while minimizing VMT and public costs to build and maintain the system.

- **Policy C-1.1:** Strive to balance levels of service (LOS) for all modes (vehicles, transit, bicycle, and pedestrians) to maintain a high level of access and mobility, while developing a safe, complete, and efficient circulation system. The impact of new development and land uses proposal on VMT, LOS, and accessibility for all modes should be considered in the review process.
- **Policy C-1.2:** To the extents feasible, strive for a vehicular LOS of D or better during the weekday AM and PM peak hours at all streets and intersections, except in the Downtown area in accordance with Policy C-1.3

Goal C-2 Provide a safe, high-quality, climate-resilient transportation system that addresses all modes of travel and includes attractive streetscapes with native and drought-resistant landscaping, street trees, planted beams, and landscaped medians.

- **Policy C-2.1:** Promote development of a future roadway system as shown in the Major Streets Master Plan, Figure C-1, with streets designed in accordance with the City's standards plans to provide multiple, direct, and convenient routes for all modes, and to provide high-volume, multi-lane facilities with access controls, as needed, to preserve the through traffic carrying capacity of the facility.
- **Policy C-2.3:** Require new development to pay a fair share of the costs of street and other transportation improvements based on impacts in conformance with the goals and policies established in this Circulation Element and the Public Facilities Implementation Program (PFIP).
- **Policy C-2.19:** Prohibit the creation of traffic, bicycle, and pedestrian hazards and conflicts with vehicular traffic movements in new development, infill development, and redevelopment areas and pursue opportunities to improve conditions where there are existing conflicts to ensure that the pedestrian and bicycle network provides a direct and convenient route equal to or greater than vehicular routes in new development, infill, and redevelopment areas.
- **Policy C-2.20:** Ensure there are adequate corner sight distances appropriate for the speed and type of facility, including intersections of city streets and private access drives and roadways.

Goal C-3 Establish reasonable vehicle parking requirements (minimum and maximum rates for uses) that limit parking encroachment while minimizing the amount of land consumed by parking lots.

- **Policy C-3.2:** Require new development to provide an appropriate number of off-street parking spaces to accommodate the typical parking demands of the type of development on the site. The City may dictate both minimum and maximum amounts of parking to ensure that adequate parking is available for typical activities associated with a use as well as for special events, where anticipated and appropriate, and to ensure that parking standards encourage alternatives to single occupant vehicles.

Goal C-4 Provide a safe, secure, comfortable, and convenient pedestrian and bicycle system that connects riders for all ages and abilities to schools, including safe routes to schools, retail, employment centers, public facilities, and parks.

- **Policy C-4.3:** Provide a sidewalk and bicycle route system that serves all pedestrian and bicycle users and meets the latest guidelines related to the Americans with Disabilities Act (ADA).
- **Policy C-4.4:** Provide bicycle parking facilities at commercial, business/professional and light industrial uses in accordance with Part 11 of the California Building Standards Code.
- **Policy C-4.6:** Provide on-street Class II bike lanes, Class IV protected bike lanes, or off-street Class I bike paths along major collect and arterial streets whenever feasible.

Goal C-5 Maintain a coordinated, efficient bus service that provides an effective alternative to automobile use, serves members of the community that cannot drive, and includes regional transit connections that link Manteca to other destinations.

- **Policy C-5.1:** Encourage and plan for the expansion of regional bus service in the Manteca area.
- **Policy C-5.2:** Promote increased commuter and regional passenger rail service that will benefit the businesses and residents of Manteca. Examples include Amtrak, the Altamont Commute Express (ACE), and high-speed rail.

Goal C-7 Reduce vehicle miles traveled associated with trips within, to, and from the City while expanding access and mobility options for residents, employees, and visitors.

