DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT
1010 10TH Street, Suite 3400, Modesto, CA 95354
Planning Phone: (209) 525-6330 Fax: (209) 525-5911
Building Phone: (209) 525-6557 Fax: (209) 525-7759

CEQA Referral Initial Study And Notice of Intent to Adopt a Negative Declaration

Date: **June 7, 2022**

To: **Distribution List (See Attachment A)**

From: **Planning and Community Development, Kristy Doud, Deputy Director**

Subject: **GENERAL PLAN AMENDMENT AND REZONE APPLICATION NO. PLN2021-0108 – JAMES BATES RV & BOAT STORAGE**

Comment Period: **June 7, 2022 – July 11, 2022**

Respond By: **July 11, 2022**

Public Hearing Date: **July 21, 2022**

You may have previously received an Early Consultation Notice regarding this project, and your comments, if provided, were incorporated into the Initial Study. Based on all comments received, Stanislaus County anticipates adopting a Negative Declaration for this project. This referral provides notice of a 30-day comment period during which Responsible and Trustee Agencies and other interested parties may provide comments to this Department regarding our proposal to adopt the Negative Declaration.

All applicable project documents are available for review at: Stanislaus County Department of Planning and Community Development, 1010 10th Street, Suite 3400, Modesto, CA 95354. Please provide any additional comments to the above address or call us at (209) 525-6330 if you have any questions. Thank you.

Applicant: **James Bates, Eagles and Spartans, LLC**

Project Location: **Litt Road, on the southeast corner of Plainview and Litt Roads, west of Terminal Avenue and the Burlington Northern Santa Fe Railroad, in the Modesto Area.**

APN: **084-003-006**

Williamson Act Contract: **N/A**

General Plan: **Urban Transition (UT)**

Current Zoning: **General Agriculture (A-2-10)**

Project Description: **Request to amend the General Plan and zoning designations of an 18.5 total acre parcel, from Urban Transition (UT) and General Agriculture (A-2-10) to Planned Development (P-D) to allow for development consistent with permitted uses in the Planned Industrial (P-I) zoning district. Specifically, the applicant proposes the development of a RV and boat storage facility; however, other P-I uses may be developed on the site in the future with a use permit. The project proposes to construct 15 structures, each with a maximum of 14 enclosed RV and boat parking spaces, for a total of 231,000 square feet of buildings, and one 1,600 square-foot office, with restroom. The storage units will include electrical for battery charging purposes. No vehicle**

maintenance and dumping services will occur on site. Parking areas and drive aisles are proposed to be paved. The site will be fenced with an 8-foot-tall block wall and will be open to customers through a secured access gate 24 hours a day, 7 days a week. One to two employees will be on-site between 9 a.m. and 5 p.m., 7 days a week. The project anticipates a maximum of 33 customers per day. A monument sign is proposed to be installed at the gate entry along Litt Road. Lighting will include, wall lighting on the storage buildings and parking lot light poles, which are proposed to be 15 feet in height. The street frontage along Litt Road will be landscaped in accordance with the City of Modesto standards. The project is proposed to be served with public water and sewer by the City of Modesto. The project is located within the City of Modesto's LAFCO adopted Sphere of Influence.

Full document with attachments available for viewing at:
http://www.stancounty.com/planning/pl/act-projects.shtm

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GENERAL PLAN AMENDMENT AND REZONE APPLICATION NO. PLN2021-0108 – JAMES BATES RV & BOAT STORAGE

Attachment A - Distribution List

X	CA DEPT OF CONSERVATION Land Resources / Mine Reclamation		STAN CO ALUC
X	CA DEPT OF FISH & WILDLIFE		STAN CO ANIMAL SERVICES
	CA DEPT OF FORESTRY (CAL FIRE)	X	STAN CO BUILDING PERMITS DIVISION
	CA DEPT OF TRANSPORTATION DIST 10	X	STAN CO CEO
X	CA OPR STATE CLEARINGHOUSE		STAN CO CSA
	CA RWQCB CENTRAL VALLEY REGION	X	STAN CO DER
	CA STATE LANDS COMMISSION	X	STAN CO ERC
	CEMETERY DISTRICT		STAN CO FARM BUREAU
	CENTRAL VALLEY FLOOD PROTECTION	X	STAN CO HAZARDOUS MATERIALS
X	CITY OF: MODESTO		STAN CO PARKS & RECREATION
	COMMUNITY SERVICES DIST:	X	STAN CO PUBLIC WORKS
X	COOPERATIVE EXTENSION		STAN CO RISK MANAGEMENT
	COUNTY OF:	X	STAN CO SHERIFF
	DER GROUNDWATER RESOURCES DIVISION	X	STAN CO SUPERVISOR DIST #1: SUPERVISOR B. CONDIT
X	FIRE PROTECTION DIST: STANISLAUS CONSOLIDATED FIRE PROTECTION	X	STAN COUNTY COUNSEL
X	GSA: STANISLAUS AND TUOLUMNE RIVERS GROUNDWATER BASIN ASSOCIATION		StanCOG
	HOSPITAL DIST:	X	STANISLAUS FIRE PREVENTION BUREAU
X	IRRIGATION DIST: MODESTO	X	STANISLAUS LAFCO
X	MOSQUITO DIST: EASTSIDE		STATE OF CA SWRCB DIVISION OF DRINKING WATER DIST. 10
	MOUNTAIN VALLEY EMERGENCY MEDICAL SERVICES	X	SURROUNDING LAND OWNERS
	MUNICIPAL ADVISORY COUNCIL:	X	TELEPHONE COMPANY: AT&T
X	PACIFIC GAS & ELECTRIC	X	TRIBAL CONTACTS (CA Government Code §65352.3)
	POSTMASTER:		US ARMY CORPS OF ENGINEERS
X	RAILROAD: BURLINGTON NORTHERN SANTA FE	X	US FISH & WILDLIFE
X	SAN JOAQUIN VALLEY APCD		US MILITARY (SB 1462) (7 agencies)
X	SCHOOL DIST 1: SYLVAN UNION		USDA NRCS
X	SCHOOL DIST 2: MODESTO CITY SCHOOLS		WATER DIST:
	WORKFORCE DEVELOPMENT		TUOLUMNE RIVER TRUST
X	STAN CO AG COMMISSIONER		

STANISLAUS COUNTY
CEQA REFERRAL RESPONSE FORM

TO: **Stanislaus County Planning & Community Development**
1010 10th Street, Suite 3400
Modesto, CA 95354

FROM: _____

SUBJECT: **GENERAL PLAN AMENDMENT AND REZONE APPLICATION NO. PLN2021-0108 – JAMES BATES RV & BOAT STORAGE**

Based on this agency's particular field(s) of expertise, it is our position the above described project:

_____ Will not have a significant effect on the environment.
_____ May have a significant effect on the environment.
_____ No Comments.

Listed below are specific impacts which support our determination (e.g., traffic general, carrying capacity, soil types, air quality, etc.) – (attach additional sheet if necessary)

1.
2.
3.
4.

Listed below are possible mitigation measures for the above-listed impacts: *PLEASE BE SURE TO INCLUDE WHEN THE MITIGATION OR CONDITION NEEDS TO BE IMPLEMENTED (PRIOR TO RECORDING A MAP, PRIOR TO ISSUANCE OF A BUILDING PERMIT, ETC.):*

1.
2.
3.
4.

In addition, our agency has the following comments (attach additional sheets if necessary).

_____

_____

Response prepared by:

_____

Name Title Date

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CEQA INITIAL STUDY

Adapted from CEQA Guidelines APPENDIX G Environmental Checklist Form, Final Text, January 1, 2020

1.	**Project title:**	General Plan Amendment and Rezone Application No. PLN2021-0108 – James Bates RV & Boat Storage SCH No. 2021120445
2.	**Lead agency name and address:**	Stanislaus County 1010 10th Street, Suite 3400 Modesto, CA 95354
3.	**Contact person and phone number:**	Kristy Doud, Deputy Director (209) 525-6330
4.	**Project location:**	Litt Road, on the southeast corner of Plainview and Litt Roads, west of Terminal Avenue and the Burlington Northern Santa Fe Railroad, in the Modesto Area. (APN: 084-003-006).
5.	**Project sponsor's name and address:**	James Bates, Eagles and Spartans, LLC 3833 Lakeside Dr., Modesto, CA 95355
6.	**General Plan designation:**	Urban Transition
7.	**Zoning:**	General Agriculture (A-2-10)

8. Description of project:

Request to amend the General Plan and zoning designations of an 18.5 total acre parcel, from Urban Transition (UT) and General Agriculture (A-2-10) to Planned Development (P-D) to allow for development consistent with permitted uses in the Planned Industrial (P-I) zoning district. Specifically, the applicant proposes the development of a RV and boat storage facility; however, other P-I uses may be developed on the site in the future with a use permit. The project proposes to construct 15 structures, each with a maximum of 14 enclosed RV and boat parking spaces, for a total of 231,000 square feet of buildings, and one 1,600 square-foot office, with restroom. The storage units will include electrical for battery charging purposes. No vehicle maintenance and dumping services will occur on site. Parking areas and drive aisles are proposed to be paved. The site will be fenced with an 8-foot-tall block wall and will be open to customers through a secured access gate 24 hours a day, 7 days a week. One to two employees will be on-site between 9 a.m. and 5 p.m., 7 days a week. The project anticipates a maximum of 33 customers per day. A monument sign is proposed to be installed at the gate entry along Litt Road. Lighting will include, wall lighting on the storage buildings and parking lot light poles, which are proposed to be 15 feet in height. The street frontage along Litt Road will be landscaped in accordance with the City of Modesto standards. The project is proposed to be served with public water and sewer by the City of Modesto. The project is located within the City of Modesto's LAFCO adopted Sphere of Influence.

9.	**Surrounding land uses and setting:**	The Burlington Northern Santa Fe Railroad (BNSF) and Terminal Avenue border the project site to the east, Litt Road to the west, Plainview Road to the north, and the City of Modesto's corporation yard, to the south. Agricultural property ranging in size from 20 to 96 acres, which is either farmed in row crops or orchards, surround the site in all directions. The City of Modesto is located ½ mile south of the project site.
10.	**Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):**	City of Modesto San Joaquin Valley Air Pollution Control District Stanislaus County Department of Public Works Stanislaus County Department of Environmental Resources
11.	**Attachments:**	1. Air and Health Risk Assessment Memo, dated March 23, 2022, prepared by BaseCamp Environmental, Inc. 2. Central California Information Center records search, dated October 8, 2021 3. Will Serve letter for sewer services received from the City of Modesto, dated September 30, 2021 4. Will Serve letter for water services received from the City of Modesto, dated September 30, 2021 5. Vehicle Turning Analysis completed by KD Anderson and Associates, Inc., dated March 30, 2022

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

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

DETERMINATION: (To be completed by the Lead Agency)
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.**

☐ **I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.**

☐ **I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.**

☐ **I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.**

☐ **I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.**

Signature on file. **June 1, 2022**
Prepared by Kristy Doud, Deputy Director Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

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, than 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). References 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 significant 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 significant.**

ISSUES

I. AESTHETICS – Except as provided in Public Resources Code Section 21099, could the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
c) 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 point). 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	

Discussion: The site itself is not considered to be a scenic resource or unique scenic vista. The project proposes to allow for development consistent with permitted uses in the Planned Industrial (P-I) zoning district. Specifically, the applicant proposes the future development of a RV and boat storage facility; however, other P-I uses may be developed on the site in the future with a use permit. The project proposes to construct 15 structures, each with a maximum of 14 enclosed RV and boat parking spaces, for a total of 231,000 square feet of buildings, and one 1,600 square-foot office, with restroom. The storage units will include electrical for battery charging purposes. No vehicle maintenance and dumping services will occur on site. Parking areas and drive aisles are proposed to be paved. The site will be fenced with an 8-foot-tall block wall and will be open to customers through a secured access gate 24 hours a day, 7 days a week. A monument sign is proposed to be installed at the gate entry along Litt Road. Lighting will include, wall lighting on the storage buildings and parking lot light poles, which are proposed to be 15 feet in height. The street frontage along Litt Road will be landscaped in accordance with the City of Modesto standards. To prevent the potential for the creation of a new source of substantial light or glare affecting the day or nighttime views in the area, a development standard will be applied to the project requiring that a photometric lighting plan be submitted for review and approval to the Planning Department, should additional lighting be added in the future. With the inclusion of this development standard, aesthetic impacts from the project are considered to be less-than significant.

Mitigation: None.

References: Application materials; Stanislaus County Zoning Ordinance; the Stanislaus County General Plan; and Support Documentation[1].

II. AGRICULTURE AND FOREST RESOURCES: 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) 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:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Included**	**Less Than Significant Impact**	**No Impact**
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?			X	
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?			X	
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 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	

Discussion: The Stanislaus County's Williamson Act Uniform Rules defines prime farmland as land that qualifies for rating as class I or class II in the Natural Resource Conservation Service land use capability classification, land which qualifies for rating of 80 through 100 in the Storie Index Rating, irrigated pasture land which supports livestock used for the production of food and fiber, or land planted with crops that gross $800 per acre for three of the last five years. The USDA uses the class system for soils which ranges from I to VIII to score the capability of the soils for agricultural production, with Class I soils being the most productive and Class VIII soils be non-agricultural. The California Revised Storie Index is a rating system based on soil properties, including texture, steepness, and drainage, that dictate the potential for soils to be used for irrigated agricultural production in California. This rating system grades soils with an index rating between 81-100 to be excellent (Grade 1), 61-80 to be good (Grade 2), 41-60 to be fair (Grade 3), 21-40 to be poor (Grade 4), 11-20 to be very poor (Grade 5), and 10 or less to be nonagricultural (Grade 6). The USDA Natural Resources Conservation Service's Eastern Stanislaus County Soil Survey indicates that the northern 2/3rd of the property is made up of San Joaquin sandy loam (SaA), with 0 to 3 percent slopes, which has a Storie Index Rating of 24 (Grade 4) and is rated as class IV, which is not considered to be prime soil. The southern 1/3rd of the property is made up of Snelling sandy loam (SnA), with 0-3 percent slopes, which has a Storie Index Rating of 86 (Grade 1) and is rated as class II, which is considered to be prime soil. The California Department of Conservation's Important Farmland Maps considers the northern 2/3rd portion of the site to be unique farmland and the southern 1/3rd of the site to be prime farmland.

The project site is designated as Business-Commercial-Residential (BCR) in the City of Modesto's General Plan Land Use Diagram. The City of Modesto's Master Environmental Impact Report (EIR) for their General Plan found impacts to

agriculture to be significant and unavoidable. The project site is designated as Urban Transition in the Land Use Element of the Stanislaus County General Plan and has a zoning designation of General Agriculture (A-2-10). Policy 2.15 of the Agricultural Element of the General Plan requires mitigation for the conversion of agricultural land resulting from a discretionary project requiring a General Plan or Community Plan amendment from Agriculture to a residential land use designation at a 1:1 ratio with agricultural land of equal quality located in Stanislaus County. The project does not propose residential development and therefore the requirement for agricultural mitigation does not apply. Further, according to Goal Two, Policy 2.5, Implementation Measure One, of the General Plan's Agricultural Element, when defining the County's most productive agricultural areas, it is important to recognize that soil types alone should not be the determining factor; "Most Productive Agricultural Areas" do not include any land within LAFCO approved Spheres of Influence of cities. The project site is not considered to be a most productive agricultural area as it is located within the City of Modesto's Local Agency Formation Commission (LAFCO) adopted Sphere of Influence. Generally, urban development will only occur upon annexation to a city, but such development may be appropriate prior to annexation provided the development is not inconsistent with the land use designation of the general plan of the affected city. The City of Modesto has provided written support of the proposed project.

The project site is currently farmed in irrigated forage crops. The Burlington Northern Santa Fe Railroad (BNSF) and Terminal Avenue border the project site to the east, Litt Road to the west, Plainview Road to the north, and the City of Modesto's corporation yard, which is 40 acres, to the south. Agricultural property ranging size from 20 to 96 acres, which is either farmed in row crops or orchards, surround the site all of which are also within the City of Modesto's Sphere of Influence. The 65 acre parcel to the west of the site, located across Litt Road, is currently under a Williamson Act Contract, as are two parcels 20 and 51 acres in size east of the site, located across the BNSF railroad and Terminal Road.

The County's Agricultural Element's Agricultural Buffer Guidelines states that new or expanding uses approved by discretionary permit in the A-2 zoning district or on a parcel adjoining the A-2 zoning district should incorporate a minimum 150-foot-wide agricultural buffer setback, or 300-foot-wide buffer setback for people intensive uses, to physically avoid conflicts between agricultural and non-agricultural uses. Public roadways, utilities, drainage facilities, rivers and adjacent riparian areas, landscaping, parking lots, and similar low people intensive uses are permitted uses within the buffer setback area. A referral response received from the Environmental Review Committee stated that the proposed office doesn't meet the 150-foot agricultural buffer setback requirement from the property to the west, which is currently in agricultural production. The response also pointed out that there were other surrounding parcels that were currently farmed. The office is located 100 feet from the farmed parcel to the west, which is 50 feet less than the 150-foot agricultural buffer. The site is proposed to be improved with an 8-foot-tall block wall and to be landscaped around the perimeter of the wall. Parking is a permitted use within the setback area. Conflicts between surrounding agricultural uses is not anticipated to occur as the office activities will occur indoors and will include intermittent customers and one to two employees per day during operating hours.

A referral response from the Modesto Irrigation District (MID) indicated that there is an existing private open-channel ditch along the project site's northern pipeline and an existing open-channel ditch (Cavil Drainage pipeline) that lies along the eastern and southern property lines which is required to be replaced within the project footprint and pressure manholes installed, per MID's standards, and a 20-foot irrigation easement be dedicated along the area of the replaced Cavil Drainage pipeline. Further MID requested that draft improvement plans be submitted to MID for review and approval and that all work within MID right-of-way be completed to MID standards and all work impacting irrigation facilities be completed during the non-irrigation season (typically November 1st to March 1st). These requirements will be reflected in the development standards applied to the project.

Impacts associated with agricultural resources are considered to be less than significant.

Mitigation: None.

References: Application materials; Referral response received from the Stanislaus County Environmental Review Committee, dated January 5, 2022; Referral response received from MID, dated January 6, 2022; United States Department of Agriculture NRCS Web Soil Survey; California State Department of Conservation Farmland Mapping and Monitoring Program - Stanislaus County Farmland 2018; Stanislaus County General Plan and Support Documentation[1].

III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) 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 odors adversely affecting a substantial number of people)?			X	

Discussion: The proposed project is located within the San Joaquin Valley Air Basin (SJVAB) and, therefore, falls under the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD). In conjunction with the Stanislaus Council of Governments (StanCOG), the SJVAPCD is responsible for formulating and implementing air pollution control strategies. The SJVAPCD's most recent air quality plans are the 2007 PM10 (respirable particulate matter) Maintenance Plan, the 2008 PM2.5 (fine particulate matter) Plan, and the 2007 Ozone Plan. These plans establish a comprehensive air pollution control program leading to the attainment of state and federal air quality standards in the SJVAB, which has been classified as "extreme non-attainment" for ozone, "attainment" for respirable particulate matter (PM-10), and "non-attainment" for PM 2.5, as defined by the Federal Clean Air Act.

The primary source of air pollutants generated by this project would be classified as being generated from "mobile" sources. Mobile sources would generally include dust from roads, farming, and automobile exhausts. Mobile sources are generally regulated by the Air Resources Board of the California Environmental Protection Agency (EPA) which sets emissions for vehicles and acts on issues regarding cleaner burning fuels and alternative fuel technologies. As such, the District has addressed most criteria air pollutants through basin wide programs and policies to prevent cumulative deterioration of air quality within the Basin. The project will increase traffic in the area and, thereby, impacting air quality. The project proposes to allow for customer access 24 hours a day, 7 days a week, with 33 customers per day on average anticipated, and one to two employees on-site between 9 a.m. and 5 p.m., 7 days a week. The SJVAPCD's Small Project Analysis Level (SPAL) Analysis indicates that the minimum threshold of significance for industrial projects is 1,506 trips per day. The project estimates 70 trips per day, which is below the District's thresholds of significance for vehicle related emissions.

The project proposes to construct 15 structures, each with a maximum of 14 enclosed RV and boat parking spaces, for a total of 231,000 square feet of buildings, and one 1,600 square-foot office, with restroom. The storage units will include electrical for battery charging purposes. Parking areas and drive aisles are proposed to be paved. Construction activities associated with new development can temporarily increase localized PM10, PM2.5, volatile organic compound (VOC), nitrogen oxides (NOX), sulfur oxides (SOX), and carbon monoxide (CO) concentrations a project's vicinity. The primary source of construction-related CO, SOX, VOC, and NOX emission is gasoline and diesel-powered, heavy-duty mobile construction equipment. Primary sources of PM10 and PM2.5 emissions are generally clearing and demolition activities, grading operations, construction vehicle traffic on unpaved ground, and wind blowing over exposed surfaces.

Construction activities associated with the proposed project would consist primarily of the construction of covered/enclosed RV parking and grading activities for the parking area. These activities would not require any substantial use of heavy-duty construction equipment and would require minor grading as the site is considered to be topographically flat. Consequently, emissions would be minimal. Furthermore, all construction activities are temporary in nature and would occur in compliance with all SJVAPCD regulations. An early consultation referral response received from the Department of Public Works indicated that a grading, drainage, and erosion/sediment control plan for the project will be required, subject to Public Works' review and Standards and Specifications.

The project was referred to SJVAPCD, who responded with a request for additional analysis on construction and operational emissions, and on health risks. Accordingly, an Air and Health Risk Assessment Memo was prepared, dated March 23, 2022, by BaseCamp Environmental, Inc. The analysis evaluated construction and operational emissions based on the

proposed construction of 15 new structures, including 14 enclosed RV and boat parking spaces and one 1,600 square-foot office, for a total floor area of 231,000 square feet on the 18.8 acre site. The Air and Health Risk Assessment Memo included an estimate of the construction and operational emissions of the project using the California Emissions Estimator Model (CalEEMod), the model recommended by the SJVAPCD, assuming that each unit would generate a total of four RV trips and four trips from passenger cars traveling to and from the storage unit per year. To ensure a conservative estimate of pollutant emissions, it was further assumed that each RV trip would consist of 100 miles each. This is based on a survey that found that approximately half of all camping trips were 100 miles or less. The Air and Health Risk Assessment Memo concluded that neither the construction nor the operational criteria pollutant emissions generated by the project would exceed the SJVAPCD significance thresholds. As such, the project would have no significant impacts related to criteria pollutant emissions.

An Ambient Air Quality Analysis (AAQA) is required by SJVAPCD for any development project with emissions that exceed 100 pounds per day. Based on the results of the CalEEMod run for the project, none of its operational pollutant emissions would exceed 100 pounds per day. Therefore, an AAQA for the project is not required.

As noted 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 project emissions would be well below SJVAPCD significance thresholds, the project would not have impacts that are cumulatively considerable.

Stationary sources include any building, structure, facility, or installation which emits or may emit any affected pollutant directly or as a fugitive emission. Rule 2010 requires operators of emission sources to obtain an Authority to Construct and a Permit to Operate, while Rule 2201 requires new and modified stationary sources to mitigate their emissions using best available control technology. The proposed project does not include stationary sources as defined in the subject Rules, therefore these rules would not apply. SJVAPCD Rule 9510, also known as the Indirect Source Rule, requires projects that meet specified criteria to implement measures to reduce NOx and PM10 construction and operational emissions by specified percentages, either directly or through payment of an off-site fee. The SJVAPCD considers the proposed project to be a light industrial use with total square footage exceeding 25,000 square feet, which would subject the project to Rule 9510 requirements. However, Rule 9510 Section 4.3 exempts development projects with a mitigated baseline below two tons per year of NOx and two tons per year of PM10 from the rule's mitigation requirements and off-site fee payments. As shown above, the CalEEMod run indicates that project operational emissions of NOx and PM10 would be below two tons annually. The project would be required to submit an Air Impact Assessment in accordance with Rule 9510, but it would not be subject to the rule's NOx and PM10 mitigation requirements or off-site fee payments. The project would comply with Rules 4102, 4601, and 4641 if necessary. The project also would be required to comply with Regulation VIII, which controls fugitive dust emissions during construction activities. A development standard which requires the project to obtain all applicable Air District permits will be incorporated into the project.

