CITY OF TURLOCK
INITIAL STUDY CHECKLIST

REVISED

1) Project Title: **Conditional Use Permit 2024-02 [Mirage Banquet Hall]**

2) Lead Agency Name and Address: City of Turlock
156 South Broadway, St. 120
Turlock, CA 95380

3) Contact Person and Phone Number: Adrienne Werner – Planning Manager
(209) 668-5640

4) Project Location: 2218 & 2250 W. Main Street
Stanislaus County APNs 044-007-024 & 044-007-040

5) Project Sponsor's Name and Address: Kiranjit Kaur
4080 Kingsbarns Drive
Roseville, CA 95747

6) General Plan Designation: Community Commercial (CC)

7) Zoning: Community Commercial (CC)

8) Description of the Project:

The applicant is requesting approval to develop two properties, totaling approximately 7-acres, with a 2-story 23,723 square foot banquet hall/event center, 5-story 120-room hotel, and a 4,040 square foot commercial building. The Mirage Banquet Hall measures 46'11" tall from grade to the top of the tower element. The building includes two event halls measuring 4,701 square feet and 8,596 square feet, respectively, an approximately 17,668 square foot outdoor space, a full-service catering kitchen, offices, guest changing rooms, and storage. The banquet hall/event center specializes in full-service catering and event planning. The majority of events occur Thursday, Friday, Saturday, and Sunday and include weddings & receptions, corporate events, conventions, birthday parties, proms, quinceañeras, and other similar events. During scheduled events the Mirage Banquet Hall will be able to accommodate between 500-1,000 guests between the two reception halls.

The Mirage Banquet Hall includes an outdoor space that is approximately 17,668 square feet and will be decorated with landscaping, walkways, gazebos, trellis', water features and an open plaza area. The outdoor spaces are accessory to the banquet hall and are intended for photo shoots and to provide an area of outdoor amenities for the guests attending the indoor events.

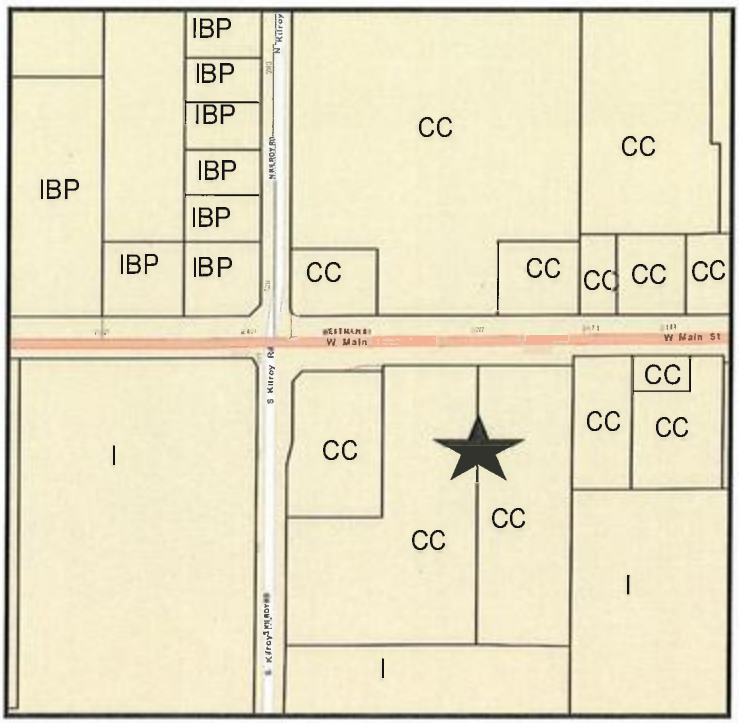
A 4,040 square foot commercial building is proposed on a vacant area in front of the banquet hall. At this time specific tenants and uses have not been identified. The future commercial building will be subject to design review through the Minor Discretionary Permit Process prior to construction. All proposed uses will be required to comply with the uses established in the Community Commercial zoning district and the Westside Industrial Specific Plan.

A 5-story, 120 room dual/brand hotel is also included in the overall development of the project. The 5-story hotel measures 60' tall from grade to the top of the parapet.

Access to the project sites will be from a new driveway on S. Kilroy, and two existing driveways from W. Main Street, including the shared driveway with parcel 044-007-041. Curb, gutters, and sidewalks are already installed along the W. Main Street frontage and are proposed to be installed along S. Kilroy. Onsite improvements include, paving, landscaping, parking and trash enclosures.

9) Surrounding Land Uses and Setting: (Briefly describe the project's surroundings)

The project site consists of development of two parcels located near the intersection of West Main Street and South Kilroy Road. The site is bounded on the south and west by properties zoned industrial with industrial users, directly north is the community commercial zoning district currently developed with a commercial retail center housing the Regal Cinemas and other retail users; the northwest corner of West Main Street is zoned industrial business park and developed with a self-serve car wash, and to the east are properties zoned community commercial.



10) Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement).

San Joaquin Valley Air Pollution Control District
Regional Water Quality Control Board

11) Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality?

The Yokuts tribe was contacted in writing on May 24, 2024 and June 12, 2024 with the project description as part of the Early Public Consultation process. Consultation has not been requested by the Yokuts tribes for this project.

NOTE: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

12) EARLIER ENVIRONMENTAL ANALYSES
Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, one or more effects have been adequately analyzed in an earlier EIR or negative declaration. [Section 15183]

1) **Earlier analyses used**. (Available for review at the City of Turlock –Development Services Department, 156 S. Broadway, Suite 120, Turlock, CA).

City of Turlock General Plan, 2012 (City Council Resolution No. 2012-173)
Turlock General Plan – EIR, 2012 (Turlock City Council Resolution No. 2012-156)
City of Turlock, Housing Element, Certified in 2016
City of Turlock, Water Master Plan Update, 2003 (updated 2009)
Turlock Parks Master Plan, 1995 (Reviewed in 2003)
City of Turlock, Waste Water Master Plan, 1991 (Updated 2014)
City of Turlock, Storm Water Master Plan, 2013 (Adopted 2016)
City of Turlock, Urban Water Management Plan, 2010 (Adopted 2011), 2015 Update Adopted in 2016
City of Turlock, Sewer System Master Plan, 2013
Turlock Municipal Code
City of Turlock Capital Facilities Fee Nexus Study (Turlock City Council Resolution No. 2013-202)
Westside Industrial Specific Plan (WISP) (Turlock City Council Resolution No. 2006-259) (November 14, 2006, Amended June 12, 2007, Second Amendment November 28, 2017)
Westside Industrial Specific Plan MEIR (WISP MEIR) (Turlock City Council Resolution No. 2006-259) (November 14, 2006)
Westside Industrial Specific Plan MEIR Addendum (WISP EIR Addendum) (Turlock City Council Resolution No. 2007-148) (July 12, 2007; September 2017)

2) **Impacts adequately addressed.** (Effects from the checklist below, were within the scope of, and adequately analyzed during an earlier document pursuant to applicable legal standards, and such effects were addressed by mitigation measures based on the earlier analysis).

As identified in the Turlock General Plan EIR, development in the project area would result in significant, and unavoidable, impacts in the areas of transportation, noise, regional air quality, and the eventual loss of agricultural land and soil resources. The magnitude of these impacts can be reduced, but not eliminated, by applying the policies, programs and mitigation measures identified in the Turlock General Plan to the project and identifying mitigation measures as necessary in this initial study. The intensity of the proposed development will result in project level impacts that are equal to, or of lesser severity, than those anticipated in the General Plan EIR, and they would not be different from cumulative effects anticipated by the Turlock General Plan EIR. Potential secondary environmental impacts from the project will be of equal or lesser severity than those identified in the General Plan EIR. Therefore, mitigation measures identified in the General Plan EIR, and their respective Statements of Overriding Considerations (contained in Turlock City Council Resolution No. 2012-156), are adequate to mitigate the impacts from the proposed project where feasible, and are hereby incorporated by reference.

3) **Mitigation Measures**. (For effects that are "Less than Significant with Mitigation Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

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Project level impacts will be mitigated by application of mitigation measures identified in this initial study, and by appropriate conditions of approval. All cumulative environmental effects related to the ultimate development of the project area will be mitigated through compliance with the policies, standards, and mitigation measures of the Turlock

General Plan and General Plan MEA/EIR, as well as the standards of the Turlock Municipal Code, and are herein incorporated by reference where not specifically identified.

