CITY OF TURLOCK
INITIAL STUDY CHECKLIST

1) Project Title: **MINOR DISCRETIONARY PERMIT 2025-02**

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

3) Contact Person and Phone Number: Kate Bailey - Assistant Planner
(209) 668-5640

4) **Project Location:** 1808 N Tegner Rd. (Stanislaus County APN: 088-031-001)

5) Project Sponsor's Name and Address: Brian Rosenberger
4335B North Star Way
Modesto, CA 95356

6) General Plan Designation: Community Commercial (CC)

7)Zoning: Community Commercial (CC)

8) Description of the Project:

The applicant is proposing to develop a 10-acre parcel at 1808 N Tegner Rd. (Stanislaus County APN 088-031-001) for a RV storage facility. The project will construct 265 RV spaces, 6 standard parking spaces, a 120 square foot security guard booth and trash enclosures. Main access to the RV storage facility will be from Tegner Road. Full frontage improvements, including curb, gutter, and sidewalk will be constructed along Tegner Road. On-site paving, landscaping, security lighting, perimeter fencing, and a storm water retention drains are also proposed.



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

The 10-acre parcel is located within the Northwest Triangle Specific Plan (NWTSP) area, situated at the northeast corner of Tegner Road and Fulkerth Road. The adjacent properties to the north and south are zoned Community Commercial (CC) and are currently undeveloped. To the west, the property lies within Stanislaus County and is actively used for agricultural production, with a designated area for semi-truck parking associated with Joe Gomes fuel trucks. To the east, the adjoining properties are zoned Commercial Thoroughfare (CT) and are occupied by operational businesses.
Per the NWTSP, a new local roadway is planned along the parcel's northern boundary. This road will have a total width of 56 feet and will require a 28-foot dedication from the subject property. Additionally, the intersection of the new local road and North Tegner Road must include a minimum 25-foot curb return to

accommodate the design of a deceleration/acceleration lane serving both the new road and the primary site entrance.

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, etc.?

The Yokuts tribe was contacted in writing on May 7, 2025 with the project description as part of the Early Public Consultation process. Consultation has not been requested by the Yokuts tribes for this project.

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]

a) **Earlier analyses used**. (Available for review at the City of Turlock – Community Development Services, 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)
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)
Northwest Triangle Specific Plan (Adopted August 1995; Amended June 12, 2017)
Northwest Triangle Specific Plan Amendment - Addendum to Mitigation Negative Declaration (Adopted June 13, 2017)

b) **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 and the Northwest Triangle Specific Plan (NWTSP) MEIR & Addendum, development in the project area would result in significant, and unavoidable, impacts in the areas of transportation/traffic, 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 and the NWTSP 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 the NWTSP EIR and Addendum, and they would not be different from cumulative effects anticipated by the Turlock General Plan EIR and NWTSP EIR and Addendum. Potential secondary environmental impacts from the project will be of equal or lesser severity than those identified in the General Plan EIR and NWTSP EIR and Addendum. Therefore, mitigation measures identified in the General Plan EIR and the NWTSP EIR and Addendum, 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.

c) **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.

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, the NWTSP MEIR and Addendum as well as the standards of the Turlock Municipal Code, and are herein incorporated by reference where not specifically identified.

The project is not located on a site which is included in one or more Hazardous Waste and Substance Site Lists, compiled pursuant to California Government Code Section 65962.5.

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. However, these impacts would result in a less than significant impact on the environment by incorporating appropriate mitigation measures.

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

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:

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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 NWTSP MEIR and Addendum.

2. All feasible mitigation measures developed in the General Plan EIR and NWTSP 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 NWTSP 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 NWTSP 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.

7. Pursuant to Public Resources Code Section 21157.6(a), having reviewed the General Plan EIR and Northwest Triangle 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 NWTSP 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 NWTSP 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 Northwest Triangle 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.	