The SJVAPCD recommended a screening that includes all sources of emissions that may have a significant health impact. For this project, the only emission that may have a significant health effect would be diesel particulate matter, a toxic air contaminant resulting primarily from diesel engine combustion. Exhaust PM2.5 emissions estimated by CalEEMod were used to estimate diesel particulate emissions. Exhaust PM2.5 emissions are considered a surrogate for diesel particulate matter released from construction equipment in Health Risk Assessments. Based on the CalEEMod run, the total exhaust PM2.5 emissions generated by project construction would be approximately 104 pounds over the estimated eight-month construction period. This amount is relatively small and would readily dissipate and would not be concentrated such as to affect any nearby sensitive receptors. The nearest known sensitive receptor is a rural residence is approximately 0.35 miles to the east. Operational diesel particulate matter emissions are of greater concern, since these emissions would occur for a longer time period, thereby presenting a greater health risk to any nearby sensitive receptors. To determine if a more detailed health risk assessment would be required, the Facility Prioritization Score for cancer risk for the project was calculated. The calculation is based on the procedures set forth in the CAPCOA Prioritization Guidelines, which have been adopted by the SJVAPCD. Based on the operational exhaust PM2.5 emissions from the project and the distance to the nearest sensitive receptor, the Facility Prioritization Score for the project is 0.004, which is well below the threshold of 10 set by the SJVAPCD. Because of this, the project is not considered to pose a potential health risk to nearby sensitive receptors.

Air impacts associated with the project are considered to be less-than significant with development standards requiring that all applicable Air District permits be obtained applied to the project. Other P-I uses may be developed on the site in the future with a use permit; at which time additional environmental review will be completed to evaluate the new proposed uses.

Mitigation: None.

References: Application materials; Referral response received from the San Joaquin Valley Air Pollution Control District, dated December 29, 2021; Referral response received from the Department of Public Works, dated January 5, 2022; Air and Health Risk Assessment Memo, dated March 23, 2022, prepared by BaseCamp Environmental, Inc.; San Joaquin Valley Air Pollution Control District - Regulation VIII Fugitive Dust/PM-10 Synopsis; www.valleyair.org; and the Stanislaus County General Plan and Support Documentation[1].

IV. BIOLOGICAL RESOURCES -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, 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 state or federally protected wetlands (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	

Discussion: The project is located within the Riverbank Quad of the California Natural Diversity Database (CNDDB). There are several species which are state or federally listed, threatened, or identified as species of special concern within the Riverbank California Natural Diversity Database Quad. These species include the Swainson's hawk, burrowing owl, vernal pool fairy shrimp and tadpole shrimp, green sturgeon, Sacramento hitch, hardhead, Sacramento splittail, chinook salmon, moestan blister beetle, and Northern California legless lizard. The site is not near a river so no fish species exist in the site. There is a low likelihood that the other species are present on the project site as the land is already disturbed by annual farming practices and is dissected by three roadways and a railroad.

The project will not conflict with a Habitat Conservation Plan, a Natural Community Conservation Plan, or other locally approved conservation plans. Impacts to endangered species or habitats, locally designated species, or wildlife dispersal or mitigation corridors are considered to be less-than significant.

An early consultation was referred to the California Department of Fish and Wildlife (formerly the Department of Fish and Game) who responded with no comments.

Mitigation: None.

References: Application materials; California Department of Fish and Wildlife email response, dated May 20, 2022; California Department of Fish and Wildlife's Natural Diversity Database Quad Species List; Stanislaus County General Plan and Support Documentation[1].

V. CULTURAL RESOURCES -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to 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	

Discussion: As this project is a General Plan Amendment it was referred to the tribes listed with the Native American Heritage Commission (NAHC), in accordance with SB 18. No tribes responded with a request for consultation or with any project comments. However, a response was received from the Tuolumne Me-Wuk Tribal Council indicating they had no comments or concerns with the project. Tribal notification of the project was not referred to any tribes in conjunction with AB 52 requirements, as Stanislaus County has not received any requests for consultation from the tribes listed with the NAHC. A records search conducted by the Central California Information Center (CCIC) indicated that there are no historical, cultural, or archeological resources recorded on-site and that the site has a low sensitivity for the discovery of such resources. A development standard will be added to the project which requires if any cultural or tribal resources are discovered during project-related activities, all work is to stop, and the lead agency and a qualified professional are to be consulted to determine the importance and appropriate treatment of the find. Cultural Impacts are considered to be less-than significant.

Mitigation: None.

References: Application materials; Referral response received from the Tuolumne Me-Wuk Tribal Council, dated January 3, 2022; Central California Information Center Report for the project site, dated October 8, 2021; Stanislaus County General Plan and Support Documentation[1].

VI. ENERGY. -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
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	

Discussion: The CEQA Guidelines Appendix F states that energy consuming equipment and processes, which will be used during construction or operation such as: energy requirements of the project by fuel type and end use, energy conservation equipment and design features, energy supplies that would serve the project, total estimated daily vehicle trips to be generated by the project, and the additional energy consumed per-trip by mode, shall be taken into consideration

when evaluating energy impacts. Additionally, the project's compliance with applicable state or local energy legislation, policies, and standards must be considered.

The project proposes to allow for customer access 24 hours a day, 7 days a week, with 33 customers per day on average anticipated, and one to two employees on-site between 9 a.m. and 5 p.m., 7 days a week. This equates to an estimated 70 trips per day. The project proposes to construct 15 structures, each with a maximum of 14 enclosed RV and boat parking spaces, for a total of 231,000 square feet of buildings, and one 1,600 square-foot office, with restroom. The storage units will include electrical for battery charging purposes. No vehicle maintenance and dumping services will occur on site. Parking areas and drive aisles are proposed to be paved. Lighting will include, wall lighting on the storage buildings and parking lot light poles, which are proposed to be 15 feet in height. All construction must meet California Green Building Standards Code (CALGreen Code), which includes mandatory provisions applicable to all new residential, commercial, and school buildings. The intent of the CALGreen Code is to establish minimum statewide standards to significantly reduce the greenhouse gas emissions from new construction. The Code includes provisions to reduce water use, wastewater generation, and solid waste generation, as well as requirements for bicycle parking and designated parking for fuel-efficient and carpool/vanpool vehicles in commercial development. The code requires mandatory inspections of building energy systems for non-residential buildings over 10,000 square feet to ensure that they are operating at their design efficiencies. It is the intent of the CALGreen Code that buildings constructed pursuant to the Code achieve at least a 15 percent reduction in energy usage when compared to the State's mandatory energy efficiency standards contained in Title 24. The Code also sets limits on VOCs (volatile organic compounds) and formaldehyde content of various building materials, architectural coatings, and adhesives. A development standard will be added to this project to address compliance with Title 24, Green Building Code, which includes energy efficiency requirements.

Senate Bill 743 (SB743) requires that the transportation impacts under the California Environmental Quality Act (CEQA) evaluate impacts by using Vehicle Miles Traveled (VMT) as a metric. Stanislaus County has currently not adopted any significance thresholds for VMT, and projects are treated on a case-by-case basis for evaluation under CEQA. However, the State of California - Office of Planning and Research (OPR) has issued guidelines regarding VMT significance under CEQA. One of the guidelines, presented in the December 2018 document Technical Advisory on Evaluating Transportation Impacts in CEQA, states that locally serving retail would generally redistribute trips from other local uses, rather than generate new trips. The proposed project fits this description of locally serving retail and therefore is presumed to create a less-than significant transportation impact related to VMT.

A referral response from the Modesto Irrigation District (MID) provided general safety information regarding existing electrical infrastructure on the site and requested that all electrical plans meet District standards and be submitted to MID for review and approval. These requirements will be reflected in the development standards applied to the project.

The project was referred to SJVAPCD, who responded with a request for additional analysis on construction and operational emissions, and on health risks. Accordingly, an Air and Health Risk Assessment Memo was prepared, dated March 23, 2022, by BaseCamp Environmental, Inc. The analysis evaluated construction and operational emissions based on the proposed construction of 15 new structures, including 14 enclosed RV and boat parking spaces and one 1,600 square-foot office, for a total floor area of 231,000 square feet on the 18.8 acre site. The Air and Health Risk Assessment Memo included an estimate of the construction and operational emissions of the project using the California Emissions Estimator Model (CalEEMod), the model recommended by the SJVAPCD, assuming that each unit would generate a total of four RV trips and four trips from passenger cars traveling to and from the storage unit per year. To ensure a conservative estimate of pollutant emissions, it was further assumed that each RV trip would consist of 100 miles each. This is based on a survey that found that approximately half of all camping trips were 100 miles or less. The Air and Health Risk Assessment Memo concluded that neither the construction nor the operational criteria pollutant emissions generated by the project would exceed the SJVAPCD significance thresholds.

Development standards requiring that all applicable Air District permits be obtained and that the project meet Title 24, which includes energy efficiency requirements will be applied to the project. Impacts related to energy are considered to be less-than significant. Other P-I uses may be developed on the site in the future with a use permit; at which time additional environmental review will be completed to evaluate the new proposed uses.

Mitigation: None.

References: Application materials; Referral response received from MID, dated January 6, 2022; Referral response received from the SJVAPCD, dated December 29, 2021; Air and Health Risk Assessment Memo, dated March 23, 2022,

prepared by BaseCamp Environmental, Inc.; 2016 California Green Building Standards Code Title 24, Part 11(Cal Green); 2016 California Energy Code Title 24, Part 6; State of California - Office of Planning and Research (OPR) guidelines regarding VMT significance under CEQA; Stanislaus County General Plan and Support Documentation[1].

VII. GEOLOGY AND SOILS -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:			X	
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 direct or indirect risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?			X	
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	

Discussion: The USDA Natural Resources Conservation Service's Eastern Stanislaus County Soil Survey indicates that the northern 2/3rd of the property is made up of San Joaquin sandy loam (SaA), with 0 to 3 percent slopes, and the southern 1/3rd of the property is made up of Snelling sandy loam (SnA), with 0-3 percent slopes. The project site is not located near an active fault or within a high earthquake zone. Landslides are not likely due to the flat terrain of the area. As contained in Chapter 5 of the General Plan Support Documentation, the areas of the County subject to significant geologic hazard are located in the Diablo Range, west of Interstate 5; however, as per the California Building Code, all of Stanislaus County is located within a geologic hazard zone (Seismic Design Category D, E, or F) and a soils test may be required at building permit application. Results from the soils test will determine if unstable or expansive soils are present. If such soils are present, special engineering of the structure will be required to compensate for the soil deficiency. All construction must be designed and built according to building standards appropriate to withstand shaking for the area in which they are constructed which is verified with the building permit review process.

The proposed development will alter the existing drainage pattern of the site. Stormwater is proposed to be maintained on-site through an on-site storm drainage basin. A response received from the Department of Public Works indicated that a grading, drainage, and erosion/sediment control plan for the project site shall be submitted for review and approval to the Department of Public Works that includes drainage calculations and enough information to verify that runoff from the project will not flow onto adjacent properties and Stanislaus County road right-of-way and is in compliance with the current State of California National Pollutant Discharge Elimination System (NPDES) General Construction Permit. Development standards will be added to the project to reflect these requirements.

A referral response from the Modesto Irrigation District (MID) indicated that there is an existing private open-channel ditch along the project site's northern pipeline and an existing open-channel ditch (Cavil Drainage pipeline) that lies along the eastern and southern property lines which is required to be replaced within the project footprint and pressure manholes installed, per MID's standards, and a 20-foot irrigation easement be dedicated along the area of the replaced Cavil Drainage pipeline. Further MID requested that draft improvement plans be submitted to MID for review and approval and that all work within MID right-of-way be completed to MID standards and all work impacting irrigation facilities be completed during the non-irrigation season (typically November 1st to March 1st). These requirements will be reflected in the development standards applied to the project.

The Stanislaus County Department of Environmental Resources (DER) indicated that any addition or expansion of a septic tank or alternative wastewater disposal system would require the approval of the Department of Environmental Resources (DER) through the building permit process, which also takes soil type into consideration within the specific design requirements. However, the project proposes to connect to the City of Modesto for public water and sewer services and has received a will-serve letter from the City of Modesto for both water and sewer services.

The project was referred to the DER Hazardous Materials (Haz Mat) Division who responded with a request that the applicant submit an application to Haz Mat for groundwater monitoring wells and exploratory borings, if applicable.

Impacts to Geology and Soils are considered to be less-than significant.

Mitigation: None.

References: Application materials; Referral response received from MID, dated January 6, 2022; Referral response received from Haz Mat, dated December 21, 2021; Will Serve letter for sewer services received from the City of Modesto, dated September 30, 2021; Will Serve letter for water services received from the City of Modesto, dated September 30, 2021; Referral response received from the Department of Public Works, dated January 5, 2022; Referral response received from DER, dated January 4, 2022; Title 24 California Code of Regulations; Stanislaus County General Plan and Support Documentation[1].

VIII. GREENHOUSE GAS EMISSIONS -- Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Included**	**Less Than Significant Impact**	**No Impact**
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			**X**	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			**X**	

Discussion: The principal Greenhouse Gasses (GHGs) are carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), sulfur hexafluoride (SF6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H2O). CO2 is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO2 equivalents (CO2e). In 2006, California passed the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] No. 32), which requires the California Air Resources Board (ARB) design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020. Two additional bills, SB 350 and SB32, were passed in 2015 further amending the states Renewables Portfolio Standard (RPS) for electrical generation and amending the reduction targets to 40% of 1990 levels by 2030.

The project proposes to allow for customer access 24 hours a day, 7 days a week, with 33 customers per day on average anticipated, and one to two employees on-site between 9 a.m. and 5 p.m., 7 days a week. This equates to an estimated 70 trips per day. The project proposes to construct 15 structures, each with a maximum of 14 enclosed RV and boat parking spaces, for a total of 231,000 square feet of buildings, and one 1,600 square-foot office, with restroom. The storage units will include electrical for battery charging purposes. No vehicle maintenance and dumping services will occur on site. Parking areas and drive aisles are proposed to be paved. Lighting will include, wall lighting on the storage buildings and

parking lot light poles, which are proposed to be 15 feet in height. All construction must meet California Green Building Standards Code (CALGreen Code), which includes mandatory provisions applicable to all new residential, commercial, and school buildings. The intent of the CALGreen Code is to establish minimum statewide standards to significantly reduce the greenhouse gas emissions from new construction. The Code includes provisions to reduce water use, wastewater generation, and solid waste generation, as well as requirements for bicycle parking and designated parking for fuel-efficient and carpool/vanpool vehicles in commercial development. The code requires mandatory inspections of building energy systems for non-residential buildings over 10,000 square feet to ensure that they are operating at their design efficiencies. It is the intent of the CALGreen Code that buildings constructed pursuant to the Code achieve at least a 15 percent reduction in energy usage when compared to the State's mandatory energy efficiency standards contained in Title 24. The Code also sets limits on VOCs (volatile organic compounds) and formaldehyde content of various building materials, architectural coatings, and adhesives. A development standard will be added to this project to address compliance with Title 24, Green Building Code, which includes energy efficiency requirements.

Senate Bill 743 (SB743) requires that the transportation impacts under the California Environmental Quality Act (CEQA) evaluate impacts by using Vehicle Miles Traveled (VMT) as a metric. Stanislaus County has currently not adopted any significance thresholds for VMT, and projects are treated on a case-by-case basis for evaluation under CEQA. However, the State of California - Office of Planning and Research (OPR) has issued guidelines regarding VMT significance under CEQA. One of the guidelines, presented in the December 2018 document Technical Advisory on Evaluating Transportation Impacts in CEQA, states that locally serving retail would generally redistribute trips from other local uses, rather than generate new trips. The proposed project fits this description of locally serving retail and therefore is presumed to create a less-than significant transportation impact related to VMT.

A referral response from the Modesto Irrigation District (MID) provided general safety information regarding existing electrical infrastructure on the site and requested that all electrical plans meet District standards and be submitted to MID for review and approval. These requirements will be reflected in the development standards applied to the project.

The project was referred to SJVAPCD, who responded with a request for additional analysis on construction and operational emissions, and on health risks. Accordingly, an Air and Health Risk Assessment Memo was prepared, dated March 23, 2022, by BaseCamp Environmental, Inc. The analysis evaluated construction and operational emissions based on the proposed construction of 15 new structures, including 14 enclosed RV and boat parking spaces and one 1,600 square-foot office, for a total floor area of 231,000 square feet on the 18.8 acre site. The Air and Health Risk Assessment Memo included an estimate of the construction and operational emissions of the project using the California Emissions Estimator Model (CalEEMod), the model recommended by the SJVAPCD, assuming that each unit would generate a total of four RV trips and four trips from passenger cars traveling to and from the storage unit per year. To ensure a conservative estimate of pollutant emissions, it was further assumed that each RV trip would consist of 100 miles each. This is based on a survey that found that approximately half of all camping trips were 100 miles or less (Statista 2021). The Air and Health Risk Assessment Memo concluded that neither the construction nor the operational criteria pollutant emissions generated by the project would exceed the SJVAPCD significance thresholds.

Development standards requiring that all applicable Air District permits be obtained and that the project meet Title 24, which includes energy efficiency requirements will be applied to the project. Impacts associated with Greenhouse Gas Emissions are expected to have a less-than significant impact. Other P-I uses may be developed on the site in the future with a use permit; at which time additional environmental review will be completed to evaluate the new proposed uses.

Mitigation: None.

References: Application materials; Referral response received from the SJVAPCD, dated December 29, 2021; Referral response received from MID, dated January 6, 2022; Air and Health Risk Assessment Memo, dated March 23, 2022, prepared by BaseCamp Environmental, Inc.; 2016 California Green Building Standards Code Title 24, Part 11(Cal Green); 2016 California Energy Code Title 24, Part 6; State of California - Office of Planning and Research (OPR) guidelines regarding VMT significance under CEQA; Stanislaus County General Plan and Support Documentation[1].

IX. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise 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	

Discussion: The project was referred to the DER Hazardous Materials (Haz Mat) Division who responded with a request that the applicant contact Haz Mat regarding the appropriate permitting requirements for hazardous materials and/or waste and that the applicant submit an application to Haz Mat for groundwater monitoring wells and exploratory borings, if applicable. The proposed project will consist of the storage of recreational vehicles. Per the application, the operation will not include or generate any hazardous wastes associated with the project. No dumping or maintenance will occur on-site. If hazardous materials were to be stored on-site, the project would be required to obtain all applicable permits through Haz Mat , including completion of a Risk Management Prevention Program and submission of hazardous materials Business information into the California Electronic Reporting System (CERS) if storing of 55 gallons, 500 pounds of a hazardous material, or of 200 cubic feet of compressed gas or more. The applicant is required to use, store, and dispose of any hazardous materials in accordance with all applicable federal, state, and local regulations.

Pesticide exposure is a risk in areas located in the vicinity of agriculture. Sources of exposure include contaminated groundwater, which is consumed, and drift from spray applications. Application of sprays is strictly controlled by the Agricultural Commissioner and can only be accomplished after first obtaining permits. All new or expanding uses approved by discretionary permit in the A-2 zoning district or on a parcel adjoining the A-2 zoning district are required to incorporate a minimum 150-foot-wide agricultural buffer setback, or 300-foot-wide buffer setback for people intensive uses. Public roadways, utilities, drainage facilities, rivers and adjacent riparian areas, landscaping, parking lots, and similar low people intensive uses are permitted uses within the buffer setback area. A referral response received from the Environmental Review Committee stated that the proposed office doesn't meet the 150-foot agricultural buffer setback requirement from the property to the west, which is currently in agricultural production. The response also pointed out that there were other surrounding parcels that were currently farmed. The office is located 100 feet from the farmed parcel to the west, which is 50 feet less than the 150-foot agricultural buffer. The site is proposed to be improved with an 8-foot-tall block wall and to be landscaped around the perimeter of the wall. Parking is a permitted use within the setback area. Accordingly, the project proposes an agricultural buffer alternative consisting of a reduced setback of 100 feet on the western property line. The

office activities will occur indoors and will include intermittent customers and one to two employees per day during operating hours.

The project site is not listed on the EnviroStor database managed by the CA Department of Toxic Substances Control or within the vicinity of any airport. The groundwater is not known to be contaminated in this area. The project does not interfere with the Stanislaus County Local Hazard Mitigation Plan, which identifies risks posed by disasters and identifies ways to minimize damage from those disasters. The site is located in a Local Responsibility Area (LRA) for fire protection and is served by Stanislaus Consolidated Fire Protection District. The project was referred to the District, however no response was received. Project impacts related to Hazards and Hazardous Materials are considered to be less-than significant impact. Other P-I uses may be developed on the site in the future with a use permit; at which time additional environmental review will be completed to evaluate the new proposed uses.

Mitigation: None.

References: Application materials; Referral response received from the Stanislaus County Environmental Review Committee, dated January 5, 2022; Referral response received from the San Joaquin Air Pollution Control District, dated December 29, 2021; Referral response received from Haz Mat, dated December 21, 2021; California Department of Toxic Substance Control's EnviroStor database; Stanislaus County General Plan and Support Documentation[1].

X. HYDROLOGY AND WATER QUALITY - Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Included**	**Less Than Significant Impact**	**No Impact**
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water 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 erosion or siltation on – or off-site;			**X**	
(ii) substantially increase the rate of amount of surface runoff in a manner which would result in flooding on- or off-site;			**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**	

Discussion: Areas subject to flooding have been identified in accordance with the Federal Emergency Management Act (FEMA). The project site is located in FEMA Flood Zone X, which includes areas determined to be outside the 0.2% annual chance floodplains. All flood zone requirements will be addressed by the Building Permits Division during the building permit process. On-site areas subject to flooding have not been identified by the Federal Emergency Management Agency and/or County designated flood areas.

The project proposes to connect to the City of Modesto for public water and sewer services and has received a will-serve letter from the City of Modesto for both water and sewer services. The will-serve letter indicates that the developer will be required to construct a 12-inch water main to connect to water services and an 8-inch sewer main to connect to sewer services, at the applicant/developers expense, and that all City standards shall be met and LAFCO approval shall be obtained prior to connecting. These requirements will be incorporated into the project's development standards.

A referral response from the Department of Environmental Resources (DER) stated that if the development is unable to obtain an executed will-serve letter for water and sewer services and LAFCO approval, that the project's on-site wastewater treatment system (OWTS) will be required to meet Measure X septic and Local Agency Management Program (LAMP) standards. LAMP standards include minimum setbacks from wells to prevent negative impacts to groundwater quality. DER also stated that if an executed will-serve letter and LAFCO approval are unable to be obtained that the project will be required to apply for and be permitted as a Public Water System. Prior to the installation of any on-site well for the site, the property owner must obtain concurrence from the State of California Water Resources Control Board (SWRCB), Drinking Water Division, in accordance to CHSC, Section 116527 (SB1263) and submit an application for a water supply permit if necessary with the associated technical report to Stanislaus County DER. If the applicant is required to install a water treatment system, it will be required to be approved by the Regional Water Quality Control Board and the Department of Environmental Resources. Additionally, public water supply permits require on going testing. These comments will be included in the development standards applied to the project.