- **Policy C-7.4:** Require proposed development projects that could have a potentially significant VMT impact to consider reasonable and feasible project modifications and other measures during the project design and environmental review stage of project development that would reduce VMT effects in a manner consistent with state guidance on VMT reduction.
- **Policy C-7.5:** Evaluate the feasibility of a local or regional VMT impact fee program, bank, or exchange. Such an offset program, if determined feasible, would be administered by the City or a City-approved agency, and would offer demonstrated VMT reduction strategies through transportation demand management programs, impact fee programs, mitigation banks or exchange programs, in-lieu fee programs, or other land use project conditions that reduce VMT in a manner consistent with state guidance on VMT reduction. If, through on-site changes, a subject project cannot eliminate VMT impacts, the project could contribute on a pro-rata basis to a local or regional VMT reduction bank or exchange, as necessary, to reduce net VMT impacts.

City of Manteca Active Transportation Plan

The City of Manteca Active Transportation Plan has four goals to promote and encourage active transportation opportunities. The plan identifies planned bicycle and pedestrian network facilities. W. Yosemite Avenue between N. Airport Way and Main Street is identified as a priority project location. Planned improvements include closing concrete sidewalk gaps between N. Airport Way and Winters Drive and installing crossing enhancements to improve safety.

City of Manteca Local Road Safety Plan

The Local Road Safety Plan (LRSP) identified priority locations and recommends safety countermeasures. The plan identified W. Yosemite Avenue between N. Union Road and Trevino Avenue / Pacific Road as a priority location. Some of the countermeasures for this location include installing buffered bike lanes with raised elements and green bicycle lane striping in conflict areas; refreshing intersection and crosswalk striping; and other roadway improvements.

Plan Consistency Evaluation

Based on the Project Description and proposed plans, the Project would not conflict with the above transportation-related regulations, plans, and standards. The Project would not create traffic, bicycle,

and pedestrian hazards or conflicts with vehicular traffic movements. The Site Development Area of the Project includes two parking areas that would each be accessible via bi-directional driveways. The driveways directly lead to multiple bi-directional aisles to provide access to vehicular parking spaces. The Project would not be expected to generate vehicular queues within the parking lots that would extend out the driveways and onto the local roadway network. Additionally, the Project would provide short-term bicycle parking spaces near one of the entrances of the new ED building and would provide multiple pedestrian paths from the existing concrete sidewalks along W. Yosemite Avenue to the ED building and the existing Kaiser Manteca campus. Furthermore, the raised median with buffered bicycle lane along the Site Development Area frontage on W. Yosemite Avenue would expand the bicycle network of the City.

VMT Analysis

Traffic impacts related to the Project were evaluated for both compliance with applicable regulatory documents and environmental significance as defined in CEQA. In accordance with the Governor's Office of Planning and Research's (OPR) *2018 Technical Advisory on Evaluating Transportation Impacts in CEQA* (the "*Technical Advisory*"), a quantitative VMT assessment is the preferred methodology for determining the environmental significance of transportation impacts of development projects under CEQA. Effective July 1, 2020, vehicular delay on roadway segments and intersections qualitatively measured using the level of service (LOS) metric can no longer be used to determine the environmental significance of transportation impacts of development projects for CEQA purposes.

VMT is a metric that quantifies vehicular travel volumes on transportation facilities. A quantity of ten VMT could equate to one vehicle traveling ten miles or ten vehicles traveling one mile.

VMT Screening

Senate Bill 743 of 2013 ("SB 743") directs OPR to establish specific criteria for determining the significance of transportation impacts of development projects for CEQA purposes. The OPR *Technical Advisory* provides such specific criteria but additionally allows local jurisdictions and agencies the discretion to set or apply their own thresholds of significance. As the City of Manteca has not established its own VMT standards, this transportation evaluation defaults to the standards provided in the OPR *Technical Advisory*.

The OPR *Technical Advisory* contains the following criteria to screen out projects that are presumed to have a less-than-significant impact and would not require a full VMT analysis:

- Small Project
- 100% Affordable Housing Project
- Transit Supportive Project
- Local Serving Public Project
- Local Serving Retail Project

The Project would only need to satisfy at least one screening criteria. Project information was evaluated to determine if the Project would be exempt from a VMT analysis. The evaluation results are summarized in **Table 1**. Based on current Project information given for this analysis, a VMT

analysis is not required for the Project. Detailed evaluation for each criterion is discussed in the following sections.

