



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

Date: August 12, 2026

To: Distribution List (See Attachment A)

From: Emily DeAnda, Associate Planner
Planning and Community Development

Subject: GENERAL PLAN AMENDMENT, REZONE AND PARCEL
MAP APPLICATION NO. PLN2025-0015 – KEYES-
CENTRAL

Comment Period: August 12, 2026 – September 16, 2026

Respond By: September 16, 2026

Public Hearing Date: Not yet scheduled. A separate notice will be sent to you
when a hearing is scheduled.

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

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

Applicant: Navjot Athwal, Athwal Investments, LP

Project Location: 5956 Central Avenue, between Turner Road and Keyes Road, in the Ceres area.

APNs: 041-038-014 and 041-038-015

Williamson Act Contract: N/A

General Plan: Agriculture

Current Zoning: General Agriculture (A-2-40)

Project Description: Request to amend the General Plan and zoning designation of a 7.16± acre portion of a 17.6± acre parcel from Agriculture and General Agriculture (A-2-40) to Planned Development (P-D), and to subdivide the parcel into a 7.16± acre parcel and a 10.44± acre designated remainder. The project proposes to develop the 7.16± acres, located on the northeast corner of the Keyes Road and Central Avenue intersection, with a 12-pump fueling station, a 4,000± square-foot convenience store with an attached 2,500 square-foot car wash, and a 7,500± square-foot quick-serve restaurant with a drive-through, in two phases.

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



**GENERAL PLAN AMENDMENT, REZONE AND PARCEL MAP APPLICATION NO.
PLN2025-0015 – KEYES-CENTRAL**

Attachment A

Distribution List

X	CA DEPT OF CONSERVATION Land Resources		STAN CO ALUC
X	CA DEPT OF FISH & WILDLIFE		STAN CO ANIMAL SERVICES
	CA DEPT OF FORESTRY (CAL FIRE)	X	STAN CO BUILDING PERMITS DIVISION
X	CA DEPT OF TRANSPORTATION DIST 10	X	STAN CO CEO
X	CA OPR STATE CLEARINGHOUSE		STAN CO CSA
X	CA RWQCB CENTRAL VALLEY REGION	X	STAN CO DER
	CA DEPT OF WATER RESOURCES	X	STAN CO ERC
	CEMETERY DISTRICT	X	STAN CO FARM BUREAU
X	CENTRAL VALLEY FLOOD PROTECTION	X	STAN CO HAZARDOUS MATERIALS
	CITY OF:		STAN CO PARKS & RECREATION
	COMMUNITY SERVICES DIST:	X	STAN CO PUBLIC WORKS
X	COOPERATIVE EXTENSION	X	STAN CO PUBLIC WORKS - SURVEY
	COUNTY OF:		STAN CO RISK MANAGEMENT
X	DER GROUNDWATER RESOURCES DIVISION	X	STAN CO SHERIFF
X	DISPOSAL DIST: BERTOLOTTI DISPOSAL AREA 1	X	STAN CO SUPERVISOR DIST #5: SUPERVISOR C. CONDIT
X	FIRE PROTECTION DIST: KEYES FIRE	X	STAN COUNTY COUNSEL
X	GSA: WEST TURLOCK SUBBASIN		StanCOG
	HOSPITAL DIST:	X	STANISLAUS FIRE PREVENTION BUREAU
X	IRRIGATION DIST: TURLOCK	X	STANISLAUS LAFCO
X	MOSQUITO DIST: TURLOCK	X	STATE OF CA SWRCB DIVISION OF DRINKING WATER DIST. 10
X	STANISLAUS COUNTY EMERGENCY MEDICAL SERVICES	X	SURROUNDING LAND OWNERS
	MUNICIPAL ADVISORY COUNCIL:		INTERESTED PARTIES
X	PACIFIC GAS & ELECTRIC	X	TELEPHONE COMPANY: AT&T
	POSTMASTER:	X	TRIBAL CONTACTS (CA Government Code §65352.3)
X	RAILROAD: UNION PACIFIC		US ARMY CORPS OF ENGINEERS

X	SAN JOAQUIN VALLEY APCD	X	US FISH & WILDLIFE
X	SCHOOL DIST 1: CERES UNIFIED		US MILITARY (SB 1462) (7 agencies)
	SCHOOL DIST 2:		USDA NRCS
	WORKFORCE DEVELOPMENT		
X	STAN CO AG COMMISSIONER		



STANISLAUS COUNTY CEQA REFERRAL RESPONSE FORM

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

FROM: _____

**SUBJECT: GENERAL PLAN AMENDMENT, REZONE, AND PARCEL MAP
APPLICATION NO. PLN2025-0015 – KEYES-CENTRAL**

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

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

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

- 1.
- 2.
- 3.
- 4.

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

- 1.
- 2.
- 3.
- 4.