The proposed development will alter the existing drainage pattern of the site. Stormwater is proposed to be maintained on-site through an on-site storm drainage basin. A response received from the Department of Public Works indicated that a grading, drainage, and erosion/sediment control plan for the project site shall be submitted for review and approval to the Department of Public Works that includes drainage calculations and enough information to verify that runoff from the project will not flow onto adjacent properties and Stanislaus County road right-of-way and is in compliance with the current State of California National Pollutant Discharge Elimination System (NPDES) General Construction Permit. Development standards will be added to the project to reflect these requirements.

The project site is located within the San Joaquin Valley – Modesto groundwater sub-basin which is managed by the Stanislaus and Tuolumne Rivers Groundwater Basin Association Groundwater Sustainability Agency (STRGBA GSA). The Modesto basin isn't considered to be critically over drafted, but since most of the cities within the basin rely solely on groundwater, it is considered a high-priority basin. Due to that designation, the Sustainable Groundwater Management Act (SGMA) requires that the STRGBA GSA adopt and begin implementation of a Groundwater Sustainability Plan (GSP) by January 31, 2022. The City of Modesto, as the public water provider for the project, will be required to adhere to any applicable GSP requirements.

A referral response received from the Central Valley Regional Water Quality Control District provided a list of the Board's permits and programs that may be applicable to the proposed project. The developer will be required to contact Regional Water to determine which permits/standards must be met prior to construction as a development standard.

A referral response from the Modesto Irrigation District (MID) indicated that there is an existing private open-channel ditch along the project site's northern pipeline and an existing open-channel ditch (Cavil Drainage pipeline) that lies along the eastern and southern property lines which is required to be replaced within the project footprint and pressure manholes installed, per MID's standards, and a 20-foot irrigation easement be dedicated along the area of the replaced Cavil Drainage pipeline. Further MID requested that draft improvement plans be submitted to MID for review and approval and that all work within MID right-of-way be completed to MID standards and all work impacting irrigation facilities be completed during the non-irrigation season (typically November 1st to March 1st). These requirements will be reflected in the development standards applied to the project.

The project was referred to the DER Hazardous Materials (Haz Mat) Division who responded with a request that the applicant submit an application to Haz Mat for groundwater monitoring wells and exploratory borings, if applicable.

As a result of the development standards required for this project, impacts associated with drainage, water quality, and runoff are expected to have a less-than significant impact. Other P-I uses may be developed on the site in the future with a use permit; at which time additional environmental review will be completed to evaluate the new proposed uses.

Mitigation: None.

References: Application materials; Referral response received from Haz Mat, dated December 21, 2021; Will Serve letter for sewer services received from the City of Modesto, dated September 30, 2021; Will Serve letter for water services received from the City of Modesto, dated September 30, 2021; Referral response received from the Department of Public Works, dated January 5, 2022; Referral response from MID, dated January 6, 2022; Referral response received from DER, dated January 4, 2022; Referral response received from the Regional Water Quality Control District, dated January 4, 2022; Stanislaus and Tuolumne Rivers Groundwater Basin Association Groundwater Sustainability Agency website (About STRGBA - Stanislaus and Tuolumne Rivers Groundwater Basin Association); Stanislaus County General Plan and Support Documentation[1].

XI. LAND USE AND PLANNING - Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
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	

Discussion: This is a request to amend the General Plan & zoning designations of an 18.5 total acre parcel, from Urban Transition (UT) and General Agriculture (A-2-10) to Planned Development (P-D) to allow for development consistent with permitted uses in the Planned Industrial (P-I) zoning district. Specifically, the applicant proposes the development of a RV and boat storage facility. Other P-I uses may be developed on the site in the future with a use permit; at which time additional environmental review will be completed to evaluate the new proposed uses.

The Land Use Element describes the Planned Development designation as a designation intended for land which, because of demonstrably unique characteristics, may be suitable for a variety of uses without detrimental effects on other property. As stated by the Introduction to the General Plan, General Plan Amendments affect the entire County and any evaluation must give primary concern to the County as a whole; therefore, a fundamental question must be asked in each case: "Will this amendment, if adopted, generally improve the economic, physical and social well-being of the County in general?" Additionally, the County in reviewing General Plan amendments shall consider how the levels of public and private service might be affected; as well as how the proposal would advance the long-term goals of the County. In each case, in order to take affirmative action regarding a General Plan Amendment application, it must be found that the General Plan Amendment will maintain a logical land use pattern without detriment to existing and planned land uses and that the County and other affected government agencies will be able to maintain levels of service consistent with the ability of the government agencies to provide a reasonable level of service. In the case of a proposed amendment to the Land Use diagrams of the Land Use Element, an additional finding that the amendment is consistent with the goals and policies of the General Plan must also be made. Additionally, Goal Two of the Land Use Element aims to ensure compatibility between land uses.

To approve a Rezone, the Planning Commission must find that it is consistent with the General Plan. Pursuant to the General Plan, land within a Planned Development designation should be zoned A-2 (General Agriculture) until development occurs through Planned Development zoning.

The Stanislaus County General Plan Sphere of Influence policy states, that development, other than agricultural uses and churches, which requires discretionary approval from incorporated cities, shall be referred to that city for preliminary approval. The project shall not be approved by the County unless written communication is received from the city memorializing their approval. If approved by the city, the city should specify what development standards are necessary to ensure that development will comply with city development standards. Approval from a city does not preclude the County's decision-making bodies from exercising discretion, and it may either approve or deny the project.

The project site is designated as Business-Commercial-Residential (BCR) in the City of Modesto's General Plan Land Use Diagram. The project site is designated as Urban Transition in the Land Use Element of the Stanislaus County General Plan and has a zoning designation of General Agriculture (A-2-10). Policy 2.15 of the Agricultural Element of the General Plan requires mitigation for the conversion of agricultural land resulting from a discretionary project requiring a General Plan or Community Plan amendment from Agriculture to a residential land use designation at a 1:1 ratio with agricultural land of equal quality located in Stanislaus County. The project does not propose residential development and therefore the

requirement for agricultural mitigation does not apply. Further, according to Goal Two, Policy 2.5, Implementation Measure One, of the General Plan's Agricultural Element, when defining the County's most productive agricultural areas, it is important to recognize that soil types alone should not be the determining factor; "Most Productive Agricultural Areas" do not include any land within LAFCO-approved Spheres of Influence of cities. The project site is not considered to be a most productive agricultural area as it is located within the City of Modesto's Local Agency Formation Commission (LAFCO) adopted Sphere of Influence. Generally, urban development will only occur upon annexation to a city, but such development may be appropriate prior to annexation provided the development is consistent with the land use designation of the general plan of the affected city. The City of Modesto has provided written support of the proposed project.

The project site is currently farmed in irrigated forage crops. The Burlington Northern Santa Fe Railroad (BNSF) and Terminal Avenue border the project site to the east, Litt Road to the west, Plainview Road to the north, and the City of Modesto's corporation yard, which is 40 acres, to the south. Agricultural property ranging in size from 20 to 96 acres, which is either farmed in row crops or orchards, surround the site all of which are also within the City of Modesto's Sphere of Influence. The 65 acre parcel to the west of the site, located across Litt Road, is currently under a Williamson Act Contract, as are two additional parcels which are 20 and 51 acres in size east of the site, located across the BNSF railroad and Terminal Road.

The County's Agricultural Element's Agricultural Buffer Guidelines states that new or expanding uses approved by discretionary permit in the A-2 zoning district or on a parcel adjoining the A-2 zoning district should incorporate a minimum 150-foot-wide agricultural buffer setback, or 300-foot-wide buffer setback for people intensive uses, to physically avoid conflicts between agricultural and non-agricultural uses. Public roadways, utilities, drainage facilities, rivers and adjacent riparian areas, landscaping, parking lots, and similar low people intensive uses are permitted uses within the buffer setback area. A referral response received from the Environmental Review Committee stated that the proposed office doesn't meet the 150-foot agricultural buffer setback requirement from the property to the west, which is currently in agricultural production. The response also pointed out that there were other surrounding parcels that were currently farmed. The office is located 100 feet from the farmed parcel to the west, which is 50 feet less than the 150-foot agricultural buffer. The site is proposed to be improved with an 8-foot-tall block wall and to be landscaped around the perimeter of the wall. Parking is a permitted use within the setback area. Conflicts between surrounding agricultural uses is not anticipated to occur as the office activities will occur indoors and will include intermittent customers and one to two employees per day during operating hours.

The project site is located in the LAFCO adopted Sphere of Influence for the City of Modesto. A referral response was received from the City indicating project support. The project proposes to connect to the City of Modesto for public water and sewer services and has received a will-serve letter from the City of Modesto for both water and sewer services. The will-serve letter indicates that the developer will be required to construct a 12-inch water main to connect to water services and an 8-inch sewer main to connect to sewer services, at the applicant/developers expense, and that all City standards shall be met and LAFCO approval shall be obtained prior to connecting. These requirements will be incorporated into the project's development standards.

The project will not physically divide an established community nor conflict with any habitat conservation plans. Project impacts related to land use and planning are considered to be less than significant.

Mitigation: None.

References: Application materials; Referral response received from the Stanislaus County Environmental Review Committee, dated January 5, 2022; Will Serve letter for sewer services received from the City of Modesto, dated September 30, 2021; Will Serve letter for water services received from the City of Modesto, dated September 30, 2021; Referral response received from the City of Modesto Community & Economic Development Department, Planning Division, dated December 17, 2021; Stanislaus County General Plan and Support Documentation[1].

XII. MINERAL RESOURCES - Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Included**	**Less Than Significant Impact**	**No Impact**

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

Discussion: The location of all commercially viable mineral resources in Stanislaus County has been mapped by the State Division of Mines and Geology in Special Report 173. There are no known significant resources on the site, nor is the project site located in a geological area known to produce resources.

No significant impacts related to Mineral Resources have been identified.

Mitigation: None.

References: Application materials; Stanislaus County General Plan and Support Documentation[1].

XIII. NOISE - Would the project result in:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Included**	**Less Than Significant Impact**	**No Impact**
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 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

Discussion: The Stanislaus County General Plan identifies noise levels up to 70 dB Ldn (or CNEL) as the normally acceptable level of noise for industrial, manufacturing, utilities, and agriculture uses. The Stanislaus County General Plan identifies noise levels for residential or other noise-sensitive land uses of up to 55 hourly Leq, dBA and 75 Lmax, dBA from 7 a.m. to 10 p.m. and 45 hourly Leq, dBA and 65 Lmax, dBA from 10 p.m. to 7 a.m. Pure tone noises, such as music, shall be reduced by five dBA; however, when ambient noise levels exceed the standards, the standards shall be increased to the ambient noise levels. The site itself is impacted by the noise generated from Terminal Avenue and the Burlington Northern Santa Fe Railroad which are on the project site's eastern border and by the Railroad crossing at Terminal Avenue and Claus Road, located approximately ¾ of a mile southeast of the site. On-site grading resulting from this project may result in a temporary increase in the area's ambient noise levels; however, noise impacts associated with on-site activities and traffic are not anticipated to exceed the normally acceptable level of noise. Noise associated with the construction work would be temporary but required to meet the noise ordinance and Noise Element standards. The site is not located within an airport land use plan. Noise impacts are considered to be less-than significant with mitigation included. Other P-I uses may be developed on the site in the future with a use permit; at which time additional environmental review will be completed to evaluate the new proposed uses.

Mitigation: None.

References: Application materials; Stanislaus County Noise Control Ordinance, General Plan, and Support Documentation[1].

XIV. POPULATION AND HOUSING - Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Included**	**Less Than Significant Impact**	**No Impact**
a) Induce substantial unplanned 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**	

Discussion: The site is not included in the vacant sites inventory for the 2016 Stanislaus County Housing Element, which covers the 5th cycle Regional Housing Needs Allocation (RHNA) for the county and will therefore not impact the County's ability to meet their RHNA. No population growth will be induced, nor will any existing housing be displaced as a result of this project.

Impacts related to Population and Housing are considered to be less-than significant.

Mitigation: None.

References: Application materials; Stanislaus County General Plan and Support Documentation[1].

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

Discussion: The project site is served by the Stanislaus Consolidated Fire District for fire protection services, the Modesto City and Sylvan Union school districts for school services, the Stanislaus County Sheriff Department for police protection, the City of Modesto for public water and sewer, Stanislaus County Parks and Recreation Department for parks facilities, and the Turlock Irrigation District (TID) for power. County adopted Public Facilities Fees, as well as fire and school fees are required to be paid based on the development type prior to issuance of a building permit. Payment of the applicable district fees will be required prior to issuance of a building permit. This project was circulated to all applicable: school, fire, police, irrigation, public works departments, and districts during the Early Consultation referral period, and no concerns were identified with regard to public services.

The project proposes to connect to the City of Modesto for public water and sewer services and has received a will-serve letter from the City of Modesto for both water and sewer services. The will-serve letter indicates that the developer will be required to construct a 12-inch water main to connect to water services and an 8-inch sewer main to connect to sewer services, at the applicant/developers expense, and that all City standards shall be met and LAFCO approval shall be obtained prior to connecting. These requirements will be incorporated into the project's development standards.

A referral response from the Department of Environmental Resources (DER) stated that if the development is unable to obtain an executed will-serve letter for water and sewer services and LAFCO approval, that the project's on-site wastewater treatment system (OWTS) will be required to meet Measure X septic and Local Agency Management Program (LAMP) standards. LAMP standards include minimum setbacks from wells to prevent negative impacts to groundwater quality. DER also stated that if an executed will-serve letter and LAFCO approval are unable to be obtained that the project will be required to apply for and be permitted as a Public Water System. Prior to the installation of any on-site well for the site, the property owner must obtain concurrence from the State of California Water Resources Control Board (SWRCB), Drinking Water Division, in accordance to CHSC, Section 116527 (SB1263) and submit an application for a water supply permit if necessary with the associated technical report to Stanislaus County DER. If the applicant is required to install a water treatment system, it will be required to be approved by the Regional Water Quality Control Board and the Department of Environmental Resources. Additionally, public water supply permits require on going testing. These comments will be included in the development standards applied to the project.

A referral response from the Modesto Irrigation District (MID) indicated that there is an existing private open-channel ditch along the project site's northern pipeline and an existing open-channel ditch (Cavil Drainage pipeline) that lies along the eastern and southern property lines which is required to be replaced within the project footprint and pressure manholes installed, per MID's standards, and a 20-foot irrigation easement be dedicated along the area of the replaced Cavil Drainage pipeline. Further MID requested that draft improvement plans be submitted to MID for review and approval and that all work within MID right-of-way be completed to MID standards and all work impacting irrigation facilities be completed during the non-irrigation season (typically November 1st to March 1st). These requirements will be reflected in the development standards applied to the project.

No significant impacts related to Public Services were identified. Other P-I uses may be developed on the site in the future with a use permit; at which time additional environmental review will be completed to evaluate the new proposed uses.

Mitigation: None.

References: Application materials; Will Serve letter for sewer services received from the City of Modesto, dated September 30, 2021; Will Serve letter for water services received from the City of Modesto, dated September 30, 2021; Referral response from MID, dated January 6, 2022; Referral response from DER, dated January 4, 2022; Stanislaus County General Plan and Support Documentation[1].

XVI. RECREATION - Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Included**	**Less Than Significant Impact**	**No Impact**
a) 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) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	

Discussion: This project does not include any recreational facilities and is not anticipated to increase demands for recreational facilities, as such impacts typically are associated with residential development. Non-residential development pays parks fees through the payment of public facilities fees, which are collected during the issuance of a building permit. This requirement will be incorporated into the project as a development standard.

No significant impacts related to Recreation were identified.

Mitigation: None.

References: Application materials; Stanislaus County General Plan and Support Documentation[1].

XVII. TRANSPORTATION - Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			X	
b) Would the project 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	

Discussion: The project proposes to allow for customer access 24 hours a day, 7 days a week, with 33 customers per day on average anticipated, and one to two employees on-site between 9 a.m. and 5 p.m., 7 days a week. This equates to an estimated 70 trips per day.

A referral response was received from the Stanislaus County Environmental Review Committee and from the Department of Public Works requesting that a Traffic Impact Assessment be prepared for the project.

Additionally, the response received from the Department of Public Works indicated that no parking is permitted within the road right-of-way, that the developer shall install signage at the developers expense if requested, that an encroachment permit be obtained for any work done in the road right-of-way, that all driveway locations and widths be approved by the Department of Public Works and be constructed to the applicable County or City standards, that all access be taken from Litt Road and no access be taken from Plainview Road, that road improvements be made to the applicable county/city standards, and that a Plan Check/Inspection Agreement be executed, a financial guarantee and engineers estimate be provided along with a $5,000 deposit paid for the improvements to be constructed, and that the developer pay their fair share for improvements to the intersection of Plainview Road and Terminal Avenue. However, in lieu of paying its fair share the developer may make improvements to the intersection of Plainview Road and Terminal Avenue and the at-grade railroad crossing to accommodate an appropriate design vehicle for the proposed use, to the satisfaction of the Department of Public Works. Additionally, the Department of Public Works requested that a grading, drainage, and erosion/sediment control plan for the project site shall be submitted that includes drainage calculations and enough information to verify that runoff from the project will not flow onto adjacent properties and Stanislaus County road right-of-way and is in compliance with the current State of California National Pollutant Discharge Elimination System (NPDES) General Construction Permit. All of these requirements will be applied to the project as development standards.

As requested a Vehicle Turning Analysis was completed by KD Anderson and Associates, Inc., dated March 30, 2022. The study prepared an AutoTurn analysis for passenger vehicles towing boats and for 30-foot-long recreational vehicles at two intersections, Plainview Road at Litt Road and Plainview Road at Terminal Road to identify whether the intersections can accommodate the design vehicles. The AutoTurn analysis included a swept path analysis and a tracking path analysis. The swept path illustrates the widest path swept by the sides and overhang of the vehicle while the tracking path illustrates the wheel paths of the vehicle. The results of these paths indicated whether a design vehicle can travel the route without leaving the roadway, and whether the vehicle envelope could be impeded by existing conditions. The Plainview Road and Terminal Road intersection is a four-way intersection with stop control along Plainview Road. A rail line is present west of and paralleling Terminal Road, with about 100 feet separating the centerlines of both. The rail line was considered with regard to storage of eastbound project design vehicles at the intersection assuming the railroad gates are activated while a vehicle is waiting to enter the intersection. Additionally, all utility poles and railroad structures (crossing gates) were considered with regard to the swept path of the vehicles while the tracking path was used to determine whether the vehicles would leave the roadway. Based on the ability of the design vehicles to complete turns at the intersection, this assessment identifies whether improvements are needed to allow project-related vehicles to make turns without leaving the paved surface, encroaching into an opposing travel lane or interfering with existing facilities off the travel way. The spatial database used for this analysis included Google Earth imagery from September 2020. The assessment was conducted using *AutoTURN* software prepared by Transoft. The analysis determined that both vehicle types can complete westbound to southbound left turns at the Plainview Road / Litt Road intersection. However, to allow motorhomes to complete the

northbound to eastbound right turn at the intersection additional paving will be required in the southeast quadrant. Both vehicles can complete turns from and to Terminal Road at the Plainview Road intersection.

A referral response received from the City of Modesto indicated that the city reviewed the traffic study and concurred with it's conclusion and recommendation for additional paving on the project site at the Plainview/Litt Road intersection. However, the Department of Public Works reviewed the traffic analysis and requested that in addition to the pickup truck/boat combo and 30-foot-long recreational vehicles that were evaluated, that 40-foot-long recreational vehicles and pickup truck 40-foot-long recreational vehicle combos be analyzed. Additionally, County Public Works identified that the traffic analysis only covered the RV and boat parking use, not the other planned industrial uses that have been requested to be permitted by the project. The applicant responded to County Public Works request with clarification that the size of the parking stalls will not allow for 40-foot-long recreational vehicles which is why they were not analyzed in the study. Ultimately, County Public Works accepted the study and the requirement for additional paving along the Terminal Road and Plainview Road intersection but required that prior to development of any additional planned industrial uses that additional analysis be performed prior to approval. Accordingly, the requirement for paving of the Terminal Road and Plainview Road intersection and a requirement that additional land use entitlements be obtained, in the form of a use permit, prior to development of any additional uses permitted in the planned industrial zoning district, and any additional environmental review be performed as appropriate, will be incorporated into the development standards for the project.

Senate Bill 743 (SB743) requires that the transportation impacts under the California Environmental Quality Act (CEQA) evaluate impacts by using Vehicle Miles Traveled (VMT) as a metric. Stanislaus County has currently not adopted any significance thresholds for VMT, and projects are treated on a case-by-case basis for evaluation under CEQA. However, the State of California - Office of Planning and Research (OPR) has issued guidelines regarding VMT significance under CEQA. One of the guidelines, presented in the December 2018 document Technical Advisory on Evaluating Transportation Impacts in CEQA, states that locally serving retail would generally redistribute trips from other local uses, rather than generate new trips. The proposed project fits this description of locally serving retail and therefore is presumed to create a less-than significant transportation impact related to VMT.

Impacts associated with Transportation are expected to have a less-than significant impact.

Mitigation: None.

References: Application materials; Vehicle Turning Analysis completed by KD Anderson and Associates, Inc., dated March 30, 2022; Referral response received from the City of Modesto regarding the traffic study, dated April 5, 2022; Referral response received from the Stanislaus County Environmental Review Committee, dated January 5, 2022; Referral response received from the Department of Public Works, dated January 5, 2022, and an email dated May 9, 2022; Applicant email, dated April 7, 2022; Stanislaus County General Plan and Support Documentation[1].

XVIII. TRIBAL CULTURAL RESOURCES - Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Included**	**Less Than Significant Impact**	**No Impact**
a) 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:			**X**	
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), or			**X**	

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set for the in subdivision (c) of Public Resource 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	

Discussion: As this project is a General Plan Amendment it was referred to the tribes listed with the Native American Heritage Commission (NAHC), in accordance with SB 18. No tribes responded with a request for consultation or with any project comments. However, a response was received from the Tuolumne Me-Wuk Tribal Council indicating they had no comments or concerns with the project. Tribal notification of the project was not referred to any tribes in conjunction with AB 52 requirements, as Stanislaus County has not received any requests for consultation from the tribes listed with the NAHC. A records search conducted by the Central California Information Center (CCIC) indicated that there are no historical, cultural, or archeological resources recorded on-site and that the site has a low sensitivity for the discovery of such resources. A development standard will be added to the project which requires if any cultural or tribal resources are discovered during project-related activities, all work is to stop, and the lead agency and a qualified professional are to be consulted to determine the importance and appropriate treatment of the find. Tribal Impacts are considered to be less-than significant.

Mitigation: None.

References: Application materials; Referral response received from the Tuolumne Me-Wuk Tribal Council, dated January 3, 2022; Central California Information Center Report for the project site, dated October 8, 2021; County General Plan and Support Documentation[1].

XIX. UTILITIES AND SERVICE SYSTEMS - Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Included**	**Less Than Significant Impact**	**No Impact**
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications 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 foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it 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	

Discussion: Limitations on providing services have not been identified.

The project proposes to connect to the City of Modesto for public water and sewer services and has received a will-serve letter from the City of Modesto for both water and sewer services. The will-serve letter indicates that the developer will be required to construct a 12-inch water main to connect to water services and an 8-inch sewer main to connect to sewer

services, at the applicant/developers expense, and that all City standards shall be met and LAFCO approval shall be obtained prior to connecting. These requirements will be incorporated into the project's development standards.

