



**Public Review DRAFT Initial Study/Mitigated Negative Declaration**

**Edwards Grove Annexation  
ANX-24-33, PRZ 24-34, SDJ 24-35, and LLA 24-36**

*prepared by*  
**City of Manteca**  
Development Services Department  
1215 W. Center Street, Ste. 201  
Manteca, CA 95337

*prepared with the assistance of*  
**J.B. Anderson Land Use Planning**  
139 S. Stockton Avenue  
Ripon, California 95366



**October 1, 2025**

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# MITIGATED NEGATIVE DECLARATION

## PROJECT NAME:

Edwards Grove Annexation: ANX-24-33, PRZ-24-34, SDJ-24-35, and LLA-24-36

## PROJECT PROPONENT AND LEAD AGENCY:

Project Proponent: Mr. Ed Cardoza  
P.O. Box 1022  
Manteca, CA 95336

Lead Agency: City of Manteca  
Development Services Department  
1215 W. Center Street, Ste. 201 Manteca, CA 95337

## PROJECT LOCATION:

The Proposed Project is located in the northern portion of the City of Manteca. Specifically, the Project site is bounded by ranchette and agricultural lands to the north, Louise Avenue to the south, Cottage Avenue, a neighborhood commercial retail center, and ranchette parcels to the east, and existing single-family residential uses to the west.

## PROJECT DESCRIPTION:

### Overview

The Proposed Project consists of Annexation, Prezone, Tentative Subdivision Map, and lot line adjustment to allow for the annexation of 27.08-acres to the City of Manteca, and the subdivision of 13.21-acres to allow for the development of seventy-two (72) single-family residential lots, and a 4.6-acre remainder parcel set aside for future commercial development. The Proposed Project is commonly referred to as Edward's Grove.

Below, the Project Description is organized to describe the actions of the Annexation and Prezone followed by Tentative Subdivision Map and Lot Line Adjustment.

### Annexation and Pre-Zone:

The Project site is located within the land use jurisdiction of San Joaquin County, and within the City of Manteca's Sphere of Influence (SOI). The Proposed Project would result in the annexation of ten (10) legal

parcels and five (5) remnant roadway parcels into the City of Manteca, identified as the following Assessor Parcel Numbers (APN):

- 218-150-090;
- 218-150-110;
- 208-100-010;
- 208-100-020;
- 208-100-030;
- 208-100-040;
- 208-100-050;
- 208-090-120;
- 208-090-130;
- 208-090-140;
- 218-150-080
- 218-150-100; and
- 218-150-070

In addition to the parcels above, the proposed annexation area includes a 7,930 square foot remnant parcel located at the southern edge of the Project site, adjacent to East Louise Avenue. The proposed annexation area is contiguous with the existing City Limits along the eastern, southern, and western boundary. The proposed annexation area is bisected by Cottage Avenue and further bounded by East Louise Avenue to the south, an age restricted, private community located directly to the west, estate homes to the north with East Southland Road located a quarter mile to the north, and a small commercial development to the east.

In terms of the pre-zoning designation of each of the parcels described above, the table below depicts each parcel (identified by APN), its respective General Plan land use designation, followed by development assumptions based upon land use designations defined in the City's General Plan.

**Table 1 – Pre-Zone Designations and Development Assumptions**

APN No.	Acres	2043 General Plan Land Use Designation	Pre-Zone Designation	Development Capacity (# of residential units)
218-150-090	16.63	Low Density Residential (LDR) / Commercial (C)	One-Family Dwelling (R-1)/ Neighborhood Commercial (CN)	72
218-150-110	1.82	C	CN	-
208-100-010*	0.89	Very Low Density Residential (VLDR)	Residential Estate (R-E)	1
208-100-020*	0.56	VLDR	R-E	1
208-100-030	0.60	VLDR	R-E	1
208-100-040*	1.21	VLDR	R-E	1
208-100-050*	0.59	VLDR	R-E	1
208-090-120*	1	VLDR	R-E	1
208-090-130*	1	VLDR	R-E	1
208-090-140*	1	VLDR	R-E	1
Street ROW	1.6	-	-	-
Remnant Parcel	0.18	-	-	-
<b>Total</b>	<b>27.08</b>	-	-	<b>80</b>
<i>*Existing Residential Unit</i>				

As depicted above, development capacity within the proposed annexation area is assumed to be 80 single family residential units: 72 residential units as part of the Proposed Project and capacity for eight (8) residential units on parcels located directly east of Cottage Avenue. In terms of new development, 72 residential units are proposed at this time.

The figure below illustrates the annexation area including the 13.21-acres to be subdivided and developed into seventy-two (72) single-family residential lots, 4.6-acre remainder parcel to be set aside for future commercial uses, eight (8) existing residential properties located directly east of Cottage Avenue, and an additional 4,459 square feet of right-of-way along Cottage Avenue.

**Tentative Subdivision Map**

The Proposed Project also consists of a Tentative Subdivision Map (Appendix A) to allow for the subdivision of approximately 13.21-acres into seventy-two (72) single-family residential lots, one (1) landscaped lot (Lot A) and one (1) commercial lot (Lot B). Lot A will function as a tot lot equipped with park structures and will

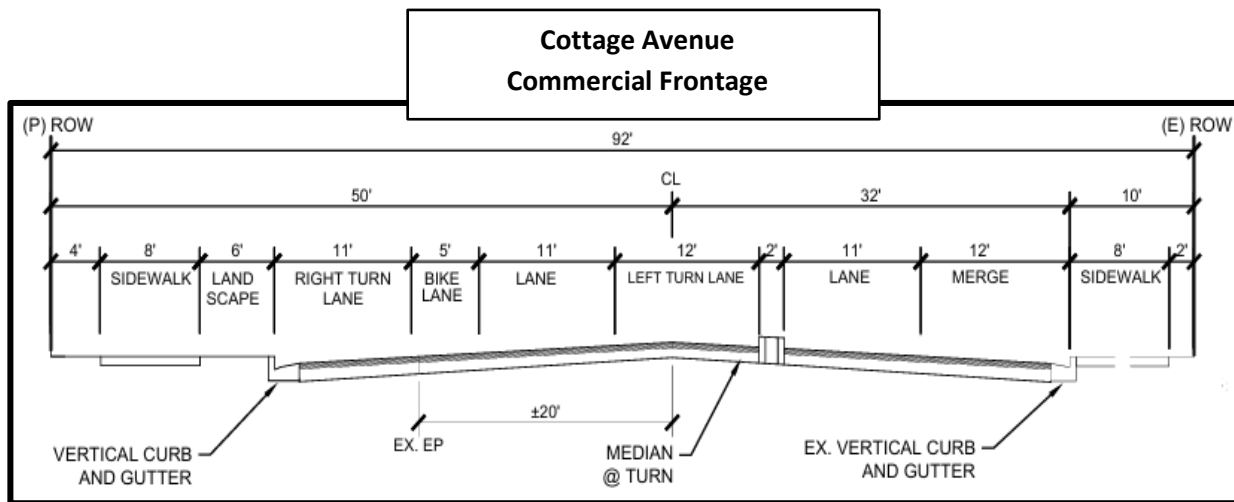
also serve as Emergency Vehicle Access (EVA) to allow secondary access to Cottage Avenue; Lot A will be 0.77-acres in size. The typical lot size of new residential parcels created as part of the Proposed Project are approximately 5,000 square feet in size and primary access to the Project site will be provided via Cottage Avenue and Street 3. Consistent with the City of Manteca's 2043 General Plan, Lot B, approximately 4.6-acres in size, will be set aside for future commercial uses. There is no development planned for Lot B at this time. For the purposes of this environmental analysis, it is assumed that future development in Lot B will be consistent with Sections 17.22 and 17.26 of the City's Zoning Code in terms of permitted uses and development standards.

The Proposed Project will generate new demand for City services. Therefore, the Proposed Project will connect existing City services including water and sewer to the Project site sufficient in capacity to meet future demand for both residential and commercial uses. Service to the Project site will consist of connecting to the existing water transmission line located in Cottage Avenue. Water distribution facilities will be in a grid pattern and connect to several lines stubbed to the Project site from the south. The existing twelve (12) inch water line will also be extended and stubbed up to the limits of the northern boundary of the Project site.

The Project site will be served by a twenty-four (24) inch gravity sanitary sewer system that is currently located in Louise Avenue. The twenty-four (24) inch sewer line located at the intersection of Louise Avenue and Cottage Avenue will be extended as part of the Proposed Project to serve the development. South of Louise Avenue sits the Rodoni Estates where an oversized detention basin is located; the Proposed Project site is currently accounted for in this detention basin. The existing storm drain basin located at Rodoni Park will accommodate stormwater from Rodoni Estates, Alves Center, and the Proposed Project. The Proposed Project will be conditioned to submit topography of the Project site to verify storm drainage capacity both in the pump station and associated improvements to allow for stormwater to discharge into the basin. If needed, improvements will be installed to provide for this capacity. Additionally, there is stub for the property located on Louise Avenue.

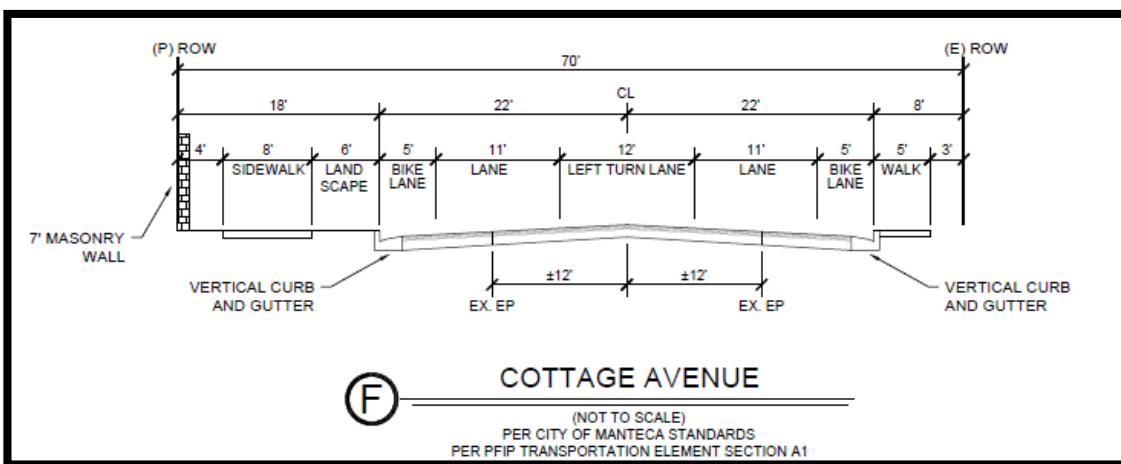
The Proposed Project will also include the replacement of existing South San Joaquin Irrigation District (SSJID) facilities that are located along the Project site's frontage, including Lateral RfB and Drain 3. The Proposed Project will be required to replace these facilities in accordance with SSJID standards and specifications.

Along the Proposed Project's frontage, Cottage Avenue will be improved as shown in the following cross sections illustrated below. As noted above, 4,459 square feet of Right-of-Way along Cottage Avenue will have to be acquired to improve Cottage Avenue to meet City standards. The commercial frontage of Cottage Avenue will be improved to a ninety-two (92) foot Right-of Way as shown in the cross section below.



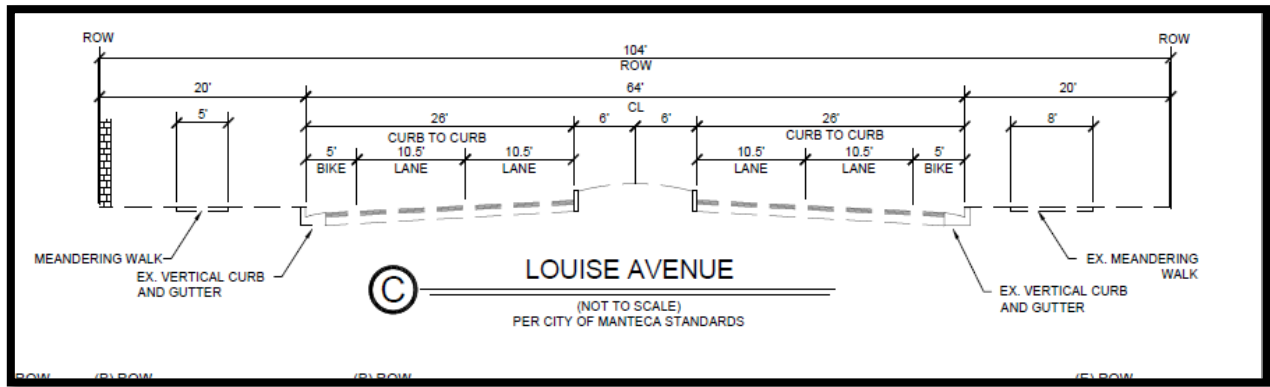
Extending north along the Proposed Project’s residential frontage, Cottage Avenue’s Right-of-Way will be reduced to seventy (70) feet in width as is illustrated in the two cross sections below. Additionally, a seven (7) foot tall, masonry wall is proposed to be installed along Cottage Avenue spanning the length of the Project site. The masonry wall will also extend from Cottage Avenue westward to separate the residential area from the 4.6-acre site (Lot B) set aside for future commercial uses. Consistent with the Special Fence and Wall Requirements of the City’s Municipal Code, section 17.46.070 (E), the masonry wall spanning west will have a minimum height of seven (7) feet to screen future commercial uses abutting the residential portion of the Proposed Project.

**Cottage Avenue Cross Section – Residential Frontage**



Along the Proposed Project’s southern boundary, Louise Avenue’s ninety-four (94) foot Right-of-Way, as shown in the following cross section, will remain unchanged.

## Louise Avenue Cross Section



### Lot Line Adjustment

The Proposed Project includes a Lot Line Adjustment that will ultimately segregate the residential and commercial portions of the Project site into two (2) large lots. As proposed, Lot A will make up the land to be subdivided into residential uses and total 13.21 acres; Lot B will be comprised of the commercial portion of the Proposed Project and will equal 4.6 acres. The Lot Line Adjustment will occur prior to the subdivision map recordation, and an exhibit of the proposed Lot Line Adjustment provided in Figure 5.

## **ENVIRONMENTAL DETERMINATION:**

The Lead Agency has prepared an Initial Study, following, which considers the potential environmental effects of the Proposed Project. The Initial Study shows that there is no substantial evidence, considering the whole record before the Lead Agency, that the Proposed Project may have a potentially significant effect on the environment, provided that the following mitigation measures are included in the Proposed Project.

## **MITIGATION MEASURES:**

### Mitigation Measure AES-1

The Applicant and/or Project Proponent shall submit for approval of a lighting plan for the proposed facilities prior to building permit issuance for any development within the commercial site. The lighting plan shall demonstrate that the Proposed Project lighting is the minimum amount of lighting required for safety purposes and provided to avoid adverse effects on surrounding areas. Exterior lighting shall not include unnecessary illumination of building or site walls.

### Mitigation Measure CUL-1:

In accordance with Section 15064.4(e) of the CEQA Guidelines, in the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps shall be taken:

1. There shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlie adjacent human remains until:
  - a) The coroner of the County in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required; and,
  - b) If the coroner determines the remains to be Native American:
    - i. The coroner shall contact the Native American Heritage Commission within 24 hours.
    - ii. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American.
    - iii. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains, and any associated grave goods as provided in Public Resources Code Section 5097.98. The above measure shall be included in the contract specifications that shall be reviewed and approved by the City of Manteca Development Services Department prior to the start of construction. The above measure would reduce noise generated by the construction of the Project to the extent feasible for the Proposed Project's size.

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Mr. Toben Barnum, Associate Planner

Date

# INITIAL STUDY

## 1. PROJECT TITLE

Edwards Grove Annexation: ANX-24-33, PRZ-24-34, SDJ-24-35, and LLA-24-36

## 2. LEAD AGENCY NAME AND ADDRESS

City of Manteca  
Development Services Department  
1215 W. Center Street, Ste. 201  
Manteca, CA 95337

## 3. CONTACT PERSON AND PHONE NUMBER

Mr. Toben Barnum, Associate Planner, (209) 456-8500

## 4. PROJECT LOCATION

The Proposed Project is in the northern portion of the City of Manteca. Specifically, the Project site is bounded by ranchette and agricultural lands to the north, Louise Avenue to the south, Cottage Avenue, neighborhood commercial retail uses, and ranchette parcels to the east, and existing single-family residential uses to the west.

## 5. PROJECT SPONSOR'S NAME AND ADDRESS

Cardoza Enterprises  
P.O. Box 1022  
Manteca, CA 95336

## 6. EXISTING SETTING

The Project site consists primarily of raw fallow land in addition to existing single-family residences and associated accessory structures. West of Cottage Avenue, there are two (2) existing structures, a single-family residence, and a barn structure. East of Cottage Avenue and within the Project site boundary, the existing setting consists of ranchette parcels with single-family residences and ancillary structures.

## 7. EXISTING GENERAL PLAN DESIGNATION

The Project site is designated for Low Density Residential (LDR) and Commercial (C) land uses per the City’s General Plan, dated February 2024

## 8. EXISTING ZONING

The existing zoning of the Project site is AU-20, per San Joaquin County GIS.

## 9. SURROUNDING LAND USES AND SETTING

Table 2, below, provides the Project site’s surrounding land uses and setting:

**Table 2: Surrounding Land Uses and Setting**

	Land Use	Existing General Plan Land Use Designation	Existing Zoning
<b>North</b>	Agricultural and Ranchette Parcels	Very Low Density Residential (VLDR)	Agriculture-Urban Reserve, 20-acre minimum (San Joaquin County)
<b>South</b>	Louise Avenue and Single-Family Residential	Low Density Residential (LDR)	R1 (One Family Dwelling)
<b>East</b>	Single-Family Residential, Commercial, and Ranchette Parcels	LDR	R1 (One Family Dwelling)
<b>West</b>	Single-Family Residential	LDR	Planned Development (PD)

## 10. DESCRIPTION OF THE PROJECT

### Overview

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The proposed annexation area is contiguous with the existing City Limits along the eastern, southern, and western boundary. The proposed annexation area is bisected by Cottage Avenue and further bounded by East Louise Avenue to the south, an age restricted, private community located directly to the west, estate homes to the north with East Southland Road located a quarter mile to the north, and a small commercial development to the east.

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Street ROW	1.6	-	-	-
Remnant Parcel	0.18			
<b>Total</b>	<b>27.08</b>	-	-	<b>80</b>
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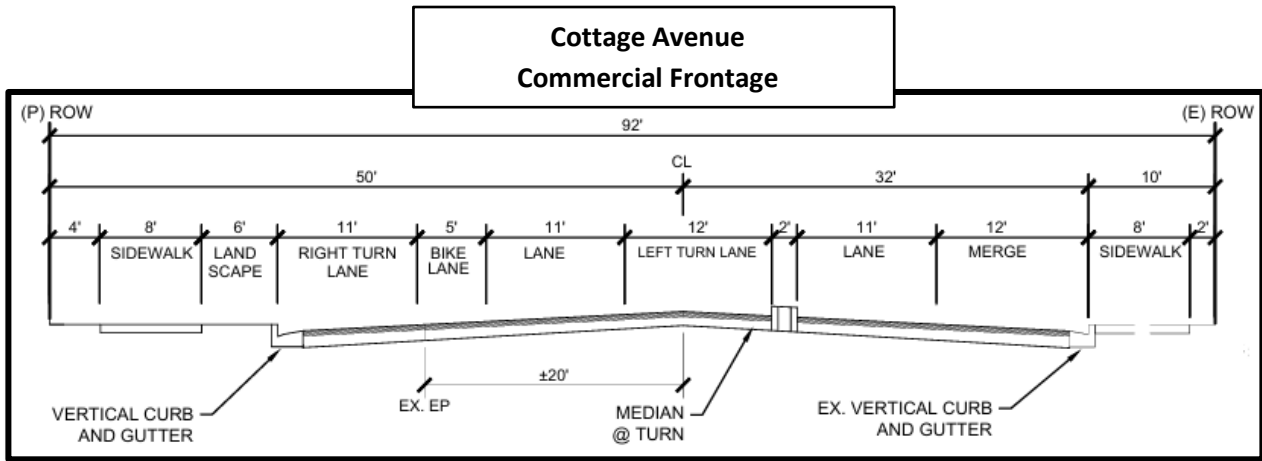
also serve as an Emergency Vehicle Access (EVA) to allow secondary access to Cottage Avenue; Lot A will be 0.77-acres in size. The typical lot size of new residential parcels created as part of the Proposed Project are approximately 5,000 square feet in size and primary access to the Project site will be provided via Cottage Avenue and Street 3. Consistent with the City of Manteca's 2043 General Plan, Lot B, approximately 4.6-acres in size, will be set aside for future commercial uses. There is no development planned for Lot B at this time. For the purposes of this environmental analysis, it is assumed that future development in Lot B will be consistent with Sections 17.22 and 17.26 of the City's Zoning Code in terms of permitted uses and development standards.

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The Project site will be served by a twenty-four (24) inch gravity sanitary sewer system that is currently located in Louise Avenue. The twenty-four (24) inch sewer line located at the intersection of Louise Avenue and Cottage Avenue will be extended as part of the Proposed Project to serve the development. South of Louise Avenue sits the Rodoni Estates where an oversized detention basin is located; the Proposed Project site is currently accounted for in this detention basin. The existing storm drain basin located at Rodoni Park will accommodate stormwater from Rodoni Estates, Alves Center, and the Proposed Project. The Proposed Project will be conditioned to submit topography of the Project site to verify storm drainage capacity both in the pump station and associated improvements to allow for stormwater to discharge into the basin. If needed, improvements will be installed to provide for this capacity. Additionally, there is stub for the property located on Louise Avenue.

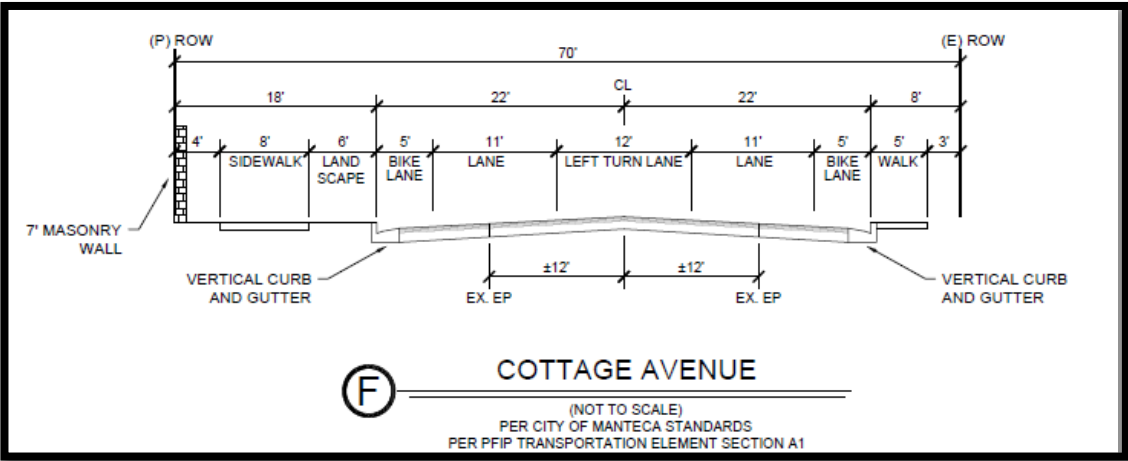
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Along the Proposed Project's frontage, Cottage Avenue will be improved as shown in the following cross sections illustrated below. As noted above, 4,459 square feet of Right-of-Way along Cottage Avenue will have to be acquired in order to improve Cottage Avenue to meet City standards. The commercial frontage of Cottage Avenue will be improved to a ninety-two (92) foot Right-of Way as shown in the cross section below.



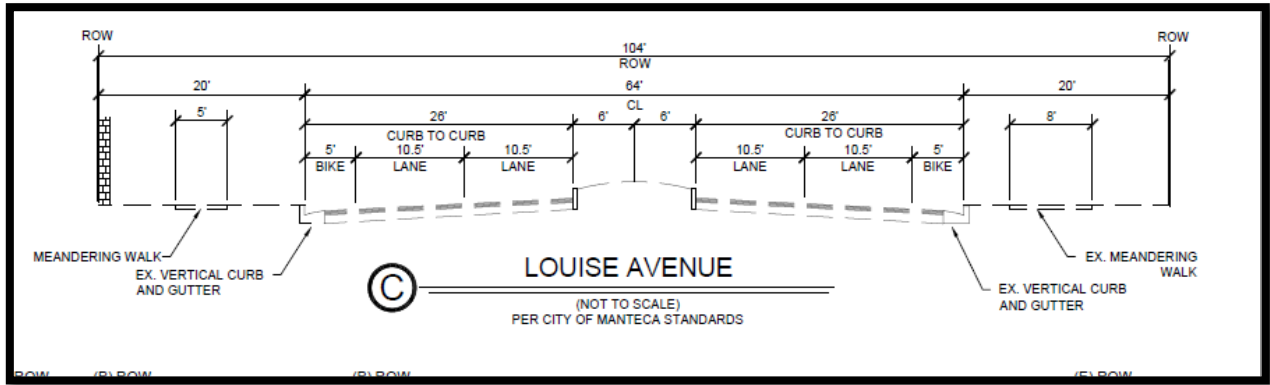
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**Cottage Avenue Cross Section**



Along the Proposed Project’s southern boundary, Louise Avenue’s ninety-four (94) foot Right-of-Way, as shown in the following cross section, will remain unchanged.