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		Hazards & Hazardous Materials	X	Transportation
	Agricultural and Forestry Resources	X	Hydrology/Water Quality		Tribal Cultural Resources
X	Air Quality		Land Use/Planning	X	Utilities/Service Systems
X	Biological Resources		Mineral Resources		Wildfire
X	Cultural Resources	X	Noise		
X	Energy		Population/Housing		
X	Geology/Soils	X	Public Services		
X	Greenhouse Gas Emissions		Recreation		

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RECOMMENDED FINDINGS:

Pursuant to Public Resources Code Section 21080(c)(2) and CEQA Guidelines Section 15168(c)(1), the City of Turlock, as lead agency for the proposed project, has prepared an initial study to make the following findings:

1. Pursuant to CEQA Guidelines Section 15162, the proposed activity is adequately described and is within the scope of the General Plan EIR and the WISP MEIR and Addendum.
2. All feasible mitigation measures developed in the General Plan EIR and WISP EIR and Addendum have been incorporated into the project.
3. Pursuant to Public Resources Code Sections 21080(c)(2) and 21157.5, the initial study prepared for the proposed project has identified potential new or significant effects that were not adequately analyzed in the General Plan EIR or WISP EIR and Addendum, but feasible mitigation measures have been incorporated to revise the proposed subsequent project to avoid or mitigate the identified effects to a point where clearly no significant effects would occur.
4. There is no substantial evidence before the lead agency that the subsequent project, as revised, may have a significant effect on the environment.
5. The analyses of cumulative impacts, growth inducing impacts, and irreversible significant effects on the environment contained in the General Plan EIR and WISP EIR and Addendum are adequate for this subsequent project.
6. Pursuant to CEQA Guidelines Section 15093, a Statement of Overriding Considerations was adopted for the General Plan EIR (City Council Resolution 2012-156). As identified in the Turlock General Plan EIR, development in the project area would result in significant, and unavoidable, impacts in the areas of noise, regional air quality, and the eventual loss of agricultural land. The magnitude of these impacts can be reduced, but not eliminated by the mitigation measures referenced in the initial study prepared for this project and General Plan EIR. Therefore, mitigation measures identified in the General Plan EIR, and its respective Statements of Overriding Considerations, are adequate to mitigate the impacts from the proposed project where feasible, and are hereby incorporated by reference.

Pursuant to Section 15164 of the California Environmental Quality Act Guidelines the lead agency prepared an addendum to a previously certified Environmental Impact Report if some changes or additions to the project are necessary but none of the conditions described in Section 15162 have occurred.

7. Pursuant to Public Resources Code Section 21157.6(a), having reviewed the General Plan EIR and Westside Industrial Specific Plan MEIR, the City of Turlock finds and determines that:
   a. No substantial changes have occurred with respect to the circumstances under which the General Plan EIR and WISP MEIR were certified, and
   b. That there is no new available information which was not and could not have been known at the time the General Plan EIR and WISP MEIR were certified.
8. Whereas, on September, 2017, the City of Turlock adopted minor changes, deletions, and additions to the project described in the Final Master Environmental Impact Report for the Westside Industrial Specific Plan and certified an Addendum to the Final EIR demonstrating that the preparation of a Subsequent Environmental Impact Report (EIR) was not required, pursuant to Section 15162 of the California Environmental Quality Act, because none of the following findings could be made:

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

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

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.	X
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 "potential 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 in an earlier EIR or NEGATIVE DEDCLARATION 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.	

Adrienne Werner, Planning Manager 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, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Potentially Significant Unless Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less 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 17, "Earlier Analysis," may be cross-referenced).

5) Earlier analysis 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 that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The analysis of each issue should identify: (a) the significance criteria or threshold used to evaluate each question; and (b) the mitigation measure identified, if any, to reduce the impact to less than significance.

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	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
1. Aesthetics – Except as provided in Public Resources Code Section 21099 would the project:				
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	

Response:

a) **The General Plan recognizes the relatively flat topography of Turlock results in few scenic vistas and notes that brief panoramic views of surrounding farmland are visible from highway overpasses on the City's boundary and at its agricultural edge. There are no scenic vistas located within the project area. The only scenic designation in Stanislaus County is along Interstate 5 approximately 20-miles west of the project site. The property is zoned community commercial (CC) and the project would convert the undeveloped property for the development of a 120-room 5-story hotel, 23,723 square foot banquet hall/event center and a 4,040 square foot commercial building. The Westside Industrial Specific Plan (WISP) notes that the existing visual character of agricultural fields and orchards will be replaced with urban development, including business, industrial and commercial uses that will be different in character from the current agricultural uses. However, this is considered a less than significant impact as the magnitude of this impact is no greater than the anticipated urban development for the area under the Turlock General Plan. The property is surrounded by industrial and commercial uses. Pursuant to CEQA §15162, the project will not create any adverse aesthetic impacts that warrant additional environmental documentation over and above the impacts addressed in the Turlock Area General Plan MEA/EIR and the Westside Industrial Specific Plan (WISP) Master Environmental Impact Report (MEIR) and Addendum.** *(General Plan EIR pg. 3.7-1, 3.7-7, 3.7-9, WISP pgs. 3.1, 3.4)*

b) **There are no scenic or historic resources on the project site. A site visit conducted by staff on June 7, 2024 confirmed the property is currently undeveloped and has no historic buildings, or other distinctive natural or historic resources. State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic. There are currently no highways in the General Plan study area eligible or officially designated as scenic highways by The Master Plan of State Highways Eligible for Official Scenic Highway Designation. The nearest State scenic highway is State Highway 5, which is designated scenic from the Merced county line to the San Joaquin county line. State Highway 5 is located approximately 20 miles from the project site. Due to the distance and intervening topography the project site is not visible from State Highway 5.**

c) Located in an urbanized area and surrounded by a mix of commercial and industrial uses the project is proposed to develop two parcels with a 120-room 5-story hotel, 23,723 square foot banquet hall/event center and a 4,040 square foot commercial building. The future buildings will develop in accordance with City standards in the General Plan Urban Design Element, Westside Industrial Specific Plan, Zoning Ordinance, and the adopted design guidelines. The General Plan notes that new development that implements the General Plan Urban Design Element creates a more aesthetically pleasing character for the City. While evaluation of visual impacts is subjective, any development of the site would affect the existing visual character of the undeveloped site; however, using the design elements noted above the project meets the intent of the General Plan Urban Design Element, Westside Industrial Specific Plan, Zoning Ordinance, and the adopted design guidelines and would not conflict with applicable zoning or regulations governing scenic quality.

d) The development of the project area will produce additional light and glare from site and building lighting. In accordance with the Turlock Municipal Code and the Turlock General Plan, all types of illumination generated by the project shall not be a source of light and glare upon adjoining properties. The lighting will be consistent with residential lighting surrounding the area and will not create an adverse effect today or nighttime views. The Turlock General Plan EIR concludes that any new development has the potential to create new sources of light and glare; but would generally not be out of character with the existing urban environment, and would not rise to a level of being significant.

Sources: *City of Turlock, General Plan and MEIR, 2012; Aesthetics and Visual Resources, City Design Element, 2012; City of Turlock, Standard Specifications, Section 18; City of Turlock Beautification Master Plan, 2003; Caltrans Scenic Highway Program*

Mitigation:

1. Prior to the issuance of a building permit, a lighting plan shall be submitted to the Building Division for review and approval to ensure that all lighting is designed to confine light spread within the site boundaries.

2. Building illumination and architectural lighting shall be indirect. Floodlights are prohibited.

3. Light standards for parking areas shall not exceed 30-feet in height.

4. Security lighting fixtures shall not project above the fascia or roofline of the building and are to be shielded. The shields shall be painted to match the surface to which they are attached.

5. Provide automatic shutoff or motion sensors for lighting features.

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	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
2. Agriculture and Forestry 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 states 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:				
a) Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use of 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

Response:

a) The project is proposed to be developed on property designated as "Urban and Built-Up Land" on the 2020 Stanislaus County Important Farmland Map as compiled by the California Department of Conservation, Farmland Mapping and Monitoring Program. The infill property is currently undeveloped, surrounded by urban uses and has no agricultural uses on the property. Therefore, the project will not be converting prime farmland, unique farmland, or farmland of statewide importance.

b) The property is not enrolled in Williamson Act contracts or adjacent to any properties that are enrolled in the Williamson Act. The site is zoned for urbanized uses and will not conflict with any agricultural zoning districts or land held in Williamson Act Contract.

c), d) The project site is located within the City of Turlock in an area designated for urban uses. There are no forest lands or timberlands within the City of Turlock.

e) **The site is currently designated for urban uses and is an infill site. The surrounding properties are developed with a mix of commercial and industrial uses. Development of the site will not involve changes in the existing environment which will result in conversion of farmland or forest land as the properties in the area are already developed with commercial and industrial uses or are zoned for commercial and industrial uses.**

Sources: *CA Dept. of Conservation Farmland Mapping and Monitoring Program, 2020: City of Turlock, General Plan, Land Use Element, 2012; City of Turlock, General Plan EIR, 2012;*

Mitigation:

None

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
3. 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:				
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 leading to odors adversely affecting a substantial number of people?			X	

Response:

a), b), c) The project will not conflict with, or obstruct, implementation of the 2007 PM10 Maintenance Plan, the 2016 Ozone Plan, or the 2012, 2015 and 2018 PM2.5 Plan or related subsequent progress reports of these plans. SJVAPCD has established thresholds for ROG, NOx, PM 10 & PM 2.5 emissions. The project will be subject to San Joaquin Valley Air District rules and regulations designed to control criteria pollutants, such as Rule 9510 and Regulation VIII. The project is required to obtain these permits to construct and operate. As such, the project is not expected to cause a conflict with, or obstruct implementation of applicable air quality plans.