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

Response prepared by:

Name Title Date



CEQA INITIAL STUDY

Adapted from CEQA Guidelines APPENDIX G Environmental Checklist Form, Final Text,
January 1, 2025

1. **Project title:** General Plan Amendment, Rezone, and Parcel Map Application No. PLN2025-0015 – Keyes-Central
2. **Lead agency name and address:** Stanislaus County
1010 10th Street, Suite 3400
Modesto, CA 95354
3. **Contact person and phone number:** Emily DeAnda, Associate Planner
(209) 525-6330
4. **Project location:** 5956 Central Avenue, between Turner Road and Keyes Road, in the Ceres area (APNs: 041-038-014 and 041-038-015).
5. **Project sponsor's name and address:** Navjot Athwal, Athwal Investments, LP
2561 4th Street, Ceres, CA 95307
6. **General Plan designation:** Agriculture
7. **Zoning:** General Agriculture (A-2-40)
8. **Description of project:**

Request to amend the General Plan and zoning designation of a 7.16± acre portion of a 17.6± acre parcel from Agriculture and General Agriculture (A-2-40) to Planned Development (P-D), and to subdivide the parcel into a 7.16± acre parcel and a 10.44± acre designated remainder. The project proposes to develop the 7.16± acres, located on the northeast corner of the Keyes Road and Central Avenue intersection, with a 12-pump fueling station, a 4,000± square-foot convenience store with an attached 2,500 square-foot car wash, and a 7,500± square-foot quick-serve restaurant with a drive-through, in two phases. The remainder will remain designated as Agriculture and zoned General Agriculture (A-2-40); no improvements are proposed on the remainder under this request. The project site is currently improved with a manufactured home. A produce stand is currently in use on the property which was permitted under Use Permit No. 92-40 – Sarbjit Singh Athwal and was later modified under Staff Approval Permit No. 95-18 – Sarbjit S. Athwal. The balance of the current parcel is planted in almond trees and is bisected by the Lower Lateral 2 ½ Turlock Irrigation District (TID) canal.

In addition to the subdivision of the property, Phase 1 of the proposed project will include the demolition of the existing 3,000 square-foot produce stand and construction of the fueling station,

convenience store, car wash, trash enclosure, four underground storage tanks, and parking lot with 21 parking spaces. The fueling station is proposed to be open seven days a week, 24 hours per-day. A total of 10-12 employees is anticipated for the convenience store, with a maximum shift of four employees, with up to three shifts per-day. Access for the development under Phase 1 is proposed from Central Avenue via a 25-foot-wide driveway and from Keyes Road via a 36-foot-wide driveway. Construction under Phase 1 is anticipated to begin within two years of approval, if approved.

Phase 2 will consist of construction of the quick-serve restaurant with a drive-through, a trash enclosure, and 37 additional parking spaces. Access for the development under Phase 2 will be taken from Central Avenue via a 25-foot-wide driveway. The quick-serve restaurant is proposed to operate seven days a week from 8:00 a.m. to 10:00 p.m. and with a total of 10-15 employees (five to six on a maximum shift with up to three shifts per-day). The development of Phase 2 is anticipated to begin within five years of approval, after the completion of Phase 1.

The project is projected to generate approximately 6,600 daily trips, including 659 trips during the AM peak hour and 522 during the PM peak hour upon full build out of both phases of development. After accounting for internal and pass-by trip reductions, the net-new trip estimates are 4,930 daily trips, 473 AM peak hour trips, and 374 PM peak hour trips as determined in a Trip Generation & VMT Screening Analysis prepared by Fehr & Peers for the proposed project (see Attachment I).

A total of .42± acres of landscaping, including drought tolerant shrubs, are proposed to be installed around the convenience store, quick-serve restaurant, and parking areas; 24-foot-tall lighting poles are proposed to be installed throughout the parking lot; and a monument sign is proposed to be installed at the corner of Keyes and Central Road. Almond trees will remain planted on 4± acres of the 7.16± acre proposed parcel. The development is proposed to be served by a private onsite septic system for wastewater treatment and a private onsite well (to be permitted as a public water system). The proposed remainder parcel will remain developed with a septic system and well which serves the existing manufactured home which is proposed to remain on the designated remainder parcel.

9. Surrounding land uses and setting:

Orchards to the north, east and south; an almond hulling and shelling facility, and the City of Ceres to the northeast; the community of Keyes to the east; a horse boarding facility to the southwest; ranchettes to the south and west of the project site; and a winery to the west.