A referral response from the Department of Environmental Resources (DER) stated that the project's on-site wastewater treatment system (OWTS) will be required to meet Measure X septic and Local Agency Management Program (LAMP) standards. LAMP standards include minimum setbacks from wells to prevent negative impacts to groundwater quality. DER also stated that the project will require an amendment to the existing Public Water System. Prior to the installation of any water infrastructure for the site, the property owner must obtain concurrence from the State of California Water Resources Control Board (SWRCB), Drinking Water Division, in accordance to CHSC, Section 116527 (SB1263) and submit an application for a water supply permit if necessary with the associated technical report to Stanislaus County DER. If the applicant is required to install a water treatment system, it will be required to be approved by the Regional Water Quality Control Board and the Department of Environmental Resources. Additionally, water supply permits require on going testing.

The proposed development will alter the existing drainage pattern of the site. Stormwater is proposed to be maintained on-site through an on-site storm drainage basin. A response received from the Department of Public Works indicated that a grading, drainage, and erosion/sediment control plan for the project site shall be submitted for review and approval to the Department of Public Works that includes drainage calculations and enough information to verify that runoff from the project will not flow onto adjacent properties and Stanislaus County road right-of-way and is in compliance with the current State of California National Pollutant Discharge Elimination System (NPDES) General Construction Permit. Development standards will be added to the project to reflect these requirements.

A referral response from the Modesto Irrigation District (MID) indicated that there is an existing private open-channel ditch along the project site's northern pipeline and an existing open-channel ditch (Cavil Drainage pipeline) that lies along the eastern and southern property lines which is required to be replaced within the project footprint and pressure manholes installed, per MID's standards, and a 20-foot irrigation easement be dedicated along the area of the replaced Cavil Drainage pipeline. Further MID requested that draft improvement plans be submitted to MID for review and approval and that all work within MID right-of-way be completed to MID standards and all work impacting irrigation facilities be completed during the non-irrigation season (typically November 1st to March 1st). MID's response also provided general safety information regarding existing electrical infrastructure on the site and requested that all electrical plans meet District standards and be submitted to MID for review and approval. These requirements will be reflected in the development standards applied to the project.

No significant impacts related to Utilities and Services Systems have been identified. Other P-I uses may be developed on the site in the future with a use permit; at which time additional environmental review will be completed to evaluate the new proposed uses.

Mitigation: None.

References: Application materials; Will Serve letter for sewer services received from the City of Modesto, dated September 30, 2021; Will Serve letter for water services received from the City of Modesto, dated September 30, 2021; Referral response received from the Department of Public Works, dated January 5, 2022; Referral response MID, dated January 6, 2022; Referral response received from DER, dated January 4, 2022; Stanislaus County General Plan and Support Documentation[1].

XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Included**	**Less Than Significant Impact**	**No Impact**
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 a wildfire or the uncontrolled spread of a wildfire?			**X**	

c) Require the installation of maintenance 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 to the environment?			X	
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			X	

Discussion: The Stanislaus County Local Hazard Mitigation Plan identifies risks posed by disasters and identifies ways to minimize damage from those disasters. With the Wildfire Hazard Mitigation Activities of this plan in place, impacts to an adopted emergency response plan or emergency evacuation plan are anticipated to be less-than significant. The terrain of the site is relatively flat, and the site has access to a County-maintained road. The site is located in a Local Responsibility Area (LRA) for fire protection, the southern half is designated as urban and the northern half as nonurban and is served by Stanislaus Consolidated Fire Protection District. The project was referred to the District, but no response was received. California Building Code establishes minimum standards for the protection of life and property by increasing the ability of a building to resist intrusion of flame and embers. No construction is proposed but if future construction does occur it will be required to meet fire code, which will be verified through the building permit review process. A grading and drainage plan will be required for the RV parking area and all fire protection, and emergency vehicle access standards met. These requirements will be applied as development standards for the project. Accordingly, wildfire risk and risks associated with postfire land changes are considered to be less-than significant. Other P-I uses may be developed on the site in the future with a use permit; at which time additional environmental review will be completed to evaluate the new proposed uses.

Mitigation: None.

References: Application materials; California Building Code Title 24, Part 2, Chapter 7; Stanislaus County Local Hazard Mitigation Plan; Stanislaus County General Plan and Support Documentation[1].

XXI. MANDATORY FINDINGS OF SIGNIFICANCE -	**Potentially Significant Impact**	**Less Than Significant With Mitigation Included**	**Less Than Significant Impact**	**No Impact**
a) Does the project have the potential to substantially 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, substantially 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	

Discussion: Review of this project has not indicated any potential for cumulative impacts which might significantly impact the environmental quality of the site and/or the surrounding area. The project site is designated as Business-Commercial-Residential (BCR) in the City of Modesto's General Plan Land Use Diagram. The project is located within the City of Modesto's LAFCO adopted Sphere of Influence (SOI). Development within a city SOI cannot be approved, except for

churches and agricultural related uses, without support from the city. The City of Modesto has provided written support of the proposed project. The project site is currently farmed in irrigated forage crops. The Burlington Northern Santa Fe Railroad (BNSF) and Terminal Avenue border the project site to the east, Litt Road to the west, Plainview Road to the north, and the City of Modesto's corporation yard, which is 40 acres, to the south. Agricultural property ranging in size from 20 to 96 acres, zoned A-2-40, which is either farmed in irrigated forage crops or orchards, surround the site to the north, east, and west, all of which are also within the City of Modesto's Sphere of Influence. Several commercially developed properties exist within a ½ mile of the project site including a high school, baseball facility, and mini storage facility. Outside of the permitted uses for the A-2 zoning district, development of the surrounding properties would require discretionary approval, additional environmental review, and city support. Approval of the project is not anticipated to set a precedent for further development of the surrounding area. Other P-I uses may be developed on the site in the future with a use permit; at which time additional environmental review will be completed to evaluate the new proposed uses.

Mitigation: None.

References: Application materials; Initial Study; Stanislaus County General Plan and Support Documentation[1].

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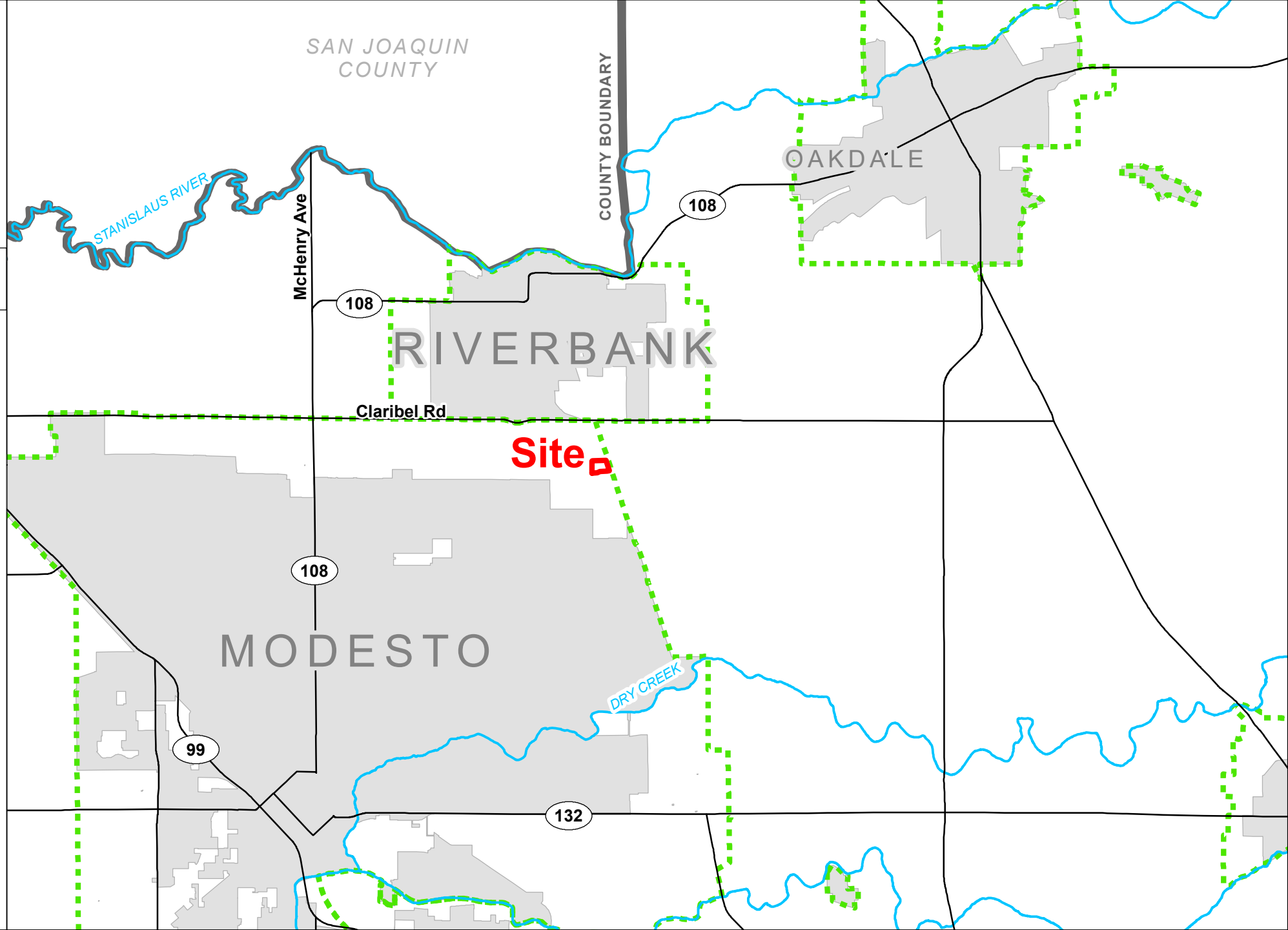
[1]Stanislaus County General Plan and Support Documentation adopted in August 23, 2016, as amended. ***Housing Element*** adopted on April 5, 2016.

JAMES BATES RV AND BOAT STORAGE

GPA REZ PLN2021-0108

AREA MAP



LEGEND

- Project Site
- Sphere of Influence
- City
- Road
- River

N

0 2mi

0 2km

Source: Planning Department GIS

Date: 11/17/2021

JAMES BATES RV AND BOAT STORAGE

GPA REZ PLN2021-0108

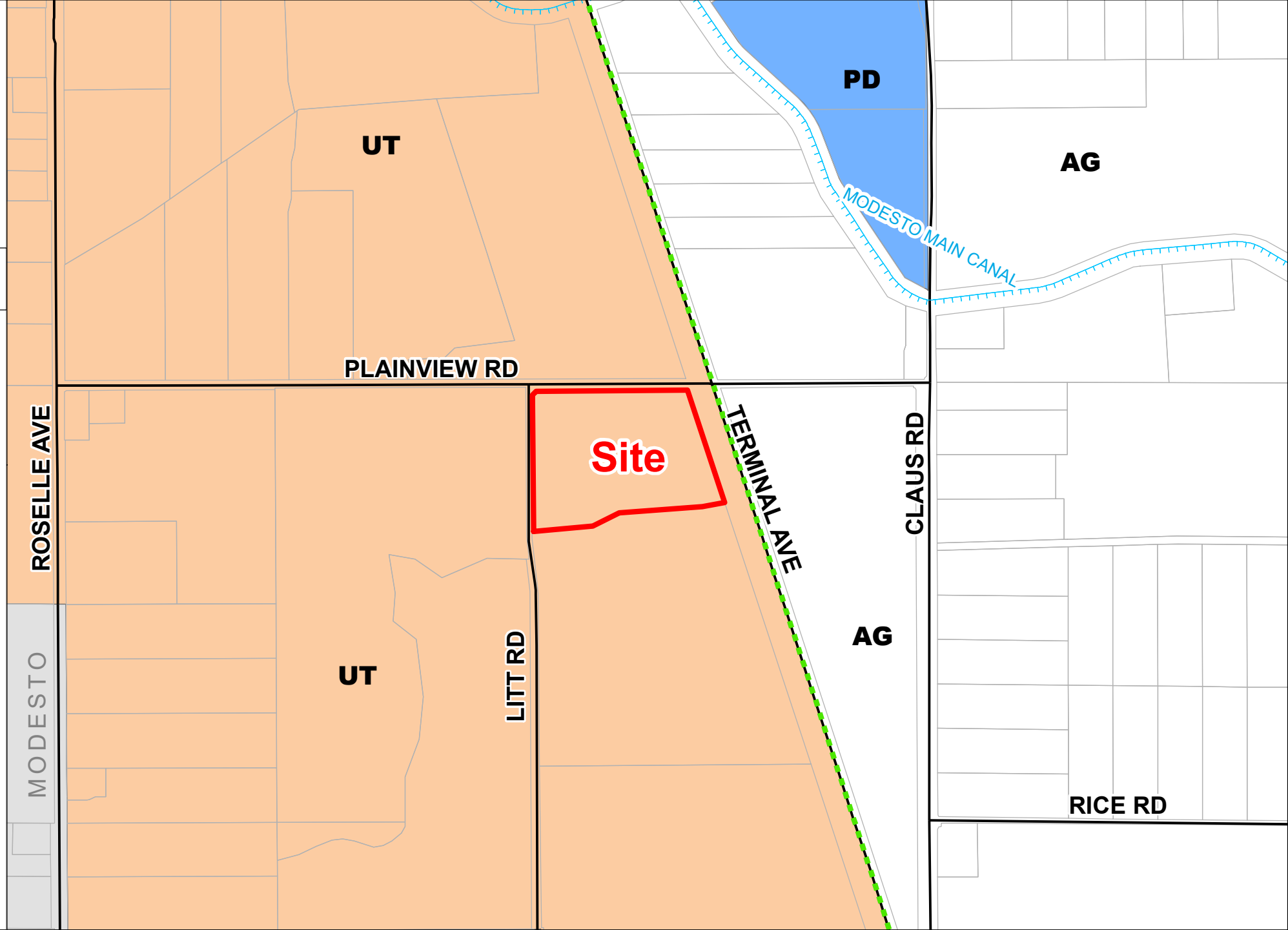
GENERAL PLAN MAP

LEGEND

- Project Site
- Sphere of Influence
- City of
- Parcel
- Road
- Canal

General Plan

- Agriculture
- Planned Development
- Urban Transition



N

0 1,500 ft

0 300 m

Source: Planning Department GIS

Date: 11/17/2021

JAMES BATES RV AND BOAT STORAGE

GPA REZ PLN2021-0108

ZONING MAP

LEGEND

- Project Site
- Sphere of Influence
- City of
- Parcel
- Road
- Canal

Zoning Designation

- Planned Development
- General Agriculture 10 Acre
- General Agriculture 40 Acre

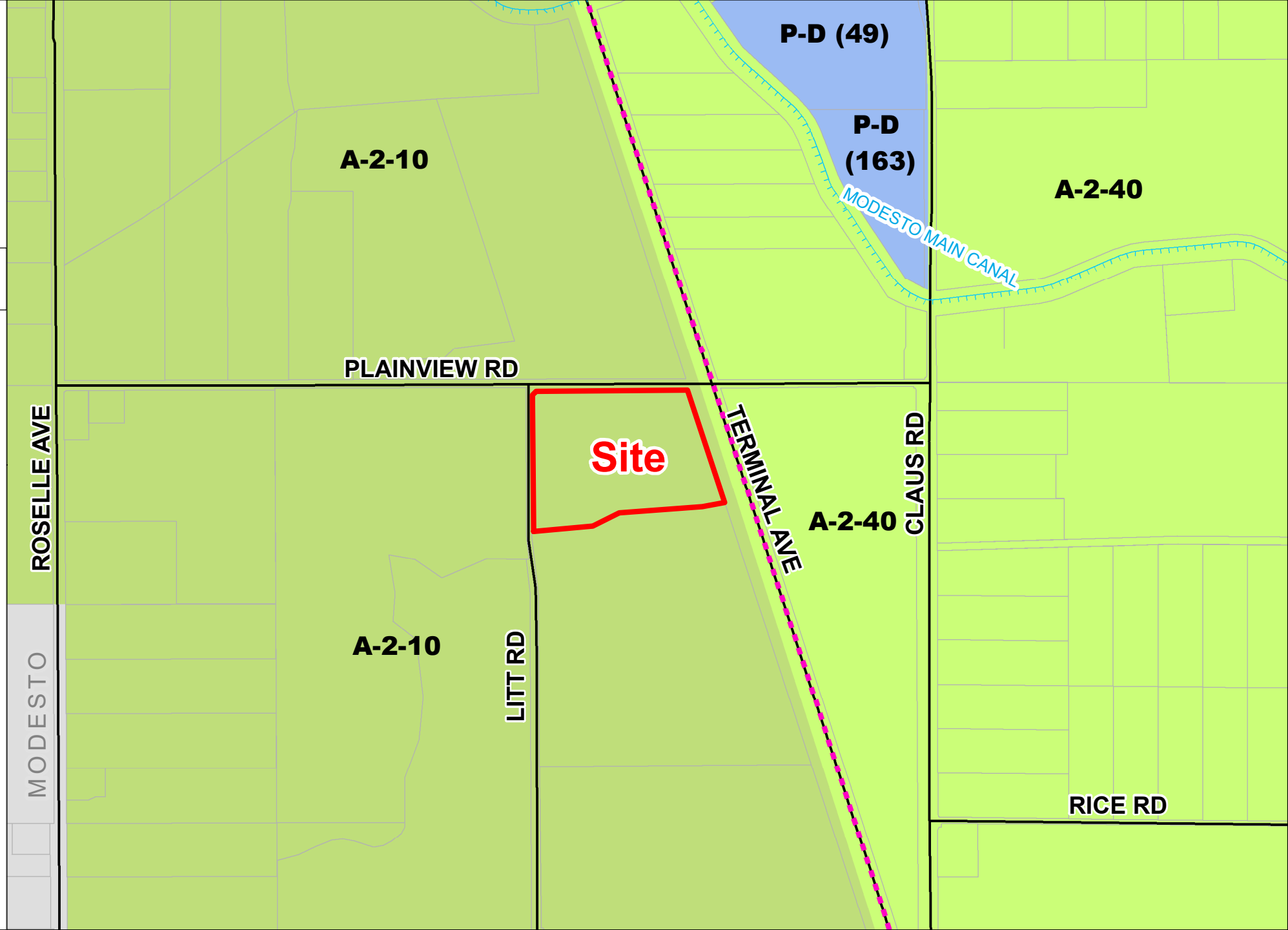
N

0 1,500 ft

0 300 m

Source: Planning Department GIS

Date: 11/17/2021



JAMES BATES RV AND BOAT STORAGE

GPA REZ PLN2021-0108

2021 AERIAL AREA MAP

LEGEND

- Project Site
- Sphere of Influence
- Road
- Canal

N

0 1,500 ft

0 300 m

Source: Planning Department GIS

Date: 11/17/2021

JAMES BATES RV AND BOAT STORAGE

GPA REZ PLN2021-0108

2021 AERIAL SITE MAP

LEGEND

Project Site

Road

N

0 250 ft

0 50 m

Source: Planning Department GIS

Date: 11/17/2021

JAMES BATES RV AND BOAT STORAGE

GPA REZ PLN2021-0108

ACREAGE MAP

LEGEND

- Project Site
- Sphere of Influence
- City of
- # Parcel/Acres
- Road
- Canal

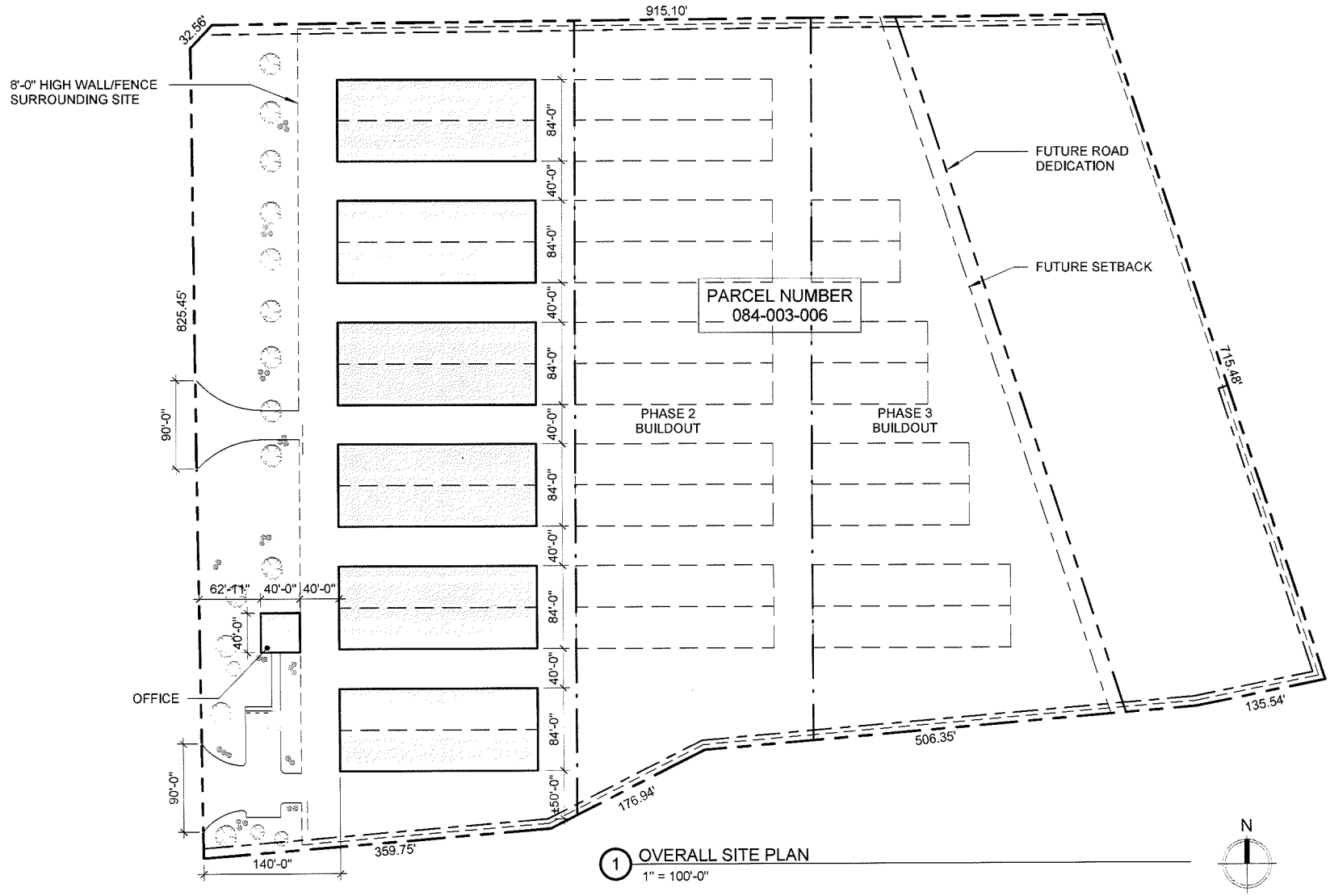
N

0 1,500 ft

0 300 m

Source: Planning Department GIS

Date: 11/17/2021



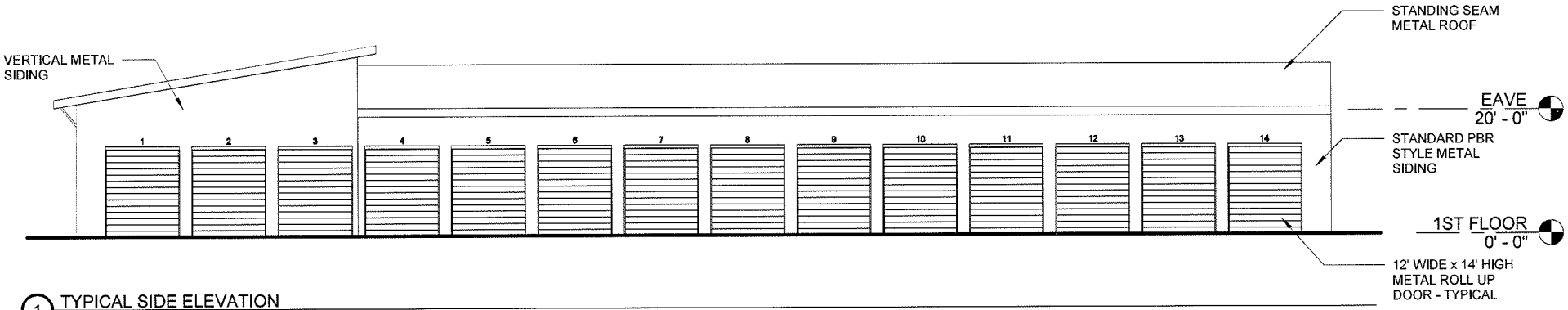
1 OVERALL SITE PLAN
1" = 100'-0"