Kate Bailey, Assistant Planner — Date 6/16/25

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 project is located in an urbanized area. The General Plan EIR notes that the primary scenic views lie on the City's boundary, at its agricultural edge, and further concludes that any aesthetic impacts of the development within the City would have a less than significant impact. Infill development, such as the proposed project, will have no significant effect on the visual quality of the City.

b) There are no scenic or historic resources on the project site. The property is currently undeveloped. There are no distinctive natural or historic resources.

c) The 10-acre property is currently undeveloped. A RV storage center with onsite parking and landscaping is proposed. The Turlock General Plan notes that new development that implements the General Plan Urban Design Element creates a more aesthetically pleasing character for the City. The Northwest Triangle Specific Plan (NWTSP) likewise includes development and design standards. The development of the site would affect the existing visual character of the vacant site; however, the development standards contained in the Northwest Triangle Specific Plan and the City Design Guidelines will be applied to the project to ensure it meets the community's standards and is compatible with current and futures uses in the area. The General Plan contains several policies that would specifically improve the visual character throughout the city and are designed to minimize the negative impact on visual character. Any development of the property would affect the existing visual character of the site; however, the policies and standards contained in the General Plan and the NWTSP reduce any adverse impacts on visual character to less than significant.

d) The development of the project area will produce additional light and glare from required street and on-site lighting. In accordance with the Turlock Municipal Code, the NWTSP, 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 Turlock General Plan EIR concludes that any new development has the potential to create new sources of light and glare; however, those impacts are deemed to be less than significant. The NWTSP MEIR identifies specific mitigation measures to reduce these potential impacts to a less than significant level. To ensure compliance with this standard, mitigation measures have been incorporated into the project to reduce the impact to a less than significant level.

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Sources: *City of Turlock, General Plan and MEIR, 2012; City Design Element, 2012; City of Turlock, Standard Specifications, Section 18; Northwest Triangle Specific Plan and Addendum, 2017; City of Turlock Beautification Master Plan, 2003.*

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. **All lighting fixtures must be shielded to confine light spread within the site boundaries.**
3. **Building illumination and architectural lighting shall be indirect. Floodlights are prohibited.**
4. **Light standards for parking areas shall not exceed thirty (30') feet in height.**
5. **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.**
6. **Automatic shutoff or motion sensors shall be used for lighting to be used intermittently or for safety purposes.**

	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 proposed RV storage facility is proposed to be developed on property designated as "Farmland of statewide importance" on the 2020 Stanislaus County Important Farmland Map as compiled by the California Department of Conservation, Farmland Mapping and Monitoring Program. Some properties in the project area remain in agricultural production. The NWTSP allows agricultural activity to continue on lands designated for urban use, until urban development is imminent. The project site is currently undeveloped. The project will not be converting prime farmland, unique farmland, or farmland of statewide importance. Pursuant to CEQA §15162, this project will not create any new significant environmental impacts related to agricultural resources and therefore no additional environmental documentation is warranted. Pursuant to CEQA §15183, this project is consistent with the General Plan and no additional environmental review is needed because there are no agricultural impacts peculiar to the project, no new significant agricultural impacts, no new offsite and cumulative agricultural impacts, or no agricultural impacts that are more significant than described in the prior General Plan EIR.

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 and development. There are no forest lands or timberlands within the City of Turlock.

e) The property is located within the City of Turlock in an area designated for urban uses and development. The site is zoned for Community Commercial uses. The surrounding properties are zoned and developed with industrial and Community Commercial uses. Development of the site will not involve changes in the existing environment which will result in conversion of farmland or forest land.

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; Northwest Triangle Specific Plan and Addendum, 2017. Statement of Overriding Considerations (Turlock City Council Resolution 2012-156)*

Mitigation:

1. None Required.

	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 letter received from the San Joaquin Valley Air Pollution Control District dated June 12, 2025 concluded that they had no comment on the project.