The CalEEMod analysis run on June 24, 2024 had incorrectly identified the square footage of the commercial/retail building as 4,000,040 square feet. The correct square footage of the commercial building is 4,040 square feet. The air quality analysis was re-run using the correct square footage of the commercial building. Based on the CalEEMod 2022.1.1.24 analysis run on July 18, 2024 the project is located in an urbanized area surrounded by commercial and industrial uses in Climate Zone 3, wind speeds 3.1 m/s, and 29 days precipitation frequency. When the construction emissions and operational emissions were calculated in the CalEEMOD models, it was found that emissions would not exceed the established Air Quality Thresholds of Significance for Construction Emissions for ROG (10 tons per year), NOx (10 tpy), PM 10 (15 tpy) & PM 2.5 (15 tpy) emissions. The operational emissions calculated in the CalEEMOD 2022.1.1.24 model, would exceeded 1 ton per year for

each of the established thresholds for ROG, NOx, PM 10 & PM 2.5. However, the SJVAPCD has published guidance on determining potential significant impacts and potential mitigation of significant impacts in its Guidance for Assessing and Mitigating Air Quality Impacts (GMAQI). The District has established thresholds of Significance for criteria pollutant emissions, which are based on the District's New Source Review (NSR) offset requirements for stationary sources. Using the project type, size, and number of vehicle trips, the District has pre-quantified emissions and determined values below which it is reasonable to conclude that a project would not exceed applicable thresholds of significance for criteria pollutants.

The SJVAPCD Small Project Level Analysis Levels (SPAL) pre-quantified the following land use types and sizes:

Retail: Strip Mall	46,000 square feet
Educational: Place of Worship	141,000 square feet
Recreational: Hotel	228 rooms

The propose project is the development of two properties, totaling approximately 7-acres, with a 2-story 23,723 square foot banquet hall/event center, 5-story 120-room hotel, and a 4,040 square foot commercial building.

Based on the project type and the SJVAPCD SPAL the proposed project is not expected to exceed the thresholds of significance for criteria pollutants.

Overall Construction Emissions
CalEEMOD 2022.1.1.24 ROG 0.41 tpy, NOx 3.65 tpy, CO 3.77 tpy SOx 0.01 tpy, PM_{10E} 0.15 tpy PM_{10D} 2.58, $PM_{2.5E}$ 0.14 tpy, $PM_{2.5D}$ 1.32 and $PM_{2.5T}$ 1.46

Overall Operational Emissions
CalEEMOD 2022.1.1.24: ROG 2.4 tpy, NOx 1.25 tpy, CO 7.62 tpy SOx 0.02 tpy, PM_{10E} 0.04 tpy PM_{10D} 1.31 PM_{10T} 1.34 and $PM_{2.5E}$ 0.04 tpy. $PM_{2.5D}$ 0.33 $PM_{2.5T}$ 0.37

A variety of toxic air contaminants (TACs) are of environmental concern. The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective* provides recommended setback distances for sensitive land uses from major sources of TACs such as gas stations, freeways and high traffic roads, distribution centers and dry cleaners. The SJVAPCD defines sensitive receptors "*people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling unit(s).*" The proposed project will not place sensitive receptors within any recommended setback distance of any existing source of TACs, and therefore would not expose sensitive receptors to TAC emissions.

Furthermore, to ensure compliance with District standards the mitigation measures identified below will be incorporated as conditions of approval for the project.

The project will not violate any air quality standards, result in cumulatively considerable net increase of any criteria pollutant, or expose sensitive receptors to substantial pollutant concentrations. Compliance with the General Plan policies and standards, and the SJVAPCD Rules and Regulations is expected to reduce the project impacts; however, the Turlock General Plan EIR found that there would be significant and unavoidable air quality impacts even with implementation of these measures with the build out of the General Plan primarily

due to local and regional vehicle emissions generated by future population growth associated with the build out of the proposed plan. A Statement of Overriding Considerations has been adopted as part of that process.

Additionally, the City of Turlock adopted an Air Quality and Greenhouse Gas Emissions Element demonstrating that the General Plan would reduce greenhouse gas emissions. Compliance with the State's greenhouse gas emissions targets for 2030 relied on the adoption of the regional Sustainable Communities Strategy (SCS). StanCOG's SCS has been adopted and was approved by the California Air Resources Board. StanCOG has found that the City of Turlock's General Plan complies with the SCS. This project is consistent with the General Plan; therefore, the project is expected to have a less than significant impact on greenhouse gas emissions.

d) The proposed commercial project will not produce other pollutants such as odors. The proposed development is not expected to expose sensitive receptors to increased pollutants. The project may produce odors during the construction phase, however, these impacts are short-term in nature and are anticipated to be of a less-than-significant impact.

Sources: *San Joaquin Valley Unified Air Pollution Control District 2016 Plan for the 2008 8-Hour Ozone Standard, 2010 PM-10 Maintenance Plan, 2012 and 2015 PM-2.5 Plan; SJVAPCD's Guide For Assessing and Mitigating Air Quality Impacts (revised March 19, 2015); California Air Resources Board Air Quality and Land Use Handbook; A Community Health Perspective; Turlock General Plan EIR, 2012, Turlock General Plan, Air Quality and Greenhouse Gas Element Section, 2012; Statement of Overriding Considerations (Turlock City Council Resolution 2012-156); StanCOG Regional Transportation plan/Sustainable Communities Strategy Letter of Consistency for the Turlock General Plan dated January 25, 2015; SJVUAPCD (June 2005) Air Quality Guidelines for General Plans; San Joaquin Valley Air Pollution Control District comment letter dated June 11, 2024; CalEEMod Air Quality Analysis report dated June 24, 2024 available upon request;*

Mitigation:

1. **The applicant shall comply with all applicable San Joaquin Valley Air Pollution Control District rules and regulations. The applicant shall contact the SJVAPCD prior to submitting an application for a building, grading and/or encroachment permit. Compliance with Rule 9510 shall be demonstrated to the Planning Division prior to the issuance of a building permit.**

2. **TMC§9-2-211 Bike racks shall be installed to encourage alternative modes of transportation.**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
4. Biological Resources - Would the project:				
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 substantially adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. 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 resident or migratory fish or wildlife species or with established native resident 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 Conservation Community Plan, other approved local, regional, or state habitat conservation plan?				X

Response:

a) The General Plan states that the Study Area contains mostly human-modified habitats, with almost all the land being urban (52%) or under agricultural production (46%). The General Plan further states that development proposed under the General Plan would be situated on infill sites or land contiguous to existing development. The project is proposed to develop two parcels totaling approximately 7-acres with a 120-room 5-story hotel, 23,723 square foot banquet hall/event center, and 4,040 square foot commercial building. Located in an urbanized area the project site is surrounded by a mix of commercial and industrial uses. The proposed project would not have any direct effects on species, riparian habitat, wetlands, nor would it interfere with the movement of any resident or migratory fish, conflict with policies protecting biological resources or the provisions of an adopted Habitat Conservation Plan. Virtually all of the land within the urban boundaries of Turlock, as well as unincorporated land within the City's Sphere of Influence, have been modified from its native state, primarily converted into urban or agricultural production. The site has been actively cleared for many years.

