



*Planning Division*

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February 24, 2005

Kyle Kollar  
Community Development Director  
City of Manteca  
1001 W. Center Street  
Manteca, CA 95337

Subject: Draft Environmental Impact Report (DEIR) for the Union Ranch Specific Plan

Dear Mr. Kollar:

This letter is in response to the recent DEIR on the Union Ranch project that was forwarded to the City of Lathrop. Thank you for the opportunity to review and comment.

As you are undoubtedly aware, the City of Lathrop and the City of Manteca recently agreed to prepare a joint Traffic Study to identify impacts and develop appropriate mitigation measures. The City of Lathrop believes this Traffic Study, to which the Union Ranch project is subject, should address and mitigate our concerns. Nevertheless, and to make sure the Traffic Study includes the necessary information on the Union Ranch project, the City of Lathrop notes the following:

Traffic and Circulation

1. The DEIR states that the I-5/Roth Road and the I-5/Louise Avenue interchanges may provide site access from the north and south. The traffic section in the EIR did not study these interchanges. By participating in the Traffic Study described above these impacts shall be quantified and mitigated.
2. The DEIR lists the intersection of Lathrop Road/McKinley Avenue as a City of Manteca intersection. This intersection is in the City of Lathrop.
3. Increases in traffic will occur on Lathrop Road between I-5 and the project site. The City of Lathrop believes traffic volumes from this project will precipitate the need for widening of this road and the future railroad grade separators. By participating in the Traffic Study described above these impacts shall be quantified and mitigated.

4. The DEIR states that the project will contribute 2.2% of a signal cost at Interstate-5 and Lathrop Road. This figure appears to be calculated as a percentage of trips the project generates in comparison to the total vehicles at build-out. Since the analysis relies on build-out conditions, the mitigation shall be a fair share contribution toward the interchange improvements.
5. The DEIR references the regional fee, as a potential source of funds for regional projects. However, this fee has not been adopted by the City of Manteca and therefore can not be utilized as there are no requirements and therefore can not be utilized as mitigation toward impacts this project may have on regional roads located in the City of Lathrop and elsewhere.

The only two regional traffic improvements identified are the signal, described in paragraph 4, above, and a contribution towards the signal at Lathrop Road/McKinley Avenue. These two measures alone do not appear to be sufficient to address the impacts of this development because they focus solely on the intersections without referencing any pavement or roadway width improvements to handle the additional traffic identified as passing through the intersections. A key component of the improvements on Lathrop/McKinley is a grade separator. However, by participating in the Traffic Study described above these impacts shall be quantified and mitigated.

6. Appendix G Traffic Reports

- a. The report indicates that 13% of the traffic from the project will travel north via Airport Way then travel west on Roth Road to Interstate -5. The impacts to Roth Road and the Interstate-5/Roth Road interchange were not analyzed in this report nor were any mitigations discussed. By participating in the Traffic Study described above these impacts shall be quantified and mitigated.
  - b. The reports states that Manteca used the Traffic numbers from the Central Lathrop Specific Plan (CLSP), for the "future/no project scenario" at the intersections in Lathrop. The numbers at these intersections do not agree with the CLSP numbers.
7. Traffic from the project will also utilize Lathrop Road and Louise Avenue to access Interstate-5. The actual traffic generated would result in a significant adverse impact to both the easterly and westerly direction of Louise Avenue and Lathrop Road in the City of Lathrop. Traffic generated by this project would also result in significant impacts to the Louise Avenue/Interstate-5 and Lathrop Road/Interstate-5 on and off ramps. In addition the DEIR states that the Roth Road/Interstate-5 interchange could also be impacted, yet it is not studied nor is Louise Avenue/Interstate-5 interchange studied. These impacts need to be addressed in the DEIR and appropriate fair share funding mitigation measures should be required.
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As set forth above, all of the comments made will be mitigated by this project's participation in the agreed-upon joint traffic study and implementation of the mitigation measures identified as part of that study. A mitigation measure to that effect included in the Union Ranch project FEIR will resolve the City of Lathrop's concerns as herein referenced.

Please provide me with a copy of the Final Environmental Impact Report for this project when available. In addition, please provide me with the dates of any future actions by the Planning Commission and City Council regarding the above referenced project. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Bruce Coleman / By JAH".

Bruce Coleman,  
Community Development Director

cc: Pam Carder, City Manager  
Susan Burns Cochran, City Attorney  
Deanna Walsh, Principal Planner

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