### Louise Avenue Cross Section



### Lot Line Adjustment

The Proposed Project includes a Lot Line Adjustment that will ultimately segregate the residential and commercial portions of the Project site into two (2) large lots. As proposed, Lot A will make up the land to be subdivided into residential uses and total 13.21 acres; Lot B will be comprised of the commercial portion of the Proposed Project and will equal 4.6 acres. The Lot Line Adjustment will occur prior to the subdivision map recordation, and an exhibit of the proposed Lot Line Adjustment provided in Figure 5.

**11. OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED**

San Joaquin Local Agency Formation Commission (LAFco) will be required to review and consider the annexation request. Their approval is required for the proposed annexation.

**12. HAVE CALIFORNIA NATIVE AMERICAN TRIBES TRADITIONALLY AND CULTURALLY AFFILIATED WITH THE PROJECT AREA REQUESTED CONSULTATION PURSUANT TO PUBLIC RESOURCES CODE SECTION 21080.3.1.**

The City has not received any consultation requests in accordance with Section 21080.3.1 of the Public Resources Code.

Figure 1: Project Location Map

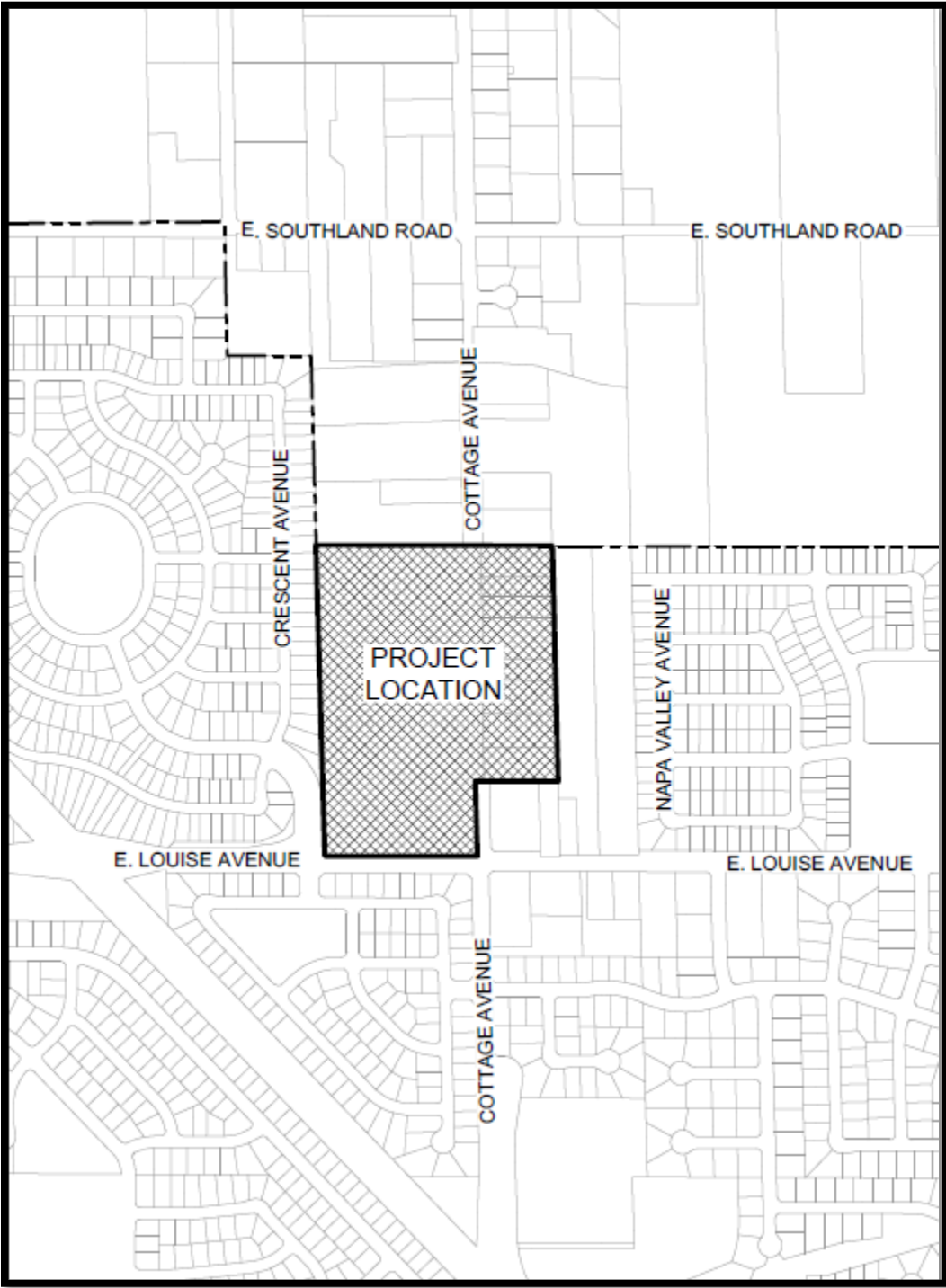


Figure 2: General Plan Land Use Designation

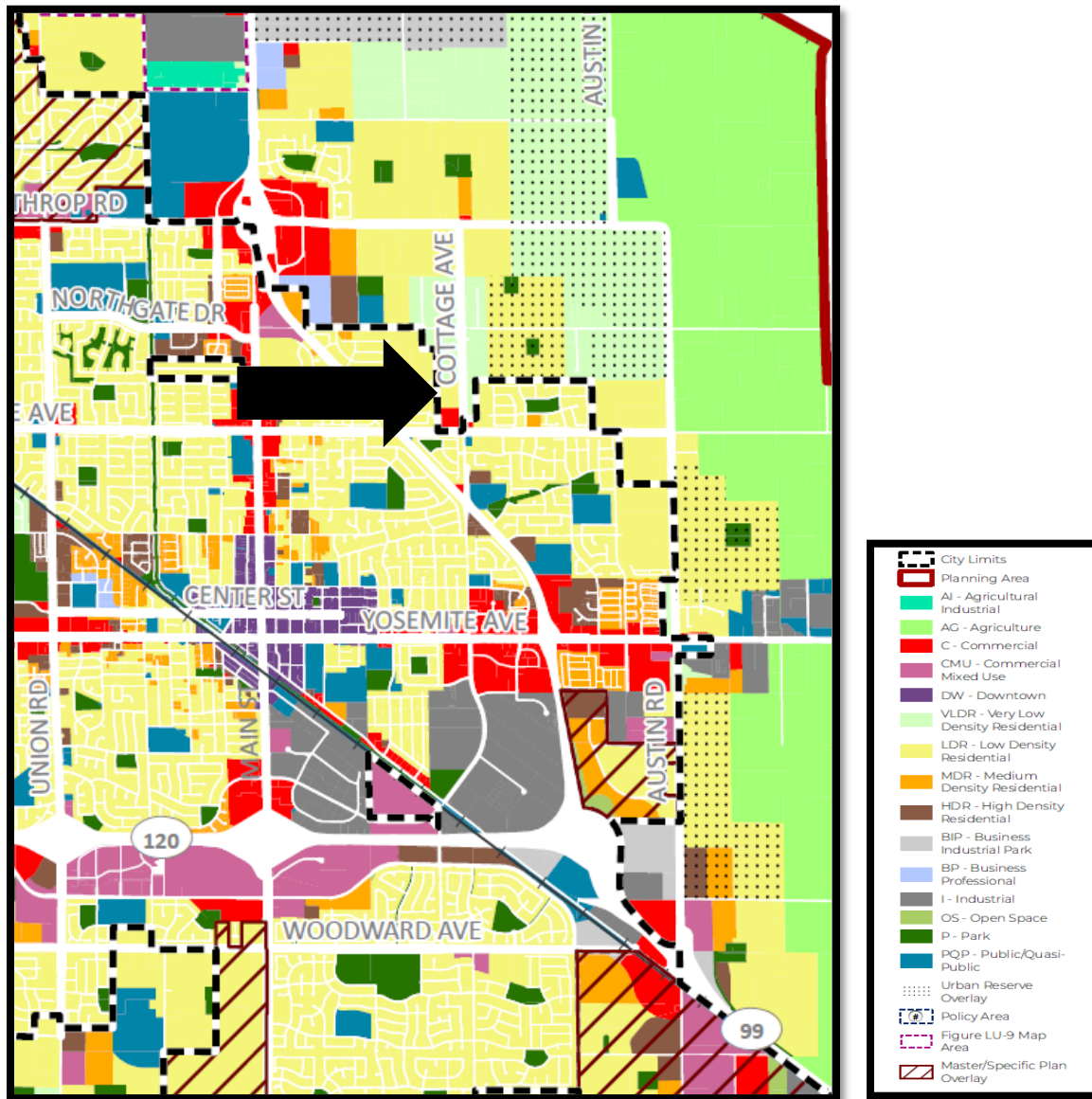


Figure 3: Existing Zoning

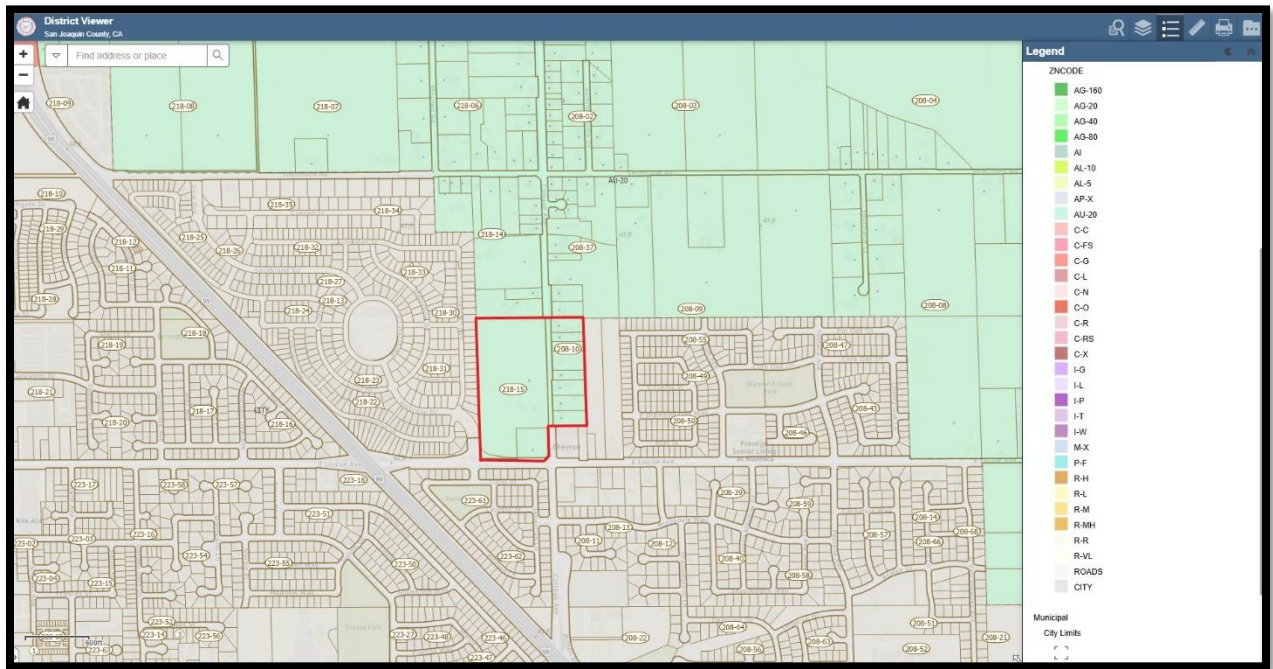


Figure 4: Proposed Annexation Boundary

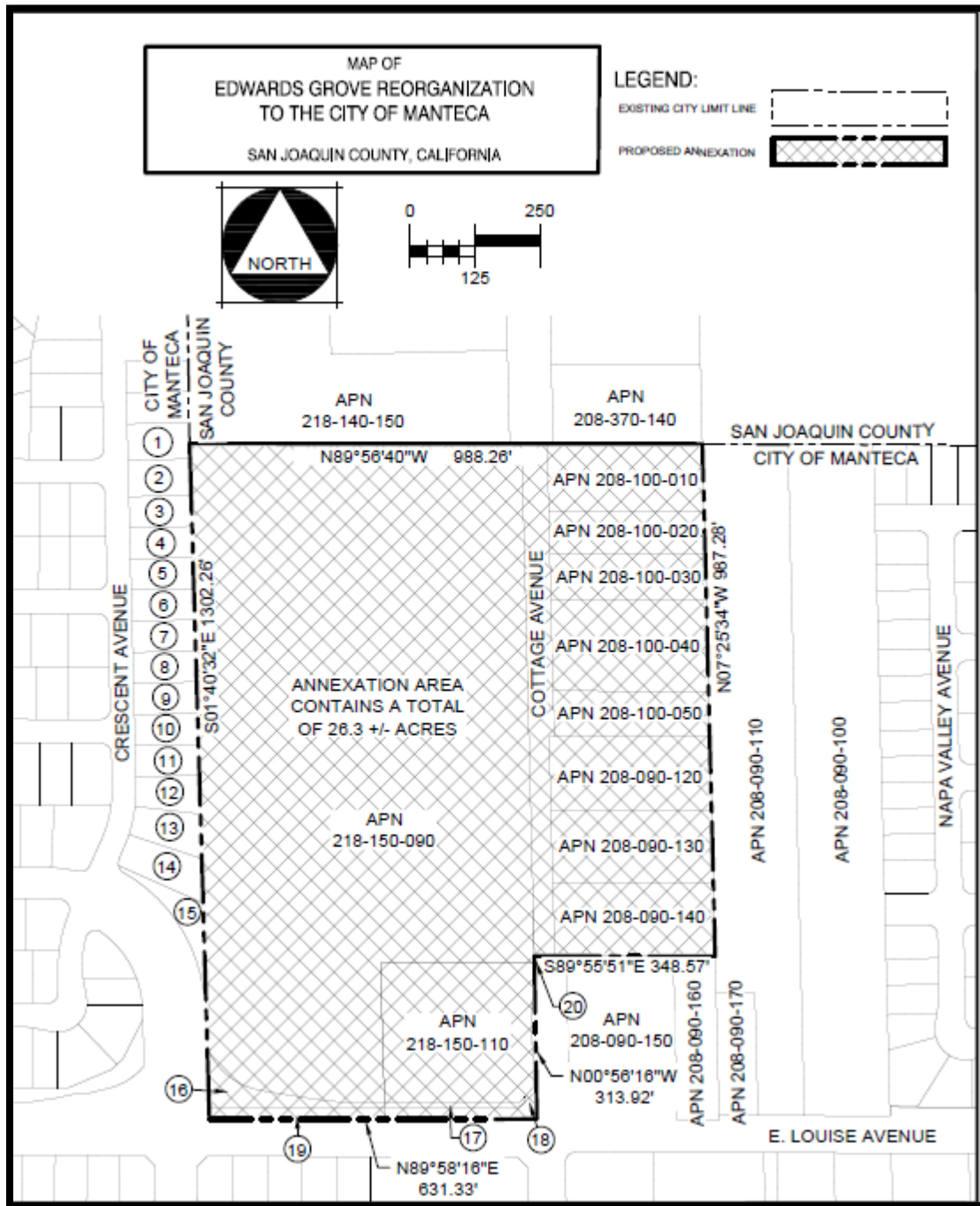
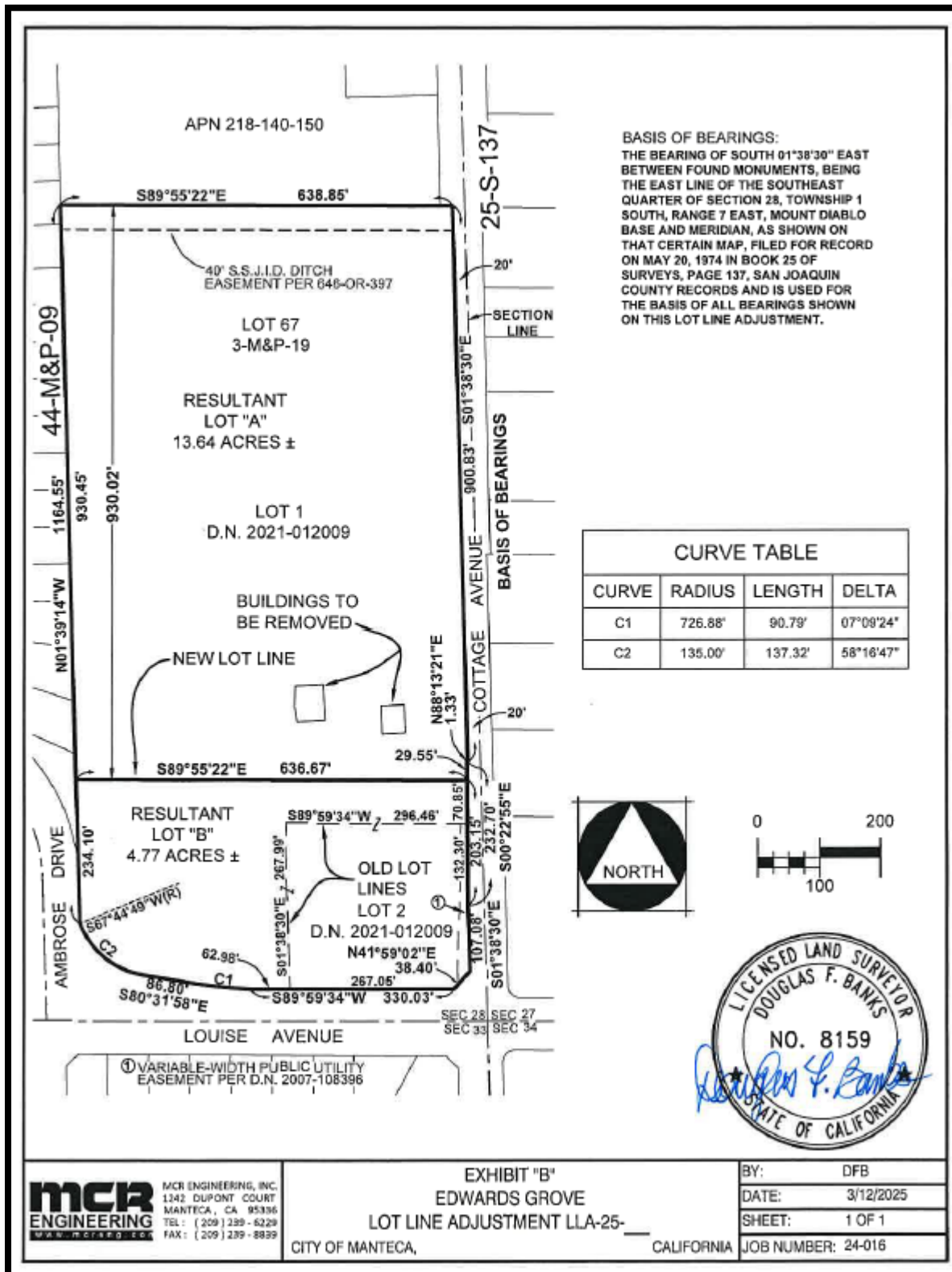


Figure 5: Lot Line Adjustment



**13. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

X	Aesthetics		Agriculture and Forestry Resources		Air Quality
	Biological Resources	X	Cultural Resources		Energy
	Geology and Soils		Greenhouse Gas Emissions Materials		Hazards and Hazardous
	Hydrology and Water Quality		Land Use and Planning		Mineral Resources
	Noise		Population and Housing		Public Services
	Recreation		Transportation/Traffic		Utilities and Service Systems
	Wildfire		Mandatory Findings of Significance		

#### 14. LEAD AGENCY DETERMINATION:

On the basis of this initial evaluation:

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

## SECTION 2.0 EVALUATION INSTRUCTIONS:

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

- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
  - a) The significance criteria or threshold, if any, used to evaluate each question; and
  - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

# INITIAL STUDY CHECKLIST

This section of the Initial Study incorporates the most current Appendix "G" Environmental Checklist Form, contained in the CEQA Guidelines.

## 1. AESTHETICS - WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?				X
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		X		

## IMPACT ANALYSIS

### a. *Would the project have a substantial adverse effect on a scenic vista?*

According to the City of Manteca 2023 General Plan and Environmental Impact Report (EIR), the Project site is not considered a scenic vista. The Project site currently consists of approximately 18.29-acres of primarily vacant land, with the exception of an existing single-family residence and communications tower leased and operated by Version Wireless. The Proposed Project would convert the existing vacant setting to a single-family residential development and associated improvements. Furthermore, the Project site is surrounded by urban uses to the east, south, and west.

Therefore, the Proposed Project will have a **Less Than Significant Impact**.

- b. *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a state scenic highway?*

The Proposed Project is located immediately adjacent to the city limits of the City of Manteca and is not located on a state designated highway. Based on a review of the California Department of Transportation website ([http://www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways)), the nearest state scenic highway is Interstate 580, in San Joaquin County between the Stanislaus County line and Alameda County line. The Proposed Project is not located on or adjacent to Interstate 580 and therefore will have no impact to a state scenic highway. As such, impacts from the construction of the Proposed Project on a scenic vista or scenic resources would have **No Impact**.

- c. *Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

The Proposed Project is comprised of 26.9-acres in the City of Manteca and is currently surrounded by urban development within the city limits. The existing visual character of the Proposed Project and its surroundings consists primarily of urban uses, including residential and commercial. The Proposed Project is not located within a non-urbanized area.

Therefore, the Proposed Project will have a **Less Than Significant Impact**.

- d. *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Lighting impacts are associated with the use of artificial light during the evening and nighttime hours. There are two (2) primary sources of light: light emanating from building interiors passing through windows and light from exterior sources (i.e., street lighting, building illumination, security lighting, parking lot lighting and landscape lighting). Light introduction can be a nuisance to adjacent residential areas, diminish the view of the clear night sky, and if uncontrolled, can cause disturbances. Uses such as the adjacent residences are considered light sensitive since occupants have expectations of privacy during evening hours and may be subject to disturbance by bright light sources. Light spill is typically defined as the presence of unwanted light on properties adjacent to the property being illuminated.

The Proposed Project will include both site and building mounted illumination. The majority of site lighting will consist of pole mounted lighting in and around the parking lot area of the future commercial area. Due to the proximity of the adjacent residences, light, and glare from the commercial component of Proposed Project may have the potential to create significant impacts on surrounding residential uses. Therefore, potential light and glare impacts would be minimized by incorporating specific mitigation measures to design lighting so that it focuses the light onto the areas necessary to be illuminated and minimize overflow of lighting off-site. As such, the Proposed Project would not result in significant light and glare impacts to surrounding residences or other sensitive

uses, resulting in **Less Than Significant Impact with Mitigation Incorporation**. Refer to Mitigation Measure AES-1, below.

**MITIGATION MEASURES:**

The following mitigation measure shall be incorporated into the Proposed Project:

Mitigation Measure AES-1:

The Applicant and/or Project Proponent shall submit for approval of a lighting plan for the proposed facilities prior to building permit issuance for any development within the commercial site. The lighting plan shall demonstrate that the Proposed Project lighting is the minimum amount of lighting required for safety purposes and provided to avoid adverse effects on surrounding areas. Exterior lighting shall not include unnecessary illumination of building or site walls.

**2. AGRICULTURE AND FORESTRY RESOURCES: WOULD THE PROJECT:**

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997, as updated) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the Project:</p>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?			X	
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?			X	
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))?			X	
d) Result in the loss of forest land or conversion of forest land to non-forest use?			X	
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?			X	

**IMPACT ANALYSIS**

The following discussion is an analysis for criteria (a) and (e):

- a. *Would the project convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*
- b. *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*
- c. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?*
- d. *Would the project result in the loss of forest land or conversion of forest land into non-forest use?*
- e. *Would the project involve other changes in the existing environment, which, due to their location or nature, could result in the conversion of Farmland to non-agricultural use?*

As noted previously in this Initial Study, the Proposed Project site is designated for Low Density Residential (LDR) and Commercial (C) land uses per the City’s General Plan, dated February 2024. A review of the City’s General Plan Draft Environmental Impact Report, and specifically, Figure 3.2-1 (Important Farmlands), the Project site is designated as urban and built-up land and farmland of local importance. The Project site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance and it does not contain a Williamson Act Contract. However, where there is urban development proposed near or adjacent to agricultural land uses and/or operations, General Plan Policy RC-8e requires the following conditions of approval:

- Require notifications in urban property deeds that agricultural operations are in the vicinity, in keeping with the City’s right-to-farm ordinance.
- Require adequate and secure fencing at the interface of urban and agricultural uses.
- Require phasing of new residential subdivisions, so as to include an interim buffer between residential and agricultural uses.
- Require a buffer, which may include a roadway and landscaped buffer, open space transition area, or low intensity uses, between urban uses and lands designated Agriculture on the land use map.