The California Natural Diversity Database has identified two special-status species within the General Plan Study area, the Swainson's Hawk and the Hoary bat. While the General Plan Study Area does not contain land that is typical for the Hawk's breeding and nesting, it is presumed to be present and mitigation measures have been incorporated to address any potential impacts. The proposed project site is undeveloped. The Hoary bat is not listed as a Species of Special Concern by the California Department of Fish and Wildlife but it is monitored in the CNDDB. The subject site is out of the area in which the Hoary bat is presumed to be present. Due to the property's proximity to urban development, the property has little habitat value for these species. Mitigation measures identified in the General Plan EIR, (General Plan Policy 7.4-d), consistent with the comments received on the Turlock General Plan, have been added to the project to reduce the impacts of the project to a less than significant level. The General Plan concludes that potential impacts on biological resources would be reduced to less than significant through implementation of General Plan policies, as well as regional, State, and federal regulations.

b) There are no rivers, lakes or streams located within the City of Turlock. There are no irrigation facilities, such as canals, located on or adjacent to the project site. Therefore, the project will have no impact on riparian habitats or species.

c) The General Plan EIR identifies the federally protected wetlands located within the City of Turlock and the surrounding Study Area. These areas are located west of Highway 99 and are not identified on the subject property.

d) The project is located within the City of Turlock in an urbanized and developed area. No migratory wildlife corridors have been designated on, near or through the project site; therefore, the project would not impede the movement of any resident or migratory fish or wildlife species. The General Plan identifies mitigation measures that will be incorporated in to the project requiring the investigation of the existence of any wildlife nursery sites on the project site.

e) There are no natural features on the undeveloped property that offer habitat opportunities except the land itself which could potentially offer foraging habitat for Swainson's Hawk. The land has been a grassy field, kept clear for a number of years. See "a" above for mitigation measures.

f) There is no Habitat Conservation Plan, Natural Conservation Community Plan, other approved local or regional conservation plan that encompasses the project site.

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Sources: *California Dept. of Fish & Wildlife: Natural Diversity Data Base; California Native Plant Protection Act; U.S. Dept. of Agriculture: Land Capability Classification Maps; California Dept. of Conservation: Important Farmlands Maps & Monitoring Program; Stanislaus County Williamson Act Contract Maps; Turlock General Plan, Conservation Element, 2012; US Fish and Wildlife Service – Recovery Plan for Upland Species of the San Joaquin Valley, 1998*

Mitigation:

1. **GP 7.4-e, 7.4-f; If ground disturbing activities, such as grading, occurs during the typical nesting season for songbirds and raptors, February through mid-September, the developer is required to have a qualified biologist conduct a survey of the site no more than 10 days prior to the start of disturbance activities. If nests are found, no-disturbance buffers around active nests shall be established as follows until the breeding season has ended or until a qualified biologist determines that the birds have fledged and are no longer on the nest for survival: 250 feet for non-listed bird species; 500 feet for migratory bird species; and one-half mile for listed species and fully protected species.**

2. **GP 7.4-e, 7.4-f; If nests are found, they should be continuously surveyed for the first 24 hours prior to any construction related activities to establish a behavioral baseline. Once work commences the nest shall be continuously monitored to detect any behavioral changes as a result of the project. If behavioral changes are observed, the work causing the change should cease and the Department consulted for additional avoidance and minimization measures.**

3. **GP 7.4e, If Swainson's Hawks are found foraging on the site prior to or during construction, the applicant shall consult a qualified biologist for recommended proper action, and incorporate appropriate mitigation measures. Mitigation may include, but are not limited to: establishing a one-half mile buffer around the nest until the breeding season has ended or until a qualified biologist determines that the birds have fledged and are no longer dependent on the nest for survival. Mitigating habitat loss within a 10-mile radius Mitigating habitat loss within a 10 mile radius of known nest sites as follows: providing a minimum of one acre of habitat management land or each acre of development for projects within one mile of an active nest tree. Provide a minimum of .75 acres of habitat management land for each acre of development for projects within between one and five miles of an active nest tree. Provide a minimum of .5 acres of habitat management land for each acre of development for projects within between five and 10 miles of an active nest tree.**

4. **GP 7.4e, The applicant shall comply with all applicable federal, State, and local laws and regulations related to the protection and preservation of endangered and/or threatened species through consultations with appropriate agencies.**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
5. Cultural Resources - Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?		X		
b) Cause a substantial adverse change in the significance of an archaeological resources pursuant to Section 15064.5?		X		

c) Disturb any human remains, including those interred outside of formal cemeteries?		X		

Response:

a) **The project is an infill project proposed to be constructed on two undeveloped parcels totaling approximately 7-acres. The project is proposed to develop two parcels totaling approximately 7-acres with a 120-room 5-story hotel, 23,723 square foot banquet hall/event center, and 4,040 square foot commercial building. Located in an urbanized area the project site is surrounded by a commercial and industrial uses. The project would not alter or destroy any historic archaeological site, building, structure, or object, nor would it alter or affect unique ethnic cultural values or restrict religious or sacred uses. The City of Turlock consulted with California Native American tribes as required under SB 18 when developing the General Plan EIR. The closest historic resource identified in the General Plan EIR is located approximately 1.25 miles away. In addition, the City has conducted a Cultural Records Search as part of the Turlock General Plan and found no evidence of significant historic or cultural resources on or near this site.**

b) **and c) As a result of many years of extensive agricultural production, virtually all of the land in the City of Turlock has been previously altered from its native or riparian state. The project is proposed to develop two parcels totaling approximately 7-acres with a 120-room 5-story hotel, 23,723 square foot banquet hall/event center, and 4,040 square foot commercial building and located in an urbanized area surrounded by a mix of commercial and industrial uses. The project would not alter or destroy any historic archaeological site, building, structure, or object, nor would it alter or affect unique ethnic cultural values or restrict religious or sacred uses. The City of Turlock consulted with California Native American tribes as required under SB 18 when developing the General Plan EIR. The closest historic resource identified in the General Plan EIR is located more than 1.25 miles away. In addition, the City has conducted a Cultural Records Search as part of the Turlock General Plan and found no evidence of significant historic or cultural resources on or near this site. As a result of many years of extensive agricultural production virtually all of the land in the Plan area has been previously altered from its native or riparian state. There are no known sites of unique prehistoric or ethnic cultural value. Mitigation measures have been added in the event anything is discovered during construction.**

Sources: *Turlock General Plan, Conservation Element, 2012; City of Turlock General Plan EIR, 2012; Cultural Resources Records Search, 2008*

Mitigation:

1. **GP 7.5a, 7.5c, In accordance with State Law, if potentially significant cultural, archaeological, or Native American resources are discovered during construction, work shall halt in that area until a qualified archaeologist can assess the significance of the find, and, if necessary develop appropriate treatment measures in consultation with Stanislaus County, Native American tribes, and other appropriate agencies and interested parties.**

2. **GP 7.5a, 7.5c , If human remains are discovered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the coroner determines that no investigation of the cause of death is required and if the remains are of Native American origin, the coroner will notify the Native American Heritage Commission, which in turn will inform a most likely descendant. The descendant will then recommend to the landowner appropriate disposition of the remains and any grave goods.**

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	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
6. Energy – Would the project:				
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		

Response:

a) and b) The commercial project is proposed on two undeveloped parcels totaling approximately 7-acres and surrounded by commercial and industrial uses. The project site is easily accessed by the existing roadway infrastructure, BLST bus system, and will have a bus stop in close proximity. The hotel, banquet hall/event center, and commercial building will have access to existing electrical and telecommunication services. No new transportation, electrical or telecommunication facilities are required to support the project leading to unnecessary consumption of energy resources. Compliance with the California Green Building Standards Code and the San Joaquin Valley Air Pollution Control District standards during construction and operation of the project will further ensure the efficient consumption of energy resources.

Sources: *Turlock General Plan, Conservation Element, Air Quality & Greenhouse Gases Element, 2012; California Building Standards Code.; San Joaquin Valley Air Pollution Control District*

Mitigation:

1. **The applicant shall comply with all applicable San Joaquin Valley Air Pollution Control District rules and regulations.**
2. **The project shall comply with the California Green Building Code Standards (CBC), requirements regulating energy efficiency.**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
7. Geology and Soils - Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.		X		
ii) Strong seismic ground shaking?		X		
iii) Seismic-related ground failure, including liquefaction?		X		
iv) Landslides?				X

b) Result in substantial soil erosion or the loss of topsoil?		X		
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?		X		
d) Be located on expansive soil, as defined in Table 18-a-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 wastewater disposal systems where sewers are not available for the disposal of wastewater?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	

Response:

a) Several geologic hazards have a low potential to occur within the Turlock General Plan study area. The greatest seismic hazard identified in the Turlock General Plan EIR is posed by ground shaking from a fault located at least 45 miles away. While no specific liquefaction hazard is located within the Turlock General Plan study area, the potential for liquefaction is recognized throughout the San Joaquin Valley. The risk to people and structures was identified as a less than significant impact addressed through compliance with the California Building Codes. Turlock is located in Seismic Zone 3 according to the State of California and the Alquist-Priolo Special Study Zones Act. All building permits are reviewed to ensure compliance with the California Building Code (CBC) for compliance with standards to reduce the potential damage that could be associated with seismic events. The property is flat and is not located adjacent to areas subject to landslides. In addition, the City enforces the provisions of the Alquist-Priolo Special Study Zones Act that limits development in areas identified as having special seismic hazards. The project will comply with GP 10.2-a, 10.2-b; The project shall comply with the current California Building Code (CBC) requirements for Seismic Zone 3, which stipulates building structural material and reinforcement and GP 10.2-a, 10.2-b. The project shall comply with California Health and Safety Code Section 19100 et seq. (Earthquake Protection Law), which requires that buildings be designed to resist stresses produced by natural forces caused earthquakes and wind.