Based on the CalEEMod 2022.1.1.29 analysis run on June 6, 2025, the project is located in an urbanized area surrounded by residential uses in Climate Zone 3, wind speeds 3.10 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 both Construction and Operational Emissions for ROG (10 tons per year), NOx (10 tpy), PM 10 (15 tpy) & PM 2.5 (15 tpy) emissions. The construction emissions and operational emissions calculated in the CalEEMOD 2022.1.1.29 model, will not exceeded 5 tons per year for each of the established thresholds for ROG, NOx, PM 10 & PM 2.5.

Overall Construction Emissions
CalEEMOD 2022.1.129 ROG 0.16 tpy, NOx 1.30 tpy, CO 1.73 tpy SO2 <0.0005 tpy, PM_{10} .32 tpy and $PM_{2.5}$ 0.30 tpy.

Overall Operational Emissions
CalEEMOD 2022.1.1.129: ROG .36 tpy, NOx .20 tpy, CO 1.42 tpy SO2 <.0005 tpy, PM_{10} .25 tpy and $PM_{2.5}$ .19 tpy.

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 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. A Statement of Overriding Considerations has been adopted as part of that process.

Furthermore, 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. Furthermore, 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 RV self-storage facility is an infill project proposed to be constructed on an undeveloped 10-acre parcel zoned for Community Commercial use. Located in an urbanized area with a mix of industrial, commercial, and agricultural uses the RV self-storage project is not expected to create substantial pollutant concentrations. 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 2007 Ozone Plan, 2010 PM-10 Maintenance Plan, 2012 and 2015 PM-2.5 Plan; SJVAPCD's Guide For Assessing and Mitigating Air Quality Impacts (revised January 10, 2002); 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); SJVUAPCD (June 2005) Air Quality Guidelines for General Plans; NWTSP Addendum June 2017; CalEEMOD 2022.1.129 (June, 06, 2525)*

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.**

	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 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 cultivated and 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. There are no large trees on the property that offer nesting habitat for Swainson's Hawk. 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.

b) There are no rivers, lakes or streams located within the City of Turlock. There are no riparian habitats or other sensitive natural communities within the NWTSP area. Therefore, the project will have no impact on riparian habitats or species.

c) The General Plan EIR and NWTSP EIR identifies the federally protected wetlands located within the City of Turlock and the surrounding Study Area. There are no federally protected wetlands as defined by Section 404 of the Clean Water Act within or adjacent to the NWTSP Study Area.
d) The project is located within the City of Turlock. 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 and NWTSP identify mitigation measures that will be incorporated into the project requiring the investigation of the existence of any wildlife nursery sites on the project site.
e) The 10-acre property is currently undeveloped. There are limited natural features on the property that offer habitat opportunities except the land itself which could potentially offer foraging habitat for Swainson's Hawk.
f) There is no Habitat Conservation Plan, Natural Conservation Community Plan, other approved local or regional conservation plan that encompasses the project site.
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; NWTSP Addendum June 2017*

Mitigation:

1. **If ground disturbing activities, such as grading, occurs during the 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. **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. **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. **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 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 2 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 proposed RV storage facility is an infill project proposed to be constructed on an undeveloped 10-acre parcel zoned for Community Commercial use. 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 1½ -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. 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; NWTSP Addendum, 2017; Cultural Resources Records Search, 2008*

Mitigation:

1. **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. **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.**

6. 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 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?		X		
e) Have soils incapable of adequately supporting the use of septic tanks or alternative 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 earthquakes originating outside of the area. 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. There are no known active surface fault ruptures located within or adjacent to the NWTSP area. 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.**

and c) The General Plan EIR notes that because the City of Turlock is relatively flat and has no natural waterways, the risk of soil erosion due to water is relatively low. 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.

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.