In addition to General Plan Policy RC-8e, the Proposed Project shall also comply with Chapter 13.42 (Agricultural Mitigation Fee) of the City’s Municipal Code. This compliance is required as the Proposed Project will convert Farmland of Local Importance to a non-agricultural use.

Additionally, the Proposed Project site is not zoned for forest land or timberland and the Proposed Project does not result in the loss of forest land or conversion of forest land to non-forest use.

The Project site currently consists of raw, undeveloped land and existing single-family residence and ancillary structures including a barn structure. Furthermore, the site is surrounded by urban development to its east, west, and south. The Proposed Project will not involve changes in the

existing environment that would result in the conversion of farmland to a non-agricultural use. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

**MITIGATION MEASURES:**

Mitigation is not required for this topic.

**3. AIR QUALITY -- WOULD THE PROJECT:**

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied on to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

**REGULATORY SETTING**

Federal Regulations

At the federal level, the United States Environmental Protection Agency (EPA) administers and enforces air quality regulations. Federal air quality regulations were developed primarily from implementation of the Federal Clean Air Act. If an area does not meet National Ambient Air Quality Standards (NAAQS) over a set period (three years), EPA designates it as a "nonattainment" area for that pollutant. EPA requires states that have areas that do not comply with the NAAQS to prepare and submit air quality plans showing how the standards would be met. If the states cannot show how the standards would be met, then they must show progress toward meeting the standards. These plans are referred to as the State Implementation Plan (SIP). Under severe cases, EPA may impose a federal plan to make progress in meeting the federal standards. The San Joaquin Valley Air Basin does not meet the NAAQS for O and PM.

The EPA also sets nationwide emissions and fuel standards for mobile sources, which include on-road (highway) motor vehicles such trucks, buses, and automobiles, and non-road (off-road) vehicles and equipment used in construction, agricultural, industrial, and mining activities (such as bulldozers and loaders). California also has the ability to set its own motor vehicle emission and fuel standards, as long as they are the same or more stringent than the Federal standards.

In the past decade, the EPA has established a number of emission standards for on- and non-road heavy-duty diesel engines used in trucks and other equipment. This was done in part because diesel engines are a significant source of nitrogen oxides, or NO, and particulate matter (PM and PM) and because the EPA has identified diesel particulate matter as a probable carcinogen. Implementation of the heavy-duty diesel on-road vehicle standards and the non-road diesel engine standards are estimated to reduce PM and NO emissions from diesel engines up to 95 percent in 2030 when the heavy-duty vehicle fleet is completely replaced with newer heavy-duty vehicles that comply with these emission standards.

In contrast with the diesel engine emission standards, the EPA substantially reduced the amount of sulfur allowed in diesel fuels. The sulfur contained in diesel fuel is a significant contributor to the formation of particulate matter in diesel-fueled engine exhaust. The new standards reduced the amount of sulfur allowed by 97 percent for highway diesel fuel (from 500 parts per million by weight [ppmw] to 15 ppmw), and by 99 percent for off-highway diesel fuel (from about 3,000 ppmw to 15 ppmw). The low sulfur highway fuel (15 ppmw sulfur), also called ultra-low sulfur diesel (ULSD) is currently required for use by all vehicles in the U.S.

All of the above Federal diesel engine and diesel fuel requirements have been adopted by California, in some cases with modifications making the requirements more stringent or the implementation dates sooner.

### State Regulations

The California Clean Air Act (CCAA) sets more stringent ambient air quality standards (i.e., California Ambient Air Quality Standards, or CAAQA) for all the pollutants covered under EPA's NAAQS, and additionally regulates levels of vinyl chloride, hydrogen sulfide, sulfates, and visibility-reducing particulates. The CCAA also outlines a program for areas in the State to attain the CAAQS by the earliest practical date. CARB is the state air pollution control agency and if an area does not meet the CAAQS, CARB designates the area as a nonattainment area. The San Joaquin Valley Air Basin does not meet the CAAQS for O, PM, and PM. CARB requires regions that do not meet CAAQS for O to submit clean air plans that describe plans to attain the standard or show progress toward attainment.

In addition to the EPA, CARB further regulates the amount of air pollutants that can be emitted by new motor vehicles sold in California. California-specific vehicle emissions standards were first imposed in 1961 and are more stringent than federal standards. CARB also sets standards for motor vehicle fuels sold in the state and has implemented vehicle Inspection and Maintenance (I/M) and "Smog Check" programs with the California Bureau of Automotive Repair.

To address the issue of diesel emissions in the state, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. In addition to requiring more stringent emission standards for new on-road and off-road mobile sources and stationary diesel-fueled engines to reduce particulate matter emissions by 90 percent, a significant component of the plan involves.

the application of emission control strategies to existing diesel vehicles and equipment. Many of the measures of the Diesel Risk Reduction Plan have been approved and adopted, including the Federal on-road and non-road diesel engine emission standards for new engines, as well as adoption of regulations for low sulfur fuel in California.

CARB has adopted and implemented a number of regulations for stationary and mobile sources to reduce emissions of DPM. Several of these regulatory programs affect medium and heavy-duty diesel trucks that represent the bulk of DPM emissions from California highways. CARB regulations require on-road diesel trucks to be retrofitted with particulate matter controls or replaced to meet 2010 or later engine standards that have much lower DPM and PM emissions. This regulation will substantially reduce these emissions between 2013 and 2023. While new trucks and buses will meet strict federal standards, this measure is intended to accelerate the rate at which the fleet either turns over so there are more cleaner vehicles on the road or is retrofitted to meet similar standards. With this regulation, older, more polluting trucks would be removed from the roads sooner.

CARB has also adopted and implemented regulations to reduce DPM and NO<sub>x</sub> emissions from in-use (existing) and new off-road heavy-duty diesel vehicles (e.g., loaders, tractors, bulldozers, backhoes, off-highway trucks, etc.). The regulations apply to diesel-powered off-road vehicles with engines 25 horsepower (hp) or greater. The regulations are intended to reduce particulate matter and NO exhaust emissions by requiring owners to turn over their fleet (replace older equipment with newer equipment) or retrofit existing equipment in order to achieve specified fleet-averaged emission rates. Implementation of this regulation, in conjunction with stringent Federal off-road equipment engine emission limits for new vehicles, will significantly reduce emissions of DPM and NO.

### **San Joaquin Valley Air Pollution Control District**

The San Joaquin Valley Air Pollution Control District (SJVAPCD) is made up of eight counties in California's Central Valley: San Joaquin, Stanislaus, Merced, Madera, Fresno, Kings Tulare, and the western portion of Kern. The primary role of the SJVAPCD is to develop rules, regulations, plans, and pollution control strategies for the San Joaquin Valley to control air pollution in the region. The district's rules and regulations control air pollution from a wide range of sources, not just large industrial sources such as factories and power plants. In March 2007, an Indirect Source Review (ISR) rule was adopted that controls air pollution from new land developments. The adopted rules and regulations that apply to land use projects, such as the Proposed Project are described below.

### **SJVAPCD Indirect Source Review Rule**

SJVAPCD Rule 9510, Indirect Source Review (ISR or Rule 9510) was adopted to reduce NO<sub>x</sub> and PM<sub>10</sub> emissions from new land use development projects. The rule, which became effective March 1, 2006, is the result of state requirements outlined in the region's SIPs. Rule 9510 was amended in December 2017 (and became effective March 21, 2018) to ensure that all large development projects are subject to the rule. The SJVAPCD's SIP commitments are contained in the 2004 Extreme Ozone Attainment

Demonstration Plan and the 2003 PM<sub>10</sub> Plan. These plans identified the need to reduce PM<sub>10</sub> and NO<sub>x</sub> substantially to attain and maintain the ambient air-pollution standards on schedule.

New projects that would generate substantial air pollutant emissions are subject to this rule. The rule requires projects to mitigate both construction and operational period emissions by applying the SJVAPCD-approved mitigation measures and paying fees to support programs that reduce emissions. The rule requires mitigated exhaust emissions during construction based on the following levels:

- 20 percent reduction from unmitigated baseline in total NO<sub>x</sub> exhaust emissions
- 45 percent reduction from unmitigated baseline in total PM<sub>10</sub> exhaust emissions

For operational emissions, Rule 9510 requires the following reductions:

- 33.3 percent of the total operational NO<sub>x</sub> emissions from unmitigated baseline
- 50 percent of the total operational PM<sub>10</sub> exhaust emissions from unmitigated baseline

Fees apply to the unmitigated portion of the emissions and are based on estimated costs to reduce the emissions from other sources plus estimated costs to cover administration of the program.

### **Regulation VIII – Fugitive PM<sub>10</sub>**

SJVAPCD controls fugitive PM<sub>10</sub> through Regulation VIII (Fugitive PM<sub>10</sub> Prohibitions). The purpose of this regulation is to reduce ambient concentrations of PM<sub>10</sub> by requiring actions to prevent, reduce or mitigate anthropogenic (human caused) fugitive dust emissions. This applies to activities such as construction, bulk materials, open areas, paved and unpaved roads, material transport, and agricultural areas. Sources regulated are required to provide dust control plans that meet the regulation requirements. Fees are collected by SJVAPCD to cover costs for reviewing plans and conducting field inspections.

### Other SJVAPCD Rules

Other SJVAPCD Rules and Regulations that may be applicable to the project include, but are not limited to:

- Rule 4101 (Visible Emissions): The purpose of this rule is to prohibit the emissions of visible air contaminants to the atmosphere. The provisions of this rule apply to any source operation which emits or may emit air contaminants.
- Rule 4102 (Nuisance): The purpose of this rule is to protect the health and safety of the public and apply to any source operation that emits or may emit air contaminants or other materials.
- Rule 4601 (Architectural Coatings): The purpose of this rule is to limit Volatile Organic Compounds (VOC) emissions from architectural coatings. Emissions are reduced by limits on VOC content and providing requirements on coatings storage, cleanup, and labeling.
- Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations): The purpose of this rule is to limit VOC emissions from asphalt paving and maintenance operations. Paving operations will be subject to Rule 4641.

## IMPACT ANALYSIS

a. *Would the project conflict with or obstruct implementation of the applicable air quality plan?*

SJVAPCD has attainment plans for ozone and particulate matter, while the State has a CO attainment plan. As indicated in Table 3, project construction and operational emissions would not exceed the applicable SJVAPCD significance thresholds. Since all project emissions are estimated to be below their respective SJVAPCD significance thresholds, the project would be consistent with adopted reduction plans for ozone, particulate matter, and CO.

**Table 3 - SJVAPCD Significance Thresholds and Project Emissions**

Project	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> <sup>1</sup>	PM <sub>2.5</sub> <sup>1</sup>
<i>SJVAPCD Significance Thresholds*</i>	10	10	100 <sup>2</sup>	27	15	15
Construction Area Sources	0.47	1.29	1.92	<0.005	0.31	0.15
<b><i>Exceed Thresholds?</i></b>	No	No	No	No	No	No
Operations Area Sources	4.91	4.17	32	0.09	7.84	2.12
<b><i>Exceed Thresholds?</i></b>	No	No	No	No	No	No
*Applicable to both construction and operational emissions.						

While project emissions would not be significant, the project would still be required to comply with applicable SJVAPCD rules and regulations, which would further reduce potential air quality impacts. As noted, SJVAPCD Regulation VIII contains measures to reduce fugitive dust emissions during construction. Dust control provisions are also routinely included in site improvement plans and specifications, along with construction contracts. In addition, the project would be subject to SJVAPCD Rule 9510, which requires specific NO<sub>x</sub> and PM<sub>10</sub> reductions from construction exhaust and operational emissions. Compliance with Rule 9510 and dust control requirements would further reduce project impacts related to air quality plans that are already less than significant.

Therefore, the Proposed Project will have a **Less Than Significant Impact**.

b. *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?*

As noted in (a) above, Project operational emissions would not exceed SJVAPCD significance thresholds. Future attainment of federal and State ambient air quality standards is a function of successful implementation of the SJVAPCD's attainment plans. Consequently, the application of significance thresholds for criteria pollutants is relevant to the determination of whether a project's individual emissions would have a cumulatively significant impact on air quality. Pursuant to the SJVAPCD's guidance, if project-specific emissions would be less than the thresholds of significance for criteria pollutants, the project would not be expected to result in a cumulatively considerable net increase of any criteria pollutant for which the SJVAPCD is in nonattainment under applicable federal or State ambient air quality standards. As noted, project emissions would not exceed SJVAPCD significance thresholds. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

c. *Would the project expose sensitive receptors to substantial pollutant concentrations?*

As defined in the Guide for Assessing and Mitigating Air Quality Impacts, “sensitive receptors” include residences, schools, parks and playgrounds, day care centers, nursing homes, and hospitals (SJVAPCD 2015). Existing residences are located adjacent to the subject property in all directions, and the nearest neighborhood park is approximately 435-feet from the southwest corner of the Project site. These land uses meet the definition of sensitive receptors. Exposure of sensitive receptors to project construction emissions would be short-term and therefore would not have a lasting impact on health or well-being. As indicated in the table above, project operational emissions would not exceed SJVAPCD significance thresholds. As discussed above, the significance thresholds were established in part to ensure consistency with the objectives of air quality attainment plans adopted by the SJVAPCD. These plans are intended to have the Air Basin attain both federal and State ambient air quality standards, including federal primary standards designed to protect human health. Sensitive receptors in the vicinity of the project site would not be exposed to any substantial air pollutant emissions from project construction or operations. The Proposed Project would not have an impact on sensitive receptors.

CO hotspots, including heavy traffic and congested roadways, have the potential to expose receptors to emissions that violate state and/or federal CO standards, even if the broader air basin is in attainment of these standards. The SJVAPCD guide indicates that a project would not violate the CO standards if neither of the following criteria are met (SJVAPCD 2015):

- A traffic study for the project indicates that the Level of Service (LOS) on one or more streets or at one or more intersections in the project vicinity will be reduced to LOS E or F; or
- A traffic study indicates that the project will substantially worsen an already existing LOS F on one or more streets or at one or more intersections in the project vicinity.

A Transportation Impact Analysis was prepared for the Proposed Project. Based on a review of this analysis, the Proposed Project will not result in any intersections or roadways being reduced to a LOS of E or F.

Based on the analysis contained above, the Proposed Project will have a **Less Than Significant Impact**.

d. *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

The Project proposes residential development with potential for future commercial development on approximately 4.6-acres, with no plans for development that could potentially be a significant source of odors. The proposed residential uses, including the construction and operation of the Proposed Project, would not generate substantial odors that would affect a substantial number of people. Land uses typically considered associated with odors include wastewater treatment facilities, waste-disposal facilities, or agricultural operations and the Project does not contain any land uses typically

associated with emitting odors. During operation, Project developments could generate odors from cooking or trash enclosures. These odors would not be substantial enough to be considered nuisance odors that would affect a substantial number of people. During Project related construction activities on the Project site, construction equipment exhaust, painting, and paving activities would temporarily generate odors. Any construction-related odor emissions would be temporary and intermittent. Additionally, noxious odors would be confined to the immediate vicinity of the construction equipment. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

**MITIGATION MEASURES:**

Mitigation is not required for this topic.

**4. BIOLOGICAL RESOURCES -- WOULD THE PROJECT:**

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

**IMPACT ANALYSIS**

The following discussion is an analysis for criteria (a) through (b):

- a. *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?*

The Proposed Project site is within the coverage area of the San Joaquin County Multi-Species Open Space and Habitat Conservation Plan (SJMSCP), a Habitat Conservation Plan adopted by the San Joaquin Council of Governments (SJCOG) and its incorporated cities. The SJMCP was developed to minimize and mitigate impacts to plant and wildlife habitat resulting from the conversion of 109,302 acres of open space to non-open space use to occur in San Joaquin County between 2001 and 2051. The SJMSCP implements a program that assesses a habitat conservation fee on participating projects that convert open space land to an urban use. The SJMSCP also sets forth Incidental Take Minimization Measures (ITMMs) that are required to be implemented by projects to prevent impacts to special-status species that may be occupying a project site or nearby areas.

The City received a letter, dated May 16, 2024 and July 30, 2025, from the SJCOG addressing the Proposed Project's requirement to comply with the SJMSCP. The letters provided by the SJCOG generally state the following:

The Proposed is subject to the SJMCP. This can up to a 30-day process and it is recommended that the Project Applicant contact the SJMCP staff as early as possible. The following steps satisfy the SJMSCP requirements; schedule a SJMCP Biologist to perform a pre-construction survey prior to any ground disturbance and satisfy the incidental take mitigation measures and mitigation requirements. The SJMCP requires that prior to any activities disrupting the site (i.e., grading, clearing, removal of vegetation, etc.), the Applicant and/or Project Proponent schedule a pre-construction survey with a SJMCP Biologist and comply with the SJMCP's Incidental Take Minimization Measures and Mitigation Requirement. Compliance with the SJMCP will be required of the Proposed Project as a standard Condition of Approval. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

- b. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Based on a review of the City's General Plan and EIR, the Proposed Project is not located within an area known to contain riparian habitat. The General Plan states that the primary area of riparian vegetation and habitat is associated with Walthall Slough. The Slough's northern boundary is contiguous with the southwestern boundary of the General Plan Study Area. The Proposed Project is not located within, or adjacent to, Walthall Slough. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

- c. *Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

Based on a review of the City's General Plan and EIR, there are no identified wetlands within the Project site. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

- d. *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native residents or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

Based on a review of the City's General Plan and EIR, significant impacts to wildlife corridors, as a result of the building out of the General Plan Planning Area could potentially occur with the conversion of surrounding farmlands to urbanized uses. The General Plan states that although there are no known native wildlife corridors passing through this developed and intensely farmed Planning Area, some species of birds may forage in the agricultural fields during migration. However, the Proposed Project is not located within the areas identified as being existing farmlands/agricultural fields in the General Plan. Additionally, the Proposed Project is surrounded by existing City development to the east, west, and south. Therefore, new development created as a result of the Proposed Project would have minimal impacts on wildlife corridors as surrounding urban development already exists. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

- e. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

Referring to the discussion above, under Item 4(a). In addition, the City requires development projects to comply with the City's Heritage Tree Ordinance, as per General Plan Policy No. RC-8.6 and Implementation measure RC-8d. Based on a visual site inspection, there are no existing trees that require removal. The Proposed Project site primarily consists of fallow dirt, and minor vegetation, as well as an existing single-family residence. The Proposed Project will have a **Less Than Significant Impact**.

- f. *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

Refer to the discussion for Item 4(a), above.

#### **MITIGATION MEASURES:**

Mitigation is not required for this topic.

**5. CULTURAL RESOURCES -- Would the project:**

	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Cause a substantial adverse change in the significance of a historical resource as defined in '15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?			X	
c) Disturb any human remains, including those interred outside of formal cemeteries?		X		

**IMPACT ANALYSIS**

- a. *Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?*
- b. *Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?*

Based on a review of the City’s General Plan Resource Conservation Element and the General Plan Draft EIR, the Project site is not known to contain historical or archaeological resources. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

- c. *Would the project disturb any human remains, including those interred outside of dedicated cemeteries?*

It is not anticipated that the Proposed Project will disturb any human remains. However, future development and construction of the Project site, human remains may be identified, particularly during activities requiring ground disturbance (i.e., grading, trench digging, etc.). As such, the Proposed Project shall incorporate Mitigation Measure CUL-1, specified below, in accordance with Section 15064.5(e) of the CEQA Guidelines, to reduce any potentially significant impacts to a level of **Less Than Significant with Mitigation Incorporated**. Refer to Mitigation Measure CUL-1, below.

**MITIGATION MEASURES:**

The following mitigation measure shall be incorporated into the Proposed Project:

### Mitigation Measure CUL-1:

In accordance with Section 15064.4(e) of the CEQA Guidelines, in the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps shall be taken:

2. There shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlie adjacent human remains until:
  - c) The coroner of the County in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required; and,
  - d) If the coroner determines the remains to be Native American:
    - iv. The coroner shall contact the Native American Heritage Commission within 24 hours.
    - v. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American.
    - vi. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains, and any associated grave goods as provided in Public Resources Code Section 5097.98.

**6. ENERGY -- Would the project:**

	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?			X	

**IMPACT ANALYSIS**

The following discussion is an analysis for criteria (a) and (b):

- a. *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*
- b. *Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?*

The Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6, of the California Code of Regulations (Title 24), was established in 1978 in response to a legislative mandate to reduce California’s energy consumption. Title 24 updated approximately every three (3) years, and the 2019 Title 24 went into effect on January 1, 2020.

The California Green Buildings Standards Code (CAL Green) establishes mandatory green building standards for buildings in California. CAL Green was developed to reduce Greenhouse Gas (GHG) emissions from buildings, promote environmentally responsible and healthier places to live and work, reduce energy, and water consumption, and respond to environmental directives. The most recent update to CAL Green went into effect January 1, 2020, and covers five (5) categories: planning and design, energy efficiency, water efficiency and conservation, material and resource efficiency, and indoor environmental quality.

The Proposed Project will be required to comply with all California Green Building Code Standards, including Energy Efficient standards for residential buildings.

The anticipated construction schedule assumes that the Proposed Project will be built over a two (2) – four (4) year period. The Proposed Project will require the site preparation, grading, paving, architectural coating, and trenching. The site is vacant and will require the demolition of existing structures.

Implementation of applicable Manteca General Plan Goals, Policies, and Implementation Measures as it relates to Air Quality, Energy, Utilities, etc. would reduce energy waste from construction. In addition, as noted in Section 8 of this Initial Study, the Proposed Project is in compliance with the City's adopted Climate Action Plan, adopted in 2013. Therefore, the Proposed Project would not consume energy in a manner that is wasteful, inefficient, or unnecessary. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

***MITIGATION MEASURES:***

Mitigation is not required for this topic.

**7. GEOLOGY AND SOILS -- WOULD THE PROJECT:**

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

## IMPACT ANALYSIS

- a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?*
- a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*
- a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?*

According to a review of Section 3.6 of the Manteca General Plan Draft EIR, there are no known active or potentially active faults, or Alquist-Priolo Earthquake Fault Zones, located within Project site. However, there are identified faults within the region including, San Joaquin Fault, The Midway Fault, the Corral-Hollow-Carnegie Fault, the Greenville Fault, the Antioch Fault, and the Los Positas Fault. Rupture of any of these faults may expose people or structures within the Project site to potential adverse effects associated with a seismic event. General Plan Policies S-2.1 through S-2.7 and Actions S-2a through S-2d were adopted to minimize the potential for impacts. In addition, future development within the Project site will be required to comply with the California Building Code, which requires the submittal of Geotechnical Reports in accordance with State law. The Proposed Project will comply with the applicable General Plan Policies and Actions, as well as the California Building Code. Therefore, consistent with the City's General Plan Draft EIR, the Proposed Project will have a **Less Than Significant Impact**.

- a.4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?*

The potential for landslides is relatively low, as the Project site and surrounding area are relatively flat in topography, with little to no slope. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

- b. Would the project result in substantial soil erosion or the loss of topsoil?*

The Proposed Project is consistent with the Manteca General Plan. Section 3.6 (Geology and Soils) of the General Plan Draft EIR concluded that within the Planning Area, the impacts of substantial soil erosion or the loss of topsoil is less than significant. In addition, construction activities for the Proposed Project will include the excavation and fill placement of soils in order to support the foundations and prevent soil erosion. These activities will be required to comply with the applicable General Plan Policies and Actions. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

- c. Would the project be located on a geologic unit or soil that is unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?*

The Proposed Project is located on a site that is relatively flat, with little to no slope. The topography of the surrounding area is also flat. As such, the potential for off-site landslides is relatively low. In addition, the Proposed Project will be required to comply with General Plan Policies S-2.1 through S-2.7 and Actions S-2a through S-2d, which were adopted to minimize potential impacts to landslides, lateral spreading, subsidence, and liquefaction or collapse. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

- d. *Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code, creating substantial risks to life or property?*

The Project site is not located on soil as defined in Table 1-B of the Uniform Building Code. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

- e. *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

New development within the Proposed Project will connect to City of Manteca wastewater system and does not propose the installation or use of a private septic tank system. The existing homes located easterly of Cottage Avenue are currently served sewer services by private septic systems. This service will remain until such time as the individual parcels connect to City sewer services. The Proposed Project will be installing utilities in Cottage Avenue to allow for these connections to be made when needed. Because the septic systems are currently known to be operational, it is assumed the soils can continue to accommodate these septic systems. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

- f. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

There are no known unique paleontological or geologic resources or features on the Project site. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

**MITIGATION MEASURES:**

Mitigation is not required for this topic.