RED INC ARCHITECTS

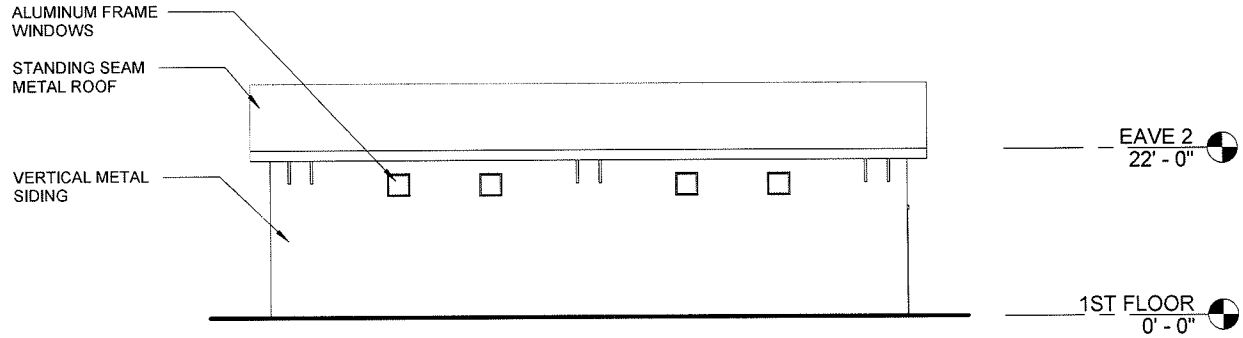
PROPOSED SITE PLAN

LITT ROAD - RV & BOAT STORAGE

A1



1 TYPICAL SIDE ELEVATION
1/16" = 1'-0"



2 TYPICAL FRONT ELEVATION
1/16" = 1'-0"

RED INC ARCHITECTS

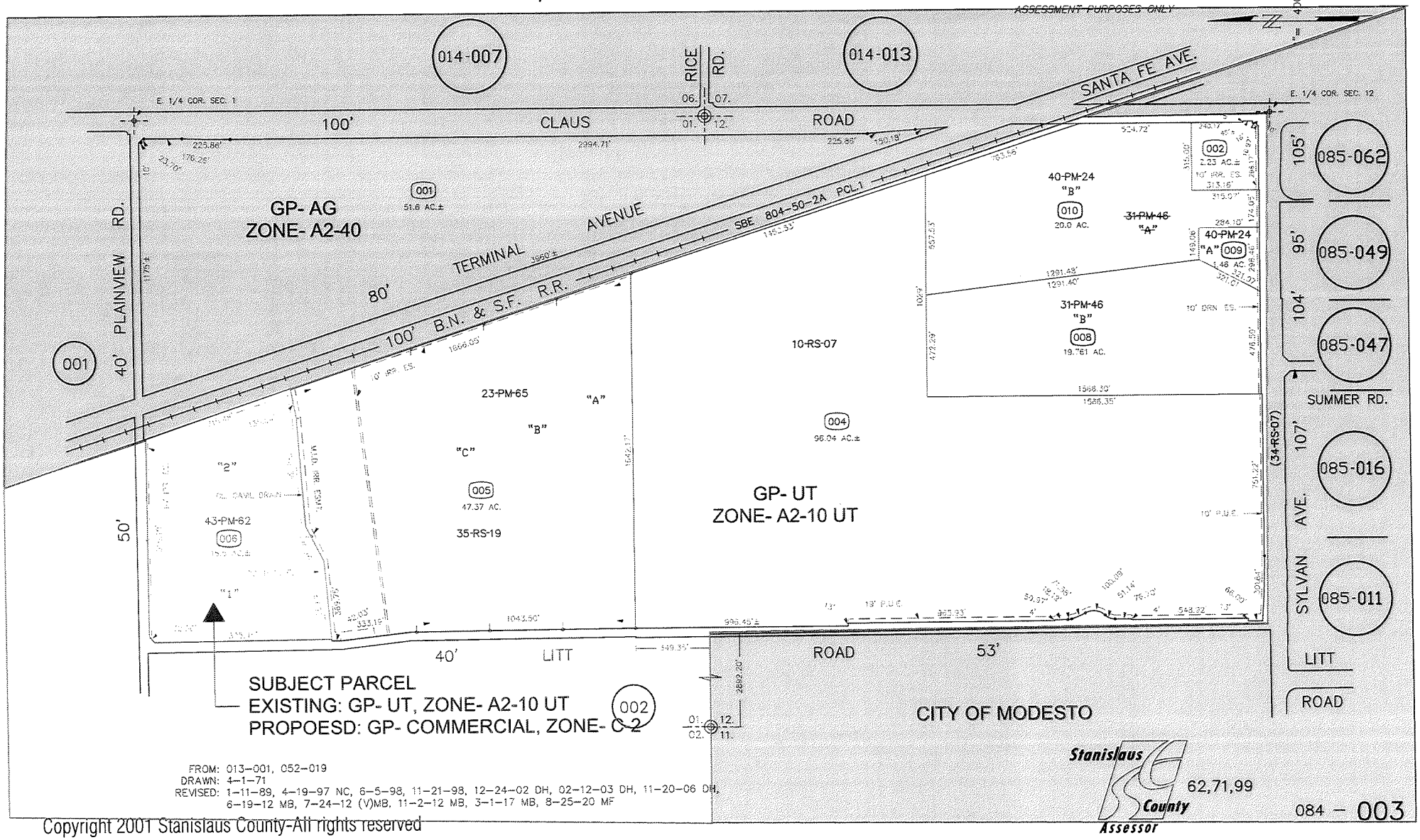
EXTERIOR ELEVATIONS

LITT ROAD - RV & BOAT STORAGE

POR. SE. 1/4 SECTION 1 T.3S. R.9E. M.D.B.& M.
POR. NE. 1/4 SECTION 12 T.3S. R.9E. M.D.B.& M.

109 001 084 – 003

THIS MAP FOR ~~ASSESSMENT PURPOSES ONLY~~



FROM: 013-001, 052-019
DRAWN: 4-1-71
REVISED: 1-11-89, 4-19-97 NC, 6-5-98, 11-21-98, 12-24-02 DH, 02-12-03 DH, 11-20-06 DH, 6-19-12 MB, 7-24-12 (V)MB, 11-2-12 MB, 3-1-17 MB, 8-25-20 MF

Stanislaus County Assessor

62,71,99

084 – 003

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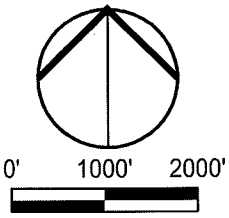


PARCEL DETAIL TABLE

1-APN 084-002-027 9.50 AC.±	6-APN 014-007-034 5.00 AC. ±
2-APN 084-002-026 9.50 AC. ±	7-APN 014-007-035 5.00 AC. ±
3-APN 084-002-025 9.50 AC. ±	8-APN 014-007-049 5.00 AC. ±
4-APN 084-002-031 9.50 AC. ±	9-APN 014-007-050 5.00 AC. ±
5-APN 084-002-035 9.50 AC. ±	10-APN 014-007-039 5.00 AC. ±
	11-APN 014-007-040 5.00 AC. ±
	12-APN 014-007-041 5.00 AC. ±
	13-APN 014-007-018 5.00 AC. ±
	14-APN 014-007-027 5.00 AC. ±
	15-APN 014-007-020 5.00 AC. ±

LEGEND.

1	ALMOND ORCHARD PARCEL	H	HOUSE
2	GROUND CROP PARCEL	O	OFFICE BUILDING
APN	ASSESSOR'S PARCEL NUMBER	S	SHOP/BARN

DATE	09/17/2021
DESIGN	KJG
DRAWN	SS
JOB NO.	21250

SIEGFRIED

CIVIL
STRUCTURAL
LANDSCAPE ARCHITECTURE
SURVEYING
PLANNING
ATHLETIC FACILITY DESIGN

3428 Brookside Road, Stockton, California 95219
209-943-2021 www.siegfriedeng.com Fx: 209-942-0214

SCALE: AS SHOWN

SHEET 1 OF: 1

F:\21projects\21250 Bates Litt Road Storage\Working Documents\Survey Office\21250-AREAMAPEXHIBIT.dwg

09/17/21

BaseCamp Environmental, Inc.

Memorandum

DATE: March 23, 2022

TO: Kristin Doud, Stanislaus County Community Development Department

FROM: Terry Farmer, Senior Environmental Planner

RE: General Plan Amendment and Rezone Application PLN2021-0108
James Bates RV and Boat Storage

Dear Ms. Doud,

This memo is a response to a letter from the San Joaquin Valley Air Pollution Control District (SJVAPCD) dated December 29, 2021 regarding potential air quality impacts of the James Bates RV and Boat Storage project. The proposed project is located at the southeast corner of Plainview Road and Litt Road, northeast of Modesto. The project proposes to amend the General Plan designation for and to rezone two parcels totaling 18.8 acres to allow for the development of an RV and boat storage facility. As proposed, the project would construct 15 new structures, including 14 enclosed RV and boat parking spaces and one 1,600-square foot office, for a total floor area of 231,000 square feet. The project is proposed to be constructed in three phases, with the first phase consisting of six RV and boat parking structures and the office building. The subsequent phases would be constructed based on market conditions, and it is possible that these subsequent phases would not be developed. Therefore, our response to the SJVAPCD letter focuses on the first phase of the proposed project.

1. Project-Related Criteria Pollutant Emissions

The SJVAPCD recommended that a more detailed preliminary review of the project's construction and operational emissions be conducted. In response, Base Camp Environmental has prepared an estimate of the construction and operational emissions of the project using the California Emissions Estimator Model (CalEEMod), the model recommended by the SJVAPCD. The first phase proposes development that would provide 168 storage units. For the CalEEMod estimate, it is assumed that all units would be occupied by RVs or that any stored boats would be towed by RVs. Moreover, it is assumed that each unit would generate a total of four RV trips and four trips from passenger cars traveling to and from the storage unit per year. To ensure a conservative estimate of pollutant emissions, it was further assumed that each RV trip would consist of 100 miles each. This is based on a survey that found that approximately half of all camping trips were 100 miles or less (Statista 2021).

The results of the CalEEMod run are attached to this memo as Exhibit A. A summary of the results is provided in the table below, along with the CEQA significance thresholds for the criteria pollutants as established by SJVAPCD.

	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Significance Thresholds (tons/year)[1]	**10**	**10**	**100**	**27**	**15**	**15**
Construction Emissions (tons/year)[2]	0.31	1.28	1.38	<0.01	0.12	0.07
Exceeds threshold?	*No*	*No*	*No*	*No*	*No*	*No*
Operational Emissions (tons/year)[3]	0.48	0.16	0.16	<0.01	0.04	0.02
Exceeds threshold?	*No*	*No*	*No*	*No*	*No*	*No*

[1] Applies to both construction and operational emissions.
[2] Maximum emissions in a calendar year.
[3] Annual emissions.

As shown in the table, neither the construction nor the operational criteria pollutant emissions generated by the project would exceed the SJVAPCD significance thresholds. As such, the project would have no significant impacts related to criteria pollutant emissions.

2. Health Risk Screening/Assessment

The SJVAPCD recommended a screening that includes all sources of emissions that may have a significant health impact. For this project, the only emission that may have a significant health effect would be diesel particulate matter, a toxic air contaminant resulting primarily from diesel engine combustion.

Exhaust PM2.5 emissions estimated by CalEEMod were used to estimate diesel particulate emissions. Exhaust PM2.5 emissions are considered a surrogate for diesel particulate matter released from construction equipment in Health Risk Assessments. Based on the CalEEMod run, the total exhaust PM2.5 emissions generated by project construction would be approximately 104 pounds over the estimated eight-month construction period. This amount is relatively small and would readily dissipate and would not be concentrated such as to affect any nearby sensitive receptors. The nearest known sensitive receptor is a rural residence more than 500 meters (approximately 0.35 miles) to the east.

Operational diesel particulate matter emissions are of greater concern, since these emissions would occur for a longer time period, thereby presenting a greater health risk to any nearby sensitive receptors. To determine if a more detailed health risk assessment would be required, the Facility Prioritization Score for cancer risk for the project was calculated. The calculation is based on the procedures set forth in the CAPCOA Prioritization Guidelines, which have been adopted by the SJVAPCD. Based on the operational exhaust PM2.5 emissions from the project and the distance to the nearest

sensitive receptor, the Facility Prioritization Score for the project is 0.004, which is well below the threshold of 10 set by the SJVAPCD. Because of this, the project is not considered to pose a potential health risk to nearby sensitive receptor, and a Health Risk Assessment is not considered necessary.

3. Ambient Air Quality Analysis

An Ambient Air Quality Analysis (AAQA) is required by SJVAPCD for any development project with emissions that exceed 100 pounds per day. Based on the results of the CalEEMod run for the project, none of its operational pollutant emissions would exceed 100 pounds per day. Therefore, an AAQA for the project is not required.

4. Cumulative Air Impacts

The SJVAPCD requests a discussion as to whether the project may have cumulatively considerable impacts on air quality. As noted 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 project emissions would be well below SJVAPCD significance thresholds, the project would not have impacts that are cumulatively considerable.

5. Vegetative Barriers and Urban Greening

The SJVAPCD suggests the County consider the feasibility of incorporating vegetative barriers and urban greening to further reduce exposure of sensitive receptors to pollutant emissions. The project is in a rural area and, as noted above, there are no sensitive receptors close to the project site. Moreover, the emissions generated by the project would be very low and would not be concentrated in any specific area. Therefore, incorporating vegetative barriers and urban greening as part of the project would not meaningfully reduce either criteria pollutant or air toxic emissions and is therefore considered inappropriate.

6. District Rules and Regulations

The SJVAPCD noted that the project could be subject to SJVAPCD Rules 2010 and 2201 – Air Quality Permitting for Stationary Sources. Stationary sources include any building, structure, facility, or installation which emits or may emit any affected pollutant directly

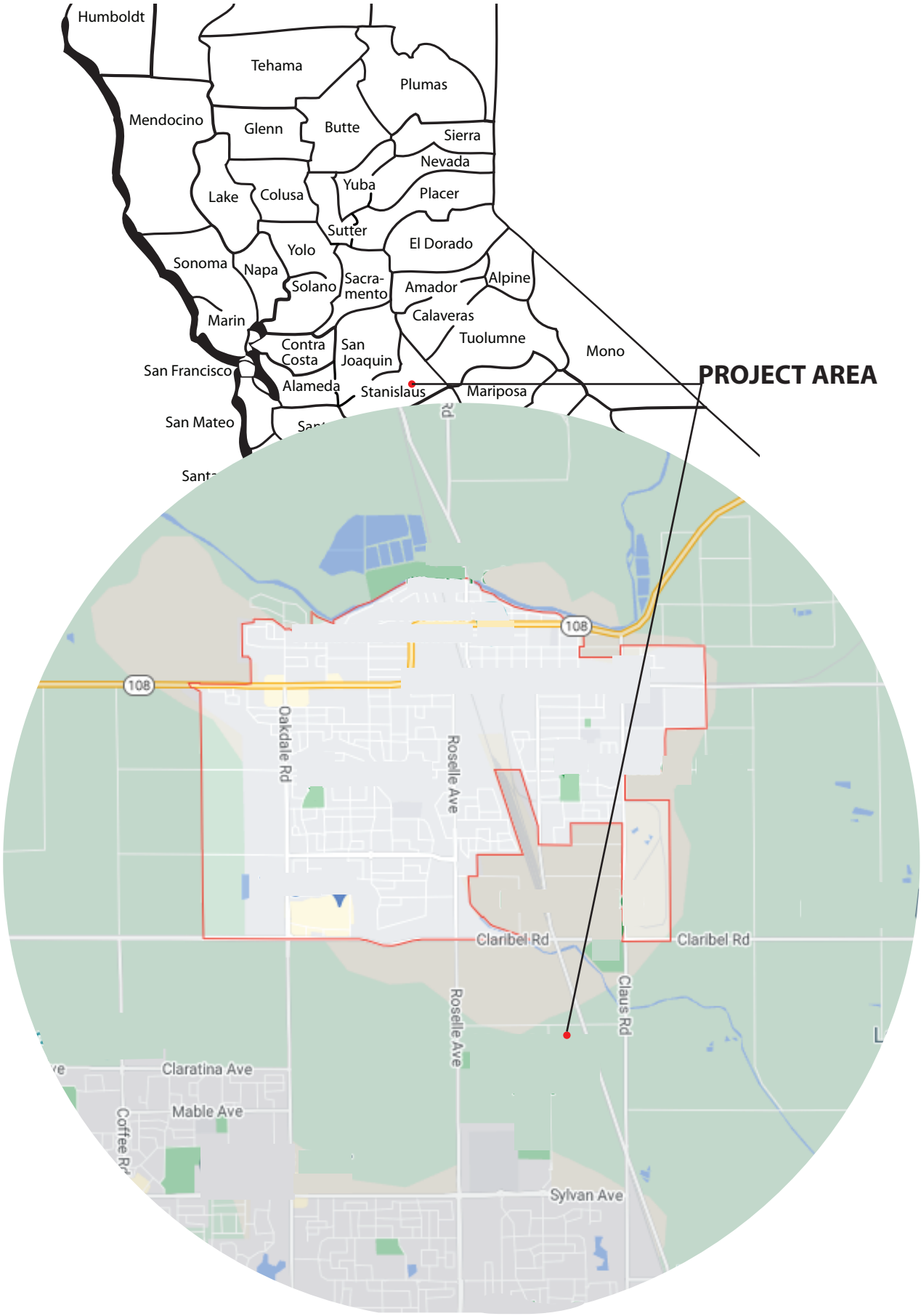
or as a fugitive emission. Rule 2010 requires operators of emission sources to obtain an Authority to Construct and a Permit to Operate, while Rule 2201 requires new and modified stationary sources to mitigate their emissions using best available control technology. The proposed project does not include stationary sources as defined in the subject Rules, therefore these rules would not apply.

SJVAPCD Rule 9510, also known as the Indirect Source Rule, requires projects that meet specified criteria to implement measures to reduce NOx and PM10 construction and operational emissions by specified percentages, either directly or through payment of an off-site fee. The SJVAPCD considers the proposed project to be a light industrial use with total square footage exceeding 25,000 square feet, which would subject the project to Rule 9510 requirements. However, Rule 9510 Section 4.3 exempts development projects with a mitigated baseline below two tons per year of NOx and two tons per year of PM10 from the rule's mitigation requirements and off-site fee payments. As shown above, the CalEEMod run indicates that project operational emissions of NOx and PM10 would be below two tons annually. The project would be required to submit an Air Impact Assessment in accordance with Rule 9510, but it would not be subject to the rule's NOx and PM10 mitigation requirements or off-site fee payments.

The project would comply with Rules 4102, 4601, and 4641 if necessary. The project also would be required to comply with Regulation VIII, which controls fugitive dust emissions during construction activities.

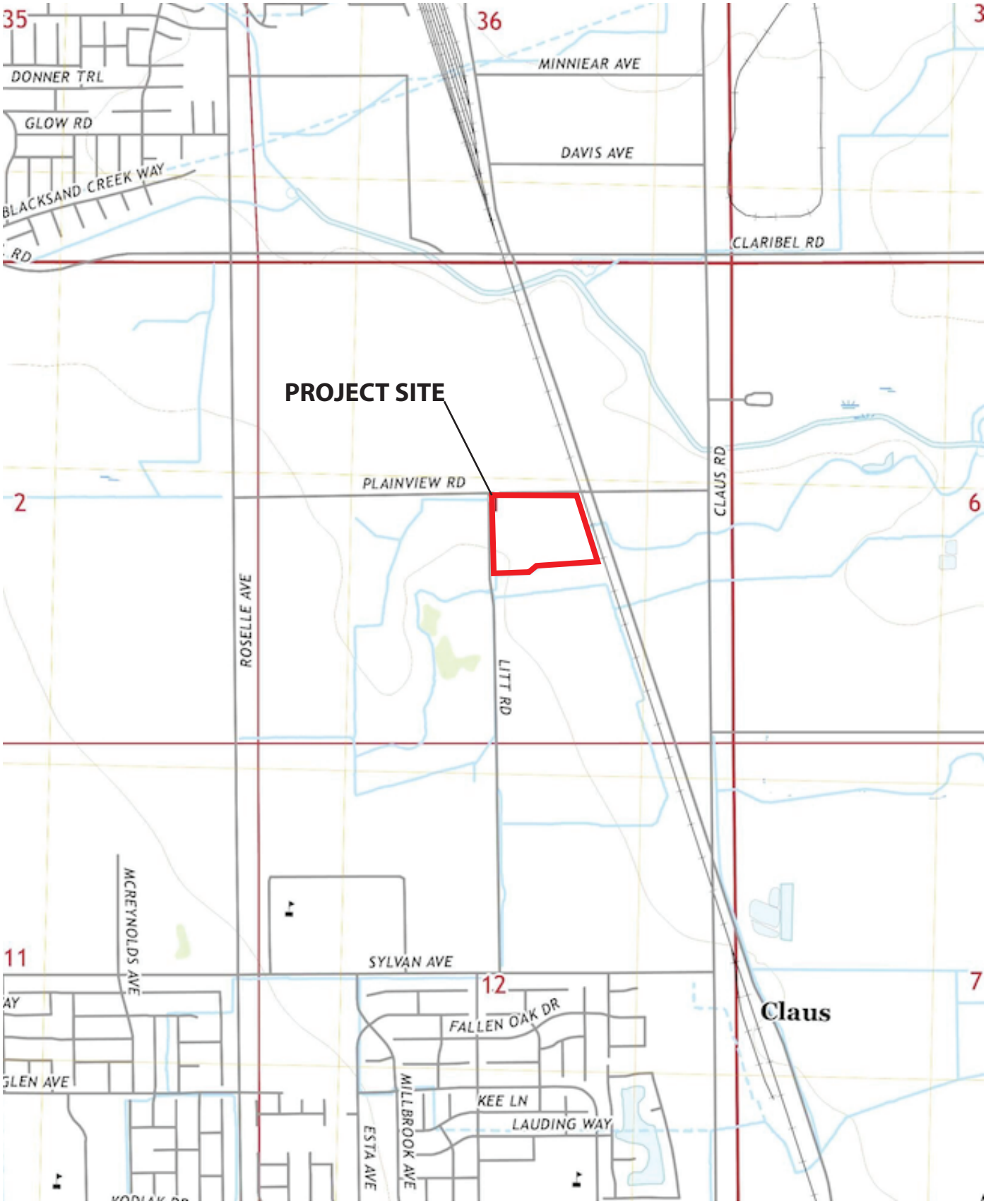
7. District Comment Letter

It is our understanding that the County has already provided a copy of SJVAPCD comment letter to the project applicant.



BaseCamp Environmental

Figure 1-1
REGIONAL PROJECT LOCATION



BaseCamp Environmental

SOURCE: USGS Quadrangle Map, Riverbank, CA 2021.