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 RV facility is an infill project proposed to be constructed on an undeveloped 10-acre parcel zoned for Community Commercial use and located in an area surrounded by a mix of industrial, commercial, and agricultural 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. No known paleontological resources have been identified in the Specific Plan area. The property is flat with no unique paleontological features noted in the area. The project will have no impact to unique paleontological resources or unique geologic features.

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; NWTSP Mitigated Negative Declaration Addendum, 2017.*

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), requirements 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
7. 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:
Response:

a), b) The proposed residential development is proposed on parcels zoned for the intended use, located in an urbanized area surrounded by a mix of residential uses.

Based on the CalEEMod 2022.1.1.29 analysis run on June 6, 2025, the project is located in an urbanized area surrounded residential uses in Climate Zone 3, wind speeds 3.10 m/s, and 29 days precipitation frequency. When the construction emissions and operational emissions were calculated in the respective CalEEMOD models, it was found that emissions would not exceed the established Air Quality Thresholds of Significance for both Construction and Operational Emissions for ROG (10 tons per year), NOx (10 tpy), PM 10 (15 tpy) & PM 2.5 (15 tpy) emissions.

Overall Construction Emissions
CalEEMOD 2022.1.1.29: ROG .16 tpy, NOx 1.30 tpy, CO 1.73 tpy SO2 <.005 tpy, PM_{10} .32 tpy and $PM_{2.5}$0.30 tpy.

Overall Operational Emissions
CalEEMOD 2022.1.1.28: ROG .36 tpy, NOx .20 tpy, CO 1.42 tpy SO2 .<.005 tpy, PM_{10} .25 tpy and $PM_{2.5}$.19 tpy.

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. Furthermore, StanCOG has found that the City of Turlock's General Plan complies with the SCS. This project is consistent with the General Plan and the NWTSP; therefore, the project is expected to have a less than significant impact on greenhouse gas emissions.

Sources: *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; NWTSP Mitigated Negative Declaration Addendum, 2017.*

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Mitigation:

1. **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
8. Hazards and Hazardous Materials - Would the project:				
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 proposed infill project is a RV storage facility proposed to be constructed on a 10-acre parcel zoned for Community Commercial use; located west of State Highway 99 and north of Tegner Road. The project site is located in an area surrounded by a mix of industrial, commercial, and agricultural uses. The project does 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. Furthermore, the project is not located 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 the planning area boundary of the Turlock Air Park. The Turlock Air Park has been removed from the Stanislaus County Airport Land Use Compatibility Plan adopted on October 6, 2016. A private airstrip serving a local pilot is located at 2707 East Zeering Road (APN 073-004-004), over 5-miles northeast of the project site. The Stanislaus County Zoning Ordinance has established a 1,000-foot radius around the perimeter of a private airstrip as a clear area not suitable for most types of development. The project site is located outside of the 1,000-foot radius.

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. The project includes the installation of improvements adjacent to the project site to facilitate access and egress in case of emergency.

g) There are no designated wildland fire areas within or adjoining the project site.

Sources: *City of Turlock, Emergency Response Plan, 2004; Stanislaus County Airport Land Use Commission Plan, 1978, amended May 20, 2004, Stanislaus County Multi-Jurisdictional Hazard Mitigation Plan, 2010; City of Turlock, General Plan, Safety Element, 2012; City of Turlock, Municipal Code, Title 8, (Building Regulations); NWTSP Mitigated Negative Declaration Addendum, 2017.*

Mitigation:

1. None Required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
9. Hydrology and Water Quality – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface of 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 RV storage 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 projects 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)

c)

d) 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.

e) **The proposed infill project is an RV storage project proposed on a 10-acre parcel zoned for Community Commercial use and surrounded by a mix of industrial, commercial, and agricultural 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 plan 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.**

d) **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).