**8. GREENHOUSE GAS EMISSIONS -- WOULD THE PROJECT:**

	<i>POTENTIALLY SIGNIFICANT IMPACT</i>	<i>LESS THAN SIGNIFICANT WITH MITIGATION</i>	<i>LESS THAN SIGNIFICANT IMPACT</i>	<i>NO IMPACT</i>
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.			X	

**ENVIRONMENTAL SETTING**

**GHG BACKGROUND**

Greenhouse gases (GHGs) are gases that absorb and emit radiation within the thermal infrared range, trapping heat in the earth’s atmosphere. GHGs are both naturally occurring and are emitted by human activity. GHGs include carbon dioxide, the most abundant GHG, as well as methane, nitrous oxide, and other gases. Potential climate change impacts occurring in the San Joaquin Valley include higher temperatures, longer and more severe droughts, more intense precipitation events, and more frequent and extensive wildfires.

GHGs are not generally thought of as traditional air pollutants because their impacts are global in nature, while air pollutants mainly affect the general region of their release to the atmosphere (SJVAPCD 2015). Nevertheless, the U.S. Environmental Protection Agency (EPA) has found that GHG emissions endanger both the public health and public welfare under Section 202(a) of the Clean Air Act due to their impacts associated with climate change (EPA 2009).

Measurements of GHG emissions are commonly expressed in carbon dioxide equivalent (CO<sub>2</sub>e), in which emissions of all other GHGs are converted to equivalent carbon dioxide emissions. GHG emissions in California in 2021, the most recent year for which data are available, were estimated at approximately 381.3 million metric tons CO<sub>2</sub>e – a decrease of approximately 21.5% from the peak level in 2004 but an increase of approximately 3 % from the 2020 emissions. Transportation was the largest contributor to GHG emissions in California, with 39% of total emissions. Other significant sources include industrial activities, with approximately 22% of total emissions, and electric power generation, both in-state and imported, with approximately 16% of total emissions (ARB 2023).

As part of the update of its Climate Action Plan, the City conducted a preliminary inventory of community GHG emissions. The results indicated that the Manteca community generated 711,197 metric tons CO<sub>2</sub>e of GHGs in 2020. The largest share came from transportation and motor vehicles, accounting for approximately 73.2% of total GHG emissions. In 2013, the City of Manteca adopted a Climate Action Plan.

The Climate Action Plan sets a citywide target of a per capita GHG emission reduction of 21.7% from 1990 levels by 2020. The City proposes to achieve this target by energy efficiency and other GHG reduction measures in City buildings and operations, and by requiring development projects constructed in the City of Manteca to reduce GHG emissions by measures such as designing energy-efficient structures, water conservation and waste reduction measures, and implementing transportation demand management programs in projects with large numbers of employees, among others (City of Manteca 2013). However, the Climate Action Plan applies only to achieving reduction targets to 2020. The City has begun a process to update its Climate Action Plan, but it is not known at this time when an updated plan will be adopted.

### **REGULATORY SETTING:**

#### *Assembly Bill 32 – California Global Warming Solutions Act (2006)*

Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006, codified the State’s GHG emissions target by directing CARB to reduce the State’s global warming emissions to 1990 levels by 2020. AB 32 was signed and passed into law by Governor Schwarzenegger on September 27, 2006. Since that time, the CARB, CEC, California Public Utilities Commission (CPUC), and Building Standards Commission have all been developing regulations that will help meet the goals of AB 32 and Executive Order S-3-05, which has a target of reducing GHG emissions 80 percent below 1990 levels.

A Scoping Plan for AB 32 was adopted by CARB in December 2008. It contains the State’s main strategies to reduce GHGs from business-as-usual emissions projected in 2020 back down to 1990 levels. Business-as-usual (BAU) is the projected emissions in 2020, including increases in emissions caused by growth, without any GHG reduction measures. The Scoping Plan has a range of GHG reduction actions, including direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system.

As directed by AB 32, CARB has also approved a statewide GHG emissions limit. On December 6, 2007, CARB staff resolved an amount of 427 million metric tons (MMT) of CO<sub>2</sub>e as the total statewide GHG 1990 emissions level and 2020 emissions limit. The limit is a cumulative statewide limit, not a sector- or facility-specific limit. CARB updated the future 2020 BAU annual emissions forecast, due to the economic downturn, to 545 MMT of CO<sub>2</sub>e. Two GHG emissions reduction measures currently enacted that were not previously included in the 2008 Scoping Plan baseline inventory were included, further reducing the baseline inventory to 507 MMT of CO<sub>2</sub>e. Thus, an estimated reduction of 80 MMT of CO<sub>2</sub>e is necessary to reduce statewide emissions to meet the AB 32 target by 2020.

#### ***SJVAPCD’s Guidance for Addressing GHG Emissions Impacts under CEQA***

Under its mandate to provide local agencies with assistance in complying with CEQA in climate change matters, the SJVAPCD developed its *Guidance for Valley Land-Use Agencies in Addressing GHG Emissions*

*Impacts for New Projects under CEQA.* As a general principal to be applied in determining whether a Proposed Project would be deemed to have a less-than-significant impact on global climate change, a project must be in compliance with an approved GHG emission reduction plan that is supported by a CEQA-compliant environmental document or be determined to have reduced or mitigated GHG emissions by 29 percent relative to Business-As-Usual conditions, consistent with GHG emission reduction targets established in CARB’s Scoping Plan for AB 32 implementation. The SJVAPCD guidance is intended to streamline the process of determining if project specific GHG emissions would have a significant effect. The proposed approach relies on the use of performance-based standards and their associated pre-quantified GHG emission reduction effectiveness (Best Performance Standards, or BPS). Establishing BPS is intended to help project proponents, lead agencies, and the public by proactively identifying effective, feasible mitigation measures. Emission reductions achieved through implementation of BPS would be pre-quantified, thus reducing the need for project specific quantification of GHG emissions. For land use development projects, BPS would include emissions reduction credits for project features such as bicycle racks and pedestrian access to public transit. Projects implementing a sufficient level of BPS would be determined to have a less-than-significant individual and cumulative impact on global climate change and would not require project specific quantification of GHG emissions. For all projects for which the lead agency has determined that an Environmental Impact Report is required, quantification of GHG emissions would be required whether or not the project incorporates BPS. SJVAPCD’s guidance document does not constitute a rule or regulation but is intended for use by other agencies in their assessment of the significance of project impacts to global climate change under CEQA.

### ***GHG Emission Reduction Plans***

The State of California has implemented GHG emission reduction strategies through AB 32, the Global Warming Solutions Act of 2006, which requires total statewide GHG emissions to reach 1990 levels by 2020, or an approximately 29% reduction from 2004 levels. For the target year of 2020, state GHG emissions were 369.2 million metric tons CO<sub>2</sub>e, which was 61.8 million metric tons CO<sub>2</sub>e below the AB 52 target (ARB 2022a). In 2016, Senate Bill (SB) 32 was enacted. SB 32 extends the GHG reduction objectives of AB 32 by mandating statewide reductions in GHG emissions to levels that are 40% below 1990 levels by the year 2030. The State has adopted an updated Scoping Plan that sets forth strategies for achieving the SB 32 target. The updated Scoping Plan continues many of the programs that were part of the previous Scoping Plans, including the cap-and-trade program, low-carbon fuel standards, renewable energy, and methane reduction strategies. It also addresses, for the first time, GHG emissions from the natural and working lands of California, including the agriculture and forestry sectors (ARB 2017).

In 2022, ARB adopted the 2022 Scoping Plan, which assesses progress towards achieving the SB 32 2030 reduction target and lays out a path to achieve carbon neutrality no later than 2045. Proposed strategies to achieve these reductions include rapid movement to zero emission transportation, phasing out fossil fuel use for heating homes and buildings, restricting use of chemicals and refrigerants that are thousands of times more powerful at trapping heat than carbon dioxide, expanded development of renewable energy sources, increased use of natural and working lands for incorporating and storing carbon, and greater employment of carbon removal technology (ARB 2022).

### ***City of Manteca Climate Action Plan***

On October 15, 2013, The City of Manteca adopted its current Climate Action Plan (CAP) as a primary strategy for ensuring that the buildout of the General Plan 2023 supported the goals of Assembly Bill (AB) 32. The City's CAP is considered a "Qualified Plan" according to CEQA Guidelines Section 15183.5.2 and includes strategies to ensure it achieves a GHG reduction goal of 15 percent below baseline (20050 and 2010) levels. The current CAP targets set the City on a trajectory to achieve reductions through 2020.

The CAP's emission inventory for 2010 showed the City emitted 408,869 metric tons (MT) of CO<sub>2</sub>e. As a point of comparison, statewide emissions were about 444 million MT of CO<sub>2</sub>e in 2011. Achieving the AB 32 target of reducing emissions to 1990 levels by 2020 required a reduction in per capita GHG emissions of 21.7 percent, with the majority of that coming through State reduction strategies (19.5 percent). The rest of the reductions (2.2 percent) were achieved through local measures including reducing vehicle trips and miles traveled, encouraging energy efficiency beyond state standards, improving transportation infrastructure, saving water, and reducing waste. The Climate Action Plan applies only to achieving reduction targets to 2020. The City has begun a process to update its Climate Action Plan, but it is not known at this time when an updated plan will be adopted.

### **IMPACT ANALYSIS**

The following discussion is an analysis for criteria (a) and (b):

- a. *Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b. *Would the project conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

This section provides a computation of GHG emissions associated with the Proposed Project. It is generally accepted that individual development projects, in and of themselves, are too small to have a perceptible effect on global climate. However, the GHG emissions from each development project results in an incremental contribution to global warming and climate change. The geographic scope of climate change is global, and the cumulative emissions of GHGs globally have resulted in cumulatively significant climate change impacts. Thus, in CEQA terms, GHG emissions associated with individual development projects are cumulative by nature in their effects. A significant project impact would occur if the GHG emissions associated with a project represent a considerable contribution to the cumulatively significant impacts resulting from global climate change. As such, the focus of this analysis is to determine whether the GHG emissions associated with the project represent a considerable contribution to the cumulatively significant impacts resulting from global climate change.

The CalEEMod model estimated the total GHG construction and operational emissions associated with the project (see Appendix B). Table 4 presents the results of the CalEEMod run. "Mitigated emissions" are the result of project compliance with applicable laws, rules, and regulations, along with inclusion of project features that reduce GHG emissions. These include the following:

- Project buildings would consume less energy under the adopted 2022 Energy Code than under the 2019 Energy Code, which is the baseline used by CalEEMod.

- SB X7-7, enacted in 2009, sets an overall goal of reducing per capita urban water use by 20% by December 31, 2020. The California Green Building Code mandates a 20% reduction in indoor water use.
- AB 341 establishes the goal of diverting 75% of California’s waste stream from landfills by 2020.

**Table 4 – Project Greenhouse Gas Emissions**

<b>Project Greenhouse Gas Emissions</b>		
<b>GHG Emission Type</b>	<b>Unmitigated Emissions</b>	<b>Mitigated Emissions</b>
Construction	410	410
Operation	8,324	8,324
Total GHG emissions for construction period in metric tons carbon dioxide equivalent (CO2e)		
Annual emissions for operations in metric tons CO2e		
Source: <i>California Emissions Estimator Model Version 2022.1.1.29</i>		

GHG construction emissions would be limited due to the length of construction activity; these emissions would cease once work is completed. Mitigated operational GHG emissions would be constant relative to business-as-usual (unmitigated) conditions.

As the City’s Climate Action Plan addresses GHG emissions only to the year 2020, analysis of project impacts will be based on the 2017 California Scoping Plan. Approximately 83% of the GHG emission reduction programs in the Scoping Plan counted toward meeting the 29% objective for 2020 are State-level programs, with the remaining 17% to be achieved by programs at the local government level, including development review. Thus, the local action share of the 29% reduction would be 4.93%. Based on this, it can be assumed that a development project that achieves at least a 4.93% reduction in GHG emissions from business-as-usual levels would be consistent with the objectives of both State and SJVAPCD GHG reduction plans. The lack of a reduction associated with the Proposed Project would not exceed this local share. Therefore, further analysis is required.

The Proposed Project would be in an area with limited retail land uses. Thus, upon completion of the commercial component of the Proposed Project, it can be expected to attract residents from the vicinity who may otherwise travel farther distances for retail and commercial services. As such, the Proposed Project is expected to reduce the VMT in the area, which in turn would reduce GHG emissions from vehicles. The amount of VMT reduction cannot be estimated. However, as mobile emissions are the primary source of GHG emissions associated with the Proposed Project, the reduction is expected to be significant.

The State of California has comprehensive GHG laws and regulations requiring reductions that affect project emissions. The Proposed Project is subject to several State regulations applicable to project design, construction, and operation that would reduce GHG emissions, increase energy efficiency, and ensure compliance with the Scoping Plan. Legal mandates to reduce GHG emissions from vehicles, for example, would reduce project-related vehicular emissions. Other mandates that would reduce GHG emissions

include reducing per capita water consumption and imposing waste management standards to reduce methane and other GHGs from solid wastes.

The Proposed Project would be subject to codes that require energy efficiency measures, which would reduce the demand for electricity produced by fossil fuels – a major source of GHG emissions. Also, attainment of the targets of the Renewables Portfolio Standard would reduce the amount of electricity generated by fossil fuels, further reducing GHG emissions from energy sources. Based on the information provided above, the Proposed Project would be consistent with GHG reduction plans of the State. Based on the analysis above, the Proposed Project will have a Less Than Significant Impact.

**MITIGATION MEASURES:**

Mitigation is not required for this topic.

**9. HAZARDS AND HAZARDOUS MATERIALS -- WOULD THE PROJECT:**

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

**IMPACT ANALYSIS**

a. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

- b. *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

Based on a review of Section 3.8 of the City's General Plan Draft EIR, "hazardous materials regulations related to the use, handling, and transport of hazardous materials are codified in Titles 8, 22, and 26 of the CCR, and their enabling legislation set forth in Chapter 6.95 of the California Health and Safety Code. These laws were established at the state level to ensure compliance with federal regulations to reduce the risk to human health and the environment from the routine use of hazardous substances."

The Proposed Project does not anticipate having to handle, use, or transport hazardous materials. In the event development of the Project site results in the handling, using, and/or transporting of hazardous materials, these activities will take place in accordance with all applicable requirements and regulations as generally described in the General Plan Draft EIR. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

Based on the above analysis, the Proposed Project will have a **Less Than Significant Impact**.

- c. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school?*

The Project is approximately 0.63 miles from Joshua Cowell Elementary School. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

- d. *Would the project be located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

Based on a review of Section 3.8 of the City's General Plan EIR, the Project site is not included on a list of hazardous materials sites compiled in accordance with Section 65962.5 of the Government Code. Therefore, the Proposed Project will have **No Impact**.

- e. *For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?*

The Project site is not located within an airport land use plan, or within two (2) miles of a public airport or public use airport. Therefore, the Proposed Project will have **No Impact**.

- f. *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The San Joaquin (SJ) County Office of Emergency Services is responsible for implementing the Countywide Emergency Preparedness Plan and Local Hazard Mitigation Plan. The San Joaquin County Environmental Health Department maintains a Hazardous Materials Management Plan/Hazardous Materials Business Plan (HMMP/HMBP). The HMMP/HMBP describes agency roles, strategies, and processes for responding to emergencies involving hazardous materials. The Environmental Health Department maintains a Hazardous Materials Database and Risk and Flood Maps.

The Proposed Project does not include any components that would impair or physically interfere with any of SJ County's emergency plans or evacuation plans. Rather, the Proposed Project consists of roadway improvements to Cottage Avenue and Louise Avenue that will enhance the County's emergency plans or evacuation plans. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

- g. Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*

Based on a review of the website: <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones> the Project site is not located in an area delineated as "wildlands." Therefore, the Proposed Project will have a **Less Than Significant Impact**.

**MITIGATION MEASURES:**

Mitigation is not required for this topic.

**10. HYDROLOGY AND WATER QUALITY -- Would the project:**

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:			X	
i) Result in substantial on- or offsite erosion or siltation;			X	
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			X	
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			X	
iv) Impede or redirect flood flows?			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

## IMPACT ANALYSIS

- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*

The Proposed Project will not violate any federal, state, or local water quality standards or waste discharge requirements. Under the existing General Construction Permit requirements of the National Pollutant Discharge Elimination System (NPDES), any reasonably near future construction on the Project site will require preparation of a stormwater pollution prevention plan (SWPPP) that incorporates water quality control Best Management Practices (BMPs). The implementation of water quality control BMPs would minimize water quality impacts from future construction to a level that is considered less than significant. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

- b. *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

The Proposed Project will be served domestic water by the City of Manteca, who is the water purveyor for development within and around the Project site. Based on information provided by the Project Proponent's Civil Engineer, the Proposed Project's peak-hour water supply demand is approximately 2,200 gallons per minute (gpm). The City can accommodate this demand with its existing water supply system. The Proposed Project will be required to install a twelve (12) inch domestic water line in the right-of-way of Louise Avenue and provide two (2) points of connection to allow for adequate fire flow. Lastly, as Building Permits within the Project site are issued, the City will collect the applicable PFIP fees that will allow the City to fund and install water supply improvements within the City.

The Proposed Project is not anticipated to substantially decrease groundwater supplies or interfere substantially with groundwater recharge. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

- c. *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*
- i. *Result in substantial on- or offsite erosion or siltation;*
  - ii. *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;*
  - iii. *Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;*  
*or*
  - iv. *Impede or redirect flood flows?*

The Proposed Project will alter the existing drainage pattern of the site by way of construction and converting the site from raw ground to urban development. However, the Proposed Project, and its storm drainage design, will comply with the City's Standards and Specifications. Compliance will be ensured through the Proposed Project's Improvement Plan process. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

- d. *Would the project be located in flood hazard, tsunami, or seiche zones, or risk release of pollutants due to project inundation?*

Figure S-2 (Flooding) of the General Plan provides an illustration of the FEMA 100- and 200-year flood zones. Based on a review of this figure, the Project site is not located within 100- or 200- year flood zones. In addition, according to Section 3.9 of the General Plan Draft Environmental Impact Report (EIR), the risk of dam failure inundating portions of the County is considered low, and the degree and nature of risk for each dam is unknown. Furthermore, the General Plan EIR stated that although the likelihood of dam failure inundation is remote, the area subject to inundation within the General Plan Study Area is not specifically defined but would generally coincide with the area delineated as the 100- and 200- year floodplain. In response to the potential of inundation by a result of dam failure (or flooding), the City has adopted General Plan policies, which include coordination with the U.S. Army Corps of Engineers on potential flooding risks and ensuring that City staff and Emergency Response Services are trained to respond to catastrophic dam failure (or flooding). Accordingly, restrictions on development or specific requirements associated with flooding are not required for this Proposed Project.

Tsunamis are defined as sea waves created by undersea fault movement. A tsunami poses little danger away from shorelines; however, when the tsunami reaches the shoreline, a high swell of water breaks and washes inland with great force. Waves may reach 50 feet in height on unprotected coasts. As Manteca is many miles inland, the project site is not exposed to flooding risks from tsunamis and adverse impacts would not result. A seiche is a long-wavelength, large-scale wave action set up in a closed body of water such as a lake or reservoir, whose destructive capacity is not as great as that of tsunamis. The Proposed Project is not located near a closed body of water. Therefore, it is not anticipated that the project site will be impacted by seiches in the future. Mudflows typically occur in mountainous or hilly terrain. The project site is not considered hilly terrain and mudflows do not pose a threat.

Based on the analysis contained above, the Proposed Project will have a **Less Than Significant Impact**.

- e. *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Refer to the analysis contained for 10(b).

#### **MITIGATION MEASURES:**

Mitigation is not required for this topic.

**11. LAND USE AND PLANNING - Would the project:**

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Physically divide an established community?			X	
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X	

**IMPACT ANALYSIS**

*a. Would the project physically divide an established community?*

The Proposed Project is located within the City of Manteca city limits and is bounded by existing urban development to the west, east, and south. North of the Project site is planned for urban uses according to the City’s General Plan. The Proposed Project is consistent with the surrounding area and would not physically divide an established community. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

*b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

The primary policy documents affecting the Proposed Project are the City’s General Plan and Zoning Ordinance. The City’s General Plan, adopted February 2024, designates the Project site for Low Density Residential (LDR) and Commercial (C) land uses. The Project as proposed is consistent with the land use designations applied to the Project site. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

**MITIGATION MEASURES:**

Mitigation is not required for this topic.

**12. MINERAL RESOURCES -- WOULD THE PROJECT RESULT IN:**

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

**IMPACT ANALYSIS**

The following discussion is an analysis for criteria (a) and (b):

- a. *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*
- b. *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?*

Based on a review of the City’s General Plan and EIR, the Proposed Project site is not located in an area known to contain mineral resources of value to the state, region, or City of Manteca. In addition, the Project site does not contain any state designated mineral resource zones, according to maps prepared by the State Mining and Geology Board. Therefore, the Proposed Project will have **No Impact**.

**MITIGATION MEASURES:**

Mitigation is not required for this topic.

**13. NOISE -- WOULD THE PROJECT RESULT IN:**

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or other applicable standards of other agencies?			X	
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X	

**IMPACT ANALYSIS**

- a. *Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

The Proposed Project consists of the development of single-family homes and retail commercial uses, located on a site within the urban area of the city of Manteca. Temporary noise levels as a result of construction activities are likely to occur. However, upon full build-out, uses such as single-family residential and commercial do not result in permanent noise levels that would exceed the City’s standard provided in the General Plan Safety Element. The Proposed Project will be required to adhere to General Plan Policies S-6.1 through S-6.16. In addition, a review of Figure S-3 (Future Noise Contours) shows that the Project site is within the 60-65 dBA Noise Contour, with the proposed residential portion being located within the 60 dBA Noise Contour. This is consistent with the exterior noise level standards defined in Tables S-1 and S-2 of the General Plan. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

- b. *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

Construction of the Proposed Project will result in groundborne vibration or groundborne noise levels, due primarily to the operation of heavy equipment. The Project Proponent shall comply with Implementation Actions S-6a through S-6j of the General Plan, which were adopted to address excessive groundborne vibration and noise.

In addition, the Proposed Project will be required to comply with Section 17.58.070 of the Manteca Municipal Code, which requires the following:

***A.** No vibration shall be produced that is transmitted through the ground and is discernible without the aid of instruments at the points of measurement specified in Section **17.58.030** (Points of Measurement) of this Chapter, nor shall any vibration produced exceed 0.002g peak at up to 50 CPS frequency, measured at the point of measurement specified in Section **17.58.030** (Points of Measurement) of this Chapter, using either seismic or electronic vibration measuring equipment. Vibrations occurring at higher than 50 CPS frequency of a periodic vibration shall not induce accelerations exceeding 0.001g. Single impulse periodic vibrations occurring at an average interval greater than five minutes shall not induce accelerations exceeding 0.01g.*

***B.** Uses, activities, and processes shall not generate vibrations that cause discomfort or annoyance to reasonable persons of normal sensitivity, or which endanger the comfort, repose, health, or peace of residents whose property abuts the property line of the parcel.*

***C.** Uses shall not generate ground vibration that interferes with the operations of equipment and facilities of adjoining parcels.*

***D.** Vibrations from temporary construction/demolition and vehicles that leave the subject parcel (e.g., trucks, trains, and aircraft) are exempt from the provisions of this Section.*

The Proposed Project will comply with General Plan Policies and Implementation Actions related to noise as well as the Municipal Code section referenced above. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

- c. *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

The Proposed Project is not located within the vicinity of a private airstrip or adopted airport land use plan, or within two (2) miles of an existing public or public use airport. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

#### **MITIGATION MEASURES:**

Mitigation is not required for this topic.

## 14. POPULATION AND HOUSING

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

### IMPACT ANALYSIS

- a. *Would the project induce a substantial population in one area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

The Proposed Project consists of single-family residential and commercial development that will induce population growth in the surrounding area of the City of Manteca. According to the 2020 U.S. Census, the population in Manteca is 83,489 people, and the average the persons per household is 3.11. As such, the Proposed Project is anticipated to generate 224 new residents (72 units x 3.11 persons per household) in addition to the properties identified within the proposed annexation boundary. This represents a 0.3% increase in population. A 0.3% increase in population is not considered to be substantial, and the City's General Plan contemplates urban development for the Project site. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

*Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

The Project site contains one (1) single family residence, which will be demolished as part of the Proposed Project's development. Existing residences located east of Cottage Avenue will not be displaced as part of the Proposed Project. The demolition of a single-family residence will not require the development of new housing off-site. As such, the Proposed Project will not displace substantial numbers of existing people or housing. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

### MITIGATION MEASURES:

Mitigation is not required for this topic.