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

Caltrans
Stanislaus County Department of
Public Works
Department of Environmental
Resources

-
- 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.?:**
- In accordance with SB 18, this project was referred to the tribes listed with the Native American Heritage Commission (NAHC) as the project is a General Plan Amendment. The Muwekma Ohlone Tribe of the San Francisco (S.F.) Bay Area has requested consultation in accordance with AB 52 for all projects located west of the San Joaquin River. This project is not located in that area; accordingly, this project is not being sent to the Muwekma Ohlone S.F. Bay Area tribe.
- 12. Attachments:**
- I. Trip Generation & VMT Screening Analysis for Proposed Keyes-Central Commercial Development in Stanislaus County, performed by Fehr & Peers, dated July 29, 2025
 - II. Air Quality, Health Risk Analysis, and Greenhouse Gas Technical Analysis, performed by Richard Miller, Air Quality and Climate Change Specialist, Johnson Johnson and Miller Air Quality Consulting Services, dated February 16, 2026
 - III. Central California Information Center Report, dated July 2, 2024

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- ☐ I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- ☐ I find that the proposed project **MAY** have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or **NEGATIVE DECLARATION** pursuant to applicable

standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature on file.

Prepared by Emily DeAnda, Associate Planner

August 12, 2026

Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration.

Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

- a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). References to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

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

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

9) The explanation of each issue should identify:

a) the significant criteria or threshold, if any, used to evaluate each question; and

b) the mitigation measure identified, if any, to reduce the impact to less than significant.

ISSUES

I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

Discussion: The site itself is not considered to be a scenic resource or unique scenic vista. The project site is currently improved with a manufactured home, and a produce stand currently in use on the property. The balance of the current parcel is planted in almond trees and is bisected by the Lower Lateral 2 ½ Turlock Irrigation District (TID) canal.

The project proposes to develop the 7.16± acres, located on the northeast corner of the Keyes Road and Central Avenue intersection, with a 12-pump fueling station, a 4,000± square-foot convenience store with an attached car wash, and a 7,500± square-foot quick-serve restaurant with a drive-through, in two phases. The remainder will remain designated as Agriculture and zoned General Agriculture (A-2-40); no improvements are proposed on the remainder under this request. Phase 1 of the proposed project includes the demolition of the existing 3,000 square-foot produce stand. The surrounding area is comprised of orchards to the north, east and south; an almond hulling and shelling facility to the northeast; a horse boarding facility to the southwest; and ranchettes to the south and west of the project site.

A total of .42± acres of landscaping, including drought tolerant shrubs, are proposed to be installed around the convenience store, quick-serve restaurant, and parking areas; 24-foot-tall lighting poles are proposed to be installed throughout the parking lot; and a monument sign is proposed to be installed at the corner of Keyes and Central Road. To prevent the potential for the creation of a new source of substantial light or glare affecting the day or nighttime views in the area, a development standard will be applied to the project requiring that a photometric lighting plan be submitted for review and approval to the Planning Department prior to issuance of a building permit for the site. With the inclusion of this development standard, aesthetic impacts from the project are considered to be less-than significant.

Mitigation: None.

References: Application information; Stanislaus County Zoning Ordinance; Stanislaus County General Plan and Support Documentation¹.

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

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?			X	
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Discussion: The California Department of Conservation's Important Farmland Maps considers the 17.6± acre parcel to be Unique Farmland and Prime Farmland. The majority of the proposed 7.16± acre parcel to be developed is considered to be Unique Farmland, and the proposed 10.44± acre remainder, which will remain designated as General Agriculture and planted in orchard, is considered to be entirely Prime Farmland. Stanislaus County considers land that meets at least one of the following requirements to be prime farmland under the Uniform Rules: parcels comprised of Grade 1 or 2 soils; irrigated pastureland which supports livestock used for the production of food and fiber; and land used for unprocessed agricultural plant production, including fruit or nut bearing trees, with an annual gross value of not less than eight hundred dollars per acre. The USDA Natural Resources Conservation Service's Eastern Stanislaus County Soil Survey indicates that approximately 75% of the project site proposed to be developed is comprised of Dinuba sandy loam (DsA), shallow with zero to one percent slopes, and the remaining 25% of the project site is comprised of Dinuba sandy loam (DrA), with zero to one percent slopes. The current 17.6± acre parcel is planted in approximately 15± acres of almond trees and is not enrolled in a Williamson Act Contract. Based on the County's Uniform Rules the project site qualifies as prime farmland.

The project site is bisected by the Lower Lateral 2 ½ Turlock Irrigation District (TID) canal and receives irrigation water from TID. The project was referred to TID who responded requesting that a minimum six-foot-tall solid masonry or concrete wall be installed next to TID's right-of-way along the canal, per District standards and specifications; that an easement centered on a private pipeline located on the east side of the northern proposed remainder parcel be recorded for the benefit of downstream users; that TID review and approve all maps and plans of the project; and that any improvements to this property which impacts irrigation facilities be subject to TID's approval and meet all standards and specifications. If it is determined that irrigation facilities will be impacted, the applicant will need to provide irrigation improvement plans and enter into an Irrigation Improvements Agreement for the required irrigation facility modifications. Additionally, TID commented that all work on irrigation facilities only be performed during the non-irrigation season (typically from November 1 – March 1). TID's comments will be placed on the project as Development Standards.