Figure 1-2
USGS MAP

BaseCamp Environmental

Figure 1-3
AERIAL PHOTO

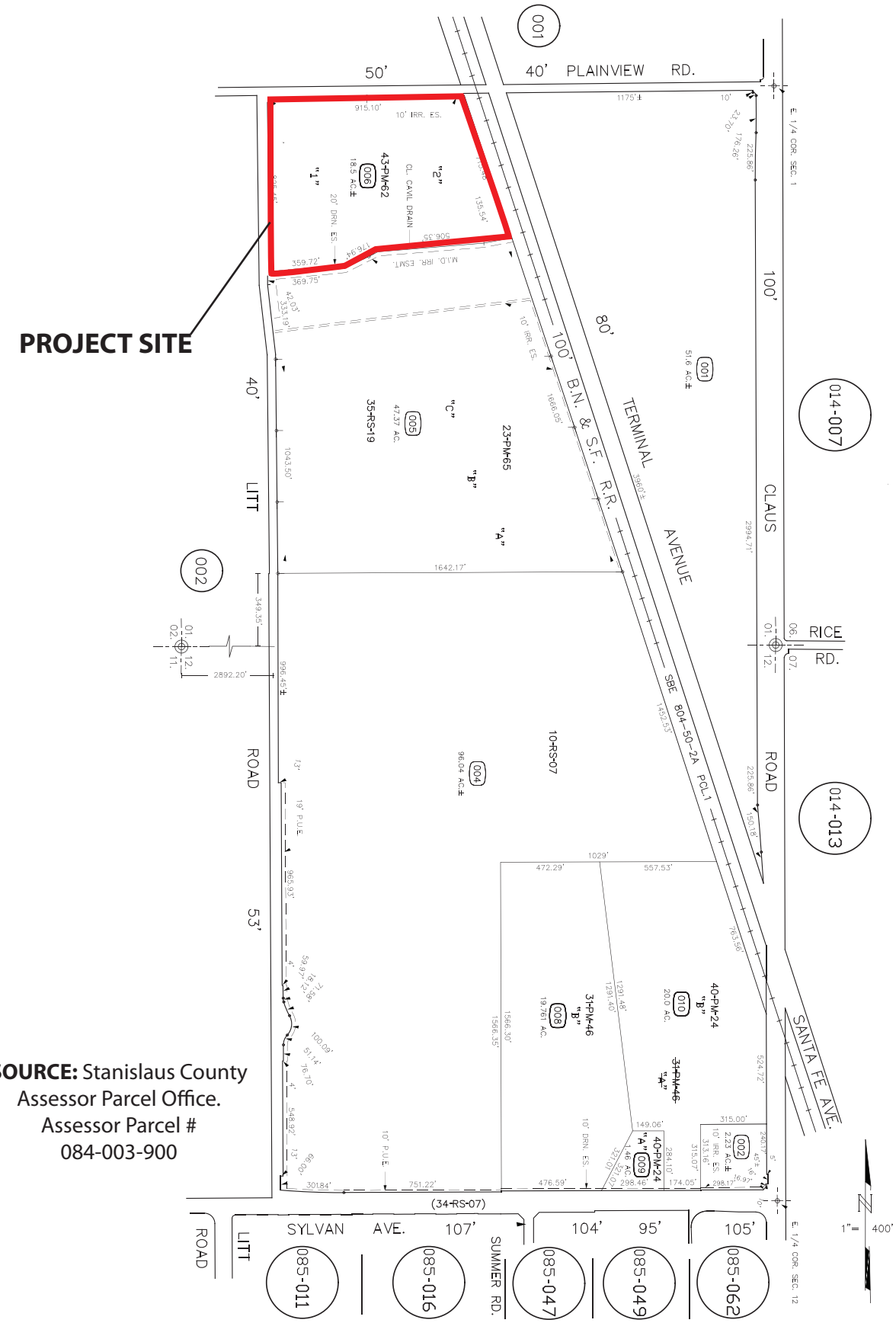


Figure 1-4
ASSESSOR PARCEL MAP

BaseCamp Environmental

EXHIBIT A

CALEEMOD RESULTS FOR PROJECT

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Litt Road RV Storage

Sutter County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	1.60	1000sqft	0.04	1,600.00	0
Unrefrigerated Warehouse-No Rail	110.25	1000sqft	2.53	110,250.00	0

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	61
Climate Zone	3			**Operational Year**	2024
Utility Company	Modesto Irrigation District				
CO2 Intensity (lb/MWhr)	452.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Construction Phase - No demolition. Estimated construction schedule.

Off-road Equipment - CalEEMod defaults.

Architectural Coating - Per SJVAPCD Rule 4601.

Vehicle Trips - Warehouse rate based on estimated vehicle traffic.

Fleet Mix - Anticipated vehicle fleet mix.

Area Coating - Per SJVAPCD Rule 4601.

Water And Wastewater - Water use rates similar for both land uses.

Solid Waste - SOlid waste rates similar for both land uses.

Land Use Change -

Construction Off-road Equipment Mitigation -

Area Mitigation -

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Water Mitigation -

Waste Mitigation -

Table Name	Column Name	Default Value	New Value
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tblAreaCoating	Area_EF_Nonresidential_Interior	0	50
tblAreaCoating	Area_EF_Parking	0	150
tblAreaCoating	Area_EF_Residential_Exterior	0	150
tblAreaCoating	Area_EF_Residential_Interior	0	150
tblAreaCoating	Area_Nonresidential_Exterior	0	55925
tblAreaCoating	Area_Nonresidential_Interior	0	167775
tblAreaCoating	ReapplicationRatePercent	0	10
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblConstructionPhase	NumDays	10.00	5.00
tblConstructionPhase	NumDays	20.00	0.00
tblConstructionPhase	NumDays	10.00	5.00
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural

2.0 Emissions Summary

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.1651	1.2824	1.3817	2.9100e-003	0.0650	0.0543	0.1192	0.0166	0.0519	0.0685	0.0000	250.0827	250.0827	0.0364	5.9000e-003	252.7500
2024	0.3101	0.3933	0.4638	9.5000e-004	0.0193	0.0159	0.0351	5.1900e-003	0.0152	0.0204	0.0000	81.0586	81.0586	0.0120	1.5900e-003	81.8319
Maximum	**0.3101**	**1.2824**	**1.3817**	**2.9100e-003**	**0.0650**	**0.0543**	**0.1192**	**0.0166**	**0.0519**	**0.0685**	**0.0000**	**250.0827**	**250.0827**	**0.0364**	**5.9000e-003**	**252.7500**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.1651	0.0868	1.3817	2.9100e-003	0.0618	0.0543	0.1161	0.0162	0.0519	0.0682	0.0000	250.0825	250.0825	0.0364	5.9000e-003	252.7498
2024	0.3101	0.0238	0.4638	9.5000e-004	0.0193	0.0159	0.0351	5.1900e-003	0.0152	0.0204	0.0000	81.0585	81.0585	0.0120	1.5900e-003	81.8318
Maximum	**0.3101**	**0.0868**	**1.3817**	**2.9100e-003**	**0.0618**	**0.0543**	**0.1161**	**0.0162**	**0.0519**	**0.0682**	**0.0000**	**250.0825**	**250.0825**	**0.0364**	**5.9000e-003**	**252.7498**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**93.40**	**0.00**	**0.00**	**3.79**	**0.00**	**2.07**	**1.61**	**0.00**	**0.39**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	**5-1-2023**	**7-31-2023**	0.5483	0.0975
2	**8-1-2023**	**10-31-2023**	0.5397	0.0920
3	**11-1-2023**	**1-31-2024**	0.5308	0.0920
4	**2-1-2024**	**4-30-2024**	0.5239	0.3037
		Highest	0.5483	0.3037

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.4629	1.0000e-005	1.0300e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-003	2.0000e-003	1.0000e-005	0.0000	2.1300e-003
Energy	0.0108	0.0978	0.0822	5.9000e-004		7.4300e-003	7.4300e-003		7.4300e-003	7.4300e-003	0.0000	319.5990	319.5990	0.0176	3.8300e-003	321.1807
Mobile	4.9000e-003	0.0640	0.0728	6.3000e-004	0.0300	1.4900e-003	0.0315	8.4900e-003	1.4200e-003	9.9100e-003	0.0000	58.6360	58.6360	5.4000e-004	2.3000e-003	59.3344
Waste						0.0000	0.0000		0.0000	0.0000	0.6049	0.0000	0.6049	0.0358	0.0000	1.4987
Water						0.0000	0.0000		0.0000	0.0000	0.1804	0.7577	0.9381	0.0186	4.4000e-004	1.5352
Total	**0.4785**	**0.1618**	**0.1560**	**1.2200e-003**	**0.0300**	**8.9200e-003**	**0.0389**	**8.4900e-003**	**8.8500e-003**	**0.0173**	**0.7854**	**378.9946**	**379.7800**	**0.0725**	**6.5700e-003**	**383.5511**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.4629	1.0000e-005	1.0300e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-003	2.0000e-003	1.0000e-005	0.0000	2.1300e-003
Energy	0.0108	0.0978	0.0822	5.9000e-004		7.4300e-003	7.4300e-003		7.4300e-003	7.4300e-003	0.0000	319.5990	319.5990	0.0176	3.8300e-003	321.1807
Mobile	4.9000e-003	0.0640	0.0728	6.3000e-004	0.0300	1.4900e-003	0.0315	8.4900e-003	1.4200e-003	9.9100e-003	0.0000	58.6360	58.6360	5.4000e-004	2.3000e-003	59.3344
Waste						0.0000	0.0000		0.0000	0.0000	0.1512	0.0000	0.1512	8.9400e-003	0.0000	0.3747
Water						0.0000	0.0000		0.0000	0.0000	0.1444	0.6061	0.7505	0.0149	3.6000e-004	1.2282
Total	**0.4785**	**0.1618**	**0.1560**	**1.2200e-003**	**0.0300**	**8.9200e-003**	**0.0389**	**8.4900e-003**	**8.8500e-003**	**0.0173**	**0.2956**	**378.8431**	**379.1387**	**0.0419**	**6.4900e-003**	**382.1200**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**62.36**	**0.04**	**0.17**	**42.13**	**1.22**	**0.37**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.3 Vegetation

Vegetation

	CO2e
Category	MT
Vegetation Land Change	-37.2000
Total	**-37.2000**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	5/1/2023	4/30/2023	5	0	
2	Site Preparation	Site Preparation	5/1/2023	5/3/2023	5	3	
3	Grading	Grading	5/4/2023	5/11/2023	5	6	
4	Building Construction	Building Construction	5/12/2023	3/14/2024	5	220	
5	Paving	Paving	3/15/2024	3/21/2024	5	5	
6	Architectural Coating	Architectural Coating	3/22/2024	3/28/2024	5	5	

Acres of Grading (Site Preparation Phase): 4.5

Acres of Grading (Grading Phase): 6

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 167,775; Non-Residential Outdoor: 55,925; Striped Parking Area: 0 (Architectural Coating – sqft)

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Scrapers	1	8.00	367	0.48
Site Preparation	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Tractors/Loaders/Backhoes	2	7.00	97	0.37
Building Construction	Cranes	1	8.00	231	0.29
Building Construction	Forklifts	2	7.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Building Construction	Welders	3	8.00	46	0.45
Paving	Cement and Mortar Mixers	1	8.00	9	0.56
Paving	Pavers	1	8.00	130	0.42
Paving	Paving Equipment	1	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition		0.00	0.00		16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation		8.00	0.00		16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Grading		10.00	0.00	204.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction		47.00	18.00		16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Paving		15.00	0.00		16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating		9.00	0.00		16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

3.2 Demolition - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Demolition - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Demolition - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

3.3 Site Preparation - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.3900e-003	0.0000	2.3900e-003	2.6000e-004	0.0000	2.6000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.9500e-003	0.0214	0.0147	4.0000e-005		8.1000e-004	8.1000e-004		7.5000e-004	7.5000e-004	0.0000	3.2317	3.2317	1.0500e-003	0.0000	3.2578
Total	**1.9500e-003**	**0.0214**	**0.0147**	**4.0000e-005**	**2.3900e-003**	**8.1000e-004**	**3.2000e-003**	**2.6000e-004**	**7.5000e-004**	**1.0100e-003**	**0.0000**	**3.2317**	**3.2317**	**1.0500e-003**	**0.0000**	**3.2578**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Site Preparation - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.0000e-005	3.0000e-005	4.2000e-004	0.0000	1.5000e-004	0.0000	1.5000e-004	4.0000e-005	0.0000	4.0000e-005	0.0000	0.1127	0.1127	0.0000	0.0000	0.1137
Total	**5.0000e-005**	**3.0000e-005**	**4.2000e-004**	**0.0000**	**1.5000e-004**	**0.0000**	**1.5000e-004**	**4.0000e-005**	**0.0000**	**4.0000e-005**	**0.0000**	**0.1127**	**0.1127**	**0.0000**	**0.0000**	**0.1137**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					1.0700e-003	0.0000	1.0700e-003	1.2000e-004	0.0000	1.2000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.9500e-003		0.0147	4.0000e-005		8.1000e-004	8.1000e-004		7.5000e-004	7.5000e-004	0.0000	3.2317	3.2317	1.0500e-003	0.0000	3.2578
Total	**1.9500e-003**		**0.0147**	**4.0000e-005**	**1.0700e-003**	**8.1000e-004**	**1.8800e-003**	**1.2000e-004**	**7.5000e-004**	**8.7000e-004**	**0.0000**	**3.2317**	**3.2317**	**1.0500e-003**	**0.0000**	**3.2578**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Site Preparation - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.0000e-005	3.0000e-005	4.2000e-004	0.0000	1.5000e-004	0.0000	1.5000e-004	4.0000e-005	0.0000	4.0000e-005	0.0000	0.1127	0.1127	0.0000	0.0000	0.1137
Total	**5.0000e-005**	**3.0000e-005**	**4.2000e-004**	**0.0000**	**1.5000e-004**	**0.0000**	**1.5000e-004**	**4.0000e-005**	**0.0000**	**4.0000e-005**	**0.0000**	**0.1127**	**0.1127**	**0.0000**	**0.0000**	**0.1137**

3.4 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.4100e-003	0.0000	3.4100e-003	3.8000e-004	0.0000	3.8000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	4.0000e-003	0.0434	0.0261	6.0000e-005		1.8100e-003	1.8100e-003		1.6700e-003	1.6700e-003	0.0000	5.4312	5.4312	1.7600e-003	0.0000	5.4751
Total	**4.0000e-003**	**0.0434**	**0.0261**	**6.0000e-005**	**3.4100e-003**	**1.8100e-003**	**5.2200e-003**	**3.8000e-004**	**1.6700e-003**	**2.0500e-003**	**0.0000**	**5.4312**	**5.4312**	**1.7600e-003**	**0.0000**	**5.4751**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Grading - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.4000e-004	0.0128	2.9500e-003	6.0000e-005	1.7300e-003	1.2000e-004	1.8500e-003	4.8000e-004	1.2000e-004	5.9000e-004	0.0000	5.7674	5.7674	1.0000e-005	9.1000e-004	6.0377
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.1000e-004	8.0000e-005	1.0400e-003	0.0000	3.7000e-004	0.0000	3.7000e-004	1.0000e-004	0.0000	1.0000e-004	0.0000	0.2818	0.2818	1.0000e-005	1.0000e-005	0.2842
Total	**3.5000e-004**	**0.0129**	**3.9900e-003**	**6.0000e-005**	**2.1000e-003**	**1.2000e-004**	**2.2200e-003**	**5.8000e-004**	**1.2000e-004**	**6.9000e-004**	**0.0000**	**6.0492**	**6.0492**	**2.0000e-005**	**9.2000e-004**	**6.3220**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					1.5400e-003	0.0000	1.5400e-003	1.7000e-004	0.0000	1.7000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	4.0000e-003		0.0261	6.0000e-005		1.8100e-003	1.8100e-003		1.6700e-003	1.6700e-003	0.0000	5.4312	5.4312	1.7600e-003	0.0000	5.4751
Total	**4.0000e-003**		**0.0261**	**6.0000e-005**	**1.5400e-003**	**1.8100e-003**	**3.3500e-003**	**1.7000e-004**	**1.6700e-003**	**1.8400e-003**	**0.0000**	**5.4312**	**5.4312**	**1.7600e-003**	**0.0000**	**5.4751**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Grading - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.4000e-004	0.0128	2.9500e-003	6.0000e-005	1.7300e-003	1.2000e-004	1.8500e-003	4.8000e-004	1.2000e-004	5.9000e-004	0.0000	5.7674	5.7674	1.0000e-005	9.1000e-004	6.0377
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.1000e-004	8.0000e-005	1.0400e-003	0.0000	3.7000e-004	0.0000	3.7000e-004	1.0000e-004	0.0000	1.0000e-004	0.0000	0.2818	0.2818	1.0000e-005	1.0000e-005	0.2842
Total	**3.5000e-004**	**0.0129**	**3.9900e-003**	**6.0000e-005**	**2.1000e-003**	**1.2000e-004**	**2.2200e-003**	**5.8000e-004**	**1.2000e-004**	**6.9000e-004**	**0.0000**	**6.0492**	**6.0492**	**2.0000e-005**	**9.2000e-004**	**6.3220**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1422	1.1308	1.1798	2.0800e-003		0.0509	0.0509		0.0488	0.0488	0.0000	172.3927	172.3927	0.0326	0.0000	173.2078
Total	**0.1422**	**1.1308**	**1.1798**	**2.0800e-003**		**0.0509**	**0.0509**		**0.0488**	**0.0488**	**0.0000**	**172.3927**	**172.3927**	**0.0326**	**0.0000**	**173.2078**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.6900e-003	0.0629	0.0209	2.7000e-004	8.8900e-003	3.9000e-004	9.2800e-003	2.5700e-003	3.7000e-004	2.9400e-003	0.0000	26.2203	26.2203	8.0000e-005	4.0000e-003	27.4149
Worker	0.0148	0.0110	0.1357	4.0000e-004	0.0480	2.2000e-004	0.0482	0.0128	2.0000e-004	0.0130	0.0000	36.6449	36.6449	8.8000e-004	9.8000e-004	36.9589
Total	**0.0165**	**0.0739**	**0.1567**	**6.7000e-004**	**0.0569**	**6.1000e-004**	**0.0575**	**0.0153**	**5.7000e-004**	**0.0159**	**0.0000**	**62.8653**	**62.8653**	**9.6000e-004**	**4.9800e-003**	**64.3738**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1422		1.1798	2.0800e-003		0.0509	0.0509		0.0488	0.0488	0.0000	172.3925	172.3925	0.0326	0.0000	173.2076
Total	**0.1422**		**1.1798**	**2.0800e-003**		**0.0509**	**0.0509**		**0.0488**	**0.0488**	**0.0000**	**172.3925**	**172.3925**	**0.0326**	**0.0000**	**173.2076**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.6900e-003	0.0629	0.0209	2.7000e-004	8.8900e-003	3.9000e-004	9.2800e-003	2.5700e-003	3.7000e-004	2.9400e-003	0.0000	26.2203	26.2203	8.0000e-005	4.0000e-003	27.4149
Worker	0.0148	0.0110	0.1357	4.0000e-004	0.0480	2.2000e-004	0.0482	0.0128	2.0000e-004	0.0130	0.0000	36.6449	36.6449	8.8000e-004	9.8000e-004	36.9589
Total	**0.0165**	**0.0739**	**0.1567**	**6.7000e-004**	**0.0569**	**6.1000e-004**	**0.0575**	**0.0153**	**5.7000e-004**	**0.0159**	**0.0000**	**62.8653**	**62.8653**	**9.6000e-004**	**4.9800e-003**	**64.3738**

3.5 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0431	0.3462	0.3807	6.8000e-004		0.0145	0.0145		0.0139	0.0139	0.0000	56.0828	56.0828	0.0105	0.0000	56.3439
Total	**0.0431**	**0.3462**	**0.3807**	**6.8000e-004**		**0.0145**	**0.0145**		**0.0139**	**0.0139**	**0.0000**	**56.0828**	**56.0828**	**0.0105**	**0.0000**	**56.3439**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Building Construction - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	5.4000e-004	0.0205	6.6700e-003	9.0000e-005	2.8900e-003	1.3000e-004	3.0200e-003	8.4000e-004	1.2000e-004	9.6000e-004	0.0000	8.3890	8.3890	2.0000e-005	1.2800e-003	8.7711
Worker	4.4800e-003	3.1500e-003	0.0407	1.3000e-004	0.0156	7.0000e-005	0.0157	4.1500e-003	6.0000e-005	4.2200e-003	0.0000	11.5249	11.5249	2.6000e-004	2.9000e-004	11.6189
Total	**5.0200e-003**	**0.0236**	**0.0474**	**2.2000e-004**	**0.0185**	**2.0000e-004**	**0.0187**	**4.9900e-003**	**1.8000e-004**	**5.1800e-003**	**0.0000**	**19.9139**	**19.9139**	**2.8000e-004**	**1.5700e-003**	**20.3900**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0431		0.3807	6.8000e-004		0.0145	0.0145		0.0139	0.0139	0.0000	56.0827	56.0827	0.0105	0.0000	56.3438
Total	**0.0431**		**0.3807**	**6.8000e-004**		**0.0145**	**0.0145**		**0.0139**	**0.0139**	**0.0000**	**56.0827**	**56.0827**	**0.0105**	**0.0000**	**56.3438**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Building Construction - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	5.4000e-004	0.0205	6.6700e-003	9.0000e-005	2.8900e-003	1.3000e-004	3.0200e-003	8.4000e-004	1.2000e-004	9.6000e-004	0.0000	8.3890	8.3890	2.0000e-005	1.2800e-003	8.7711
Worker	4.4800e-003	3.1500e-003	0.0407	1.3000e-004	0.0156	7.0000e-005	0.0157	4.1500e-003	6.0000e-005	4.2200e-003	0.0000	11.5249	11.5249	2.6000e-004	2.9000e-004	11.6189
Total	**5.0200e-003**	**0.0236**	**0.0474**	**2.2000e-004**	**0.0185**	**2.0000e-004**	**0.0187**	**4.9900e-003**	**1.8000e-004**	**5.1800e-003**	**0.0000**	**19.9139**	**19.9139**	**2.8000e-004**	**1.5700e-003**	**20.3900**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	2.1100e-003	0.0203	0.0293	4.0000e-005		9.9000e-004	9.9000e-004		9.1000e-004	9.1000e-004	0.0000	3.8787	3.8787	1.2300e-003	0.0000	3.9094
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**2.1100e-003**	**0.0203**	**0.0293**	**4.0000e-005**		**9.9000e-004**	**9.9000e-004**		**9.1000e-004**	**9.1000e-004**	**0.0000**	**3.8787**	**3.8787**	**1.2300e-003**	**0.0000**	**3.9094**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.3000e-004	9.0000e-005	1.2000e-003	0.0000	4.6000e-004	0.0000	4.6000e-004	1.2000e-004	0.0000	1.2000e-004	0.0000	0.3406	0.3406	1.0000e-005	1.0000e-005	0.3434
Total	**1.3000e-004**	**9.0000e-005**	**1.2000e-003**	**0.0000**	**4.6000e-004**	**0.0000**	**4.6000e-004**	**1.2000e-004**	**0.0000**	**1.2000e-004**	**0.0000**	**0.3406**	**0.3406**	**1.0000e-005**	**1.0000e-005**	**0.3434**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	2.1100e-003		0.0293	4.0000e-005		9.9000e-004	9.9000e-004		9.1000e-004	9.1000e-004	0.0000	3.8787	3.8787	1.2300e-003	0.0000	3.9094
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**2.1100e-003**		**0.0293**	**4.0000e-005**		**9.9000e-004**	**9.9000e-004**		**9.1000e-004**	**9.1000e-004**	**0.0000**	**3.8787**	**3.8787**	**1.2300e-003**	**0.0000**	**3.9094**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.3000e-004	9.0000e-005	1.2000e-003	0.0000	4.6000e-004	0.0000	4.6000e-004	1.2000e-004	0.0000	1.2000e-004	0.0000	0.3406	0.3406	1.0000e-005	1.0000e-005	0.3434
Total	**1.3000e-004**	**9.0000e-005**	**1.2000e-003**	**0.0000**	**4.6000e-004**	**0.0000**	**4.6000e-004**	**1.2000e-004**	**0.0000**	**1.2000e-004**	**0.0000**	**0.3406**	**0.3406**	**1.0000e-005**	**1.0000e-005**	**0.3434**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.2592					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	4.5000e-004	3.0500e-003	4.5300e-003	1.0000e-005		1.5000e-004	1.5000e-004		1.5000e-004	1.5000e-004	0.0000	0.6383	0.6383	4.0000e-005	0.0000	0.6392
Total	**0.2597**	**3.0500e-003**	**4.5300e-003**	**1.0000e-005**		**1.5000e-004**	**1.5000e-004**		**1.5000e-004**	**1.5000e-004**	**0.0000**	**0.6383**	**0.6383**	**4.0000e-005**	**0.0000**	**0.6392**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	8.0000e-005	6.0000e-005	7.2000e-004	0.0000	2.8000e-004	0.0000	2.8000e-004	7.0000e-005	0.0000	7.0000e-005	0.0000	0.2043	0.2043	0.0000	1.0000e-005	0.2060
Total	**8.0000e-005**	**6.0000e-005**	**7.2000e-004**	**0.0000**	**2.8000e-004**	**0.0000**	**2.8000e-004**	**7.0000e-005**	**0.0000**	**7.0000e-005**	**0.0000**	**0.2043**	**0.2043**	**0.0000**	**1.0000e-005**	**0.2060**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.2592					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	4.5000e-004		4.5300e-003	1.0000e-005		1.5000e-004	1.5000e-004		1.5000e-004	1.5000e-004	0.0000	0.6383	0.6383	4.0000e-005	0.0000	0.6392
Total	**0.2597**		**4.5300e-003**	**1.0000e-005**		**1.5000e-004**	**1.5000e-004**		**1.5000e-004**	**1.5000e-004**	**0.0000**	**0.6383**	**0.6383**	**4.0000e-005**	**0.0000**	**0.6392**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	8.0000e-005	6.0000e-005	7.2000e-004	0.0000	2.8000e-004	0.0000	2.8000e-004	7.0000e-005	0.0000	7.0000e-005	0.0000	0.2043	0.2043	0.0000	1.0000e-005	0.2060
Total	**8.0000e-005**	**6.0000e-005**	**7.2000e-004**	**0.0000**	**2.8000e-004**	**0.0000**	**2.8000e-004**	**7.0000e-005**	**0.0000**	**7.0000e-005**	**0.0000**	**0.2043**	**0.2043**	**0.0000**	**1.0000e-005**	**0.2060**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	4.9000e-003	0.0640	0.0728	6.3000e-004	0.0300	1.4900e-003	0.0315	8.4900e-003	1.4200e-003	9.9100e-003	0.0000	58.6360	58.6360	5.4000e-004	2.3000e-003	59.3344
Unmitigated	4.9000e-003	0.0640	0.0728	6.3000e-004	0.0300	1.4900e-003	0.0315	8.4900e-003	1.4200e-003	9.9100e-003	0.0000	58.6360	58.6360	5.4000e-004	2.3000e-003	59.3344