Table 1 – OPR VMT Screening Summary

OPR Screening Criteria	Project Exempt?
Small Project	No
Transit Supportive Project	No
100% Affordable Housing Project	N/A
Local Serving Public Project	N/A
Local Serving Retail Project	Yes

Small Project

Small projects are defined as developments that generate fewer than 110 average daily trips. For developments where there is a land use change, the total project trips are considered without any credit for existing land use replacement.

The trip generation for the Project is presented in **Table 2**. The Project would generate more than 110 average daily trips. Therefore, the Project does not meet the definition of a small project and would not be screened out based on this criterion.

Table 2 – Project Trip Generation

Land Use	Land Use Code	Size/Qty	Units	Daily Trips	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
Hospital	610	24.450	1,000 SF	296	15	8	23	5	8	13

Source: ITE *Trip Generation Manual, 11th Edition, 2021*.

Following average rates were used for daily, AM and PM trips.

Daily: 10.77

AM Peak: 0.82 (67% in, 33%)

PM Peak: 0.86 (35% in, 65% out)

100% Affordable Housing

Developments with components which consist of 100 percent restricted affordable housing may be exempt. This criterion is not applicable to the Project since this Project is not proposing any affordable housing.

Transit Supportive Project

Locations near major transit stops or high-quality transit corridors will have a less-than-significant impact on VMT and may be exempt. This criterion is not applicable to the Project since the Project site is not near any major transit stops or high-quality transit corridors. A bus stop exists within one-half mile of the Site Development Area at W. Yosemite Avenue & St. Dominics Drive and serves two bus routes. However, both bus routes have headways of 60 minutes during their daily service spans. The OPR *Technical Advisory* considers bus stops to be a “major transit stop” if it serves two or more major bus routes with headways of 15 minutes or less during the morning and afternoon peak commute periods. Therefore, the Project does not satisfy this criterion.

Local Serving Public Project

Local Serving Public Projects are developments such as fire stations, neighborhood parks, libraries, and community centers. The Project is not considered a public project. Therefore, this criterion does not apply.

Local Serving Retail Project

VMT methodologies typically lump proposed developments into the three land use categories of residential, office, and retail (even if those proposed developments do not fit the exact definitions of the three categories) as the OPR *Technical Advisory* provides VMT significance thresholds for those three land use categories. Proposed developments are lumped by matching their demographic data and employment-based trip behavior as closely as possible with those of the three land use categories.

Local serving retail generally improves the convenience of shopping by providing services closer to home and has the effect of reducing vehicle travel. Any project that uses the designation of “local-serving” should be able to demonstrate that its users (employees, customers, visitors) would be existing within the community. The project would not generate new “demand” for its land use type but would meet the existing demand and would shorten the distance existing residents, employees, customers, or visitors would need to travel.

Similarly, ED services are generally local serving, in that most patrons select services at locations which are either near their places of residence or near their employment/business locations. Additionally, ED services function in similar ways to other service land uses in that the predominant source of trips, and therefore project-related VMT, would be generated by the patrons of the site rather than employees. The density of available destinations for ED services would increase and thereby shorten travel distances in the project’s vicinity and reduce VMT. Furthermore, it is recognized that the ED/medical office land use generates trips at much lower rates than similarly sized retail projects, as much of the space is passively utilized for medical equipment and circulation around this equipment.

Therefore, given that Local Serving Retail Projects are defined as retail developments that are 50,000 square-feet or less, the Project’s proposed 27,450 square-feet of ED land uses are approximately half the size of the 50,000 square-foot threshold, and that ED services/medical office land uses are generally expected to have a lower trip generation rate than retail land uses, the Project would be screened out according to this criterion.

Hazards Due to Geometric Design Features

The Project would have a significant impact if it substantially increases hazards due to a geometric design feature (e.g., sharp curve or dangerous intersections) or incompatible uses (e.g., farm equipment).