To allow for the development of the proposed project the site must be rezoned to Planned Development. The General Plan designation of the parcel is Agriculture and must be consistent with the proposed zoning district of Planned Development; accordingly, the application also includes a General Plan amendment to Planned Development. Goal 2, Policy 2.7 of the Agricultural Element states that, "Proposed amendments to the General Plan Diagram (map) that would allow the conversion of agricultural land to non-agricultural uses shall be approved only if they are consistent with the County's conversion criteria." Implementation 1, of the Agricultural Element's Policy 2.7 describes the procedures for processing amendments to the General Plan land use designation from "Agriculture" to another designation:

Conversion Consequences. The direct and indirect effects, as well as the cumulative effects, of the proposed conversion of agricultural land shall be fully evaluated.

Conversion Considerations. In evaluating the consequences of a proposed amendment, the following factors shall be considered: plan designation; soil type; adjacent uses; proposed method of sewage treatment; availability of water, transportation, public utilities, fire and police protection, and other public services; proximity to existing airports and airstrips; impacts on air and water quality, wildlife habitat, endangered species and sensitive lands; and any other factors that may aid the evaluation process.

Conversion Criteria. Proposed amendments to the General Plan Diagram (map) that would allow the conversion of agricultural land to urban uses shall be approved only if the Board of Supervisors makes the following findings:

- A. Overall, the proposal is consistent with the goals and policies of the General Plan.
- B. There is evidence on the record to show a demonstrated need for the proposed project based on population projections, past growth rates, and other pertinent data.
- C. No feasible alternative site exists in areas already designated for the proposed uses.
- D. Approval of the proposal will not constitute a part of, or encourage, piecemeal conversion of a larger agricultural area to non-agricultural uses and will not be growth-inducing (as used in the California Environmental Quality Act).
- E. The proposed project is designed to minimize conflict and will not interfere with agricultural operations on surrounding agricultural lands or adversely affect agricultural water supplies.
- F. Adequate and necessary public services and facilities are available or will be made available as a result of the development.
- G. The design of the proposed project has incorporated all reasonable measures, as determined during the CEQA review process, to mitigate impacts to agricultural lands, fish and wildlife resources, air quality, water quality and quantity, or other natural resources.

The surrounding area is comprised of orchards to the north, east and south; an almond hulling and shelling facility, and the City of Ceres to the northeast; the community of Keyes to the east; a horse boarding facility to the southwest; ranchettes to the south and west of the project site; and a winery to the west. The nearest parcels in production agriculture are a 55± acre farmed parcel immediately adjacent to the project site to the east, a 38± acre farmed parcel to the south across East Keyes Road which is enrolled in a Williamson Act Contract, and two 18± acre farmed parcels west across Central Avenue, one of which is enrolled in a Williamson Act Contract. Similarly situated parcels of 17± acres or more, in agricultural production and zoned General Agriculture (A-2-40), are located within the immediately surrounding area.

General Plan Amendment No. 2011-01 - Revised Agricultural Buffers was approved by the Board of Supervisors on December 20, 2011, to modify County requirements for buffers on agricultural projects. The County's Agricultural Element's Agricultural Buffer Guidelines states that new or expanding uses approved by discretionary permit in the A-2 zoning district or on a parcel adjoining the A-2 zoning district should incorporate a minimum 150-foot-wide agricultural buffer setback, or 300-foot-wide buffer setback for people intensive uses, to physically avoid conflicts between agricultural and non-agricultural uses. Public roadways, utilities, drainage facilities, rivers and adjacent riparian areas, landscaping, parking lots, and similar low people intensive uses are permitted uses within the buffer setback area. Based on the proposed use a 300-foot-wide buffer for people intensive uses would be required, however, the applicant has proposed an alternative buffer for compliance with the policy. The proposed project meets the 300-foot-wide buffer to the east of the

development; however, the project will not meet the buffer requirements on the north, west, or south sides of the project area. The applicant proposes an alternative buffer of 150-foot setback area from the parcels across Central Avenue to the west and across East Keyes Road to the south, as well as an evergreen hedge, and a variety of trees and shrubs along the frontage of Central Avenue and East Keyes Road, as their alternative. To the north, the applicant proposes a no-buffer alternative and is not proposing landscaping along the property line or fencing as the TID canal abuts the proposed parcel to the north of the development creating a barrier between the parcel to be developed and the adjacent proposed remainder parcel to the north. The project was referred to the Stanislaus County Agricultural Commissioner, and no comments have been received to date.