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Office Building	2.40	2.40	2.40	9,272	9,272
Unrefrigerated Warehouse-No Rail	3.31	3.31	3.31	63,206	63,206
Total	5.71	5.71	5.71	72,479	72,479

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Office Building	14.70	6.60	6.60	59.00	0.00	41.00	92	5	3
Unrefrigerated Warehouse-No	0.00	5.00	100.00	0.00	50.00	50.00	100	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Office Building	1.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Unrefrigerated Warehouse-No Rail	0.500000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.500000

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	213.1248	213.1248	0.0155	1.8800e-003	214.0738
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	213.1248	213.1248	0.0155	1.8800e-003	214.0738
NaturalGas Mitigated	0.0108	0.0978	0.0822	5.9000e-004		7.4300e-003	7.4300e-003		7.4300e-003	7.4300e-003	0.0000	106.4741	106.4741	2.0400e-003	1.9500e-003	107.1068
NaturalGas Unmitigated	0.0108	0.0978	0.0822	5.9000e-004		7.4300e-003	7.4300e-003		7.4300e-003	7.4300e-003	0.0000	106.4741	106.4741	2.0400e-003	1.9500e-003	107.1068

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Office Building	20672	1.1000e-004	1.0100e-003	8.5000e-004	1.0000e-005		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005	0.0000	1.1031	1.1031	2.0000e-005	2.0000e-005	1.1097
Unrefrigerated Warehouse-No Rail	1.97458e+006	0.0107	0.0968	0.0813	5.8000e-004		7.3600e-003	7.3600e-003		7.3600e-003	7.3600e-003	0.0000	105.3710	105.3710	2.0200e-003	1.9300e-003	105.9971
Total		**0.0108**	**0.0978**	**0.0822**	**5.9000e-004**		**7.4400e-003**	**7.4400e-003**		**7.4400e-003**	**7.4400e-003**	**0.0000**	**106.4741**	**106.4741**	**2.0400e-003**	**1.9500e-003**	**107.1068**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Office Building	20672	1.1000e-004	1.0100e-003	8.5000e-004	1.0000e-005		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005	0.0000	1.1031	1.1031	2.0000e-005	2.0000e-005	1.1097
Unrefrigerated Warehouse-No Rail	1.97458e+006	0.0107	0.0968	0.0813	5.8000e-004		7.3600e-003	7.3600e-003		7.3600e-003	7.3600e-003	0.0000	105.3710	105.3710	2.0200e-003	1.9300e-003	105.9971
Total		**0.0108**	**0.0978**	**0.0822**	**5.9000e-004**		**7.4400e-003**	**7.4400e-003**		**7.4400e-003**	**7.4400e-003**	**0.0000**	**106.4741**	**106.4741**	**2.0400e-003**	**1.9500e-003**	**107.1068**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Office Building	14144	2.9061	2.1000e-004	3.0000e-005	2.9191
Unrefrigerated Warehouse-No Rail	1.02312e+006	210.2187	0.0153	1.8600e-003	211.1548
Total		**213.1248**	**0.0155**	**1.8900e-003**	**214.0738**

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Office Building	14144	2.9061	2.1000e-004	3.0000e-005	2.9191
Unrefrigerated Warehouse-No Rail	1.02312e+006	210.2187	0.0153	1.8600e-003	211.1548
Total		**213.1248**	**0.0155**	**1.8900e-003**	**214.0738**

6.0 Area Detail

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.4629	1.0000e-005	1.0300e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-003	2.0000e-003	1.0000e-005	0.0000	2.1300e-003
Unmitigated	0.4629	1.0000e-005	1.0300e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-003	2.0000e-003	1.0000e-005	0.0000	2.1300e-003

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0259					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.4368					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	9.0000e-005	1.0000e-005	1.0300e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-003	2.0000e-003	1.0000e-005	0.0000	2.1300e-003
Total	**0.4628**	**1.0000e-005**	**1.0300e-003**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**2.0000e-003**	**2.0000e-003**	**1.0000e-005**	**0.0000**	**2.1300e-003**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0259					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.4368					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	9.0000e-005	1.0000e-005	1.0300e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-003	2.0000e-003	1.0000e-005	0.0000	2.1300e-003
Total	**0.4628**	**1.0000e-005**	**1.0300e-003**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**2.0000e-003**	**2.0000e-003**	**1.0000e-005**	**0.0000**	**2.1300e-003**

7.0 Water Detail

7.1 Mitigation Measures Water

Apply Water Conservation Strategy

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.7505	0.0149	3.6000e-004	1.2282
Unmitigated	0.9381	0.0186	4.4000e-004	1.5352

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Office Building	0.284374 / 0.174294	0.5317	9.3000e-003	2.2000e-004	0.8306
Unrefrigerated Warehouse-No Rail	0.284374 / 0	0.4064	9.2900e-003	2.2000e-004	0.7047
Total		**0.9381**	**0.0186**	**4.4000e-004**	**1.5352**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Office Building	0.227499 / 0.139435	0.4254	7.4400e-003	1.8000e-004	0.6644
Unrefrigerated Warehouse-No Rail	0.227499 / 0	0.3251	7.4300e-003	1.8000e-004	0.5637
Total		**0.7505**	**0.0149**	**3.6000e-004**	**1.2282**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Institute Recycling and Composting Services

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.1512	8.9400e-003	0.0000	0.3747
Unmitigated	0.6049	0.0358	0.0000	1.4987

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Office Building	1.49	0.3025	0.0179	0.0000	0.7493
Unrefrigerated Warehouse-No Rail	1.49	0.3025	0.0179	0.0000	0.7493
Total		**0.6049**	**0.0357**	**0.0000**	**1.4986**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Office Building	0.3725	0.0756	4.4700e-003	0.0000	0.1873
Unrefrigerated Warehouse-No Rail	0.3725	0.0756	4.4700e-003	0.0000	0.1873
Total		**0.1512**	**8.9400e-003**	**0.0000**	**0.3747**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Total CO2	CH4	N2O	CO2e
Category	MT			
Unmitigated	-37.2000	0.0000	0.0000	-37.2000

11.1 Vegetation Land Change

Vegetation Type

	Initial/Final	Total CO2	CH4	N2O	CO2e
	Acres	MT			
Cropland	18 / 12	-37.2000	0.0000	0.0000	-37.2000
Total		**-37.2000**	**0.0000**	**0.0000**	**-37.2000**

CENTRAL CALIFORNIA INFORMATION CENTER

California Historical Resources Information System

Department of Anthropology – California State University, Stanislaus
One University Circle, Turlock, California 95382
(209) 667-3307

Alpine, Calaveras, Mariposa, Merced, San Joaquin, Stanislaus & Tuolumne Counties

Date: 10/8/2021

Records Search File #:11935N
Project: Litt Road Storage, Stanislaus County
APN 084-003-006

Kevin Genasci, PLS
Siegfried Engineering, Inc.
3728 Brookside Road
Stockton, CA 95219
209-943-2021 kgenasci@siegfriedeng.com

Dear Mr. Genasci:

We have conducted a non-confidential extended records search as per your request for the above-referenced project area located on the Riverbank USGS 7.5-minute quadrangle map in Stanislaus County.

Search of our files includes review of our maps for the specific project area and the immediate vicinity of the project area, and review of the following:

National Register of Historic Places (NRHP)
California Register of Historical Resources (CRHR)
California Inventory of Historic Resources (1976)
California Historical Landmarks
California Points of Historical Interest listing
Office of Historic Preservation Built Environment Resource Directory (BERD) and the Archaeological Determinations of Eligibility (ADOE)
Survey of Surveys (1989)
Caltrans State and Local Bridges Inventory
General Land Office Plats
Other pertinent historic data available at the CCaIC for each specific county

The following details the results of the records search:

Prehistoric or historic resources within the project area:

- There are no formally recorded prehistoric or historic archaeological resources or historic buildings or structures within the project area.

- The General Land Office Survey Plat for T3S R9E (dated 1854) shows the SE ¼ of Section 1 as a 160-acre parcel.

- The Official Map of the County of Stanislaus, California (1906) shows Edward Litt as the landowner in the SE ¼ of Section 1, T3S R9E.

- The 1916 edition of the Riverbank USGS quadrangle shows the street alignment of Litt Road.

Prehistoric or historic resources within the immediate vicinity of the project area:

- There are no formally recorded prehistoric or historic archaeological resources or historic buildings within the immediate vicinity of the project area.

- The Atchison, Topeka & Santa Railroad just east of the project area has been recorded elsewhere in Stanislaus County as P-50-002006, and is referenced as a historic feature on the 1916 edition of the Riverbank USGS quadrangle.

- The Cavill Drain just south of the project area has been recorded elsewhere in Stanislaus County as P-50-000511, and is referenced as a historic feature on the 1916 edition of the Riverbank USGS quadrangle.

Resources that are known to have value to local cultural groups: None has been formally reported to the Information Center.

Previous investigations within the project area: No project-specific survey has been reported to the Information Center, but the project area is within the boundary covered by an overview report, referenced as follows:

CCaIC Report ST-07244
Waechter, S. and M. Bunse (Far Western A.R.G, Inc.& JRP Historical Consulting; for Circle Point and Stanislaus Council of Governments)
2007 *North County Corridor Environmental Constraints Analysis: Cultural Resources.*

Recommendations/Comments:

Please be advised that a historical resource is defined as a building, structure, object, prehistoric or historic archaeological site, or district possessing physical evidence of human activities over 45 years old. Since the area has not been subject to project-specific investigations, there may be unidentified features involved in your project that are 45 years or older and considered as historical resources requiring further study and evaluation by a qualified professional of the appropriate discipline.

If the current project does not include ground disturbance, further study for archaeological resources is not recommended at this time. If ground disturbance is considered a part of the current project, we recommend further review for the possibility of identifying prehistoric or historic-era archaeological resources.

If the proposed project contains buildings or structures that meet the minimum age requirement (45 years in age or older) it is recommended that the resource/s be assessed by a professional familiar with architecture and history of the county. Review of the available historic building/structure data has included only those sources listed above and should not be considered comprehensive.

If at any time you might require the services of a qualified professional the Statewide Referral List for Historical Resources Consultants is posted for your use on the internet at http://chrisinfo.org

If archaeological resources are encountered during project-related activities, work should be temporarily halted in the vicinity of the discovered materials and workers should avoid altering the materials and their context until a qualified professional archaeologist has evaluated the situation and provided appropriate recommendations. Project personnel should not collect cultural resources.

If human remains are discovered, California Health and Safety Code Section 7050.5 requires you to protect the discovery and notify the county coroner, who will determine if the find is Native American. If the remains are recognized as Native American, the coroner shall then notify the Native American Heritage Commission (NAHC). California Public Resources Code Section 5097.98 authorizes the NAHC to appoint a Most Likely Descendant (MLD) who will make recommendations for the treatment of the discovery.

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the State Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the CHRIS Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

The California Office of Historic Preservation (OHP) contracts with the California Historical Resources Information System's (CHRIS) regional Information Centers (ICs) to maintain information in the CHRIS inventory and make it available to local, state, and federal agencies, cultural resource professionals, Native American tribes, researchers, and the public. Recommendations made by IC coordinators or their staff regarding the interpretation and application of this information are advisory only. Such recommendations do not necessarily represent the evaluation or opinion of the State Historic Preservation Officer in carrying out the OHP's regulatory authority under federal and state law.

We thank you for contacting this office regarding historical resource preservation. Please let us know when we can be of further service. Thank you for submitting the **Access Agreement Short Form.**

Note: Billing will be transmitted separately via email from the Financial Services office ($150.00), payable within 60 days of receipt of the invoice.

If you wish to include payment by Credit Card, you must wait to receive the official invoice from Financial Services so that you can reference the CMP # (Invoice Number), and then contact the link below:

https://commerce.cashnet.com/ANTHROPOLOGY

Sincerely,

E. A. Greathouse

E. A. Greathouse, Coordinator
Central California Information Center
California Historical Resources Information System

* Invoice Request sent to: ARBilling@csustan.edu, CSU Stanislaus Financial Services

City of Modesto
Community and Economic Development Department
Land Development Engineering Division
Transportation, Engineering and Design Division
1010 Tenth Street, Third Floor, Suite 3100
Modesto, CA 95354

CITY OF MODESTO CALIFORNIA

September 30, 2021

James Bates
3833 Lakeside Drive
Modesto, CA 95355

Subject: Sewer Will Serve Letter for a property located at (APN: 084-003-006) Modesto, CA

Dear Mr. Bates:

As requested in your application dated September 25, 2021, the proposed RV storage facility located at (APN: 084-003-006) in Modesto, will be allowed (subject to Council approval), to make the necessary sewer service connection to the City's existing sewer system to accommodate normal usage as described below.

Sewer Service:

Pursuant to Modesto City Council Resolution No. 91-434 that establishes various conditions for the extension of sewer services into unincorporated areas, it has been determined that a connection to the City's sewer system will be allowed to accommodate normal usage by the proposed development, once the developer constructs a 21-inch sewer main at his or her expense in Litt Road that will make the sewer service connection available for the proposed development (RV storage facility).

The proposed 21- inch sewer main construction in Litt Road will be connecting to the existing North/South 21-inch main in Litt Road extending approximately 700 + feet north, to the northerly property line of the proposed development. The design of the connecting sewer main shall be per City Standards and designed by a registered engineer authorized to perform such work. The proposed design shall be approved by the City and all costs associated with its design, installation, and permits shall be borne by the property owner.

The construction and inspection of the 8-inch sewer main must be completed within two years from the date of this letter; otherwise an application for extension has to be submitted to the City for review and issuance for an additional year.

An Outside Service Agreement with the City of Modesto must be submitted and approved by the City Council after the construction by the developer and inspection approved by the City of the 8-inch sewer main. The applicable processing fee must be paid at such time.

The final approval of the process will be contingent upon the property owner receiving the appropriate land use zone change and entitlement from the County, and approval from LAFCO.

If you have any questions, please contact Eva Dankha-Kelly at (209) 571-5120.

Recommended By: _____
Eva Dankha-Kelly, Associate Engineer

Sincerely,

Joseph Lopez
City Manager

cc: William Wong, Director of Utilities
Jim Alves- Utilities
Kerrie Freeman- Stanislaus County- PW
Robert Englent- Wastewater- Utilities
Thomas Sinclair- Environmental Compliance- Utilities

City of Modesto
Community and Economic Development Department
Land Development Engineering Division
Transportation, Engineering and Design Division
1010 Tenth Street, Third Floor, Suite 3100
Modesto, CA 95354

CITY OF
MODESTO
CALIFORNIA

September 30, 2021

James Bates
3833 Lakeside Drive
Modesto, CA 95355

Subject: Water Will Serve Letter for a property located at (APN: 084-003-006) Modesto, CA

Dear Mr. Bates:

As requested in your application dated September 25, 2021, the proposed RV storage facility located at (APN: 084-003-006) in Modesto, will be allowed (subject to Council approval), to make the necessary water service connection/s to the City's existing water system to accommodate normal usage as described below.

Water Service:

Pursuant to Modesto City Council Resolution No. 98-306 and City Council Policy No. 5.001, which both address the extension of water service into unincorporated areas, areas outside of the city limits, and inside of the sphere of influence, it has been determined that sufficient quantity of potable domestic water will be available for normal usage (including landscaping, etc.) once the developer constructs a 12-inch water main at his or her expense in Litt Road that will make the water service connection available for the proposed development (RV storage facility).

The proposed 12- inch water main construction in Litt Road will be connecting to the existing North/South 12-inch main in Litt Road extending approximately 700 + feet north, to the northerly property line of the proposed development. The design of the connecting water main shall be per City Standards and designed by a registered engineer authorized to perform such work. The proposed design shall be approved by the City and all costs associated with its design, installation, and permits shall be borne by the property owner.

The construction and inspection of the 12-inch water main must be completed within two years from the date of this letter; otherwise an application for extension has to be submitted to the City for review and issuance for an additional year.

An Outside Service Agreement with the City of Modesto must be submitted and approved by the City Council after the construction by the developer and inspection approved by the City of the 12-inch water main. The applicable processing fee must be paid at such time.

The final approval of the process will be contingent upon the property owner receiving the appropriate land use zone change and entitlement from the County, and approval from LAFCO.

If you have any questions, please contact Eva Dankha-Kelly at (209) 571-5120.

Recommended By: _____
Eva Dankha-Kelly, Associate Engineer

Sincerely,

Joseph P. Lopez
City Manager

cc: William S. Wong- Director of Utilities
Jim Alves- Utilities
Jeff Daniels- Utilities
Kerrie Freeman- Stanislaus County – Building

March 30, 2022

Mr. Barrett Lipomi, AIA
RED INC ARCHITECTS
1217 J Street
Modesto, CA 95354

RE: LITT ROAD RV & BOAT STORAGE VEHICLE TURNING ANALYSIS

Dear Mr. Lipomi:

This letter report presents an assessment of vehicle turning movements at two local intersections along Plainview Road that would potentially affect the proposed Litt Road RV & Boat Storage project in Stanislaus County. The following is a description of:

- the proposed project,
- the technical approach used in this assessment, and
- the results of the assessment.

Project Description

The Litt Road RV & Boat Storage project will provide storage of oversized vehicles including motorhomes and boats in Stanislaus County. The project is located northeast of Modesto and south of Riverbank, in the southeast quadrant of the Plainview Road / Litt Road intersection.

Purpose of Analysis

Stanislaus County has requested that an AutoTurn analysis be conducted at two intersections, Plainview Road at Litt Road and Plainview Road at Terminal Road to identify whether the intersections can accommodate the design vehicles. The following vehicles were analyzed:

- Passenger car towing boat
- 30-foot Motorhome

Controls:

The AutoTurn analysis included a swept path analysis and a tracking path analysis. The swept path illustrates the widest path swept by the sides and overhang of the vehicle while the tracking path illustrates the wheel paths of the vehicle. The results of these paths indicate whether a design vehicle can travel the route without leaving the roadway, and whether the vehicle envelope could be impeded by existing conditions.

Constraints:

- The Plainview Road / Litt Road intersection is a tee intersection with stop control along Litt Road. The project is located in the southeast quadrant of the intersection; therefore, any improvements

needed at the intersection to accommodate the design vehicles were assumed to occur in the project quadrant.

- The Plainview Road / Terminal Road intersection is a four-way intersection with stop control along Plainview Road. A rail line is present west of and paralleling Terminal Road, with about 100 feet separating the centerlines of both. The rail line was considered with regard to storage of eastbound project design vehicles at the intersection assuming the railroad gates are activated while a vehicle is waiting to enter the intersection. Additionally, all utility poles and railroad structures (crossing gates) were considered with regard to the swept path of the vehicles while the tracking path was used to determine whether the vehicles would leave the roadway.

Technical Approach

Based on the ability of the design vehicles to complete turns at the intersection, this assessment identifies whether improvements are needed to allow project-related vehicles to make turns without leaving the paved surface, encroaching into an opposing travel lane or interfering with existing facilities off the travel way. The spatial database used for this analysis included Google Earth imagery from September 2020. The assessment was conducted using *AutoTURN* software prepared by Transoft.

Results

Litt Road / Plainview Road (Location 1)

Figures 1A and 1B present the turning movements for the Litt Road / Plainview Road intersection. Figure 1A illustrates the turning movements for a passenger car – boat combination (P-B). Both turns, north to east and west to south, can be made simultaneously without encroaching in the opposing lane and without leaving the roadway; additionally, the swept path is also maintained within the paved shoulder.

Figure 1B presents the turning movements for a 30-foot motorhome. The inbound west to south movement can complete the turn without the outside wheels leaving the pavement. Without encroaching into the westbound traffic lane, the northbound to eastbound movement cannot complete the movement without the outside wheels leaving the pavement. Figure 1B illustrates the additional pavement required to complete this movement.

Plainview Road / Terminal Road (North Side)

Figures 2A and 2B present the turning movements for vehicles arriving and departing from the north side of the intersection. Figure 2A illustrates the tracking for the P-B vehicle combination while Figure 2B illustrates the motorhome tracking. Both vehicles can complete the movements within the existing pavement.

Plainview Road / Terminal Road (South Side)

Figures 3A and 3B present the turning movements for vehicles arriving and departing from the south side of the intersection. Figure 3A illustrates the tracking for the P-B vehicle combination while Figure 3B illustrates the motorhome tracking. Both vehicles can complete the movements within the existing pavement.