Based on the Project description and proposed plans, the Project would not have any geometric design features or incompatible uses that would increase hazards. The Site Development Area site plan does not exhibit adversely sharp vehicular curves and does not include features that would

adversely affect the safety of intersection operations. Additionally, no incompatible land uses are proposed. Therefore, there is no impact from the Project, and no mitigation is required.

Inadequate Emergency Access

The Project would have a significant impact if it results in inadequate emergency access.

The ED building would be accessible to emergency vehicles through the west and east parking areas. Both parking areas would be accessible to westbound and eastbound traffic on W. Yosemite Avenue due to the provision of bidirectional driveways and left-turn pockets in the median of W. Yosemite Avenue. The west and east parking areas include bidirectional aisles which would allow adequate circulation for emergency vehicles. The Project would not result in inadequate emergency access. Therefore, there is no impact from the Project, and no mitigation is required.



Attachment A – Site Development Area

Attachment B – Project Site Plan

FAR AND LOT COVERAGE INFORMATION

FROM THE ST. DOMINICK'S STANDARDS AND DESIGN GUIDELINES PUD:

- COVERAGE: 60% OF THE BUILDABLE LOT MAY BE COVERED BY THE BUILDING PROVIDED THAT MINIMUM PARKING REQUIREMENTS AND SETBACKS ARE MET
- (EX HOSPITAL GROUND FLOOR SQ FT + EDX SQ FT) / LOT SQ FT = LOT COVERAGE
- (57,485+27,450) / 295,873 = .29
- FLOOR AREA RATIO (A RATIO) OF 1.1 OR 1 GROSS SQUARE FOOT OF BUILDING TO 1 SQ FT OF LAND
- (TOTAL EX HOSPITAL SQ FT + EDX SQ FT) / LOT SQ FT = FAR
- 109,459 / 295,873 = .37

CITY OF MANTECA MUNICIPAL CODE TABLE 17.26.020-1: NO MAX FAR OR LOT COVERAGE (OPEN SPACE) RESTRICTIONS.

SITE NOTES

- NOTES:
- ACCESSIBLE PATH OF TRAVEL TO COMPLY WITH CBC 119-402. CLEAR WIDTH OF PATH SHALL BE 48" MIN. RUNNING SLOPE OF WALKING SURFACES SHALL NOT BE STEEPER THAN 1:20 AND THE CROSS SLOPE OF SURFACES SHALL NOT BE STEEPER THAN 1:48.
 - CURB/RAMP DETECTABLE WARNINGS AS REQUIRED BY CODE TO MAINTAIN A CONTINUOUS ACCESSIBLE PATH OF TRAVEL. DETECTABLE HAZARD WARNINGS (TRUNCATED DOMES) SHALL BE FEDERAL YELLOW FS 33538 STANDARD 595C.
 - FLAMMABLE OR COMBUSTIBLE LIQUIDS AND WASTE OIL LOCATION AND AMOUNT TO BE IDENTIFIED ON FINAL SUBMITTAL CONTRACT DOCUMENTS FOR REVIEW (IF PROPOSED).



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El Segundo, CA 90034
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Drawn:
DD, MF

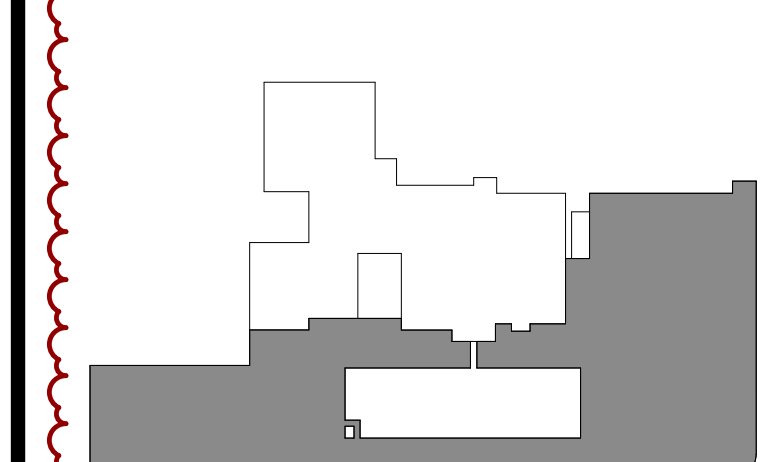
Checked:
YP, DV

Agency Approval:



CAP027912
MANTECA ED
EXPANSION
1777 W YOSEMITE AVE.
MANTECA, CA 95337

ENTITLEMENTS



KEYPLAN

Number	Date	Issued For
2	05/19/2025	BACKCHECK #1
1	08/30/2024	FIRST SUBMISSION

OVERALL PROPOSED SITE PLAN

Date: **05/08/2025**
Scale: **As indicated**
Proj. Number: **22383.10**
Drawing Number: **ENT-A001**

OVERALL SITE PLAN
1" = 40'-0"

PARKING ANALYSIS

OVERALL CAMPUS MINIMUM PARKING			
BUILDING	SIZE	REQUIRED MINIMUM PARKING RATIOS (PER MANTECA MUNICIPAL CODE, TABLE 17.26.020-1)	REQUIRED MINIMUM PARKING TOTALS
EXISTING HOSPITAL (INCLUDING OUTPATIENT PHYSICAL THERAPY SPACE) + EMERGENCY DEPARTMENT EXPANSION	99 LICENSED BEDS 81,983 SF EXISTING HOSPITAL PROGRAM (960 SF OUTPATIENT PHYSICAL THERAPY SPACE) + 27,476 SF EXPANSION	MEDICAL SERVICES, HOSPITALS: 2 PARKING SPACES / BED OR 2 PARKING SPACES / 1,000 SF, WHICHEVER IS GREATER MEDICAL SERVICES, GENERAL: 1 PARKING SPACE / 200 SF	99 BEDS x 2 = 198 PARKING SPACES OR 109,459 SF HOSPITAL x (2/1,000) = 219 PARKING SPACES 960 / 200 = 5 PARKING SPACES 224 PARKING SPACES
SIERRA MEDICAL OFFICE BUILDING	20,000 SF	1 PARKING SPACE / 200 SF	20,000 / 200 = 100 PARKING SPACES
TAHOE MEDICAL OFFICE BUILDING	12,288 SF	1 PARKING SPACE / 200 SF	12,288 / 200 = 62 PARKING SPACES
YOSEMITE MEDICAL OFFICE BUILDING	19,853 SF	1 PARKING SPACE / 200 SF	19,853 / 200 = 100 PARKING SPACES
UNOWNED MEDICAL OFFICE BUILDING	16,000 SF	1 PARKING SPACE / 200 SF	16,000 / 200 = 80 PARKING SPACES
OVERALL CAMPUS MINIMUM REQUIRED PARKING:			566 PARKING SPACES
OVERALL CAMPUS EXISTING PROVIDED PARKING:			662 PARKING SPACES
OVERALL CAMPUS PROPOSED PROVIDED PARKING:			646 PARKING SPACES

MINIMUM PARKING REQUIREMENTS

EXISTING AND PROPOSED PARKING TOTAL COUNT

- 662 OVERALL CAMPUS EXISTING PARKING SPACES
- 123 EXISTING PARKING SPACES TO BE REMOVED
- 534 EXISTING PARKING SPACES TO REMAIN
- 112 TOTAL NEW PARKING SPACES
- 646 OVERALL CAMPUS PROPOSED PARKING