No forest lands exist in Stanislaus County. Therefore, this project will have no impact to forest land or timberland. However, the project would convert prime and unique farmland to a non-agricultural use. Accordingly, a mitigation measure has been incorporated into the project requiring that farmland mitigation be provided based on a 1:1 ratio to the amount of prime and unique farmland to be converted (7.16 acres) through either a long-term agricultural easement or through the payment of an in-leu fee to a land trust. The agricultural easement shall meet all criteria, including location and characteristic criteria of the County's adopted Farmland Mitigation Program Guidelines, in effect at the time of project approval, and shall be accepted by the Planning Director. prior to issuance of a building or grading permit. Impacts to agricultural resources are considered to be less than significant with mitigation incorporated into the project.

Mitigation:

1. Farmland mitigation shall be provided based on a 1:1 ratio to the amount of farmland converted (7.16 acres). The mitigation may be met through direct acquisition of an agricultural easement or through the payment of an in-lieu fee. The easement or in-lieu fee shall be administered by a land trust, determined to be acceptable by the County Planning Director and shall meet all criteria, including location and characteristic criteria of the County's adopted Farmland Mitigation Program Guidelines, in effect at the time of project approval, as determined to be applicable by the Planning Director. Agricultural mitigation land shall be:
 - Located in Stanislaus County;
 - Designated Agriculture by the Land Use Element of the Stanislaus County General Plan;
 - Zoned General Agriculture (A-2)
 - Located outside a Local Agency Formation Commission (LAFCO) adopted Sphere of Influence of a city;
 - Agricultural Mitigation land shall be in conformance with the A-2 zoning district;
 - The type of agricultural related activity allowed on mitigation land shall be specified as part of the agricultural conservation easement and shall not be less restrictive than the A-2 zoning district;
 - Land already effectively encumbered by a conservation easement of any nature is not eligible to qualify as agricultural mitigation land;
 - The agricultural mitigation land shall be of equal or better soil quality than the agricultural land whose use is being changed to nonagricultural uses. Priority shall be given to lands designated as 'prime farmland', 'farmland of statewide importance' and 'unique farmland' by the California Department of Conservation's Farmland Mapping and Monitoring Program; and

- The agricultural mitigation land shall have an adequate water supply to support the agricultural use of the land. The water rights on the agricultural mitigation land shall be protected in the farmland conservation easement.

References: Application information; United States Department of Agriculture NRCS Web Soil Survey; California State Department of Conservation Farmland Mapping and Monitoring Program - Stanislaus County Farmland 2022; Referral response from Turlock Irrigation District, dated November 21, 2025; Stanislaus County Zoning Ordinance (Title 21); Stanislaus County General Plan and Support Documentation¹.

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

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

The project proposes to develop 7.16± acres of a 17.6± acre parcel, located on the northeast corner of the Keyes Road and Central Avenue intersection, with a 12-pump fueling station, a 4,000± square-foot convenience store with an attached 2,500 square-foot car wash, and a 7,500± square-foot quick-serve restaurant with a drive-through, in two phases. In addition to the subdivision of the property,

Phase 1 of the proposed project will include the demolition of the existing 3,000 square-foot produce stand and construction of the fueling station, convenience store, car wash, trash enclosure, four underground storage tanks, and parking lot with 21 parking spaces. The fueling station is proposed to be open seven days a week, 24 hours per-day. A total of 10-12 employees is anticipated for the convenience store, with a maximum shift of four employees, with up to three shifts per-day. Access for the development under Phase 1 is proposed from Central Avenue via a 25-foot-wide driveway and from Keyes Road via a 36-foot-wide driveway. Construction under Phase 1 is anticipated to begin within two years of approval, if approved. Phase 2 will consist of construction of the quick-serve restaurant with a drive-through, a trash enclosure, and 37 additional parking spaces. Access for the development under Phase 2 will be taken from Central Avenue via a 25-foot-wide driveway. The quick-serve restaurant is proposed to operate seven days a week from 8:00 a.m. to 10:00 p.m. and with a total of 10-15 employees (five to six on a maximum shift with up to three shifts per-day).

A Trip Generation & VMT Screening Analysis was prepared for the project by Fehr & Peers on July 29, 2025. The project is projected to generate approximately 6,600 daily trips, including 659 trips during the AM peak hour and 522 during the PM peak hour upon full build out of both phases of development. After accounting for internal and pass-by trip reductions, the net-new trip estimates are 4,930 daily trips, 473 AM peak hour trips, and 374 PM peak hour trips. As of July 1, 2020, CEQA Guidelines Section 15064.3(b) states that the recommended metric for the evaluation of transportation impacts is VMT. It outlines the criteria for analyzing a project's transportation impacts. For land use projects, this section states that "vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact". A technical advisory on evaluating transportation impacts in CEQA published by the Governor's Office of Planning and Research (OPR) in December of 2018 states that local-serving retail developments typically reduce VMT by redistributing and shortening trips rather than generating new ones. As a result, such developments are generally considered to have a less-than-significant transportation impact. OPR defines locally serving retail as developments with a building floor area of less than 50,000 sq. ft. The proposed project, including the gas station, convenience store, carwash, and drive-through restaurant, has a combined floor area and gas station canopy under 50,000 sq. ft. Therefore, it can be categorized as a locally serving retail project and is presumed to have a less-than-significant VMT impact.