b) and c) The General Plan EIR notes that soils on this project site have a "low" susceptibility to soil erosion. Erosion hazards are highest during construction. Chapter 7-4 of the Turlock Municipal Code requires all construction activities to include engineering practices for erosion control. Furthermore, future development projects are required to comply with National Pollutant Discharge Elimination System (NPDES) General Construction Permit requirements. Project applicants are required to prepare a Storm Water Pollution Prevention Plan (SWPP) and comply with the City's Municipal Separate Storm Sewer System permit (MS4) to minimize the discharge of pollutants during and post-construction. Compliance with existing policies and programs will reduce this impact to less than significant levels. The project will comply with GP 10.2-1, 10.2-b; The project shall comply with the California Building Code (CBC), requirements regulating grading activities including drainage and erosion control. And GP 10.2-h; The project shall comply with the City's NPDES permitting requirements by providing a grading and erosion control plan, including but not limited to the preparation of a Storm Water Pollution Prevent Plan and Erosion and Sediment Control Plan.

d)	**Less than one percent of the soils located in the General Plan study area are considered to have moderate potential for expansion. As required by the Turlock Municipal Code, building permit applications must be accompanied by a preliminary soil management report that characterizes soil properties in the development area. The project will comply with GP 10.2-a, 10.2-b, 10.2-g; The project shall comply with the California Building Code (CBC) requirements for specific site development and construction standards for specified soils types.**
e)	**Development within the project area will be required to connect to the City of Turlock's waste water system and will not utilize any type of septic system or alternative wastewater system.**
f)	**The proposed project is an infill project proposed to be constructed on two undeveloped parcels totaling approximately 7-acres located in an urbanized area surrounded by a mix of commercial and industrial uses. As a result of many years of extensive agricultural production, virtually all of the land in the City of Turlock has been previously altered from its native state.**

Sources: *California Uniform Building Code; City of Turlock, Standard Specifications, Grading Practices; City of Turlock Municipal Code, Title 8, (Building Regulations); City of Turlock, General Plan, Safety Element, 2012;*

Mitigation:

1. **The project shall comply with the current California Building Code (CBC) requirements for Seismic Zone 3, which stipulates building structural material and reinforcement.**
2. **The project shall comply with California Health and Safety Code Section 19100 et seq. (Earthquake Protection Law), which requires that buildings be designed to resist stresses produced by natural forces caused earthquakes and wind.**
3. **The project shall comply with the California Building Code (CBC), Chapter 70, regulating grading activities including drainage and erosion control.**
4. **The project shall comply with the City's NPDES permitting requirements by providing a grading and erosion control plan, including but not limited to the preparation of a Storm Water Pollution Prevent Plan and Erosion and Sediment Control Plan.**
5. **The project shall comply with the California Building Code (CBC) requirements for specific site development and construction standards for specified soils types.**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
8. Greenhouse Gas Emissions - Would the project:				
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	

Response:
a), b) The project will not conflict with, or obstruct, implementation of the 2007 PM10 Maintenance

Plan, the 2016 Ozone Plan, or the 2012, 2015 and 2018 PM2.5 Plan or related subsequent progress reports of these plans. SJVAPCD has established thresholds for ROG, NOx, PM 10 & PM 2.5 emissions. The project will be subject to San Joaquin Valley Air District rules and regulations designed to control criteria pollutants, such as Rule 9510 and Regulation VIII. The project is required to obtain these permits to construct and operate. As such, the project is not expected to cause a conflict with, or obstruct implementation of applicable air quality plans.

The CalEEMod analysis run on June 24, 2024 had incorrectly identified the square footage of the commercial/retail building as 4,000,040 square feet. The correct square footage of the commercial building is 4,040 square feet. The air quality analysis was re-run using the correct square footage of the commercial building. Based on the CalEEMod 2022.1.1.24 analysis run on July 18, 2024 the project is located in an urbanized area surrounded by commercial and industrial uses in Climate Zone 3, wind speeds 3.1 m/s, and 29 days precipitation frequency. When the construction emissions and operational emissions were calculated in the CalEEMOD models, it was found that emissions would not exceed the established Air Quality Thresholds of Significance for Construction Emissions for ROG (10 tons per year), NOx (10 tpy), PM 10 (15 tpy) & PM 2.5 (15 tpy) emissions. The operational emissions calculated in the CalEEMOD 2022.1.1.24 model, would exceeded 1 ton per year for each of the established thresholds for ROG, NOx, PM 10 & PM 2.5. However, the SJVAPCD has published guidance on determining potential significant impacts and potential mitigation of significant impacts in its Guidance for Assessing and Mitigating Air Quality Impacts (GMAQI). The District has established thresholds of Significance for criteria pollutant emissions, which are based on the District's New Source Review (NSR) offset requirements for stationary sources. Using the project type, size, and number of vehicle trips, the District has pre-quantified emissions and determined values below which it is reasonable to conclude that a project would not exceed applicable thresholds of significance for criteria pollutants.

The SJVAPCD Small Project Level Analysis Levels (SPAL) pre-quantified the following land use types and sizes:

Retail: Strip Mall	46,000 square feet
Educational: Place of Worship	141,000 square feet
Recreational: Hotel	228 rooms

The propose project is the development of two properties, totaling approximately 7-acres, with a 2-story 23,723 square foot banquet hall/event center, 5-story 120-room hotel, and a 4,040 square foot commercial building.

Based on the project type and the SJVAPCD SPAL the proposed project is not expected to exceed the thresholds of significance for criteria pollutants.

<u>Overall Construction Emissions</u>
CalEEMOD 2022.1.1.24 ROG 0.41 tpy, NOx 3.65 tpy, CO 3.77 tpy SOx 0.01 tpy, PM_{10E} 0.15 tpy PM_{10D} 2.58, $PM_{2.5E}$ 0.14 tpy, $PM_{2.5D}$ 1.32 and $PM_{2.5T}$ 1.46

<u>Overall Operational Emissions</u>
CalEEMOD 2022.1.1.24: ROG 2.4 tpy, NOx 1.25 tpy, CO 7.62 tpy SOx 0.02 tpy, PM_{10E} 0.04 tpy PM_{10D} 1.31 PM_{10T} 1.34 and $PM_{2.5E}$ 0.04 tpy. $PM_{2.5D}$ 0.33 $PM_{2.5T}$ 0.37

A variety of toxic air contaminants (TACs) are of environmental concern. The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective* provides recommended setback distances for sensitive land uses from major sources of TACs such as gas stations, freeways and high traffic roads, distribution centers and dry cleaners. The SJVAPCD defines sensitive receptors "*people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling unit(s).*" The proposed project will not place sensitive receptors within any recommended setback distance of any existing source of TACs, and therefore would not expose sensitive receptors to TAC emissions.

Furthermore, to ensure compliance with District standards the mitigation measures identified below will be incorporated as conditions of approval for the project.

The project will not violate any air quality standards, result in cumulatively considerable net increase of any criteria pollutant, or expose sensitive receptors to substantial pollutant concentrations. Compliance with the General Plan policies and standards, and the SJVAPCD Rules and Regulations is expected to reduce the project impacts; however, the Turlock General Plan EIR found that there would be significant and unavoidable air quality impacts even with implementation of these measures with the build out of the General Plan primarily due to local and regional vehicle emissions generated by future population growth associated with the build out of the proposed plan. A Statement of Overriding Considerations has been adopted as part of that process.

Additionally, the City of Turlock adopted an Air Quality and Greenhouse Gas Emissions Element demonstrating that the General Plan would reduce greenhouse gas emissions. Compliance with the State's greenhouse gas emissions targets for 2030 relied on the adoption of the regional Sustainable Communities Strategy (SCS). StanCOG's SCS has been adopted and was approved by the California Air Resources Board. StanCOG has found that the City of Turlock's General Plan complies with the SCS. This project is consistent with the General Plan; therefore, the project is expected to have a less than significant impact on greenhouse gas emissions.