## 15. PUBLIC SERVICES

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

### IMPACT ANALYSIS

- a. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection?*
- b. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection?*
- c. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?*
- d. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?*

- e. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could have significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?*

Fire Protection:

Fire protection services for the Proposed Project will be provided by the City of Manteca Fire Department (MFD). The MFD has reviewed the Proposed Project and provided comments on June 24, 2024. In their comments, the MFD did not suggest the Proposed Project will have a significant impact that would negatively affect service ratios, response times, or other performance objectives. In addition, the Proposed Project will be required to pay the applicable Public Facility Impact Fee (PFIP) at the time of building permit issuance. A portion of these PFIP fees will be utilized for MFD capital projects.

Police Protection:

Police protection services for the Proposed Project will be provided by the City of Manteca Police Department (MPD). The MPD has reviewed the Proposed Project and did not raise any significant concerns. Similar to fire protection services, the Proposed Project will be required to pay the applicable Public Facility Impact Fee (PFIP) at the time of building permit issuance, a portion of which will be utilized to fund MPD capital projects.

Schools:

The Proposed Project is located within the Manteca Unified School District (District). Based on a review of the District’s School Facilities Fee Justification Report, dated June 18, 2024, student generation rates consist of the following, 0.3863 per unit (Elementary School – Grades TK – 8) and 0.1921 per unit (High School – Grades 9 – 12). The Proposed Project will generate the following number of students:

**Table 5: Proposed Project Student Generation**

	<b>Elementary School (TK-8)</b>	<b>High School (9-12)</b>	<b>Total</b>
<b>Proposed Project</b>	28	14	42

As depicted above, the Proposed Project will generate a total of 42 students that will attend District schools. To mitigate any potential impacts to the District, the Proposed Project will be required to pay the applicable school impact fee, which at current time (May 2025) is \$5.17 per square foot for new residential development, and \$0.84 per square foot for new commercial development. In addition, the Project site is located within the District’s Community Facilities District No. 2020-06. The Developer/Project Proponent may elect to enter into a Mitigation Agreement with the District that

would allow the residential portion of the Project site to be annexed into CFD No. 2020-06 and pay a reduced school impact fee. At this time, 2023 General Plan Policy PF-P-34 states that “the City shall cooperate with the Manteca Unified School District in their collection of school facility development fees from new development.” According to Section 65996 of the Government Code, the payment of development fees authorized by SB 50 are deemed to be full and complete school facilities mitigation. As noted above, the Proposed Project will be required to pay the applicable school development fees prior to building permit issuance.

Parks:

The Proposed Project overall will generate use of nearby public parks however this demand is not considered to be significant. In addition, the Proposed Project will be required to pay the applicable Park fees at the time of building permit issuance, a portion of which will be utilized for park capital projects within the City of Manteca.

Other Public Facilities:

The Proposed Project will not result in the need for additional public facilities.

Based on the analysis contained above, the Proposed Project will have a **Less Than Significant Impact**.

**MITIGATION MEASURES:**

Mitigation is not required for this topic.

## 16. RECREATION

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

### IMPACT ANALYSIS

- a. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or accelerated?*

The nearest publicly owned neighborhood park to the Project site is Lucio Park and Diamond Oaks Park. Lucio Park is located south of the Project site on Lucio Drive while Diamond Oaks Park is located east of the Project site on Empire Avenue. The Proposed Project includes the development of a 0.25-acre park site, illustrated on the VTSM as Lot A. While future residents of the Proposed Project may utilize nearby parks such as Lucio Park and Diamond Oaks Park, the park site within the Proposed Project provides recreational opportunities as well. Development of the park site will comply with all City policies and regulations related to park development, including the adopted Parks Master Plan. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

- b. *Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?*

The Proposed Project does not require the construction or expansion of recreational facilities. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

### MITIGATION MEASURES:

Mitigation is not required for this topic.

**17. TRANSPORTATION/TRAFFIC -- WOULD THE PROJECT:**

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?			X	
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
d) Result in inadequate emergency access?			X	

The following analysis is based upon the Transportation Impact Analysis (TIA) prepared for the Proposed Project, dated May 16, 2025, as prepared by Fehr and Peers. A copy of this TIA can be found in Appendix B of this Initial Study.

**IMPACT ANALYSIS**

a. *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?*

The Proposed Project is subject to the policies of the City’s General Plan as it relates to the circulation system including transit, roadway, bicycle, and pedestrian facilities. The Proposed Project is also required to comply with the City’s adopted Active Transportation Plan (ATP), dated September 1, 2020.

The City’s General Plan established a Level of Service (LOS) standard which considers traffic volumes, lane configurations, signal timings, signal coordination, and other pertinent parameters of intersection operations. Policy C-1.2 of the General Plan strives for LOS D or better.

The intersections evaluated in the TIA are as follows:

- Cottage Avenue/Button Avenue;
- Louise Avenue/Cottage Avenue;

- Cottage Avenue/Southland Road;
- Cottage Avenue/Residential Driveway;
- Cottage Avenue/Lathrop Road; and,
- Louise Avenue/Commercial Driveway.

The intersections listed above are anticipated to operate at an LOS D or better with the Proposed Project.

There are no existing bicycle facilities on Cottage Avenue within the vicinity of the Project site. On Louise Avenue along the project frontage, an existing 8-foot Class I multi-use path is present.

The *City of Manteca Active Transportation Plan* identifies the following planned bicycle improvements near the project site:

- Planned Class II bike lanes along Cottage Avenue from Lathrop Road to Louise Avenue, including along the project frontage.
- Planned Class II bike lanes along Louise Avenue from Cottage Avenue to Main Street, including along the project frontage.

The Proposed Project proposes frontage improvements along Cottage Avenue. These improvements include widening the roadway to provide a two way left-turn lane, and a Class II bike lane and separated sidewalk in the southbound direction along the project frontage. It is noted that gaps in the bicycle network in the southbound direction north and south of the Project site and in northbound direction adjacent to the project site and north and south of the Project site would remain. The City of Manteca General Plan includes policy language that indicates bicycle facilities will be added, when possible, in conjunction with road rehabilitation, reconstruction, or re-striping projects and as new development occurs. Future gap closures would occur as part of these efforts and the proposed project would not preclude the future construction of these facilities.

While the Active Transportation Plan identifies a Class II bike-lane on Louise Avenue, there is an eight-foot-wide meandering sidewalk on the north side of Louise Avenue, adjacent to the project frontage. The City may designate this as a Class I multi-use path, in which case the project would not preclude the Active Transportation Plan's implementation of a bicycle connection along Louise Avenue.

While the Proposed Project does not include modifications to the facility itself, the Proposed Project would include a new right in, right out driveway along this segment which could impact bicyclist safety and comfort. However, this driveway would include a crossing which would be designed to integrate with the existing Class I. This crossing would be reviewed and approved by the City of Manteca to ensure it does not disrupt or interfere with the existing facility. With a designation of a Class I facility at Louise Avenue the project would not interfere or disrupt existing or planned bicycle facilities or result in physical changes that would be inconsistent with bicycle related policies in the City of Manteca General Plan. Therefore, this impact is considered **Less Than Significant**.

Primary access between the Project site and the surrounding neighborhood will be provided via new connections to Cottage Avenue at the proposed residential access road. The Proposed Project proposes five-foot-wide sidewalks, consistent with City of Manteca design standards for local residential streets, on both sides of all new residential roadways.

The Proposed Project proposes an eight-foot-wide sidewalk with a six-foot-wide landscape buffer on the west side of Cottage Avenue along the project site's frontage. The Proposed Project is consistent with the General Plan's goals of creating a safe and contiguous pedestrian network and the proposed sidewalk on Cottage Avenue would exceed the minimum cross-sectional requirements specified in drawing No. ST-3 in the Standard Street Cross Sections (City of Manteca, 2004).

As previously discussed, Louise Avenue along the project frontage has an existing 8' sidewalk. While the Proposed Project does not include modifications to the facility itself, the Proposed Project would include a new right in, right out driveway along this segment which could impact pedestrian safety and comfort. However, this driveway would include a crossing which would be designed to integrate with the existing sidewalk. This crossing would be reviewed and approved by the City of Manteca to ensure it does not disrupt or interfere with the existing facility. The Proposed Project would not interfere with or disrupt existing or planned pedestrian facilities or result in physical changes that would be inconsistent with pedestrian-related policies in the City of Manteca General Plan. Therefore, this impact is considered **Less Than Significant**.

Manteca Transit provides transit service. The nearest bus stop is located at the northwest corner of Louise Avenue, which is approximately 250 feet from the commercial site, and 900 feet from the residential access road. This bus stop is served by Route 3 which serves north Manteca and provides connections to the Manteca Transit Center and Downtown Manteca.

b. *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

As of July 1, 2020, CEQA Guidelines Section 15064.3(b) states that the recommended metric for the evaluation of transportation impacts is VMT. It outlines the criteria for analyzing a project's transportation impacts. For land use projects, this section states that "vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact."

According to *the City of Manteca SB 743 Implementation Policy* (City of Manteca, 2022), a project would result in a less than significant transportation VMT impact if it:

- Qualify for screening per the screening criteria outlined in the City's VMT screening guidelines. The guidelines state that a project may be screened from additional VMT analysis if it complies with one or more of the following conditions:

- 1) is a small project generating fewer than 1,000 trips a day and consistent with City's General Plan;
  - 2) is 100% affordable housing;
  - 3) is local-serving retail less than 125,000 square feet in building floor area;
  - 4) Is located in a High-Quality Transit Area; or
  - 5) is located in a low VMT area.
- Would not exceed the applicable VMT threshold based on land use type.

Additionally, Office of Planning & Research (OPR) Technical Advisory (2018) states *“OPR recommends analyzing each use separately, or simply focusing analysis on the dominant use, and comparing each result to the appropriate threshold.”* The City of Manteca SB 743 Implementation Policy also states *“In accordance with the OPR Technical Advisory local serving retail centers up to 125,000 square feet that provide the fine grain details that promote active transportation are expected to have a less-than-significant impact on VMT and are exempt from further VMT analysis. This applies to the entirety of a retail project; for a mixed-use project, this screening criteria should be applied to the retail/commercial component separately to determine if that portion of the project screens out of a detailed VMT analysis.”*

The proposed residential portion of the project would generate fewer than 1,000 daily trips and is consistent with the City's General Plan land use designation and density limits established by the City of Manteca for the project site. Therefore, the proposed residential portion of the project site may be screened from VMT analysis and would result in a **Less Than Significant Impact**.

The proposed commercial portion of the project would be zoned CN (Neighborhood Commercial Zoning) which based on the Section 17.26.020 of the City's Zoning Code, would allow a maximum 124,000 square feet of development. Examples of permitted land uses within this zoning designation include Convenience Store, Grocery Store/Supermarket, Home Improvement Supplies, Restaurant, Professional Services, etc. Based on permitted land uses<sup>1</sup>, the commercial portion of the development would constitute as local-serving retail less than 125,000 square feet in building floor area which may be screened from VMT analysis and would result in a **Less Than Significant Impact**.

Furthermore, CEQA Guidelines Section 15183(a) states that: *“CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site.”* The General Plan Environmental Impact Report (EIR), which was certified in 2023, identified a significant and unavoidable VMT impact on the transportation system.

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<sup>1</sup> It is noted that the *City of Manteca SB 743 Implementation Policy* (City of Manteca, 2022) indicates the City may require a market analysis to determine if a proposed tenant meets the characteristics of a local-serving retail development. If this analysis is required and a tenant does not qualify as local-serving, a supplemental VMT analysis may be necessary at the discretion of the City.

The project proposes detached single-family homes with an average density of 5.4 dwelling units per acre, which is consistent with the low-density residential land use designation of the General Plan. Construction of an approximately 124,000 square foot neighborhood serving commercial development would be consistent with the commercial land use designation as part of the City's General Plan.

c. *Would the project result in inadequate emergency services?*

The residential portion of the Proposed Project includes an access point on Cottage Avenue, and the commercial portion of the project includes an access point on Louise Avenue. All proposed on-site streets would provide a minimum clear width of 20 feet, meeting the City of Manteca Fire Code minimum 20-foot clear-width requirement for streets that provide access to buildings under 30 feet in height. Thus, the proposed project would be constructed to provide adequate emergency access and would result in a **Less Than Significant Impact**.

**MITIGATION MEASURES:**

Mitigation is not required for this topic.

**18. TRIBAL CULTURAL RESOURCES -- WOULD THE PROJECT:**

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

Effective July 1, 2015, Assembly Bill 52 (AB 52) amended CEQA to mandate consultation with California Native American tribes during the CEQA process to determine whether or not the Proposed Project may have a significant impact on a Tribal Cultural Resource. Section 21073 of the Public Resources Code defines California Native American tribes as “a Native American tribe located in California that is on the contact list maintained by the Native American Heritage Commission for the purposes of Chapter 905 of the Statutes of 2004.” This includes both federally and non-federally recognized tribes. Section 21074(a) of the Public Resource Code defines Tribal Cultural Resources for the purpose of CEQA as:

- 1) Sites, features, places, cultural landscapes (geographically defined in terms of the size and scope), sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
  - a. included or determined to be eligible for inclusion in the California Register of Historical Resources; and/or
  - b. included in a local register of historical resources as defined in subdivision (k) of Section 5020.1; and/or

- c. a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

Because criteria A and B also meet the definition of a Historical Resource under CEQA (see Section 5 of this document), a Tribal Cultural Resource may also require additional (and separate) consideration as a Historical Resource. Tribal Cultural Resources may or may not exhibit archaeological, cultural, or physical indicators.

Recognizing that California tribes are experts in their Tribal Cultural Resources and heritage, AB 52 requires that CEQA lead agencies carry out consultation with tribes at the commencement of the CEQA process to identify Tribal Cultural Resources. Furthermore, because a significant effect on a Tribal Cultural Resource is considered a significant impact on the environment under CEQA, consultation is required to develop appropriate avoidance, impact minimization, and mitigation measures. Consultation is concluded when either the lead agency and tribes agree to appropriate mitigation measures to mitigate or avoid a significant effect, if a significant effect exists, or when a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached, whereby the lead agency uses its best judgement in requiring mitigation measures that avoid or minimize impact to the greatest extent feasible.

#### **IMPACT ANALYSIS**

- a. *Would the project cause a significant adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*
  - i. *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?*
  - ii. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significantly pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

Based on a review of the City's General Plan EIR, the Project site is not listed on the California Register of Historical Resources, or a local register of resources as defined in Public Resources Code Section 5020.1(k).

In accordance with AB 52, the City, acting as the Lead Agency, distributed consultation request letters to the following Native American Tribes: Buena Vista Rancheria of Me-Wuk Indians; Tule River Indian Tribe; Lone Band of Miwok Indians; Wilton Rancheria; Muwekma Ohlone Indian Tribe of the SF Bay Area; Wilton Rancheria; North Valley Yokuts Tribe; Wuksache Indian Tribe/Eshom Valley Band; and, The Confederated Villages of Lisjan. The City did not receive any consultation requests in response to the letters. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

**MITIGATION MEASURES:**

Mitigation is not required for this topic.

**19. UTILITIES AND SERVICE SYSTEMS -- WOULD THE PROJECT:**

	<i>Potentially Significant Impact</i>	<i>Less Significant Than with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably near future development during normal, dry, and multiple dry years?			X	
c) Result in a determination by the wastewater treatment provider that serves or may serve the project that has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?			X	
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?			X	

**IMPACT ANALYSIS**

- a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?*
- b. The Proposed Project will require the extension of utilities to serve the Project site. These utilities include domestic water, sewer, storm drainage, and dry utilities such as gas and electricity. As part of the development of the Proposed Project, the Project Proponent and/or Developer will connect to

existing utility lines located in Louise Avenue and extend them northerly along Cottage Avenue and then looped through the interior of the residential component. The Commercial site will ultimately connect utility lines to lines located in Cottage Avenue.

All utilities will be installed in accordance with City standards, and other applicable rules and regulations required by the utility provider (i.e., SSJID, PG&E, etc.). Therefore, the Proposed Project will have a **Less Than Significant Impact**.

- c. *Would the project have sufficient water supplies available to serve the project and reasonably near future development during normal, dry and multiple dry years?*

According to City of Manteca Public Works (Engineering Division) staff, the Proposed Project will be required to comply with the City's Water Master Plan Update, currently in process. It is anticipated that there is sufficient water supply to serve the Proposed Project during normal, dry, and multiple dry years. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

*Would the project result in a determination by the wastewater treatment provider that serves or may serve the project that has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?*

Based on discussions with City of Manteca Engineering Division staff, there is adequate capacity to serve the Proposed Project's wastewater demand. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

The following discussion is an analysis for criteria (d) and (e):

- d. *Would the project generate solid waste more than State or local standards, or more than the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*
- e. *Would the project comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?*

Solid waste is collected by the City and deposited at the Forward Landfill. Recyclables are taken to a mini transfer station adjacent to the Forward Landfill where they are subsequently put into transfer trucks and hauled to Sacramento Recycling in Sacramento. According to Cal Recycle, the Forward Landfill has a closure date of 2053 and is currently operating at 50% capacity. The construction and operation of the school facility included in the Proposed Project would not increase the total amount of solid waste from the Project site that has already been addressed in the Manteca General Plan EIR. Therefore, the capacity identified in the Manteca General Plan EIR, is more than sufficient to serve the Proposed Project. Because the Forward Landfill has adequate capacity for the construction and operation of the Proposed Project, it will have a **Less Than Significant Impact**.

The Proposed Project will comply with all federal, state, and local statutes and regulations related to solid waste. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

**MITIGATION MEASURES:**

Mitigation is not required for this topic.

**20. WILDFIRE -- Would the project:**

	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
If located in or near State responsibility areas or lands classified as extremely high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from wildfire or the uncontrolled spread of a wildfire?				X
c) Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment?				X
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, because of runoff, post-fire slope instability, or drainage changes?				X

**IMPACT ANALYSIS**

The following discussion is an analysis for criteria (a), (b), (c), and (d):

*Would the project impair an adopted emergency response plan or an emergency evacuation plan?*

*b. Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

- c. *Would the project require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment?*
- d. *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, because of runoff, post-fire slope instability, or drainage changes?*

Based on a review of Section 3.16 of the General Plan Draft EIR, *“The Planning Area is not located in or near any State Responsibility Areas and there are no lands classified as extremely high fire hazard severity zones within or near the Planning Area. Therefore, the General Plan would have no impact related to wildfire risks associated with lands in or near State Responsibility Areas or lands classified as extremely high fire hazard severity zones.”*

The Proposed Project is located within the City’s Planning Area. Therefore, the Proposed Project will have **No Impact**.

***MITIGATION MEASURES:***

Mitigation is not required for this topic.

**21. MANDATORY FINDINGS OF SIGNIFICANCE --**

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

**IMPACT ANALYSIS**

- a. *Does the project have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

Based on the analysis contained herein, the Proposed Project will not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Therefore, the Proposed Project will have a **Less Than Significant Impact**.

- b. *Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in the connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

Based on the analysis contained herein, the Proposed Project does not have impacts that are individually limited but cumulatively considerable. The Proposed Project implements the City’s General Plan, dated February 2024 in that the land used proposed is consistent with the General Plan.

- c. *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Based on the analysis contained herein, the Proposed Project will not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. Therefore, the Proposed Project will have a **Less Than Significant Impact with Mitigation Incorporated**. Mitigation has been incorporated into the Proposed Project that allows compliance with State Law and local regulations in the event that human remains are identified during Project construction.

## REFERENCES

In accordance with Section 15063(a)(3) of the CEQA Guidelines, the following expert opinion, technical studies, and substantial evidence has been referenced and/or cited in the discussion included in the Initial Study Checklist:

- City of Manteca General Plan and Environmental Impact Report, adopted February 2024
- City of Manteca Zoning Ordinance (Title 17).
- School Facilities Fee Justification Report, dated June 18, 2024, prepared by the Manteca Unified School District.
- Transportation Analysis, dated May 16, 2025, prepared by Fehr and Peers.
- Letter from City of Manteca, dated June 24, 2024.
- City of Manteca Engineering Division Comments Memorandum dated December 12, 2024.
- California Air Resources Board (ARB). 2017. California's 2017 Climate Change Scoping Plan, November 2017.
- California Greenhouse Gas Emissions for 2000 to 2021: Trends of Emissions and Other Indicators, dated December 14, 2023.
- U.S. Environmental Protection Agency (EPA). 2009. Endangerment and Cause of Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act. Federal Register Vol. 74, No. 239, pp. 66496-66546, dated December 15, 2009.
- California Air Resources Board (ARB). 2022 Scoping Plan for Achieving Carbon Neutrality dated November 16, 2022.
- San Joaquin Valley Air Pollution Control District (SJVAPCD). 2015. Guide for Assessing and Mitigating Air Quality Impacts, dated March 19, 2015.
- CalEEMod Results, dated June 16, 2025, prepared by J.B. Anderson Land Use Planning.