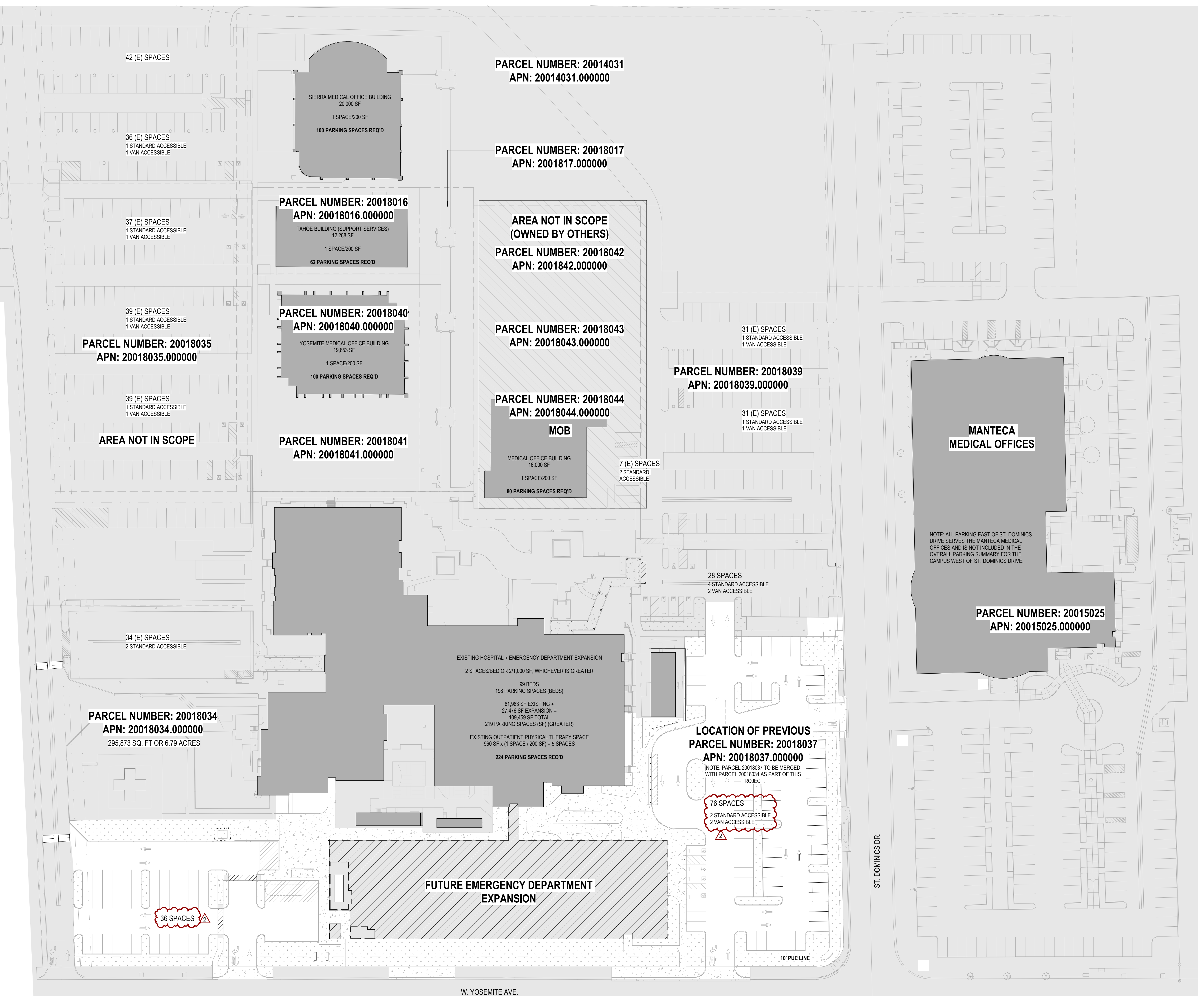
ACCESSIBLE PARKING COUNT

CBC TABLE 11B-208.2 APPLIES TO THE 646 TOTAL PARKING SPACES PROVIDED IN PARKING FACILITY:

- 501 TO 1000 PARKING SPACES REQUIRES 2% OF TOTAL TO BE ACCESSIBLE
- 2% OF 646 = 12.92

MINIMUM ACCESSIBLE PARKING TOTAL: 13
MINIMUM VAN ACCESSIBLE PARKING TOTAL PER 11B-208.2.4.3: 11

PROVIDED ACCESSIBLE PARKING TOTAL: 28
PROVIDED VAN ACCESSIBLE PARKING TOTAL: 11



Autodesk Docs/22383.10 - Manteca ED Expansion/11.12.13.Sig_024.rvt © 2021 The S/L/A/M Collaborative, Inc.