Sources: City of Turlock *2012 General Plan, Air Quality and Greenhouse Gases chapter; AB 32 Scoping Plan; 2014 Stanislaus Council of Governments Regional Transportation Plan and Sustainable Communities Strategy; San Joaquin Valley Air Pollution Control District comment letter dated June 11, 2024; CalEEMod Air Quality Analysis report dated June 24, 2024 available upon request.*

Mitigation:

1. GP 8.1-b, 8.1-j, 8.1-l; The applicant shall comply with all applicable San Joaquin Valley Air Pollution Control District rules and regulations.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
9. Hazards and Hazardous Materials - Would the project:				

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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 likely 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

Response:

a) b) and c) The project is proposed to develop two parcels totaling approximately 7-acres with a 120-room 5-story hotel, 23,723 square foot banquet hall/event center, and 4,040 square foot commercial building. The commercial uses do not involve an industrial process or commercial operation that would create the risk of explosion or release of hazardous substances through the transport or accidental use of hazardous materials. The project site is not within ¼-mile of an existing or proposed school.

d) The General Plan EIR does not identify any active cleanup sites located on or near the project site. In addition, the project is not located on a site which is included in one or more Hazardous Waste and Substance Site List, compiled pursuant to California Government Code Section 65962.5. There are no evidence of recognized environmental conditions (REC), controlled RECs or historical RECs in conjunction with the subject site.

e) The project site is not located within two miles of a public airport or public use airport and is not located within a planning area boundary for an airport.

f)	**The proposed project will not impair the implementation of an adopted emergency response/evacuation plan. The project generates traffic that is consistent with the projections contained within the Turlock General Plan EIR. The General Plan EIR found that anticipated growth, and the resulting traffic levels, would not impeded emergency evacuation routes or otherwise prevent public safety agencies from responding in an emergency.**
g)	**There are no designated wildland fire areas within or adjoining the project site.**
Sources:	*City of Turlock, Emergency Operation Plan, 2017; Local Hazard Mitigation Plan, 2010-2015; Stanislaus County Airport Land Use Commission Plan, 1978, amended May 20, 2004, updated October 6, 2016; Stanislaus County Multi-Jurisdictional Hazard Mitigation Plan, updated 2016; City of Turlock, General Plan, Safety Element, 2012; City of Turlock, Municipal Code, Title 8, (Building Regulations)*
Mitigation:	**None required.**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
10. Hydrology and Water Quality – Would the project:				
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 or 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		

Response:

a) **The proposed commercial project will be required to comply with the Regional Water Quality Control Board's construction requirements to reduce the potential impact of pollution from water runoff at the time of construction and post-construction. Upon development, the project will be required to connect to City utility systems, including water and sewer; therefore, development of the project area would not result in water quality or waste discharge violations.**

b) **The proposed development lies within the City of Turlock. The City has developed an Urban Water Management Plan (UWMP) that evaluates the long-range water needs of the City including water conservation and other measures that are necessary to reduce the impact of growth on groundwater supplies. The project has been reviewed by the City of Turlock Municipal Services, the water provider for the City of Turlock, and no concerns were raised regarding the ability of the City to provide adequate potable water to the project.**

c), d) and e) **The proposed infill project is proposed on an undeveloped parcels surrounded by a mix of commercial and industrial uses. The City of Turlock requires that all development construct the necessary storm water collection systems to convey runoff to detention basins within the project area. Grading plans for construction within the project area will be reviewed to ensure compliance with the Regional Water Quality Control Board's regulations and the City's NPDES discharge permit. Grading and improvement plans for the project are required and will be reviewed by the Engineering Division to ensure that storm water runoff from the project area is adequately conveyed to the storm water collection system that will be implemented with the project.**

The project site is not located in a flood area. The project does not involve property acquisition, management, construction or improvements within a 100-year floodplain (Zones A or V) identified by FEMA maps, and does not involve a "critical action" (e.g., emergency facilities, facility for mobility impaired persons, etc.) within a 500 year floodplain (Zone B). The entire City of Turlock is located in Flood Zone "X", according to FEMA. The City of Turlock's Community Number is 060392; Panel Numbers are: 0570E, 0600E, 0800E, 0825E. Revised update September 26, 2008.

The project site is located outside the Dam Inundation Area for New Don Pedro Dam and for New Exchequer Dam (the two inundation areas located closest to the City of Turlock Municipal Boundary).

Sources: *Federal Emergency Management Agency Floodplain regulations; City of Turlock, Storm Drain Master Plan, 1987;Turlock General Plan EIR, 2012; Turlock General Plan, 2012; City of Turlock, Water Master Plan Update, 2009; City of Turlock, Storm Water Master Plan, 2013; City of Turlock Urban Water Management Plan, 2010 (Adopted 2011), 2015 Updated Adopted in 2016; City of Turlock Sewer System Master Plan, 2013; City of Turlock, Municipal Code, Title 9, Chapter 2, Water Conservation Landscape Ordinance.*

Mitigation:

1. **GP 3.3-a, 3.3-f, The project shall connect to the City's Master Water and Storm Drainage System.**
2. **GP 3.3-o, 3.3-ae, 6.4-f, The project shall comply with the Regional Water Control Board's regulations and standards to maintain and improve groundwater and surface water quality. The**

applicant shall conform to the requirements of the Construction Storm Water General Permit and the Municipal Separate Storm Sewer System (MS4) Permit, including both Best Management Practices and Low Impact Development (post-construction) requirements.

3. If the project includes construction dewatering and it is necessary to discharge the groundwater to water of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit.
4. Site grading shall be designed to create positive drainage throughout the site and to collect the storm water for the storm water drainage system. If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United State Army Corps of Engineers (USACOE). If a USACOE permit or any other federal permit is required for this project due to the disturbance of water of the United States then a Water Quality Certification must be obtained from the Central Valley Water Board prior to the initiation of project activities. If the USCACOE determines that only non-jurisdictional water of the State are present in the proposed project are, the proposed project will require a Waste Discharge Requirements permit to be issued by the Central Valley Water Board.
5. The discharge of oil, gasoline, diesel fuel, or any other petroleum derivative, or any toxic chemical or hazardous waste is prohibited.
6. Materials and equipment shall be stored so as to ensure that spills or leaks cannot enter storm drains, or the drainage ditches or detention basins.
7. A spill prevention and cleanup plan shall be implemented.
8. GP 3.3-ae, The builder and/or developer shall utilize cost-effective urban runoff controls, including Best Management Practices (BMP's), to limit urban pollutants from entering the drainage ditches. A General Construction permit shall be obtained from the State Water Resources Control Board, a Storm Water Pollution Prevention Plan (SWPPP) shall be prepared and implemented as part of this permit.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
11. Land Use Planning – Would the project:				
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

Response:

a) Located in an urbanized area and surrounded by a mix of commercial and industrial uses the project is proposed on two undeveloped parcels totaling approximately 7-acres and proposes the construction of a 120-room 5-story hotel, 23,723 square foot banquet hall/event center, and 4,040 square foot commercial building. The proposed project will not physically divide an established community.

b) The proposed infill project is proposed to develop two parcels totaling approximately 7-acres with a 120-room 5-story hotel, 23,723 square foot banquet hall/event center, and 4,040 square foot commercial building. The parcels are currently zoned Community Commercial (CC). The area around the project site is developed with a mix of commercial and industrial uses. The commercial use of the property will not cause a conflict with any land use plan.

Sources: *Turlock General Plan, 2012 & Adopted Housing Element, 2014-23; City of Turlock General Plan EIR, 2012; Turlock Municipal Code, Title 9, Chapter 3; US Fish and Wildlife Service – Recovery Plan for Upland Species of the San Joaquin Valley, 1998*

Mitigation:

None required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
12. Mineral Resources – Would the project:				
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

Response:

a) and b) Any development that may ultimately occur in the City does result in the utilization of natural resources (water, natural gas, construction materials, etc.); however, these resources will not be depleted by this project. The only known mineral resources within the City of Turlock are sand and gravel from the Modesto and Riverbank formations. The project will result in only minor excavation of the site.