The primary source of air pollutants generated by this project would be classified as being generated from "mobile" sources. Mobile sources would generally include dust from roads, farming, and automobile exhausts. Mobile sources are generally regulated by the Air Resources Board of the California EPA which sets emissions for vehicles and acts on issues regarding cleaner burning fuels and alternative fuel technologies. As such, the District has addressed most criteria air pollutants through basin wide programs and policies to prevent cumulative deterioration of air quality within the Basin.

A referral response was received from the SJVAPCD which recommended that a more detailed preliminary review of the project be conducted for the project's construction and operational emissions to determine whether the project will exceed the District's thresholds of significance for carbon monoxide (CO), oxides of nitrogen (NOx), reactive organic gases (ROG), oxides of sulfur (SOx), and particulate matter (PM10 and PM2.5). Further, the SJVAPCD recommended other potential air impacts related to Toxic Air Contaminants, Ambient Air Quality Standards, and Hazards and Odors be addressed. The SJVAPCD recommended the project be evaluated for potential health impacts to surrounding receptors (on-site and off-site) resulting from operational and multiyear construction Toxic Air Contaminants (TAC) emissions and stated that a Health Risk Assessment

should evaluate the risk associated with sensitive receptors in the area and mitigate any potentially significant risk to help limit emission exposure to sensitive receptors. The SJVAPCD also recommended the County advise the applicant to utilize zero emission equipment. Additionally, SJVAPCD recommended that if emissions exceed 100 pounds per-day of any pollutant, an Ambient Air Quality Analysis (AAQA) be performed. The SJVAPCD recommended the environmental document include a discussion on the feasibility of implementing a Voluntary Emission Reduction Agreement (VERA) for pound to pound mitigation of emissions increases through a process that would require the applicant to provide funds to the SJVAPCD's incentive program which offers grants for projects that achieve emission reductions. Additionally, the SJVAPCD recommended that a development standard be placed on the project requiring the assessment and potential installation of particular matter emission control systems for new large restaurants operating under-fired char broilers. Urban greening, clean lawn and gardening equipment, on-site solar development and electric vehicle charging were also recommended by the SJVAPCD for the project.

The SJVAPCD response indicated the project will be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) which requires an Authority to Construct (ATC) and Permit to Operate (PTO) permit for the project, Rule 9510 (Indirect Source Review) which requires the submittal of an Air Impact Application (AIA), Rule 4002 (National Emissions Standards for Hazardous Air Pollutants), Rule 4601 (Architectural Coatings), District Regulation VIII (Fugitive PM10 Prohibitions) which requires submittal of a dust control plan pursuant to District Rule 8021 (Construction, Demolition, Excavation, and Other Earthmoving Activities), and may be subject to Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations).

In response to the SJVAPCD's comments, an Air Quality, Health Risk Analysis, and Greenhouse Gas Technical Analysis (Analysis) was performed, dated February 16, 2026, by Richard Miller, Air Quality and Climate Change Specialist, Johnson Johnson and Miller Air Quality Consulting Services. The Analysis evaluated whether the estimated criteria air pollutant, ozone precursor, toxic air contaminant (TAC), and/or greenhouse gas (GHG) emissions generated from construction and/or operation of the project would cause significant impacts to air resources in the project area. The methodology followed the Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI) prepared by the SJVAPCD for the quantification of emissions and evaluation of potential impacts to air resources and the SJVAPCD's Guidance for Valley Land-Use Agencies in Addressing GHG Emission Impacts for New Projects under the California Environmental Quality Act (CEQA). The Analysis utilized the California Emissions Estimator Model (CalEEMod) for operational and construction related emissions, Emission Factor (EMFAC) for TAC emissions from operation, the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) for dispersion modeling, and Hot Spots Analysis & Reporting Program 2 (HARP2) for health risk metric calculations.

The Analysis modeled construction of the entire project (Phases 1 and 2) as a single phase in CalEEMod which represents a "worst-case" analysis scenario since emission factors for construction equipment decrease as the analysis year increases, due to improvements in technology and more stringent regulatory requirements. Therefore, construction emissions would be similar or decrease if the construction schedule moved to later years or is phased over multiple years. Default values based on the size of the construction area were used in CalEEMod for construction equipment as well as construction vehicle trips. The construction equipment included under CalEEMod's default values include tractors, loaders, backhoes, rubber-tired dozers, graders, scrapers, pavers, paving equipment, rollers, cement and mortar mixers, cranes, forklifts, generator sets, welders, and air

compressors. Construction vehicle trips per-day are estimated to be 141 trips per-day including worker trips, vendor trips, and haul trips per-day. The construction schedule used under the analysis includes 283 days of construction over the course of 12 months for the entirety of the project.