**Appendix A**

**Tentative Subdivision Map, dated July 11, 2025**

# TENTATIVE SUBDIVISION MAP FOR: EDWARD'S GROVE

TRACT NO. 4217

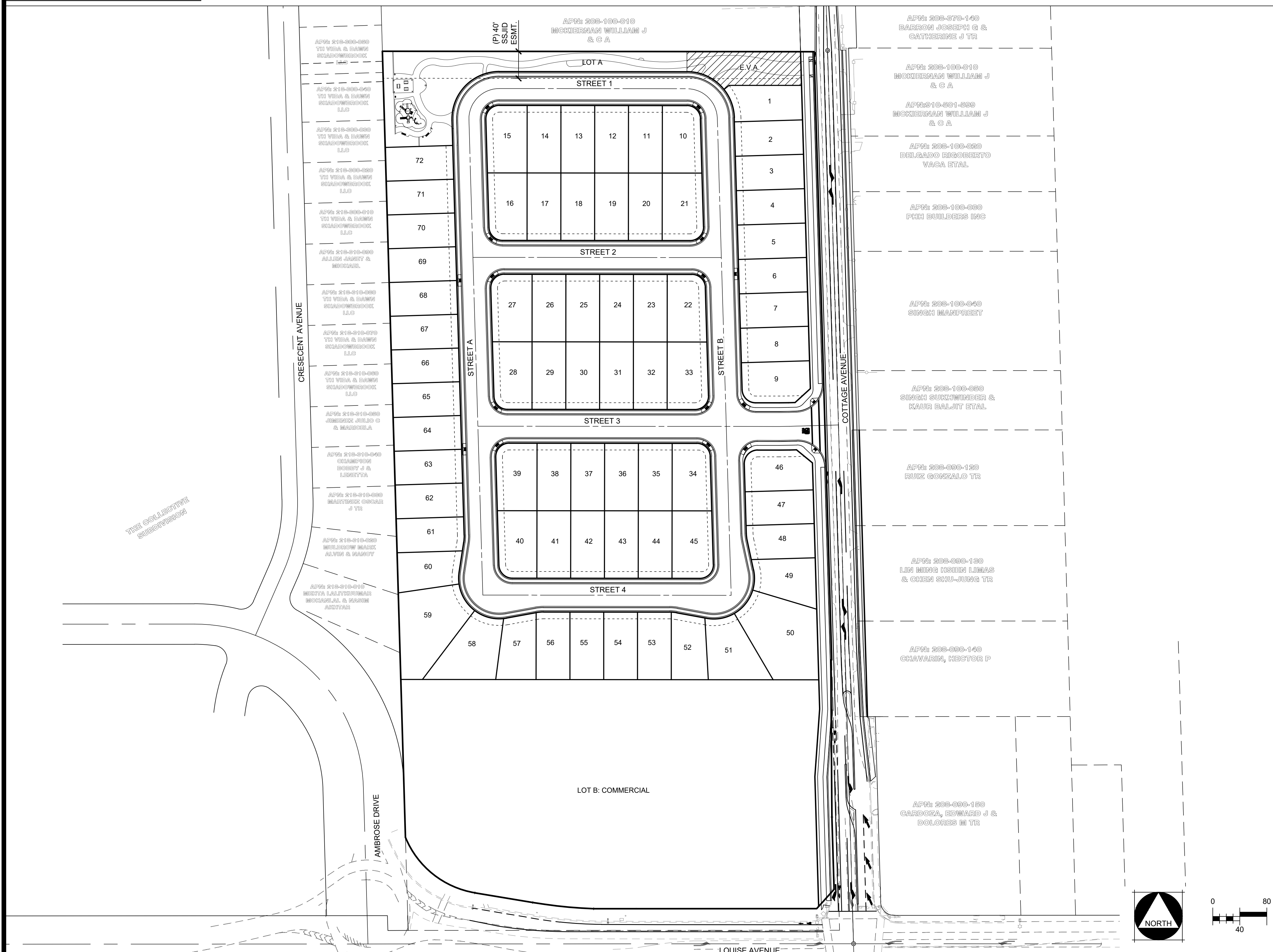
BEING A PORTION OF THE SOUTHEAST 1/4 OF SECTION 28 T.1S., R.7E, MDBM,  
CITY OF MANTECA, SAN JOAQUIN COUNTY, CALIFORNIA

**MCR ENGINEERING**  
www.mcreng.com  
1242 DUPONT COURT  
MANTECA, CA 95336  
TEL: (209) 239-6229  
FAX: (209) 239-8839

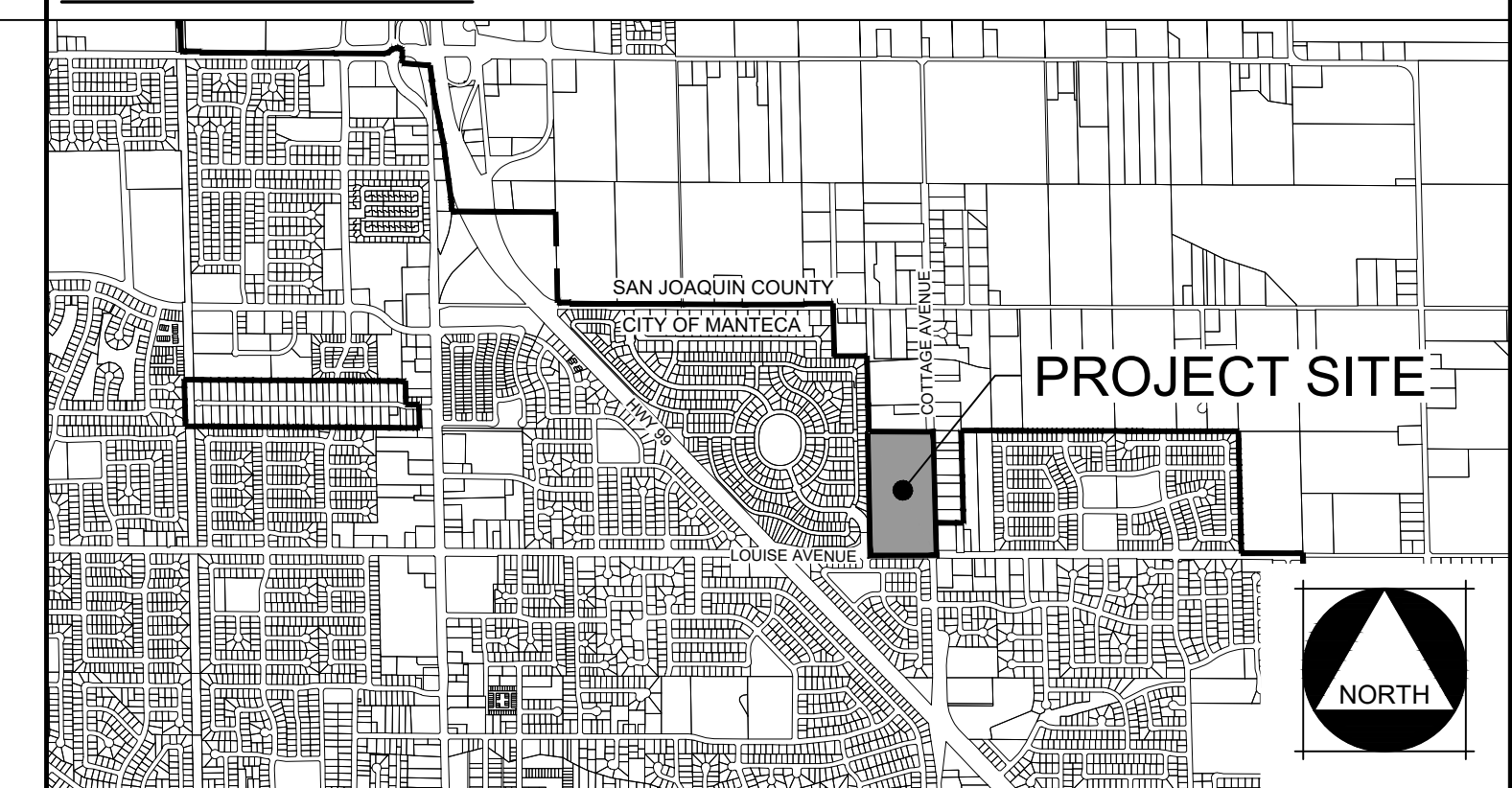


APPROVED:

## DEVELOPMENT PLAN



## VICINITY MAP



## INFORMATION DATA TABLE

- OWNER: EDWARD J. CARDOZA JR. AND BELINDA M. CARDOZA TRUSTEES OF THE CARDOZA FAMILY TRUST DATED MARCH 31, 2016  
PO BOX 1022  
MANTECA, CA 95336
- APPLICANT: EDWARD J. CARDOZA JR. AND BELINDA M. CARDOZA TRUSTEES OF THE CARDOZA FAMILY TRUST DATED MARCH 31, 2016  
PO BOX 1022  
MANTECA, CA 95336
- ENGINEER: MCR ENGINEERING, INC.  
1242 DUPONT COURT  
MANTECA, CA 95336
- NO. OF LOTS: 74 LOTS COMPOSED OF 72 RESIDENTIAL, 1 LANDSCAPED, 1 COMMERCIAL
- LAND USE: EXISTING: AGRICULTURAL  
PROPOSED: SINGLE FAMILY RESIDENTIAL
- PROPOSED ZONING: R-1 (ONE-FAMILY DWELLING)
- GENERAL PLAN: LDR (LOW DENSITY RESIDENTIAL) & GC (GENERAL COMMERCIAL)
- UTILITIES: WATER: CITY OF MANTECA  
SEWER: CITY OF MANTECA  
TELEPHONE: FRONTIER  
GAS & ELECTRIC: PACIFIC GAS & ELECTRIC COMPANY  
IRRIGATION: S.S.I.D.  
STORM: CITY OF MANTECA
- APN: 218-150-090 AND 218-150-110
- THE PROPERTY IS RELATIVELY FLAT WITH ELEVATIONS RANGING FROM 36'-38'.
- BOUNDARY LINES ARE BASED ON RECORD INFORMATION.
- EXISTING UTILITIES BASED ON RECORD INFORMATION AND TOPOGRAPHIC SURVEY.  
BENCHMARK: BENCHMARK NO. 34.  
ELEVATION: 41.51
- ANY EXISTING WELLS AND/OR SEPTIC SYSTEMS ON SITE SHALL BE ABANDONED PER SAN JOAQUIN COUNTY STANDARDS.
- PUBLIC UTILITY EASEMENTS SHALL BE DEDICATED ALONG ALL STREET FRONTAGES EXCLUDING COTTAGE AVENUE AT THE RESTRICTED ACCESS LOCATIONS.
- UTILITIES TO BE LOCATED WITHIN PUBLIC UTILITY EASEMENTS AND SHALL BE MAINTAINED BY GOVERNING AGENCIES
- THIS PROJECT WILL COMPLY WITH THE CITY'S POST-CONSTRUCTION MANUAL. THE FINAL DESIGN WILL BE DETERMINED DURING THE IMPROVEMENT PLAN STAGE OF THE PROJECT.
- LOT SUMMARY:  
LOT A - LANDSCAPED / SSJID ACCESS / EMERGENCY VEHICLE ACCESS: 0.77 ACRES  
LOT B - COMMERCIAL: 4.80 ACRES
- LANDSCAPED LOTS "A" ARE COVERED ENTIRELY BY A PUBLIC UTILITY EASEMENT. TO BE DEDICATED TO THE CITY BY FUTURE SUBDIVISION MAP.

## SHEET INDEX

#	SHEET TITLE
1	GENERAL NOTES, KEY MAP, AND LEGEND
2	TYPICAL STREET SECTIONS
3	TOPOGRAPHIC SURVEY
4	GRADING PLAN
5	DIMENSION PLAN
6	UTILITY PLAN

PLAN REVISIONS		
NO.	DESCRIPTIONS	DATE

TENTATIVE SUBDIVISION MAP FOR:  
**EDWARD'S GROVE**  
 GENERAL NOTES, KEY MAP, AND LEGEND  
 SAN JOAQUIN COUNTY  
 MANTECA, CA

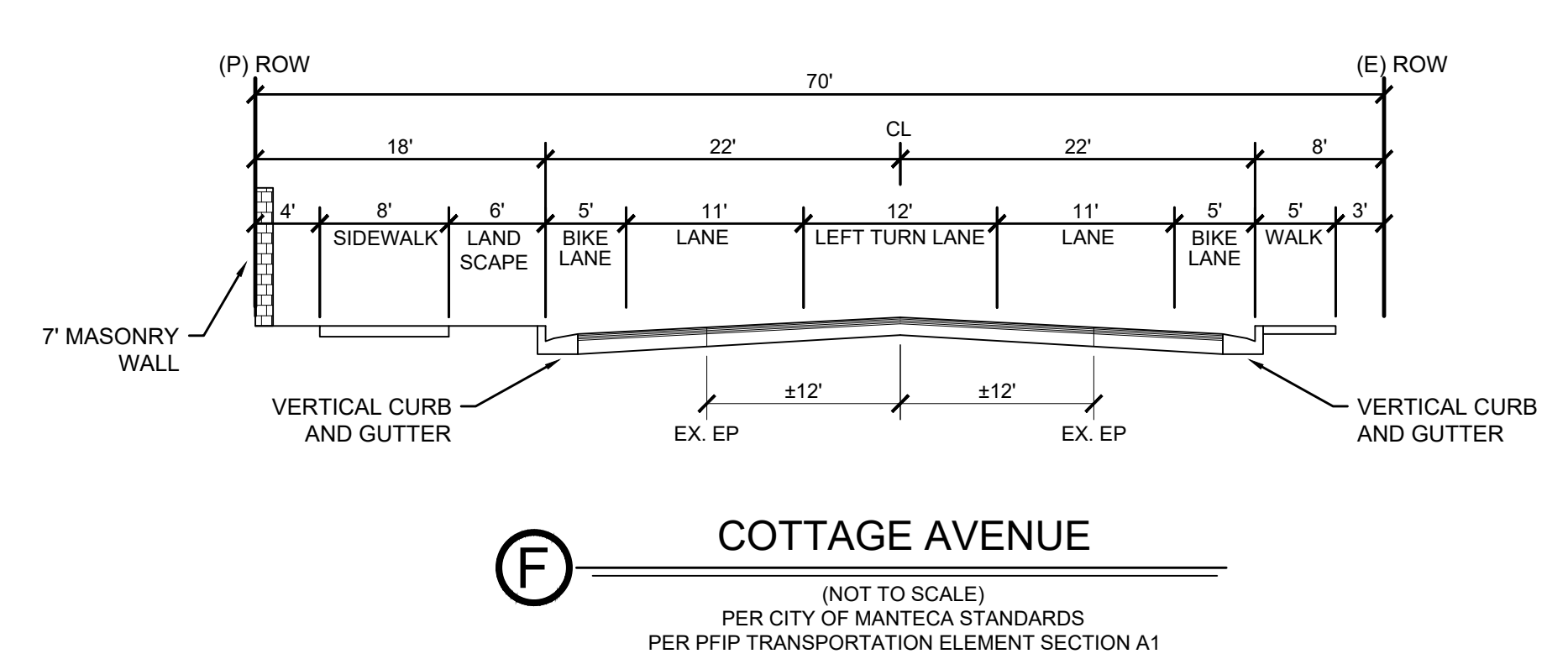
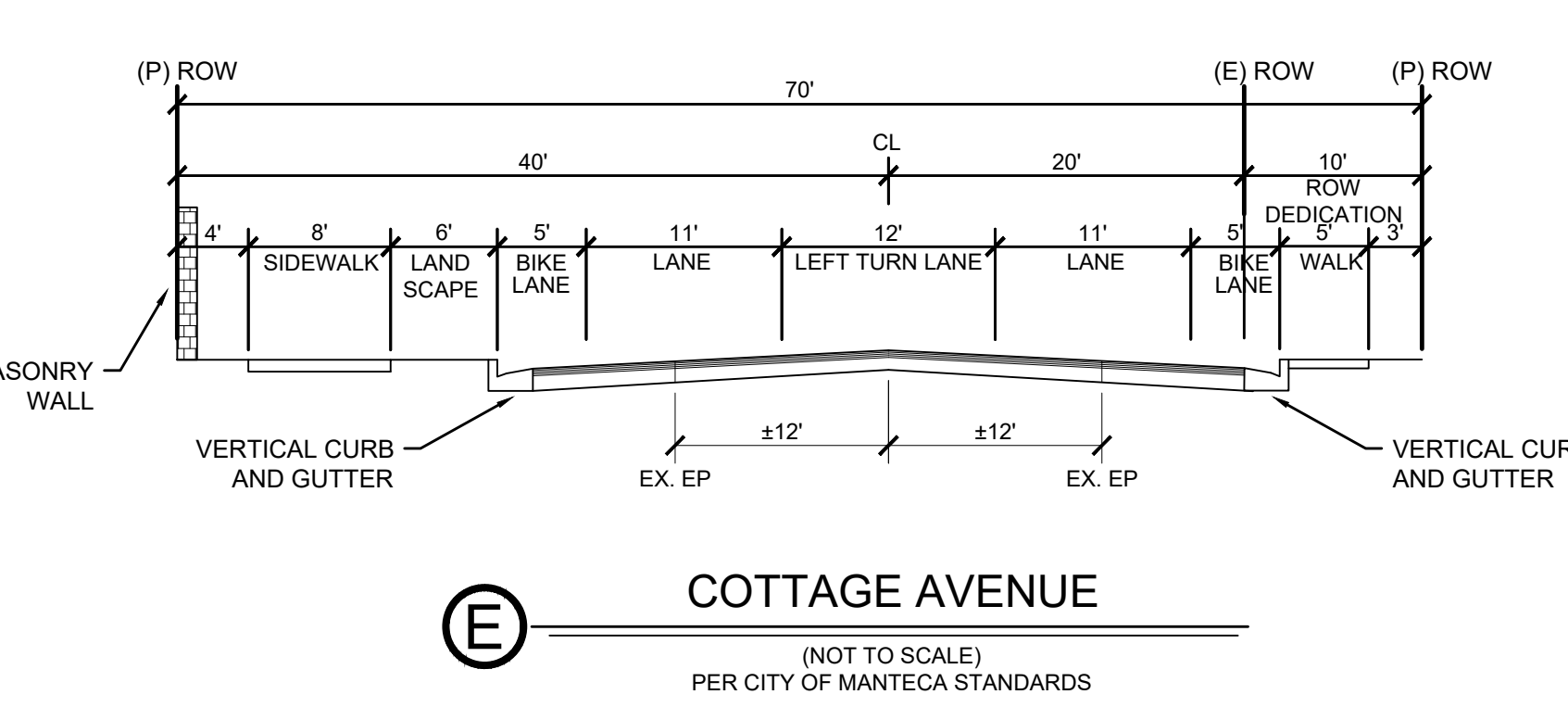
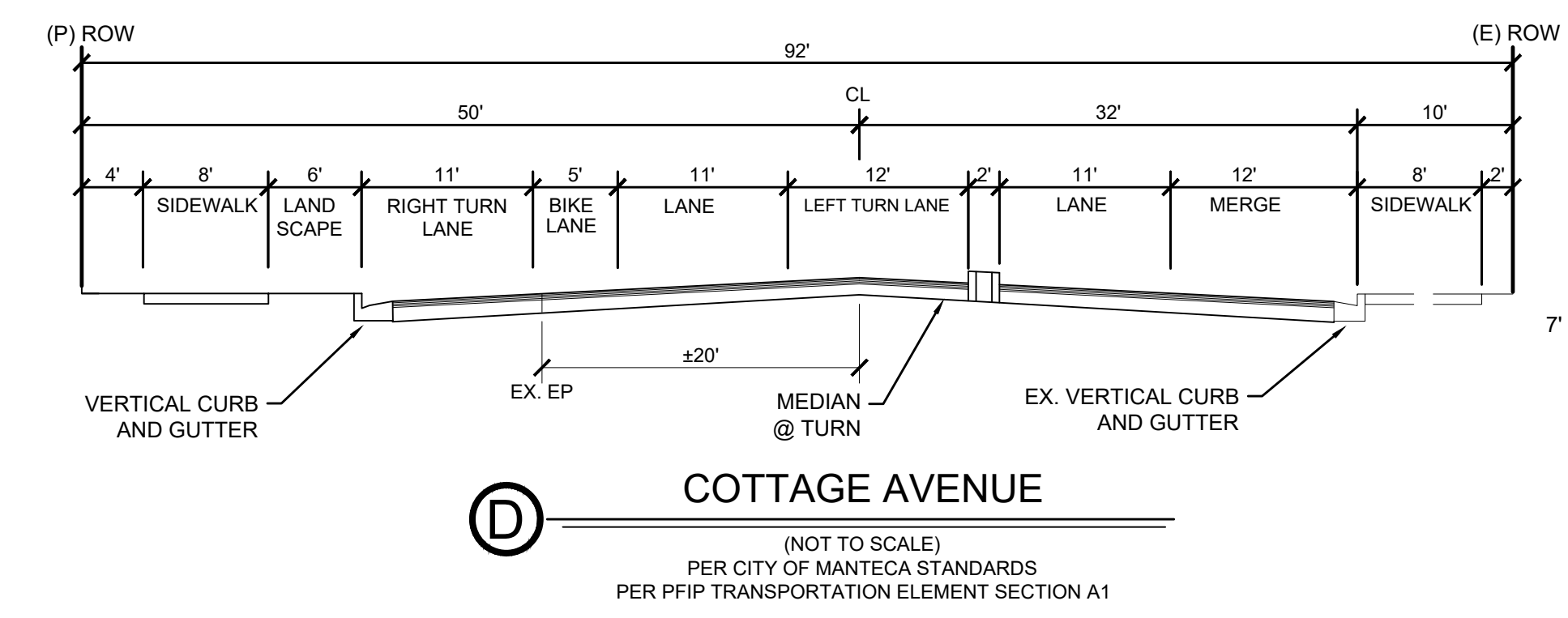
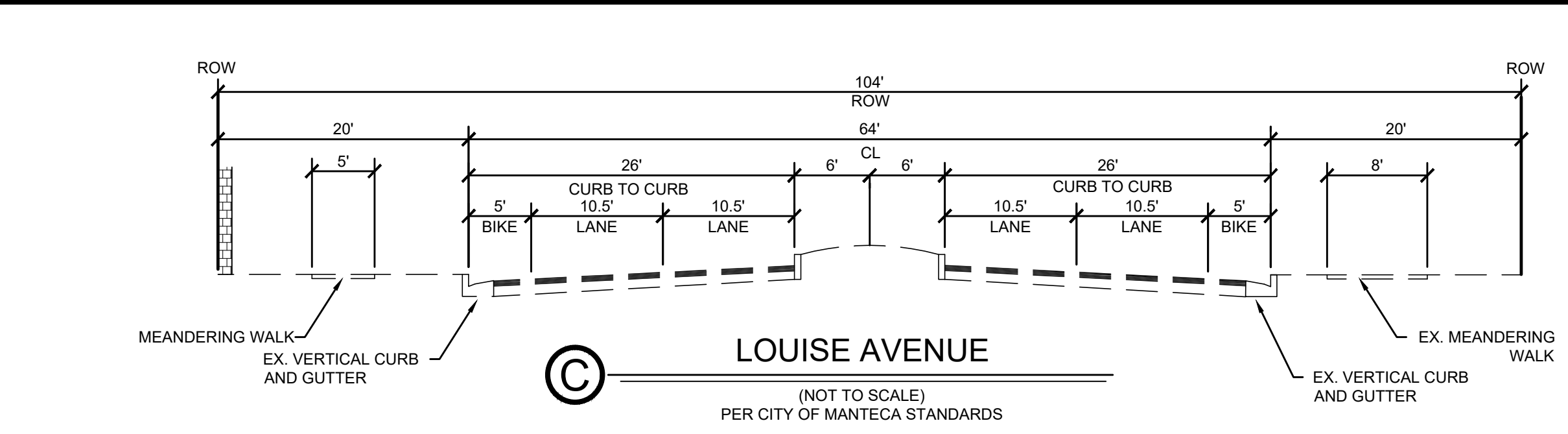
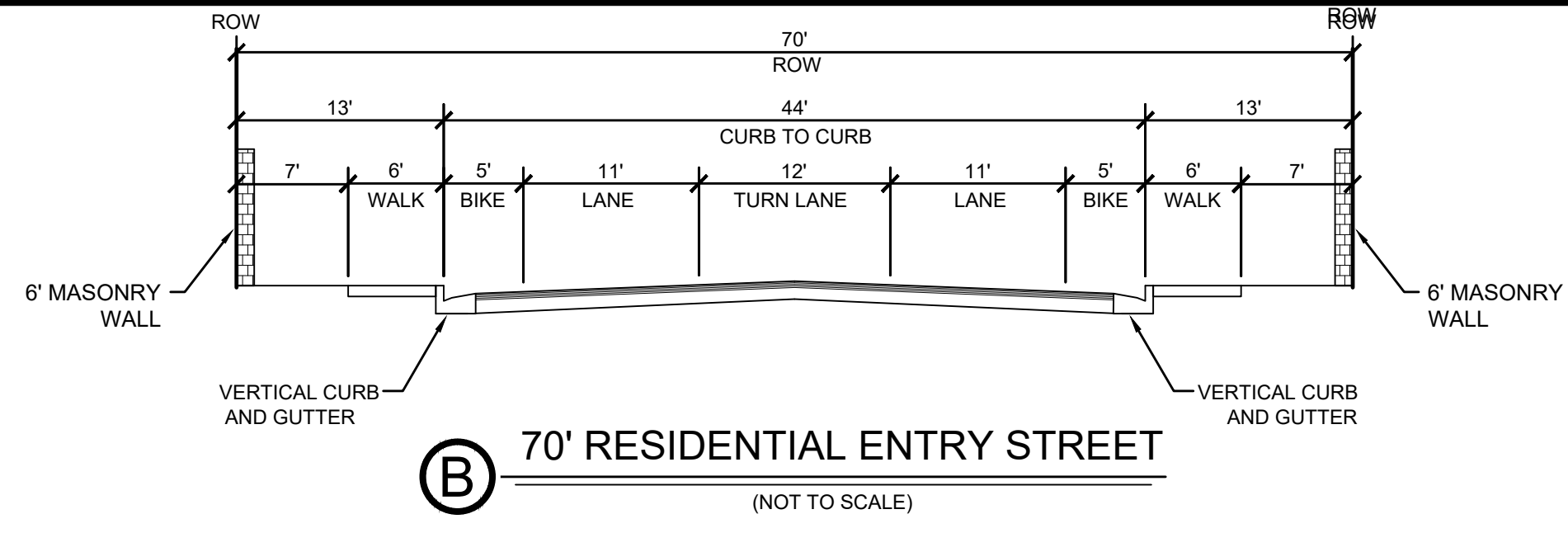
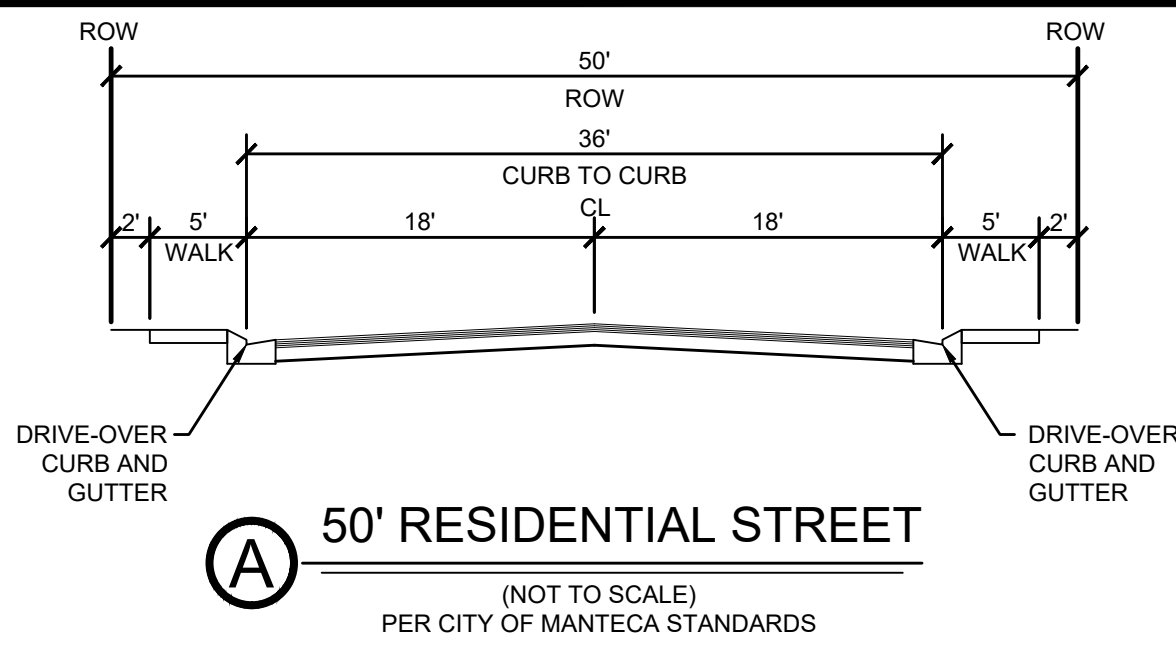
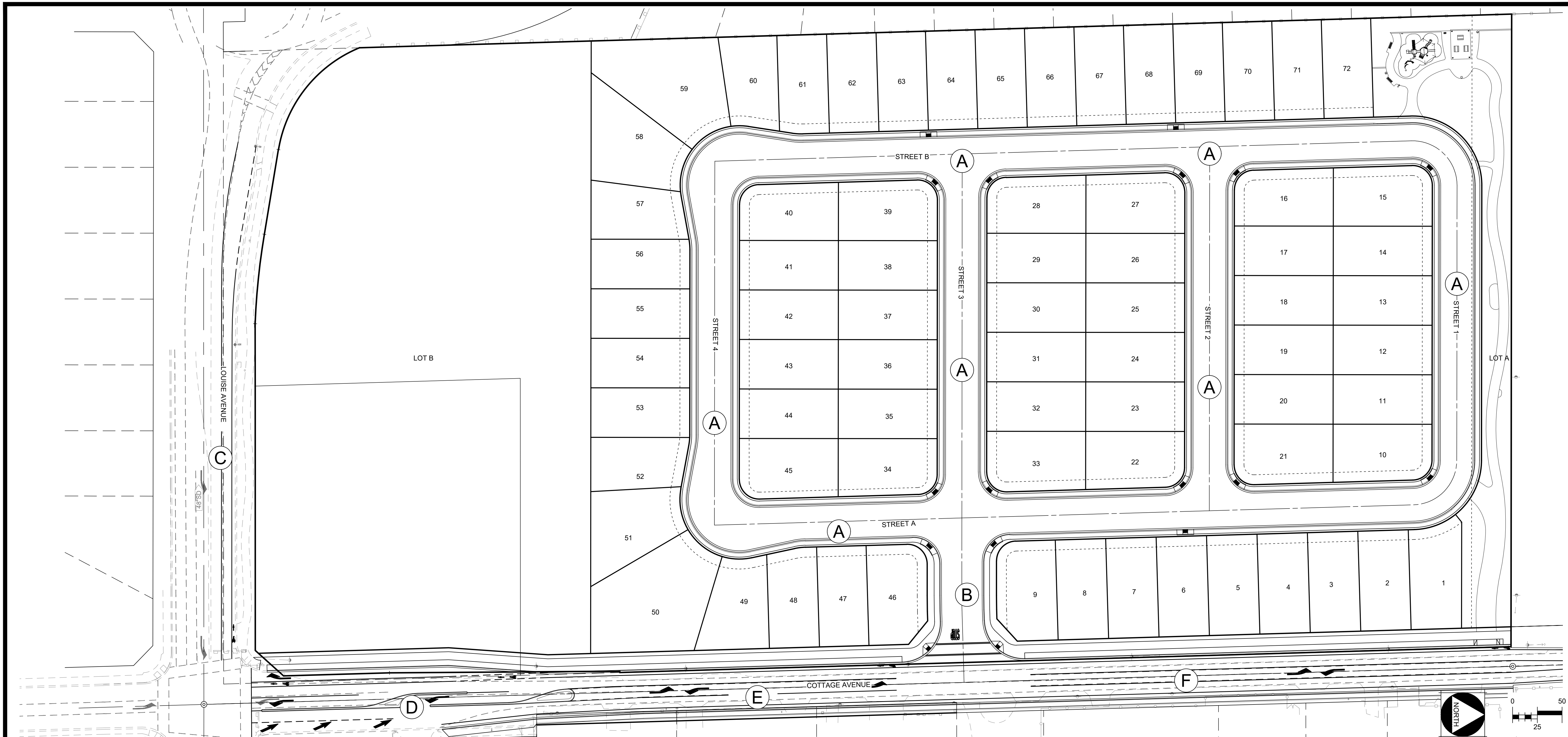
**811**  
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JOB NO.:	24-016
DATE:	07-11-2025
SCALE:	AS SHOWN
DR. BY:	MTT/SLS
CK. BY:	DE/SLS
SHEET NO.	
<b>1</b>	
OF	6 SHEET