Conclusions

Both vehicle types can complete westbound to southbound left turns at the Plainview Road / Litt Road intersection. However, to allow motorhomes to complete the northbound to eastbound right turn at the intersection additional paving will be required in the southeast quadrant. Both vehicle can complete turns from and to Terminal Road at the Plainview Road intersection.

If you have any questions please contact me at (916) 660-1555 with any questions.

Sincerely,

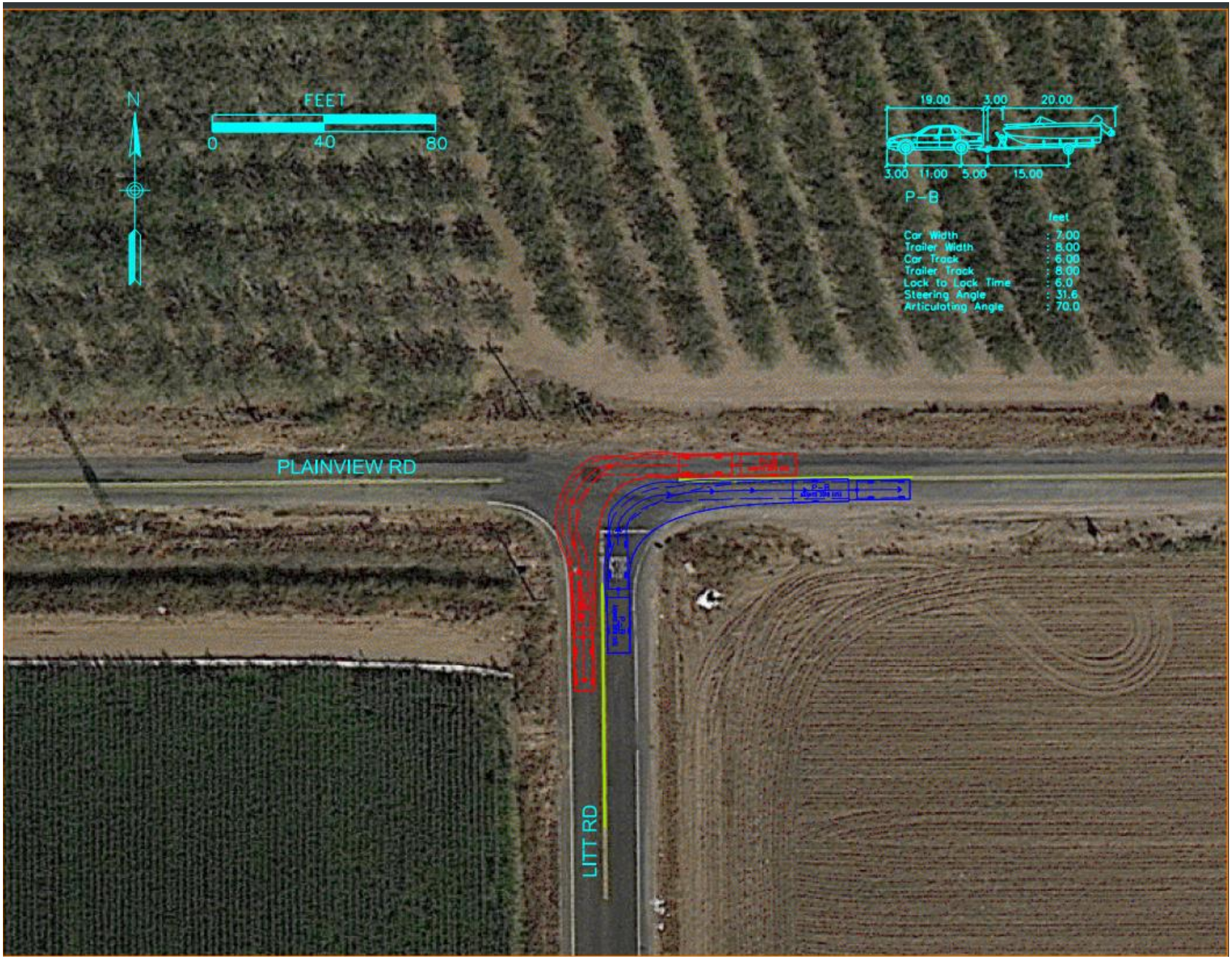
KD Anderson & Associates, Inc.

Jonathan D. Flecker, P.E.
Transportation Engineer

Enclosures

Litt Rd RV ATurn Assessment.ltr

KDA

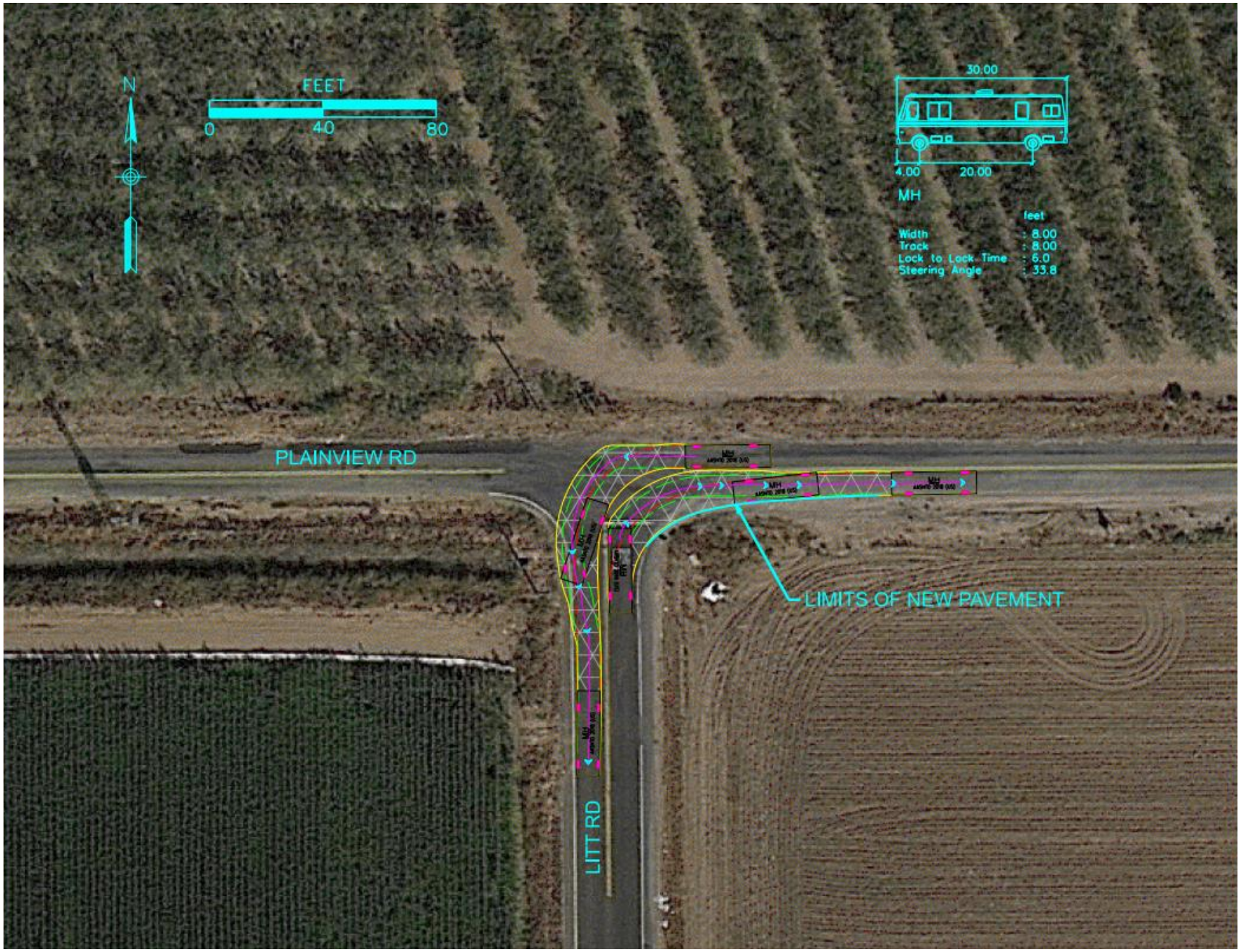


PASSENGER CAR – BOAT COMBINATION PLAINVIEW RD – LITT RD

KD Anderson & Associates, Inc.
Transportation Engineers

2540-01 RA 3/29/2022

figure 1a

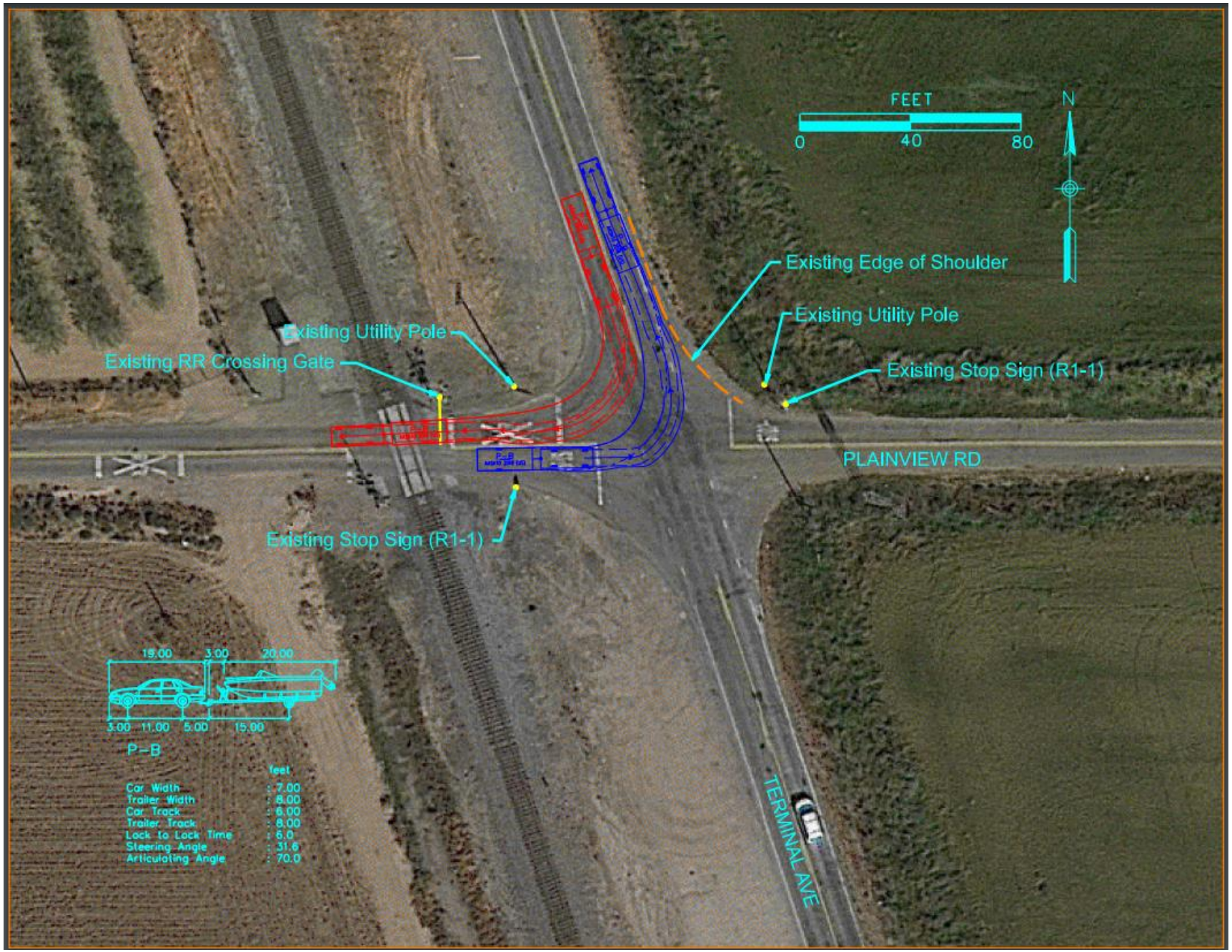


30-FOOT MOTORHOME PLAINVIEW RD – LITT RD

KD Anderson & Associates, Inc.
Transportation Engineers

2540-01 RA 3/29/2022

figure 1b



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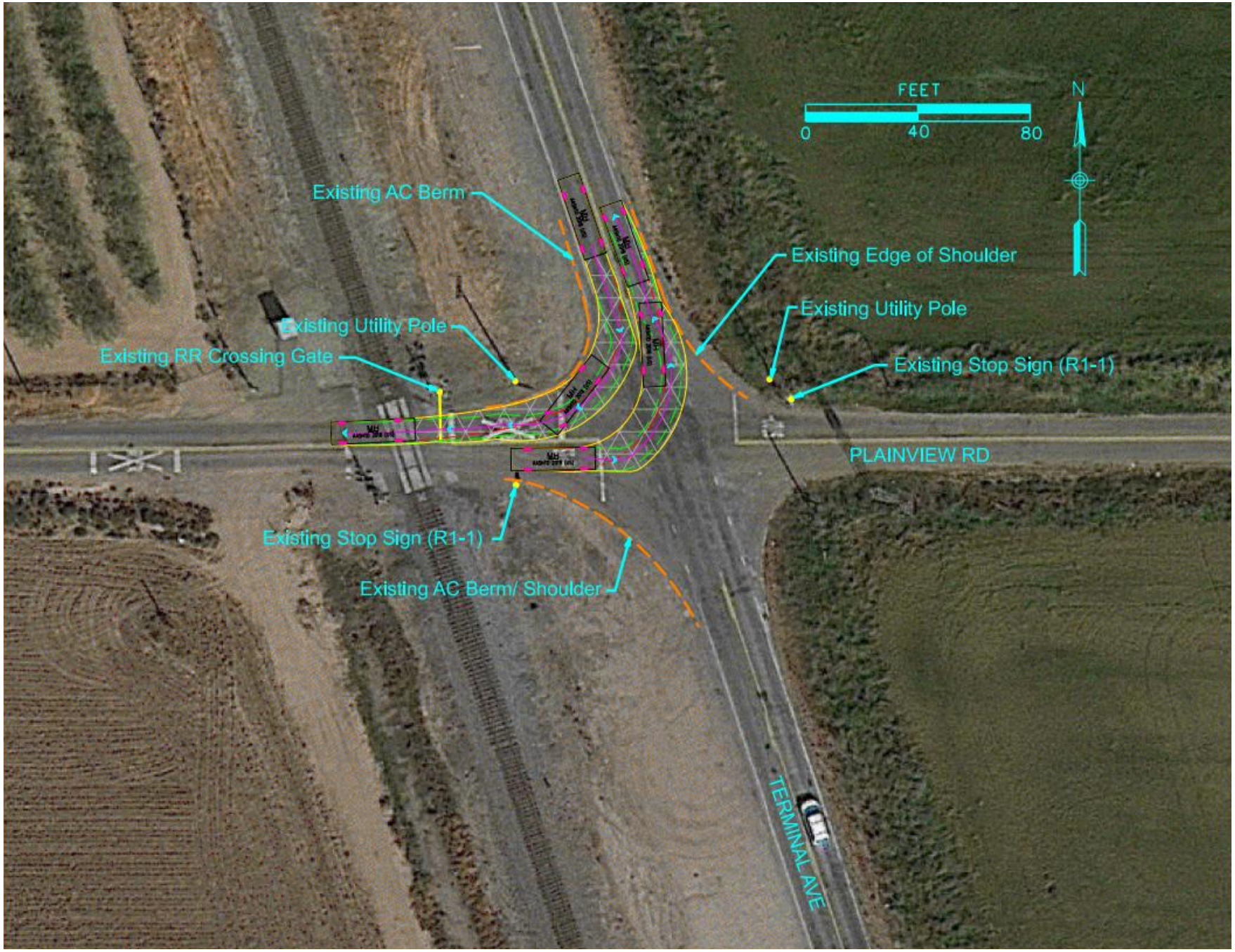
PASSENGER CAR – BOAT COMBINATION PLAINVIEW RD – TERMINAL AVE

2540-01 RA 3/29/2022

figure 2a



30-FOOT MOTORHOME PLAINVIEW RD – TERMINAL AVE

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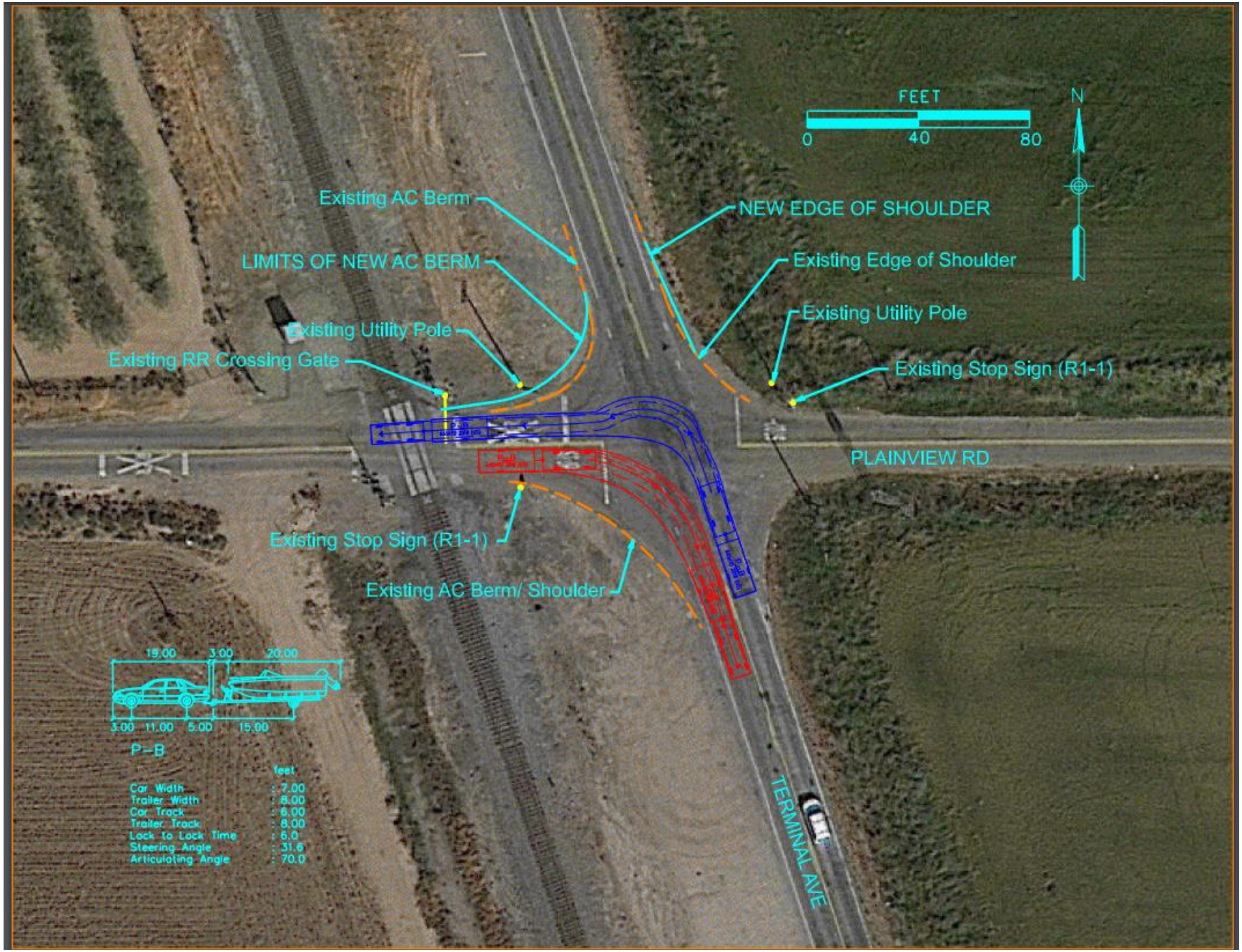
2540-01 RA 3/29/2022

figure 2b



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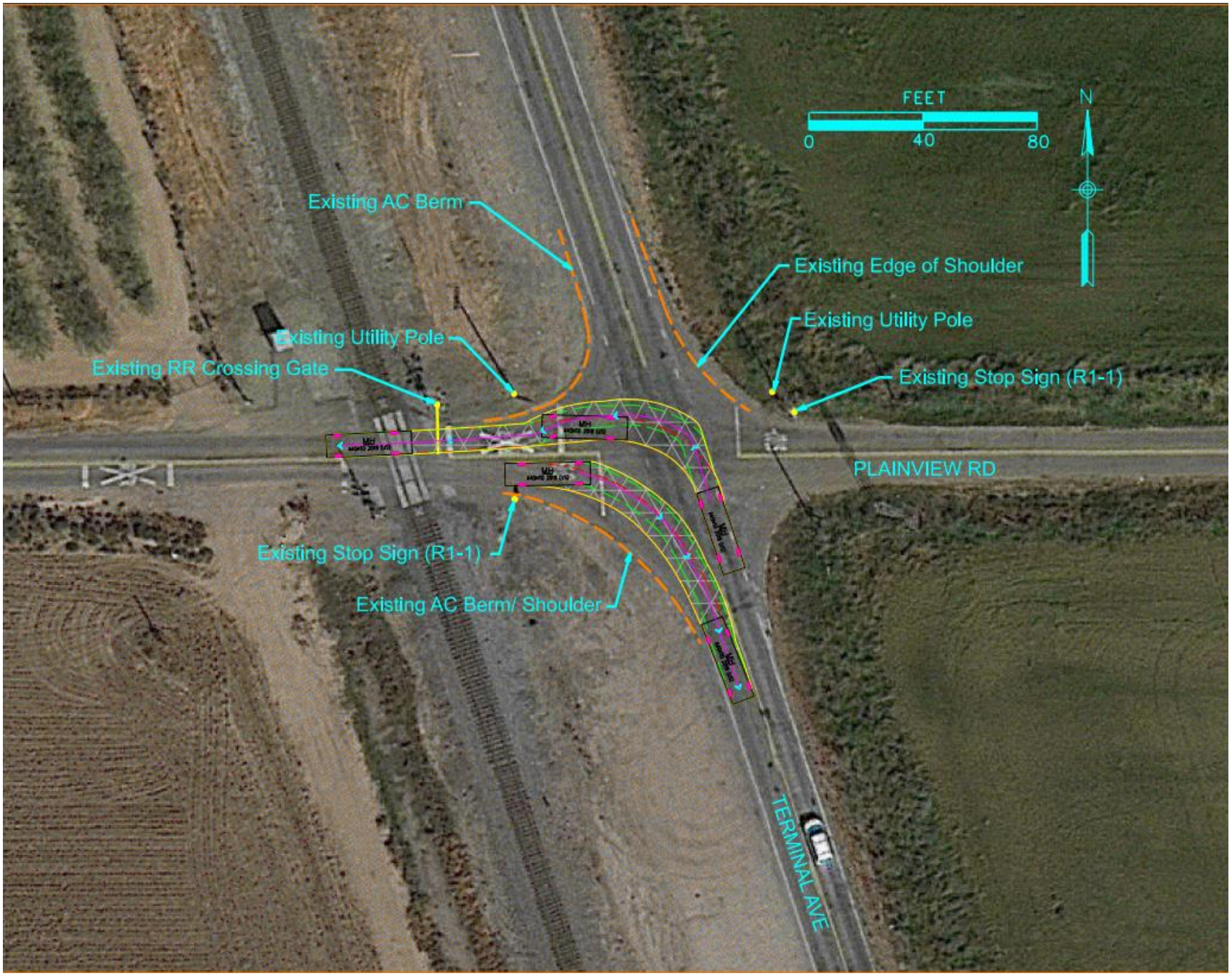
PASSENGER CAR – BOAT COMBINATION PLAINVIEW RD – TERMINAL AVE

2540-01 RA 3/29/2022

figure 3a



30-FOOT MOTORHOME PLAINVIEW RD – TERMINAL AVE

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Transportation Engineers

2540-01 RA 3/29/2022

figure 3b