e) **The proposed RV storage project is proposed on a parcel zoned for Community Commercial use and surrounded by a mix of industrial, commercial, and agricultural uses. Once constructed, runoff from the developed site could result in increased potential water contamination from urban pollutants that are commonly found in surface parking lots, ornamental landscape planters, and from atmospheric buildup on rooftops. In order to mitigate potential impacts to a less than significant level, the proposed project will be subject to post-construction BMPs per the City's NPDES permit to address increases in impervious surfaces, methods to decrease incremental increase in off-site stormwater flows, and methods for decreasing pollutant loading in off-site discharges.**

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, 2011; City of Turlock Sewer System Master Plan, 2013; City of Turlock, Municipal Code, Title 9, Chapter 2, Water Conservation Landscape Ordinance*

Mitigation:

1. **The project shall connect to the City's Master Water and Storm Drainage System.**
2. **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 site will be commercially irrigated, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program.**
4. **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.**
5. **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.**
6. **The discharge of oil, gasoline, diesel fuel, or any other petroleum derivative, or any toxic chemical or hazardous waste is prohibited.**
7. **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.**
8. **A spill prevention and cleanup plan shall be implemented.**
9. **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
10. 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) **The proposed RV storage project will not physically divide an established community. The project is proposed on a property identified for Community Commercial development and is surrounded by commercial, and agricultural uses.**

b) The proposed project is an RV storage facility on a parcel zoned for Community Commercial use. The proposed project will not require a change in the land use or zoning designation of the property. The development of the site is consistent with the City's Zoning Ordinance and General Plan designation.
Sources: *Turlock General Plan, 2012 & Adopted Housing Element, 2014-23; City of Turlock General Plan EIR, 2012; NWTSP Mitigated Negative Declaration Addendum, 2017; 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
11. 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), 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.** *(General Plan pg. 7-28)*				
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

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12. 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 RV storage project is proposed on a parcel surrounded by commercial, and agricultural uses. The RV storage facility is passive in nature; however, the project will increase existing ambient noise levels associated with development of an underdeveloped/undeveloped property. Construction activities would be temporary in nature and typically occurring during normal working hours, construction noise is not considered significant. Typical ongoing noise would most likely be generated by mechanical equipment such as heating, ventilation, and air-conditioning equipment. The General Plan and City Noise Ordinance (TMC 5-28-100ART) establish noise standards that must be met for all new development. The proposed manufacturing facility 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. The project is not expected to generate noise in excess of City standards. Turlock's Noise Ordinance (TMC 5-28-100ART) standards and enforcement mechanisms would apply.

b) 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, noise from special events, 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. Spare Space Storage 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. Two private airstrips are located adjacent to the Turlock City Limits. A private airstrip serving a local pilot is located at 2707 East Zeering Road (APN 073-004-004), approximately 5.0 miles north and east of the project site. The property is located over 3-miles northeast of the Turlock Air Park, a private air strip which has been removed from the Stanislaus County Airport Land Use Compatibility Plan adopted on October 6, 2016. The Stanislaus County Zoning Ordinance has established a 1,000-foot radius around the perimeter of a private strip as a clear area not suitable for most types of development. The project site is located outside of the 1,000-foot radius. Furthermore, the Federal Aviation Administration (FAA) has established regulations for flight operations near built-up areas. Additionally, the RV storage facility is a relatively passive use and will not expose people residing or working in the area to excessive noise levels. Therefore, the project will not be impacted by noise from the operations of any public or private airport.

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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; Merced County Airport Land Use Compatibility Plan, June 12, 2012; Turlock General Plan, Circulation Element, 2012;*

Mitigation:

1. **None required.**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
13. 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 proposed RV storage facility is proposed to be constructed on a parcel zoned Community Commercial. The proposed project would not directly or indirectly cause expansion of overall study area growth beyond what is planned in the NWTSP and the Turlock General Plan. This light-industrial use is consistent with the uses anticipated for this area in the NWTSP and the General Plan EIR and will not cause any impacts to population and housing that have not been anticipated and addressed in these documents.**

b) **The 10-acre property is currently undeveloped. The property is zoned for Community Commercial use. The proposed RV storage 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 and agricultural uses and all roads and infrastructure are available.**