Direct operational emissions including motor vehicle emissions were developed using the assumptions consistent with the traffic memorandum prepared by Fehr and Peers dated July 29, 2025, and the use of CalEEMod's default vehicle fleet mix for Stanislaus County. CalEEMod defaults were used to estimate emission from area sources such as consumer products to be used over the operation of the project, architectural coatings, and landscape emissions. Indirect emissions including those emitted off-site associated with the project include energy use, water use, wastewater use and solid waste. Emissions associated with the building electricity and natural gas usage (non-hearth) were estimated based on the land use type and size, and CalEEMod defaults were used for electricity and water consumption, and solid waste disposal.

The following criteria air pollutants were assessed in the Analysis: reactive organic gases (ROG), oxides of nitrogen (NOX), carbon monoxide (CO), sulfur oxides (SOX), particulate matter less than 10 microns in diameter (PM10), and particulate matter less than 2.5 microns in diameter (PM2.5). The proposed commercial project, including gasoline and diesel fueling, would not include sources expected to generate substantial quantities of SOX emissions during construction or operation. There are no boilers, refineries, industrial combustion sources, or large stationary combustion sources proposed as part of the project. The Analysis includes SO2 emission estimates and determined no further analysis of SO2 is required. GHGs identified in the Analysis included those identified by AB 32, which includes carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF6), and nitrogen trifluoride (NF3). The proposed project would generate a variety of GHGs, including several defined by AB 32 such as CO2, CH4, and N2O. Certain GHGs defined by AB 32 would not be emitted by the proposed commercial project. HFCs, PFCs, SF6, and NF3 are typically used in industrial applications, none of which would be used for typical commercial or gasoline and diesel fueling operations. GHG emissions associated with the proposed project construction, as well as future operations were estimated using CO2 equivalent (CO2e) emissions as a proxy for all GHG emissions. Construction GHG emissions were amortized over the lifetime of the proposed project. In order to obtain the CO2e, an individual GHG is multiplied by its Global Warming Potential (GWP). The GWP designates on a pound for pound basis the potency of the GHG compared to CO2. TACs assessed under the Analysis included Diesel Particulate Matter (DPM) represented as particulate matter that is 10 micrometers in diameter (PM10), asbestos, and Benzene.

Stanislaus County has not established specific CEQA significance thresholds regarding Air Quality or GHG emissions. The SJVAPCD thresholds for annual emission significance for regional impacts from operation and construction were utilized by the Analysis. The SJVAPCD thresholds include 100 tons per year CO, 27 tons per year SOX, 10 tons per year NOX, 10 tons per year ROG, 15 tons per year PM10 and 15 tons per year PM2.5 for regional impacts, and 100 pounds per-day of any criteria pollutant for localized impacts. The proposed project's combined construction and operational emissions per year are anticipated to be 24.65 tons per year CO, 4.66 tons per year NOX, 4.48 tons per year ROG, 4.42 tons per year PM10, and 1.19 tons per year of PM2.5. For localized impacts, the analysis estimated the following amount of emissions per-day: 92.63 pounds per-day CO, 25.37 pounds per-day NOX, 32.72 pounds per-day ROG, 6.19 pounds per-day PM10 and 2.65 pounds per-day PM2.5. Both regional annual emissions and per-day localized emission resulting from construction and operation of the project would not exceed SJVAPCD's regional criteria pollutant

emissions quantitative thresholds, or localized emissions quantitative thresholds. Therefore, based on the SJVAPCD's guidance, the construction and operational emissions would not cause an ambient air quality standard violation. As such, impacts would be less than significant. Additionally, sources requiring ATCs and PTOs will be required to comply with SJVAPCD best available control technology (BACT) requirements. Compliance with regulations would ensure that the project's stationary sources would not exceed SJVAPCD significance thresholds. The project would comply with all applicable SJVAPCD rules and regulations. Therefore, the proposed project would not conflict with or obstruct implementation of the applicable air quality attainment plan.

A Health Risk Assessment (HRA) was conducted under the Analysis. Health risks from TACs are a function of both concentration and duration of exposure. The project site is located within 1,000 feet of existing sensitive receptors (dwellings) that could be exposed to diesel emission exhaust during the construction period. The SJVAPCD's current thresholds of significance for TAC emissions is an increase in cancer risk for the maximally exposed individual of 20 in a million, and greater than or equal to 1.0 for chronic non-cancer hazard index and acute non-cancer hazard from maximum hourly exposure. A project-level assessment was conducted of the potential community health risk and health hazard impacts on surrounding sensitive receptors resulting from the emissions of TACs during construction and operation under the Analysis. The Analysis found that the maximum cancer risk from the project's combined construction and operational emissions would be 24.82 in one million parts which would exceed the applicable threshold of 20 in one million parts. The study recommend a mitigation measure be incorporated into the project to reduce diesel particulate matter (DPM) emissions during construction from off-road equipment, as construction-related emissions contribute to the overall cancer risk associated with the project. The proposed mitigation requires implementation of enhanced construction equipment standards, including the use of Tier 4 Final off-road engines and electric-powered small equipment when available, to reduce DPM emissions and associated health risks. With the mitigation in place, total exposure from combined project construction and operation would be 16.80 which is below the threshold of 20 in one million parts. Therefore, the combined construction and operational exposure would be less than significant after mitigation.