Sources: *City of Turlock, General Plan, Conservation Element, 2012*

Mitigation:

None required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
13. Noise – Would the project result in:				
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	

Response:

a) **The proposed commercial project is located in a fully urbanized area and is surrounded by commercial and industrial uses. Typical ongoing noise would most likely be generated by mechanical equipment such as heating, ventilation, and air-conditioning equipment and will be similar to the noise generated from the other nearby commercial uses. The General Plan and City Noise Ordinance (TMC 5-28-100ART) establish noise standards that must be met for all new development. The proposed commercial is not anticipated to generate noise levels in excess of the standards established in the General Plan or City Noise Ordinance. Furthermore, the project is subject to the City's noise ordinance which prohibits construction on weekdays from 7:00 p.m. to 7:00 a.m., on weekends and holidays from 8:00 p.m. to 9:00 a.m. Turlock's Noise Ordinance (TMC 5-28-100ART) standards and enforcement mechanisms would apply.**

b) **Project-related construction will result in short-term increases in noise levels and vibration on and immediately surrounding the project site. The standards of Turlock's Noise Ordinance (TMC5-28-100ART) are applicable to the development during construction and occupancy. The City's ordinance addresses both temporary construction-related noise as well as ongoing noise from equipment and other operations of this facility. The project is subject to the City's noise ordinance which prohibits construction on weekdays from 7:00 p.m. to 7:00 a.m., on weekends and holidays from 8:00 p.m. to 9:00 a.m. The project is subject to the City's noise ordinance which requires reduced noise levels from 10:00 p.m. to 7:00 a.m.**

c) **The project site is not located within two miles of a public airport or public use airport. Therefore, the project will not be impacted by noise from the operations of any public or private airport.**

Sources: *City of Turlock, General Plan, Noise Element, 2012; City of Turlock, Municipal Code, Title 9, Chapter 2, Noise Regulations; Stanislaus County Airport Land Use Commission Plan, as Amended May 20, 2004, updated October 6, 2016; Merced County Airport Land Use Compatibility Plan, June 12, 2012; Turlock General Plan, Circulation Element, 2012;*

Mitigation:

1. GP 9.4-l, TMC§5-28ART; NWTSP 6.14-a, 6.14-b Compliance with the standards of the City of Turlock's Noise Ordinance (TMC5-28-100ART).

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
14. Population and Housing – Would the project:				
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

Response:

a) **The commercial infill project proposes to develop two parcels totaling approximately 7-acres with a 120-room 5-story hotel, 23,723 square foot banquet hall/event center, and 4,040 square foot commercial building. No new homes are proposed as part of this commercial project. No new expanded infrastructure is proposed that could accommodate additional growth in the area that is not already possible with existing infrastructure, so no indirect population growth will occur. The proposed project would not directly or indirectly cause expansion of the area beyond what is planned in the Turlock General Plan.**

b) **The properties are currently undeveloped and zoned for Community Commercial uses. The proposed commercial project would not displace substantial numbers of existing housing, and would not displace substantial numbers of people necessitating the construction of replacement housing elsewhere. The project site is surrounded by existing urban uses and all roads and infrastructure are immediately available along the property frontage. There are no existing residences on the site.**

Sources: *City of Turlock, General Plan, 2012 & Housing Element, 2016;*

Mitigation:

None required.

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

Response:

a) The commercial project is an infill project proposed on two undeveloped parcels totaling approximately -acres located in an urbanized area. The project site is surrounded by a mix of commercial and industrial uses. The Turlock Fire Department provides fire and emergency response within the city limits. The Fire Department operates four fire stations located to maximize efficiency and help reduce response times. The Fire Department reviews all development applications to determine the adequacy of fire protection for the proposed development. This infill project will not have a significant impact on fire response times and will not otherwise create a substantially greater need for fire protection services than already exists. The Fire Department has commented on this project and has not indicated that the development could not be adequately served or would create an impact on the ability of the Department to serve the City as a whole. The Turlock Municipal Code and the State Fire Code establish standards of service for all new development in the City. Those standards and regulations are applicable to the project.

b) Development of the commercial project will not result in any unique circumstances that cannot be handled with the existing level of police resources. The Police Department was routed the project and did not indicate that the development of the project could not be adequately served. No new or expanded police facilities will need to be constructed as a result of this project. Therefore, it is anticipated the impacts from the development of the property on police services will be less-than-significant. The developer will be required to pay Capital Facilities Fees upon development, a portion of which is used to fund Police Service capital improvements.

c) The proposed commercial project will develop two parcels totaling approximately 7-acres with a 120-room 5-story hotel, 23,723 square foot banquet hall/event center, and a 4,040 square foot commercial building. No new residential homes are part of this project. The commercial project will not create a significant demand for school facilities. Under the Leroy F. Greene School Facilities Act of 1998, the satisfaction by the developer of his statutory fee under California Government Code Section 65995 is deemed "full and complete mitigation" of school impacts. Therefore, mitigation of impacts upon school facilities shall be accomplished by the payment of the fees set forth and established by the Turlock Unified School District.

d) The development of the two parcels totaling approximately 7-acres with a 120-room 5-story hotel, 23,723 square foot banquet hall/event center, and 4,040 square foot commercial building will not result in a significant increase in use of existing neighborhood or regional parks.

e) Development of the two parcels totaling approximately 7-acres with a 120-room 5-story hotel, 23,723 square foot banquet hall/event center, and 4,040 square foot commercial building, will not create a significant increase in the use of or need for new public facilities. The City has prepared and adopted a Capital Facility Program that identifies the public service needs of roads, police, fire, and general government that will be required through build-out of the General Plan area. This program includes the collection of Capital Facility Fees from all new development. Development fees are also collected from all new development for recreational lands and facilities. Conditions of development will require payment of these fees and charges, where appropriate and allowed by law.

Sources: *Stanislaus County, Public Facilities Plan; City of Turlock, Capital Facility Fees Program, City of Turlock Capital Improvement Program (CIP); Turlock Unified School District, School Facilities Needs Analysis; City of Turlock, General Plan, Parks and Recreational Open Space and Safety Elements, 2012;*

Mitigation:

1. **GP 10.4-d; The applicant, developer or successor in interest shall pay all applicable Citywide Capital Facility for public facility service improvements.**

2. **GP 10.4-d; Prior to the issuance of a building permit, the developer shall pay the applicable development-related school impact fees to fully mitigate its impacts upon school facilities pursuant to California statutes.**

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

Response:
a) and b) Development of the two parcels totaling approximately 7-acres with a 120-room 5-story hotel, 23,723 square foot banquet hall/event center, and 4,040 square foot commercial building will not create a significant demand for park and recreational facilities. The project does not include recreational facilities or require the construction or expansion of recreational facilities. The development will not result in a significant increase in use of existing neighborhood or regional parks.

Sources: *City of Turlock General Plan 2012: City of Turlock Parks Master Plan, 2003;*

Mitigation:

None required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
17. Transportation– Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?		X		
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?			X	

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

Response:

a) and b) The proposed commercial infill project is for the development of two undeveloped parcels totaling approximately 7-acres with a 120-room 5-story hotel, 23,723 square foot banquet hall/event center, and 4,040 square foot commercial building. The two parcels are zoned for Community Commercial uses and are located in a urbanized area surrounded by commercial and industrial uses. Access to the project will be provided by the existing roadway system.

The Institute of Transportation Engineers (ITE) Trip Generation estimates the number of vehicle trips generated by a proposed development. The estimated number of vehicle trips for the proposed commercial uses is described below.

Using ITE's Land Use 312 Business Hotel it is anticipated that the proposed 120-room 5-story hotel will generate 4.02 average vehicle trips (AVT) per room (482 .4 AVT total) during the week; 5.79 AVT (694.8 AVT total) on Saturday; and 4.43 AVT (531.6 AVT total) on Sunday.

ITE does not have a land use category specific for banquet halls or event centers. The land use that compares closely to the operation of the banquet hall/event center is Land Use: 560 Church. Using the ITE Trip Generation the banquet hall/event center is anticipated to generate 6.95 average vehicle trips (AVT) per 1,000 square feet of gross floor area (164.9 AVT total) during the week; 5.99 AVT (142.1 AVT total) on Saturday; and 27.63 AVT (655.5 AVT total) on Sunday. The peak operating days and hours of the banquet hall/event center is anticipated to be Friday, Saturday and Sunday.

At this time a specific tenant or tenants have not been identified for the 4,040 square foot commercial building. However, any proposed tenant or use would have to comply with the approved uses in the Community Commercial (CC) zoning district. ITE does not have a land use category specific for multi-tenant or single user retail uses. The land use that compares closely to the proposed commercial building is Land Use: 875 Department Store. Using the ITE Trip Generation the 4,040 square foot commercial building is anticipated to generate 22.88 average vehicle trips (AVT) per 1,000 square feet of gross floor area (95.4 AVT total) during the week; and 25.40 AVT (102.6 AVT total) on Saturday. No average vehicle trip data was provided for Sundays.

Overall, the anticipated vehicle traffic generated by the commercial project is anticipated to be less than what the highest use of the properties could potentially generate. The project sites are located within an area identified in the Turlock General Plan for commercial and industrial uses.

The City has adopted a Capital Facility Program with traffic improvements planned for build out of the General Plan. The City Engineer has reviewed the proposed traffic circulation pattern for the area and evaluated its potential impact on the operation of the local roadways serving the site, and has determined current roadway improvements can adequately accommodate the vehicular traffic generated by the project.