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

14. 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) Development of the project area will require additional fire services. The project area is located approximately 2-miles from Fire Station 4 (North Walnut Road, east of Highway 99). The Fire Department reviews all development applications to determine the adequacy of fire protection for the proposed development. The Fire Department has commented on this project but 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 RV storage facility 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) As an Community Commercial land use, RV storage project will not have any residential dwelling units and will not generate any direct 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 established by the Turlock Unified School District.

d) Demand for park and recreational facilities are generally the direct result of residential development. No residential dwelling units are proposed as part of the project. Development of the project site with an RV storage facility will not result in a significant increase in the use of existing neighborhood or regional parks.

e) **Development of the RV storage facility is a nonresidential use and will not increase 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:

None

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
15. 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) **Demand for park and recreational facilities are generally the direct result of residential development. No residential dwelling units are proposed as part of the RV storage facility. The project does not include recreational facilities or require the construction or expansion of recreational facilities. The development of the Community Commercial and light industrial building will not result in a significant increase in the use of existing neighborhood or regional parks. However, development fees are collected from all new development to provide additional park lands and facilities.**

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

Mitigation:

None required.

	Potentially	Less Than	Less Than	No Impact

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	Significant Impact	Significant Impact With Mitigation	Significant Impact	
16. 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 RV storage facility is an infill project proposed on an undeveloped 10-acre parcel zoned for Community Commercial use and surrounded by a mix of industrial, commercial, and agricultural uses. Access to the RV storage facility is provided by the existing roadway system. Frontage improvement along the Tegner Road frontage will include curb, gutter, and sidewalk and will be built to City standards.

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 vehicular traffic generated by the project.

c) The project site is not located within the flight path of any private or public airstrips.

d) Installation of public rights-of way and associated improvements will be required as a condition of approval for this project. 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, Parking Requirements; California Green Building Code; Institute of Traffic Engineers Trip Generation, 7th Edition Volume 2 of 3.*

Mitigation:

None

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact

17. 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: **and b) 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 Yokut Tribe on May 7, 2025 as part of the Early Public Consultation process.**				
Sources: *Turlock General Plan, Conservation Element, 2012; City of Turlock General Plan EIR, 2012; NWTSP Mitigated Negative Declaration Addendum,1; Cultural Resources Records Search,2008*				
Mitigation: **None**				

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
18. 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 of 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) The RV storage facility is proposed as an infill project on a 10-acre parcel zoned for Community Commercial use. 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 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 subject site is within the boundaries of the City of Turlock's Storm Water Master Plan. 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 are required to mitigate a project's impacts upon the storm water collection and treatment system.

d) and e) Solid waste will be of a domestic nature and will comply with all federal, State and local statutes. Upon completion of the RV storage 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, 2011; City of Turlock Sewer System Master Plan, 2013; NWTSP Mitigated Negative Declaration Addendum, June 2017.*

Mitigation:

None

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	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
19. 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

The RV storage center is proposed on a property zoned and Master Planned for Community Commercial uses within the City surrounded by commercial and agriculture 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 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.

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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, the NWTSP MEIR and the Addendum to the Mitigated Negative Declaration.
2. All feasible mitigation measures developed in the General Plan EIR and NWTSP EIR and Addendum to the Mitigated Negative Declaration 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, NWTSP EIR, or Addendum to the Mitigated Negative Declaration., 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, NWTSP EIR and Addendum to the Mitigated Negative Declaration 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.
7. Pursuant to Public Resources Code Section 21157.6(a), having reviewed the General Plan EIR, 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 was 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 was certified.

8. Whereas, on June 13, 2017, the City of Turlock adopted minor changes, deletions, and additions to the project described in the Northwest Triangle Specific Plan Amendment 2017 and certified an Addendum to the Mitigated Negative Declaration 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

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