APPROVED:

PLAN REVISIONS		
NO.	DESCRIPTIONS	DATE



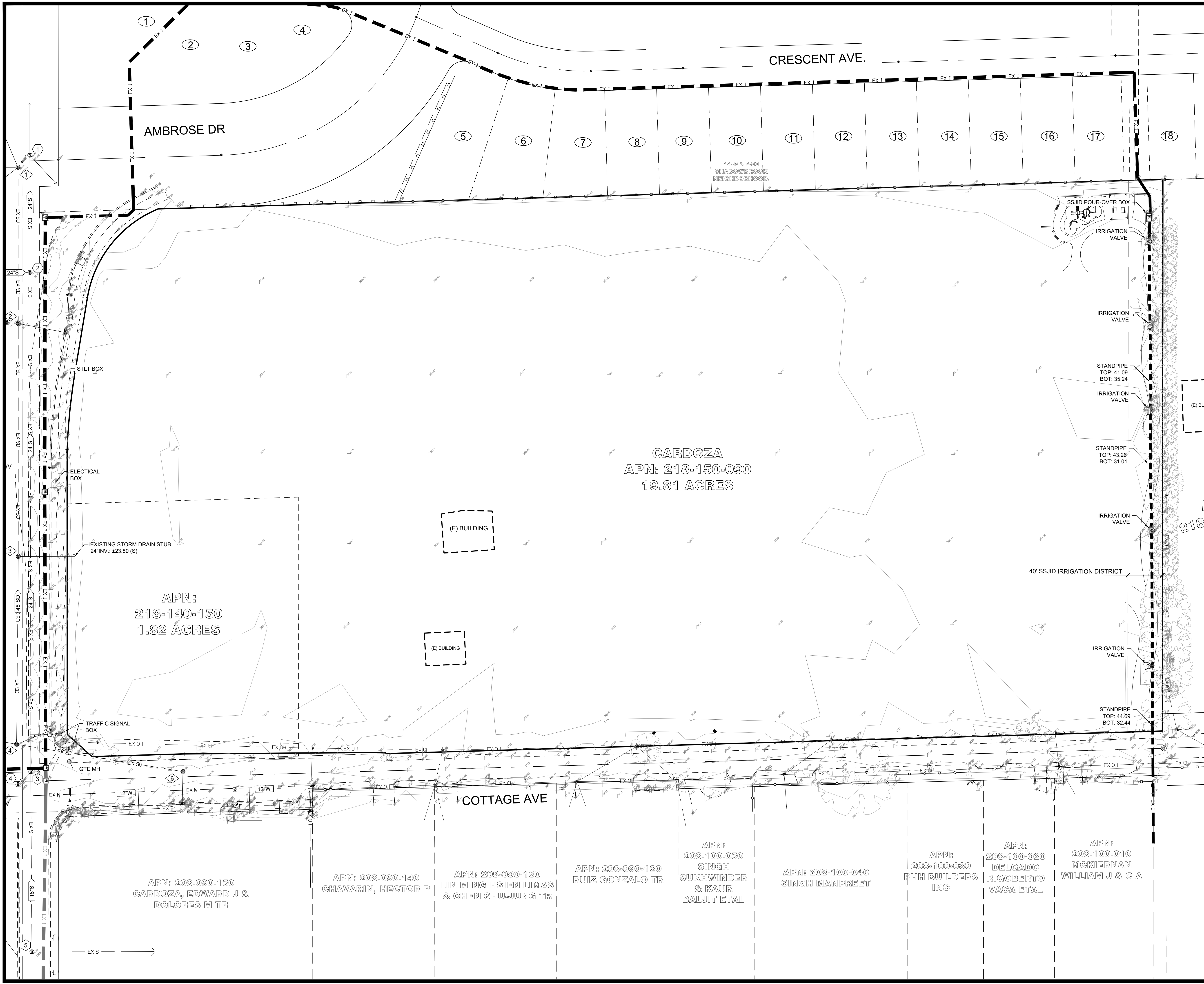
TENTATIVE SUBDIVISION MAP FOR:  
**EDWARD'S GROVE**  
TYPICAL STREET SECTIONS  
SAN JOAQUIN COUNTY

MANTECA, CA

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JOB NO.: 24-016  
DATE: 07-11-2025  
SCALE: AS SHOWN  
DR. BY: MTT/SLS  
CK. BY: DE/SLS

SHEET NO.  
**2**  
OF 6 SHEET



PARCEL: APN:

1	218-220-210
2	218-220-220
3	218-220-230
4	218-130-350
5	218-310-020
6	218-310-030
7	218-310-060
8	218-310-080
9	218-300-020
10	218-300-040
11	218-300-050
12	218-310-250
13	218-310-010
14	218-310-040
15	218-310-050
16	218-310-070
17	218-310-090
18	218-300-010

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www.mcreng.com  
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MANTECA, CA 95336  
TEL: (209) 239-6229  
FAX: (209) 239-8839

REGISTERED PROFESSIONAL ENGINEER  
RESERVED DAN EAVENSON  
No. C54088  
CIVIL  
STATE OF CALIFORNIA

APPROVED:

PLAN REVISIONS

NO.	DESCRIPTIONS	DATE
▲		
▲		
▲		
▲		
▲		
▲		

STORM DRAIN INFORMATION:

- ① SDMH-RIM: 38.23  
24" INV.: 21.68 (S)  
18" INV.: 29.33 (W)  
8" INV.: 30.03 (SE)
- ② SDMH-RIM: 36.92  
48" INV.: 22.47 (E)  
48" INV.: 22.47 (W)  
12" INV.: 31.17 (S)  
12" INV.: 31.52 (N)
- ③ SDMH-RIM: 37.80  
48" INV.: 21.10 (E,W)  
12" INV.: 25.80 (N)
- ④ SDMH-RIM: 37.68  
48" INV.: 23.83 (N)  
48" INV.: 23.98 (W)  
12" INV.: 33.85 (S)  
12" INV.: 24.38 (NW)
- ⑤ SDMH-RIM: 38.06  
12" INV.: 34.66 (W)  
10" INV.: 34.76 (S)  
10" INV.: 34.76 (E)

SEWER INFORMATION:

- ① SSMH-RIM: 38.92  
24" INV.: 26.72 (W)  
24" INV.: 26.77 (E)  
12" INV.: 29.02 (NE)  
12" INV.: 27.97 (S)
- ② SSMH-RIM: 37.30  
24" INV.: 26.65 (W)  
24" INV.: 26.70 (E)  
24" INV.: 26.90 (S)
- ③ SSMH-RIM: 38.11  
24" INV.: 27.61 (SE)  
24" INV.: 27.91 (N)  
24" INV.: 27.26 (W)  
18" INV.: 27.36 (S)
- ④ SSMH-RIM: 38.35  
24" INV.: 27.40 (NW)  
24" INV.: 27.60 (S)
- ⑤ SSMH-RIM: 38.39  
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6" INV.: 30.19 (S)

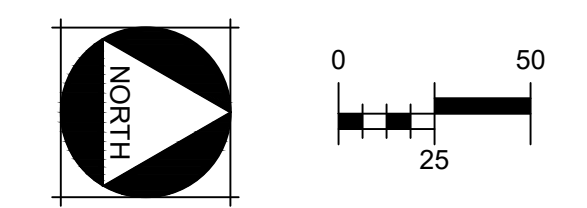
TENTATIVE SUBDIVISION MAP FOR:  
**EDWARD'S GROVE**  
**TOPOGRAPHIC SURVEY**

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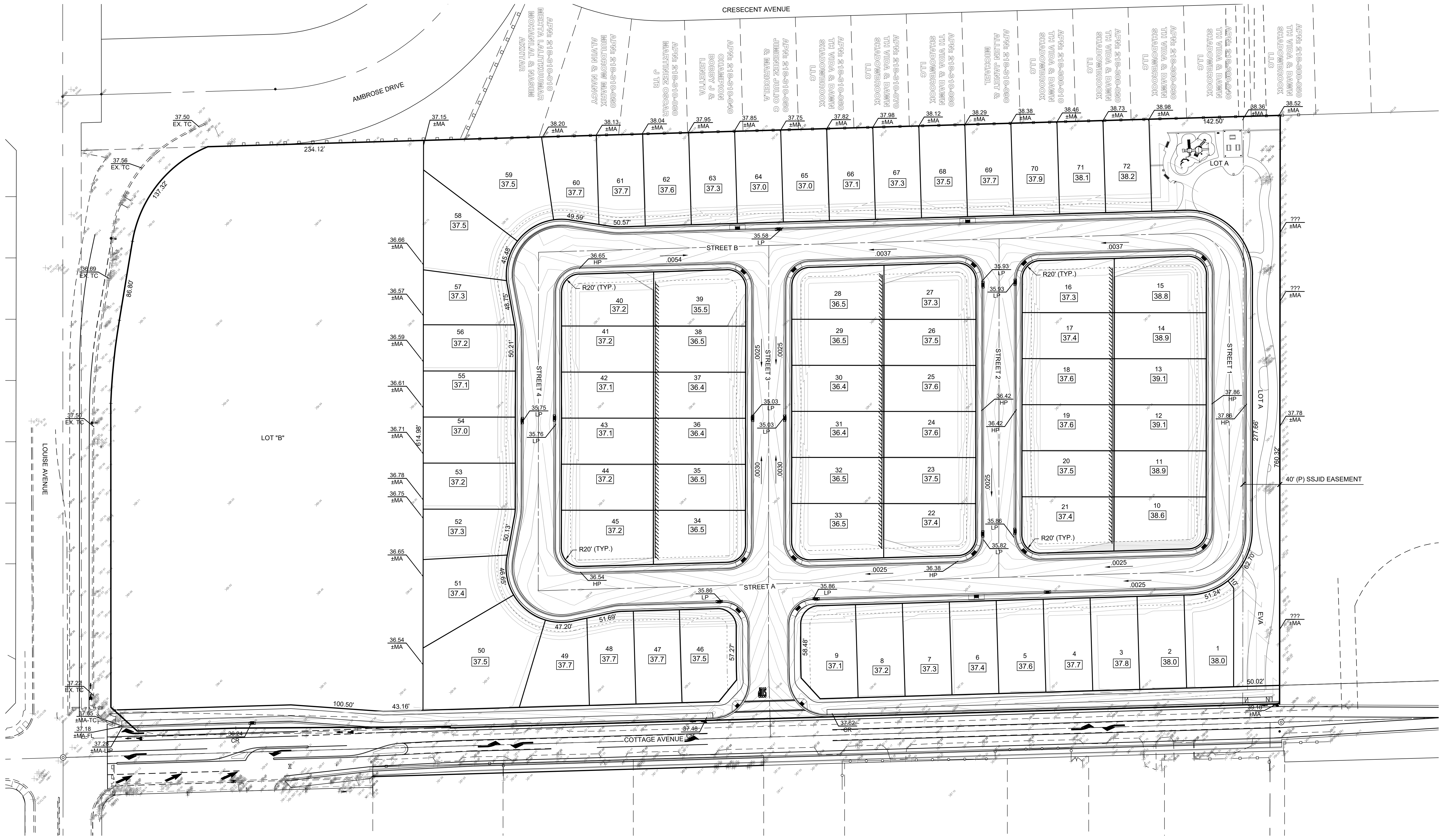
JOB NO.: 24-016  
DATE: 07-11-2025  
SCALE: AS SHOWN  
DR. BY: MTT/SLS  
CK. BY: DE/SLS





APPROVED:

PLAN REVISIONS		
NO.	DESCRIPTIONS	DATE



TENTATIVE SUBDIVISION MAP FOR:  
**EDWARD'S GROVE**

**GRADING PLAN**

SAN JOAQUIN COUNTY

MANTECA, CA



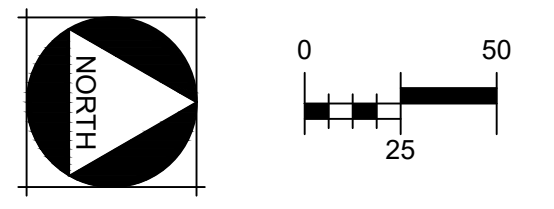
Know what's below.  
Call before you dig.  
811 / 800-227-2600

JOB NO.: 24-016  
DATE: 07-11-2025  
SCALE: AS SHOWN  
DR. BY: MTT/SLS  
CK. BY: DE/SLS

SHEET NO.

**4**

OF 6 SHEET







APPROVED:

PLAN REVISIONS		
NO.	DESCRIPTIONS	DATE

TENTATIVE SUBDIVISION MAP FOR:  
**EDWARD'S GROVE**

**UTILITY PLAN**

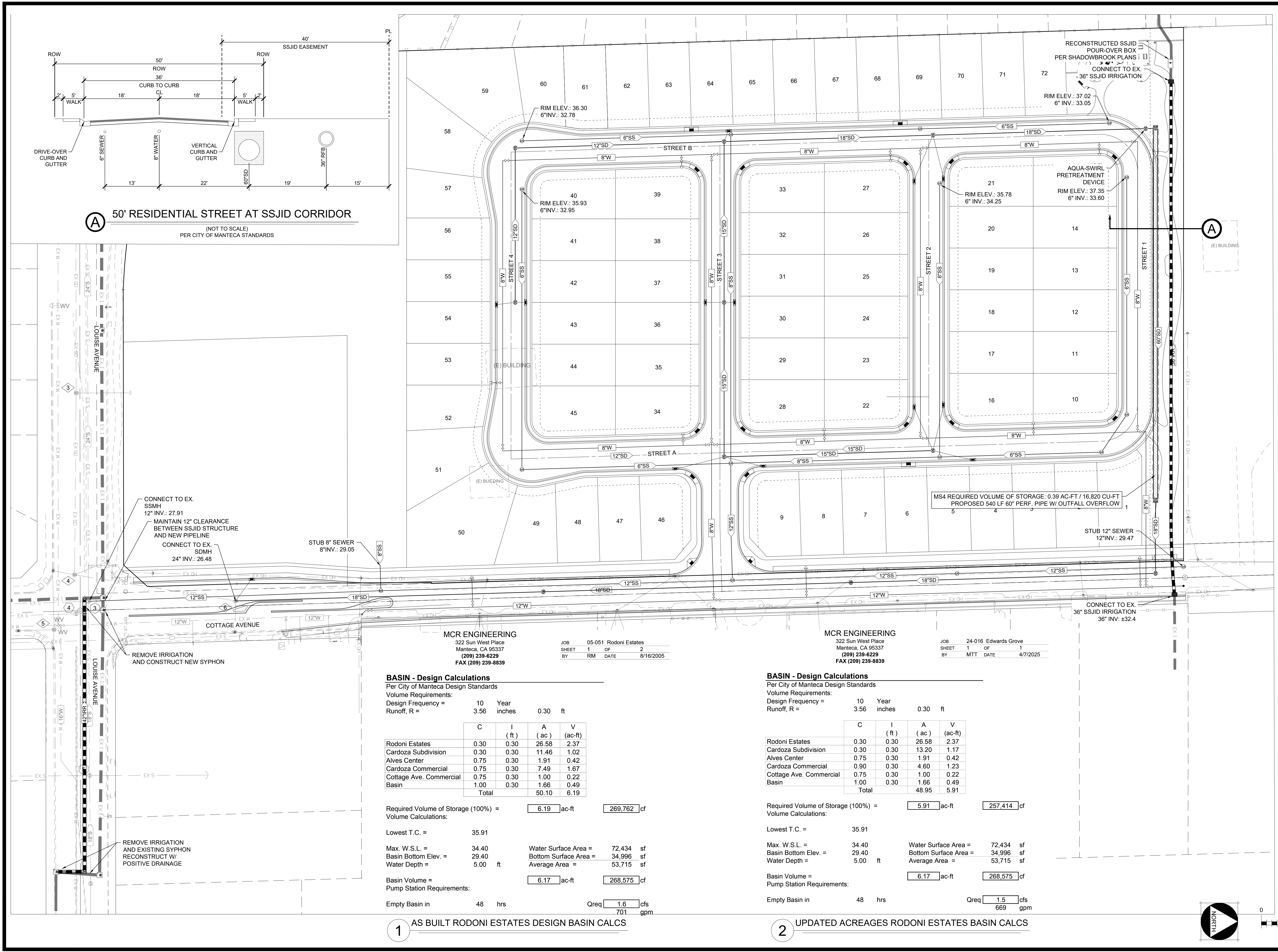
SAN JOAQUIN COUNTY

MANTECA, CA

**811**  
 Know what's below.  
 Call before you dig.  
 811 / 800-227-2600

JOB NO.: 24-016  
 DATE: 07-11-2025  
 SCALE: AS SHOWN  
 DR. BY: MTT/SLS  
 CK. BY: DE/SLS

SHEET NO.  
**6**  
 OF 6 SHEET



**A** 50' RESIDENTIAL STREET AT SSJID CORRIDOR  
 (NOT TO SCALE)  
 PER CITY OF MANTECA STANDARDS

**MCR ENGINEERING**  
 322 Sun West Place  
 Manteca, CA 95337  
 (209) 239-6229  
 FAX (209) 239-8839

JOB 05-051 Rodoni Estates  
 SHEET 1 OF 2  
 BY RM DATE 8/16/2005

**BASIN - Design Calculations**  
 Per City of Manteca Design Standards  
 Volume Requirements:  
 Design Frequency = 10 Year  
 Runoff, R = 3.56 inches 0.30 ft

	C	I (ft)	A (ac)	V (ac-ft)
Rodoni Estates	0.30	0.30	26.58	2.37
Cardoza Subdivision	0.30	0.30	11.46	1.02
Alves Center	0.75	0.30	1.91	0.42
Cardoza Commercial	0.75	0.30	7.49	1.67
Cottage Ave. Commercial	0.75	0.30	1.00	0.22
Basin	1.00	0.30	1.66	0.49
<b>Total</b>			<b>50.10</b>	<b>6.19</b>

Required Volume of Storage (100%) = **6.19** ac-ft **269,762** cf  
 Volume Calculations:  
 Lowest T.C. = 35.91  
 Max. W.S.L. = 34.40 Water Surface Area = 72,434 sf  
 Basin Bottom Elev. = 29.40 Bottom Surface Area = 34,996 sf  
 Water Depth = 5.00 ft Average Area = 53,715 sf

Basin Volume = **6.17** ac-ft **268,575** cf  
 Pump Station Requirements:  
 Empty Basin in 48 hrs Qreq **1.6** cfs **701** gpm

**1** AS BUILT RODONI ESTATES DESIGN BASIN CALCS

**MCR ENGINEERING**  
 322 Sun West Place  
 Manteca, CA 95337  
 (209) 239-6229  
 FAX (209) 239-8839

JOB 24-016 Edwards Grove  
 SHEET 1 OF 1  
 BY MTT DATE 4/7/2025

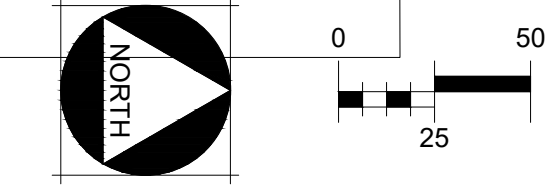
**BASIN - Design Calculations**  
 Per City of Manteca Design Standards  
 Volume Requirements:  
 Design Frequency = 10 Year  
 Runoff, R = 3.56 inches 0.30 ft

	C	I (ft)	A (ac)	V (ac-ft)
Rodoni Estates	0.30	0.30	26.58	2.37
Cardoza Subdivision	0.30	0.30	13.20	1.17
Alves Center	0.75	0.30	1.91	0.42
Cardoza Commercial	0.90	0.30	4.60	1.23
Cottage Ave. Commercial	0.75	0.30	1.00	0.22
Basin	1.00	0.30	1.66	0.49
<b>Total</b>			<b>48.95</b>	<b>5.91</b>

Required Volume of Storage (100%) = **5.91** ac-ft **257,414** cf  
 Volume Calculations:  
 Lowest T.C. = 35.91  
 Max. W.S.L. = 34.40 Water Surface Area = 72,434 sf  
 Basin Bottom Elev. = 29.40 Bottom Surface Area = 34,996 sf  
 Water Depth = 5.00 ft Average Area = 53,715 sf

Basin Volume = **6.17** ac-ft **268,575** cf  
 Pump Station Requirements:  
 Empty Basin in 48 hrs Qreq **1.5** cfs **669** gpm

**2** UPDATED ACREAGES RODONI ESTATES BASIN CALCS



## Appendix B

CalEEMod Modeling Summary Report, dated June 16, 2025

# Edwards Grove Annexation Summary Report

## Table of Contents

- 1. Basic Project Information
  - 1.1. Basic Project Information
  - 1.2. Land Use Types
  - 1.3. User-Selected Emission Reduction Measures by Emissions Sector
- 2. Emissions Summary
  - 2.1. Construction Emissions Compared Against Thresholds
  - 2.4. Operations Emissions Compared Against Thresholds
- 6. Climate Risk Detailed Report
  - 6.2. Initial Climate Risk Scores
  - 6.3. Adjusted Climate Risk Scores
- 7. Health and Equity Details
  - 7.3. Overall Health & Equity Scores
  - 7.5. Evaluation Scorecard

# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	Edwards Grove Annexation
Construction Start Date	7/1/2026
Operational Year	2028
Lead Agency	City of Manteca
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.40
Precipitation (days)	9.00
Location	37.81396843798966, -121.20009905004153
County	San Joaquin
City	Unincorporated
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2131
EDFZ	4
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.29

## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Single Family Housing	72.0	Dwelling Unit	13.2	140,400	843,326	—	233	—

Strip Mall	124	1000sqft	4.60	124,000	30,056	—	—	—
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### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-10-A	Water Exposed Surfaces
Construction	C-10-C	Water Unpaved Construction Roads
Area Sources	LL-3*	Electric Yard Equipment Compatibility

\* Qualitative or supporting measure. Emission reductions not included in the mitigated emissions results.