A condition of each new development is payment of a Citywide Capital Facility Fee, a portion of which is used to fund circulation improvements required for cumulative impacts added by development. The mitigation measures identified in the General Plan EIR and the Statement of Overriding Considerations are adequate to mitigate the transportation and traffic impacts associated with the project. Therefore, no significant traffic issues will be generated by the project.

c) The project is an infill commercial project. The project site is accessed using the existing roadway system. Any required frontage improvements must meet current City standards. The proposed project will not increase hazards due to a geometric design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment).
d) The Turlock Fire Department reviews all development proposals for adequate emergency access. The project will either meet or exceed the Fire Department needs for emergency vehicle access throughout the project site.
Sources: *City of Turlock, Capital Improvement Program (CIP); City of Turlock, General Plan, 2012;StanCOG, Regional Transportation Plan and Sustainable Communities Strategy, 2014; Stanislaus Assn. of Governments, Congestion Mgmt. Plan, 1992; City of Turlock, Municipal Code, Title 9, Chapter 2, Rental Storage Facility, and California Green Building Code, ITE Trip Generation Manual 10th Edition.*
Mitigation: **1. GP 5.2i - The applicant, developer or successor in interest shall pay all applicable Citywide Capital Facility Fees for transportation improvements. These include the development of new bicycle and pedestrian facilities, traffic calming, traffic management, and other projects to improve air quality and reduce congestion, as well as roadway, intersection and interchange improvements.**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
18. Tribal Cultural Resources -				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), 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 forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X	

Response:

a) **The Turlock General Plan EIR found that there are no known Native American cultural resources within the City of Turlock. The properties are not listed or eligible for listing on the California Register of Historical Resources. In compliance with AB52 notices were sent to the North Valley Yokuts Tribe on May 24, 2024 with the project description. The Torres Martinez Desert Cahuilla Tribe sent a letter to the City of Turlock on April 19, 2017 formally asking the City to remove them from future project notifications. The City of Turlock has not received comments on the project from the North Valley Yokuts Tribe.**

Sources: *Turlock General Plan, Conservation Element, 2012; City of Turlock General Plan EIR, 2012; Cultural Resources Records Search, 2008;*

Mitigation:

None required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
19. Utilities and Service Systems – Would the project:				
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 services or may serve the project determined 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	

Response:

a) and b) The commercial project is proposed as an infill project on two existing undeveloped parcels totaling approximately 7-acres and currently zoned for commercial uses. The project site has access to existing infrastructure including water, wastewater and storm water drainage facilities. The proposed project will not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board. Sewer, or wastewater, systems are currently available to the site. The type of wastewater anticipated by the project is readily handled by the current waste water system. The proposed project will not result in the need to construct a new water or wastewater treatment facility. The existing water and wastewater facilities which serve the City of Turlock are sufficient to serve this use. The project site has access to existing electric power, natural gas, and telecommunications and will not require or result in the construction of new or expanded facilities.

b) and c) The project site is within the boundaries of the City of Turlock's Storm Water Master Plan and Urban Water Management Plan. The project is consistent with the General Plan land use and growth assumptions that were used to update the City's Urban Water Management Plan. The applicant must construct any project-related water infrastructure to ensure adequate water service to City of Turlock standards. Mitigation of the increasing demand for storm water facilities will be through the owner, or successor in interest, paying storm drainage fees, and constructing any project-related storm drain infrastructure to ensure adequate storm drainage, as determined necessary by the City Engineer. Furthermore, mitigation measures requiring the payment of the Specific Plan and City-Wide fees is adequate to mitigate a project's impacts upon the storm water collection and treatment system because it ensures adequate capacity and infrastructure is available. This development is consistent with what has been anticipated in the General Plan and planned for in the Storm Water Master Plan.

Mitigation of the need for the alteration to water systems will be through the requirement that the applicant, prior to the issuance of building permits, pay the adopted water connection fees, reflecting the pro rata share of the necessary improvements to the existing City water system for each new water user. This is a standard condition of all development in Turlock. Furthermore, a condition of each new development is payment of a Capital Facility Fee, a portion of which is used to fund water improvements.

d) The project site is within the boundaries of the City of Turlock's Water Master Plan and Urban Water Management Plan. The project is consistent with the General Plan land use and growth assumptions that were used to update the City's Urban Water Management Plan. The applicant must construct any project-related water infrastructure to ensure adequate water service to City of Turlock standards. Mitigation of the need for the alteration to water systems will be through the requirement that the applicant, prior to the issuance of building permits, pay the adopted water connection fees, reflecting the pro rata share of the necessary improvements to the existing City water system for each new water user. This is a standard condition of all development in Turlock. Furthermore, a condition of each new development is payment of a Capital Facility Fee, a portion of which is used to fund water improvements.

e) **Solid waste will be of a domestic nature and will comply with all federal, State and local statutes. Upon completion of the project, the property owner(s), or successor(s) in interest shall contract with the City of Turlock's designated waste hauler, Turlock Scavenger, for solid waste disposal. Turlock Scavenger has an adopted waste diversion/recycling program which has resulted in waste diversion exceeding state-mandated California Integrated Waste Management Board timeframes under Public Resources Code 41000 *et seq*. The project is required to install a trash enclosure that will accommodate recycled materials. Sufficient capacity remains for the additional solid waste needs to support this project.**

Sources: *City of Turlock, Capital Improvement Program (CIP); City of Turlock, General Plan, 2012; City of Turlock, Water Master Plan Update, 2009; City of Turlock, Waste Water Master Plan, 1991; City of Turlock, Storm Water Master Plan, 2013; City of Turlock Urban Water Management Plan, 2016; City of Turlock Sewer System Master Plan, 2013, Central Valley Regional Water Quality Control Board comment letter dated February 27, 2019.*

Mitigation:

1. **GP 3.3-k, 3.3-u, 4.3-c; The developer or successor in interest shall pay the City of Turlock's Capital Facility Fee and infrastructure master plan fees.**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
20. Wildfire - If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				X
c) Require the installation or 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 structure to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X

Response:

a) The proposed project will not impair the implementation of an adopted emergency response/evacuation plan. The project generates traffic that is consistent with the projections contained within the Turlock General Plan EIR. The General Plan EIR found that anticipated growth, and the resulting traffic levels, would not impeded emergency evacuation routes or otherwise prevent public safety agencies from responding in an emergency.

b), c), and d) There are no wildlands or steep slopes in the City of Turlock, making the risk of wildland fire low; likewise, the Turlock General Plan notes the city topography as flat urbanized or agricultural land with a low fire risk. The California Department of Forestry and Fire Protection's Fire and Resource Assessment Program (FRAP) designates the City of Turlock as a Low Risk Area (LRA). There are no rivers, lakes or

streams located within the City of Turlock that would expose people of structures to significant risks of flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Sources: *City of Turlock, Emergency Operation Plan, 2017; Local Hazard Mitigation Plan, 2010-2015; Stanislaus County Multi-Jurisdictional Hazard Mitigation Plan, updated 2016 City of Turlock, General Plan, Safety Element, 2012;*

Mitigation:
None required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Imp act
21. Mandatory Findings of Significance				
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 the 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	

CITY OF TURLOCK
INITIAL STUDY CHECKLIST

The proposed commercial project is for the development of two parcels totaling approximately 7-acres with a 120-room 5-story hotel, 23,723 square foot banquet hall/event center, and 4,040 square foot commercial building, is an infill project within the City surrounded by commercial and industrial uses. As discussed in Section 1, no scenic vistas, scenic resources, or the visual character of the area will be substantially impacted and the project will not result in excessive light or glare. The project site is located within an urbanized area and surrounded by urban uses. No evidence of significant historic or cultural resources were identified on or near the project site. As a result of many years of agricultural production virtually all of the land in the General Plan area has been altered.

The commercial project is proposed on two undeveloped properties totaling approximately 7-acres. The project site is not known to have any association with an important example of California's history or prehistory. Construction-phase procedures will be implemented in the event an archaeological or cultural resource is discovered consistent with the Mitigation Measures contained in Sections 4. As discussed in Section 4, there are no rivers, lakes or streams located within the City of Turlock; therefore, the project would have no impact on riparian habitats or species.

The context for assessing air quality impacts is the immediate project vicinity with respects to emissions generated by the construction and operation of the proposed project. The environmental analysis provided in Section 3 concludes that operational and construction emissions would not exceed the air quality thresholds established by the San Joaquin Valley Air Pollution Control District (SJVAPCD). Furthermore, Mitigation Measures identified in Sections 3 & 8 would reduce potential impacts to less-than-significant levels.

Mitigation measures for any potentially significant project-level impacts have been included in this document and will reduce the impacts to less-than-significant levels. Based on the analysis above, the City finds that impacts related to environmental effects that could cause adverse effects on human beings would be less than significant.