## 2. Emissions Summary

### 2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.82	3.21	29.2	29.7	0.06	1.24	19.8	21.0	1.14	10.1	11.3	—	6,780	6,780	0.27	0.16	3.95	6,805
Mit.	3.82	3.21	29.2	29.7	0.06	1.24	7.81	9.06	1.14	3.97	5.12	—	6,780	6,780	0.27	0.16	3.95	6,805
% Reduced	—	—	—	—	—	—	61%	57%	—	61%	55%	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	72.9	72.8	11.1	15.8	0.03	0.39	0.76	1.15	0.36	0.19	0.55	—	3,714	3,714	0.13	0.16	0.10	3,765
Mit.	72.9	72.8	11.1	15.8	0.03	0.39	0.76	1.15	0.36	0.19	0.55	—	3,714	3,714	0.13	0.16	0.10	3,765
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	2.71	2.56	7.06	10.5	0.02	0.25	1.47	1.72	0.23	0.62	0.85	—	2,442	2,442	0.08	0.10	0.97	2,476
Mit.	2.71	2.56	7.06	10.5	0.02	0.25	0.68	0.93	0.23	0.27	0.50	—	2,442	2,442	0.08	0.10	0.97	2,476
% Reduced	—	—	—	—	—	—	54%	46%	—	57%	42%	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.50	0.47	1.29	1.92	< 0.005	0.05	0.27	0.31	0.04	0.11	0.15	—	404	404	0.01	0.02	0.16	410
Mit.	0.50	0.47	1.29	1.92	< 0.005	0.05	0.12	0.17	0.04	0.05	0.09	—	404	404	0.01	0.02	0.16	410
% Reduced	—	—	—	—	—	—	54%	46%	—	57%	42%	—	—	—	—	—	—	—

### 2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	36.3	32.3	24.0	236	0.59	2.89	45.8	48.7	2.78	11.7	14.4	519	57,065	57,584	16.8	2.38	156	58,870
Mit.	36.3	32.3	24.0	236	0.59	2.89	45.8	48.7	2.78	11.7	14.4	519	57,065	57,584	16.8	2.38	156	58,870
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	33.3	29.3	27.2	197	0.55	2.88	45.8	48.7	2.77	11.7	14.4	519	53,155	53,674	17.0	2.57	5.77	54,870
Mit.	33.3	29.3	27.2	197	0.55	2.88	45.8	48.7	2.77	11.7	14.4	519	53,155	53,674	17.0	2.57	5.77	54,870
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	29.3	26.9	22.8	175	0.48	0.98	42.0	43.0	0.94	10.7	11.6	216	48,932	49,148	15.3	2.29	63.1	50,277

Mit.	29.3	26.9	22.8	175	0.48	0.98	42.0	43.0	0.94	10.7	11.6	216	48,932	49,148	15.3	2.29	63.1	50,277
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	5.34	4.91	4.17	32.0	0.09	0.18	7.66	7.84	0.17	1.95	2.12	35.7	8,101	8,137	2.54	0.38	10.4	8,324
Mit.	5.34	4.91	4.17	32.0	0.09	0.18	7.66	7.84	0.17	1.95	2.12	35.7	8,101	8,137	2.54	0.38	10.4	8,324
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

## 6. Climate Risk Detailed Report

### 6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	0	0	0	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

### 6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
----------------	----------------	-------------------	-------------------------	---------------------

Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	1	1	1	2
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

## 7. Health and Equity Details

### 7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	76.0
Healthy Places Index Score for Project Location (b)	44.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

### 7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

**Appendix C**

**Transportation Impact Analysis, dated May 16, 2025**

# Memorandum

Date: May 16, 2025  
To: Mark Niskanen – J.B. Anderson Land Use Planning  
From: Jonathan Murillo, Carly Hoyt – Fehr & Peers  
Subject: **Transportation Impact Analysis for the Proposed Edwards Grove Project in Manteca, CA**

RS24-4400

---

## 1. Introduction

This memorandum documents the results of the Transportation Impact Analysis (TIA) for the proposed Edwards Grove project in Manteca, CA. This analysis includes a vehicle miles traveled (VMT) assessment, which serves as the primary travel-related metric used to identify the project's significant transportation impacts under the California Environmental Quality Act (CEQA). Impacts to the bicycle, pedestrian, and transit network, and safety are also evaluated.

While this analysis generally focuses on evaluating and identifying transportation related impacts necessary for compliance with CEQA, project trip generation, distribution, and assignment are also included. The project trip generation is necessary for the VMT assessment but is also needed, in addition to trip distribution, and assignment, to inform what additional analysis is necessary for the Local Transportation Study (LTS) required by the City of Manteca as part of the entitlement review.

Once the City has reviewed and provided comments on the trip generation, distribution, assignment, and proposed scope of work documented in this memorandum for the LTS, Fehr & Peers will proceed with the LTS.

### 1.1 Project Description

The proposed project includes subdividing an existing 20-acre parcel into 72 single-family home residential parcels and a 4.7-acre parcel (Lot B) intended for future commercial development. While there is no specific commercial development planned for Lot B at this time (e.g. no site plan

has been provided and tenants are unknown), this transportation impact analysis evaluates impacts associated with commercial development consistent with Sections 17.22 and 17.26 of the City's Zoning Code in terms of permitted uses and development standards. The City of Manteca General Plan (2023) land use map designates the project site as low-density residential and commercial, which is consistent to the proposed project land use.

The project site is located on the northwest corner of the Louise Avenue/Cottage Avenue intersection. The proposed project is in San Joaquin County but is directly adjacent to the City of Manteca and is within the City's Sphere of Influence. If approved, the project site will be annexed into the City of Manteca. **Figure 1** shows the project site location; the project site plan is provided in **Appendix A**.

The proposed project includes the following transportation-related improvements:

- New full access intersection on Cottage Avenue which would provide access to the residential parcels. This intersection would serve the residential entrance street which would be constructed with two 12-foot travel lanes, 10-foot shoulders, and five-foot sidewalks.
- New right-in, right-out driveway on Louise Avenue and on Cottage Avenue, which would provide access to commercial development.
- Intersection modifications at the existing Louise Avenue/Cottage Avenue intersection. The full extent of these modifications, including the existing southbound left turn access into the existing commercial development on the northeast corner of Louise Avenue/Cottage Avenue will be analyzed in the LTS.
- Roadway and frontage improvements on Cottage Avenue consistent with the City of Manteca requirements.
- Construction of six new two-lane internal residential streets. These internal streets will have 50-foot right-of-way, 36-foot curb-to-curb, with five feet of sidewalks.

## 2. Project Travel Characteristics

This section presents the project travel characteristics, including trip generation, distribution and assignment. This information is necessary for the VMT assessment and for informing what additional analysis is necessary for the LTS required by the City of Manteca as part of the entitlement review.

### 2.1 Trip Generation

The project’s trip generation was estimated using trip rates published in the Trip Generation Manual 11th Edition (Institute of Transportation Engineers, 2021). As previously noted, the proposed project includes subdividing an existing 20-acre parcel into 72 single-family home residential parcels and a 4.7-acre parcel (Lot B) intended for future commercial development. ITE trip rates for single-family detached housing were used to estimate trip generation for the residential portion of the development.

For the commercial development, no detailed site plan has been developed and specific tenants have not yet been determined. The proposed project would be zoned neighborhood commercial which permits a variety of retail and service type uses aimed at serving residential neighborhoods. Per Section 17.26.020 of the City’s Zoning Code, the maximum floor area ratio in this district is 0.6 which equates to a maximum allowable 124,000 square feet of building area given the proposed 4.7-acre lot designated for commercial use. For the purposes of this analysis, a shopping plaza with a supermarket was evaluated.

**Table 1** displays the estimated number of daily, AM peak hour, and PM peak hour vehicle trips for the proposed project. As shown in **Table 1**, the project is estimated to generate 11,702 daily, 488 AM peak hour, and 1,187 PM peak hour trips.

**Table 1: Project Trip Generation**

Land Use	Quantity	Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
			In	Out	Total	In	Out	Total
Single-Family Detached Housing (ITE 210) <sup>1</sup>	72 Dwelling Units	679	15	41	56	46	27	73
Shopping Plaza (40-150k) w/ Supermarket (ITE 821)	124 KSF	10,956	272	166	438	695	425	1,120
<b>Total</b>		<b>11,702</b>	<b>287</b>	<b>207</b>	<b>494</b>	<b>741</b>	<b>452</b>	<b>1,197</b>

---

Notes:

1. ITE Trip Generation (11<sup>th</sup> Edition) land use category 210 (Single Family Detached Housing – Adj. Streets, 7-9 AM, 4-6 PM, General Urban/Suburban):
  - 1) Daily:  $\ln(T) = 0.92 \ln(X) + 2.68$
  - 2) AM Peak Hour:  $\ln(T) = 0.91 \ln(X) + 0.12$  (25% in, 75% out)
  - 3) PM Peak Hour:  $\ln(T) = 0.94 \ln(X) + 0.27$  (63% in, 37% out)
2. ITE Trip Generation (11<sup>th</sup> Edition) land use category 821 (Shopping Plaza (40-150k) w/ Supermarket – Adj. Streets, 7-9 AM, 4-6 PM, General Urban/Suburban):
  - 1) Daily:  $T = 76.96(X) + 1412.79$
  - 2) AM Peak Hour:  $T = 3.5(X)$  (62% in, 38% out)
  - 3) PM Peak Hour:  $T = 7.67(X) + 118.86$  (48% in, 52% out)

Source: Fehr & Peers, July 2024.

---

According to the *City of Manteca SB 743 Implementation Policy* (City of Manteca, 2022):

*A project that generates over 1,000 ADT will be required to analyze existing conditions, existing conditions plus project, existing conditions plus near-term cumulative projects, existing conditions plus near-term cumulative projects plus project, buildout conditions (2040), and buildout conditions (2040) plus project.*

The City requires this analysis be provided in a LTS which analyzes the project's influence on the surrounding intersections and roadway network utilizing level of service (LOS) for all project scenarios. The purpose of a LTS is to ensure the goals, objectives, and policies adopted by the City are supported and implemented while monitoring the vehicular capacity for the roadway network.

## 2.2 Trip Distribution

To evaluate which intersections may be impacted by the proposed project, the proposed project was added to the base year (2019) City of Manteca General Plan travel demand model (TDM). The TDM distributes trips based on location of complementary land uses and likely paths that will be used to travel to and from the site. **Figure 2** presents the project trip distribution based on output from the TDM. Project trip distribution is summarized below:

- 17% to/from Lathrop Road north of the project site
- 30% to/from Louise Avenue west of Cottage Avenue
- 20% to/from Button Avenue east of Cottage Avenue
- 23% to/from Cottage Avenue south of Button Avenue
- 10% to/from Louise Avenue east of Cottage Avenue

## 2.3 Trip Assignment

Based on the distribution described above, trips were assigned to the following intersections which are recommended for analysis as part of the upcoming LTS:

1. Cottage Avenue / Button Avenue
2. Louise Avenue / Cottage Avenue
3. Cottage Avenue/Southland Road
4. Cottage Avenue / Residential Driveway
5. Cottage Avenue / Lathrop Road
6. Louise Avenue / Commercial Driveway

These intersections are consistent with the intersections documented in the original scope of work (see **Appendix A**). If no modifications to study intersections are required by the City of Manteca, Fehr & Peers will complete the LTS based on the original scope of work for the proposed project.

Fehr & Peers proposes to assign trip to the study intersections as shown **Table 2**.

**Table 2: Trip Assignment at Nearby Intersections**

AM Peak Hour	Northbound			Southbound			Eastbound			Westbound		
	L	T	R	L	T	R	L/U	T	R	L	T	R
1. Cottage Avenue/Button Avenue		43		39	64							29
2. Louise Avenue/Cottage Avenue		75		1	21	96	143	3	83		27	2
3. Cottage Avenue/Project Driveway	13				82	2	5		36			
4. Cottage Avenue/Southland Road		47			84							
5. Cottage Avenue/Lathrop Road	47								84			
6. Louise Avenue / Project Driveway						166						272

PM Peak Hour	Northbound			Southbound			Eastbound			Westbound		
	L	T	R	L	T	R	L	T	R	L	T	R
1. Cottage Avenue/Button Avenue		52		33	64							36
2. Louise Avenue/Cottage Avenue		89		1	14	90	154	3	83		27	5
3. Cottage Avenue/Project Driveway	42				82	4	3		24			
4. Cottage Avenue/Southland Road		45			86							
5. Cottage Avenue/Lathrop Road	45								86			
6. Louise Avenue / Project Driveway						425						695

Source: Fehr & Peers, April 2025.

### 3. CEQA Analysis

This section evaluates the proposed project’s transportation system (VMT), bicycle, pedestrian, transit, and safety impacts.

For the purposes of this analysis, a proposed project would result in a significant impact if it would:

- a) Disrupt or interfere with existing or planned bicycle, pedestrian, or transit facilities or result in a physical change that would be inconsistent with policies in the City of Manteca General Plan.
- b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).

- c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- d) Result in inadequate emergency access.

## 3.1 Bicycle, Pedestrian, and Transit Impacts

*a) Would the project disrupt or interfere with existing or planned bicycle, pedestrian, or transit facilities or result in a physical change that would be inconsistent with policies in the City of Manteca General Plan.*

### *Bicycle Facilities*

There are no existing bicycle facilities on Cottage Avenue within the vicinity of the project site. The *City of Manteca Active Transportation Plan* identifies the following planned bicycle improvements near the project site:

- Planned Class II bike lanes along Cottage Avenue from Lathrop Road to Louise Avenue, including along the project frontage.
- Planned Class II bike lanes along Louise Avenue from Cottage Avenue to Main Street, including along the project frontage.

The project proposes frontage improvements along Cottage Avenue. These improvements include widening the roadway to provide a two way left-turn lane, and a Class II bike lane and separated sidewalk in the southbound direction along the project frontage. It is noted that gaps in the bicycle network in the southbound direction north and south of the project site and in northbound direction adjacent to the project site and north and south of the project site would remain. The City of Manteca General Plan includes policy language that indicates bicycle facilities will be added when possible, in conjunction with road rehabilitation, reconstruction, or re-striping projects and as new development occurs. Future gap closures would occur as part of these efforts and the proposed project would not preclude the future construction of these facilities.

The project proposes frontage improvements along Louise Avenue that include restriping the existing roadway to include two 11-foot travel lanes in both directions with a four- to five-foot Class-II bicycle lane. This proposed configuration would be consistent with the City's Active Transportation Plan's implementation of a bicycle connection along Louise Avenue west of Cottage Avenue.

While the proposed project does not include modifications to the facility itself, the project would include a new right in, right out driveway along this segment which could impact bicyclist safety and comfort. However, this driveway would include a crossing which would be designed to integrate with the Class II bike lane. This crossing would be reviewed and approved by the City of

Manteca to ensure it does not disrupt or interfere with the facility. With a striping of a Class II facility along Louise Avenue the project would not interfere or disrupt existing or planned bicycle facilities or result in physical changes that would be inconsistent with bicycle related policies in the City of Manteca General Plan. Therefore, this impact is considered **less than significant**.

### *Pedestrian Facilities*

Primary access between the project site and the surrounding neighborhood will be provided via new connections to Cottage Avenue at the proposed residential access road. The project proposes five-foot-wide sidewalks, consistent with City of Manteca design standards for local residential streets, on both sides of all new residential roadways.

The project proposes an eight-foot-wide sidewalk with a six-foot-wide landscape buffer on the west side of Cottage Avenue along the project site's frontage. The proposed project is consistent with the General Plan's goals of creating a safe and contiguous pedestrian network and the proposed sidewalk on Cottage Avenue would exceed the minimum cross-sectional requirements specified in drawing No. ST-3 in the Standard Street Cross Sections (City of Manteca, 2004).

Louise Avenue along the project frontage has an existing 8' sidewalk. While the proposed project does not include modifications to the facility itself, the project would include a new right in, right out driveway along this segment which could impact pedestrian safety and comfort. However, this driveway would include a crossing which would be designed to integrate with the existing sidewalk. This crossing would be reviewed and approved by the City of Manteca to ensure it does not disrupt or interfere with the existing facility. The project would not interfere or disrupt existing or planned pedestrian facilities or result in physical changes that would be inconsistent with pedestrian related policies in the City of Manteca General Plan. Therefore, this impact is considered **less than significant**.

### *Transit Facilities*

Transit service is provided by Manteca Transit. The nearest bus stop is located at the northwest corner of Louise Avenue which is approximately 250 feet from the commercial site, and 900 feet from the residential access road. This bus stop is served by Route 3 which serves north Manteca and provides connections to the Manteca Transit Center and Downtown Manteca; route information is summarized in **Table 3**.

**Table 3: Transit Services Near Project Site**

Route	Route Limits	Nearest Stop (Distance from Project Site)	Weekdays		Weekends (Saturday Only)	
			Hours	Headway <sup>1</sup>	Hours	Headway <sup>1</sup>
3	Diamond Oak Park to Manteca Transit Center to East Union High School	Louise Avenue / Empire Lane (0.50 miles)	6:00 AM – 6:48 PM	60 minutes	9:00 AM – 3:48 PM	60 minutes

Notes:

1. The frequency, or interval of time between buses traveling in any given direction along a designated route.

Source: City of Manteca website visited in April 2025; Fehr & Peers, April 2025.

The City of Manteca General Plan nor the San Joaquin Council of Governments (SJCOG) Draft Fiscal Year 2025-26 Unmet Transit Needs Analysis Report identify any planned or necessary transit improvements near the study area and the project is not inconsistent with any transit related policies in the General Plan. Therefore, this impact is considered **less than significant**.

### 3.3 VMT Impacts

#### *b) Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?*

As of July 1, 2020, CEQA Guidelines Section 15064.3(b) states that the recommended metric for the evaluation of transportation impacts is VMT. It outlines the criteria for analyzing a project’s transportation impacts. For land use projects, this section states that “vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact.”

According to *City of Manteca SB 743 Implementation Policy* (City of Manteca, 2022), a project would result in a less than significant transportation VMT impact if it:

- Qualify for screening per the screening criteria outlined in the City’s VMT screening guidelines. The guidelines state that a project may be screened from additional VMT analysis if it complies with one or more of the following conditions:

- 1) is a small project generating fewer than 1,000 trips a day and consistent with City’s General Plan;

- 2) is 100% affordable housing;
  - 3) is local-serving retail less than 125,000 square feet in building floor area;
  - 4) Is located in a High-Quality Transit Area; or
  - 5) is located in a low VMT area.
- Would not exceed the applicable VMT threshold based on land use type

Additionally, Office of Planning & Research (OPR) Technical Advisory (2018) states *“OPR recommends analyzing each use separately, or simply focusing analysis on the dominant use, and comparing each result to the appropriate threshold.”* The City of Manteca SB 743 Implementation Policy also states *“In accordance with the OPR Technical Advisory local serving retail centers up to 125,000 square feet that provide the fine grain details that promote active transportation are expected to have a less-than-significant impact on VMT and are exempt from further VMT analysis. This applies to the entirety of a retail project; for a mixed-use project, this screening criteria should be applied to the retail/commercial component separately to determine if that portion of the project screens out of a detailed VMT analysis.”*

The proposed residential portion of the project would generate fewer than 1,000 daily trips and is consistent with the City’s General Plan land use designation and density limits established by the City of Manteca for the project site. Therefore, the proposed residential portion of the project site may be screened from VMT analysis and would result in a **less than significant impact**.

The proposed commercial portion of the project would be zoned CN (Neighborhood Commercial Zoning) which based on the Section 17.26.020 of the City’s Zoning Code, would allow a maximum 124,000 square feet of development. Examples of permitted land uses within this zoning designation include: Convenience Store, Grocery Store/Supermarket, Home Improvement Supplies, Restaurant, Professional Services, etc.. Based on permitted land uses<sup>1</sup>, the commercial portion of the development would constitute as local-serving retail less than 125,000 square feet in building floor area which may be screened from VMT analysis and would result in a **less than significant impact**.

Furthermore, CEQA Guidelines Section 15183(a) states that: “CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental

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<sup>1</sup> It is noted that the *City of Manteca SB 743 Implementation Policy* (City of Manteca, 2022) indicates the City may require a market analysis to determine if a proposed tenant meets the characteristics of a local-serving retail development. If this analysis is required and a tenant does not qualify as local-serving, a supplemental VMT analysis may be necessary at the discretion of the City.

review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site.” The General Plan Environmental Impact Report (EIR), which was certified in 2023, identified a significant and unavoidable VMT impact on the transportation system. The project proposes detached single-family homes with an average density of 5.4 dwelling units per acre, which is consistent with the low-density residential land use designation of the General Plan. Construction of an approximately 124,000 square foot neighborhood serving commercial development would be consistent with the commercial land use designation as part of the City’s General Plan.

### 3.3 Hazards Due to Geometric Design Features

*c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

The proposed project would create new intersections and roadways which would be designed to comply with the City of Manteca General Plan (2023), *Standard Street Cross Sections* (City of Manteca, 2004), and City of Manteca Municipal Code. The City street standards include design criteria to ensure residential subdivisions are designed to meet or exceed uniform levels of sound engineering practices.

The City’s design standards shown on Drawing No. ST-2 in the *Standard Street Cross Sections* (City of Manteca, 2004) require a minimum 50-foot ROW, 36-foot curb-to-curb width, and five-foot wide sidewalks on both sides of the street for new residential streets. The proposed cross-section for new residential streets (Street A, Street B, Street 1, Street 2, Street 3, and Street 4) meets the minimum City of Manteca design standards for residential streets (see **Appendix B**).

Drawing No. ST-3 in the *Standard Street Cross Sections* (City of Manteca, 2004) also shows design standards for new small collector streets, which require a minimum 60-foot ROW, 44-foot curb-to-curb width, and five-foot wide sidewalks on both sides of the street. The proposed cross-section for Cottage Avenue meets the minimum City of Manteca design standards for small collector streets.

Intersection signing and striping would be designed to meet applicable industry standards from the California Manual on Uniform Traffic Control Devices (CAMUTCD) and the American Associations of State Highway and Transportation Officials (AASHTO) A Policy on Geometric Design of Highways and Streets.

The proposed improvements and corresponding design features are compatible with the existing adjacent commercial and residential land uses. Therefore, the proposed project is not

incompatible with adjacent land uses and would be designed to meet applicable standards and would result in a **less than significant impact**.

### 3.4 Emergency Vehicle Access

#### *d. Would the project result in inadequate emergency access?*

The residential portion of the project includes an access point on Cottage Avenue, and the commercial portion of the project includes an access point on Louise Avenue. All proposed on-site streets would provide a minimum clear width of 20 feet, meeting the City of Manteca Fire Code minimum 20-foot clear-width requirement for streets that provide access to buildings under 30 feet in height. Thus, the proposed project would be constructed to provide adequate emergency access and would result in a **less than significant impact**.

**Appendix A** – Proposed Non-CEQA Local Transportation Study Scope of Work

**Appendix B** – Project Site Plan

**Appendix C** – ICSC U.S. Shopping-Center Classification and Characteristics