The review of the Analysis concluded that the project would not exceed SJVAPCD localized emission daily screening levels for any criteria pollutant during construction or operations. The project is not located in an area with suitable habitat for Valley fever spores and is not in an area known to contain naturally occurring asbestos. Although construction and operational health risks would be less than significant when evaluated independently, the combined construction and operational cancer risk would exceed the applicable health risk threshold prior to implementation of mitigation. Implementation of the mitigation would reduce construction-related diesel particulate matter emissions such that combined health risks would be less than significant. As such, with implementation of mitigation, the project would not result in significant impacts to sensitive receptors.

The Analysis found that there would not be conditions under which the project would have the potential to expose a substantial number of people to odors emitted from construction or operations of the project, and the impact would be less than significant.

The Analysis was referred to the SJVAPCD which responded on April 9, 2026 with a revised comment letter specifying that the project was not expected to exceed any of the significance thresholds identified by the SJVAPCD's GAMAQI, and that impacts to sensitive receptors based on the Health Risk Assessment (HRA) would not be significant with mitigation. Additionally, the

SJVAPCD provided recommend best management practices be applied to the project regarding kitchens with char broilers, urban greening, clean lawn and gardening equipment, on-site solar development, and electric vehicle charging. A development standard will be placed on the project requiring that the applicant be in compliance with the District's rules and regulations prior to issuance of a building, grading, or demolition permit, in addition to a development standard regarding the use of under-fired char broilers.

Impacts to Air Quality and health risk are considered to be less than significant and less than significant with mitigation incorporated specific to impacts to sensitive receptors.

Mitigation:

2. Prior to issuance of a grading or construction permit, the project developer/property owner shall submit documentation to the Stanislaus County Planning and Community Development Department demonstrating compliance with the following requirements:
 - Where portable diesel engines are use during construction, all off-road equipment with engines greater than 75 horsepower shall meet U.S. Environmental Protection Agency (EPA) or California Air Resources Board (CARB) Tier 4 Final off-road emission standards, unless otherwise specified herein. If Tier 4 Final equipment is not commercially available, the construction contractor shall use the next cleanest available off-road equipment (e.g., Tier 4 Interim) that is commercially available. For purposes of this measure, "commercially available" shall mean equipment that can be obtained taking into consideration factors such as (i) critical-path construction timing and (ii) geographic proximity of equipment suppliers to the project site. If Tier 4 Final equipment is determined to be unavailable, the contractor shall provide written documentation from at least two equipment rental companies for each applicable piece of equipment demonstrating that Tier 4 Final equipment is not commercially available.
 - Electric-powered equipment shall be used for small equipment (i.e., less than 50 horsepower), when such equipment is readily available and feasible for the intended construction activity.

The applicant/developer shall be responsible for providing, to the satisfaction of the Planning Director, documentation of the implementation of the aforementioned requirements. The applicant/developer shall be responsible for paying the County's actual costs of verifying compliance, based on the fully burdened weighted labor rates at the time of services rendered. If the County finds any of the applicable requirements have not been implemented, the applicant/developer shall implement said requirements within the time frame specified in writing by the County.

References: Application information; Trip Generation & VMT Screening Analysis for Proposed Keyes-Central Commercial Development in Stanislaus County, performed by Fehr & Peers, dated July 29, 2025; Air Quality, Health Risk Analysis, and Greenhouse Gas Technical Analysis, performed by Richard Miller, Air Quality and Climate Change Specialist, Johnson Johnson and Miller Air Quality Consulting Services, dated February 16, 2026; San Joaquin Valley Air Pollution Control District (SJVAPCD) referral response, dated November 10, 2025 and as revised on April 9, 2026; Governor's Office of Planning and Research Technical Advisory, December 2018; San Joaquin Valley Air

Pollution Control District - Regulation VIII Fugitive Dust/PM-10 Synopsis; www.valleyair.org; Stanislaus County General Plan and Support Documentation¹.

IV. BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			X	
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?			X	
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Discussion: The project is located within the Ceres Quad of the California Natural Diversity Database (CNDDDB). There are nine animals, two insects, and two plant species which are state or federally listed, threatened, or identified as species of special concern or a candidate of special concern within this quad. These species include the Swainsons hawk, prairie falcon, tricolored blackbird, burrowing owl, riffle sculpin, hardhead, steelhead – Central Valley DPS, Chinook salmon – Central Valley fall/late fall-run ESU, Townsends big-eared bat, Crotch's bumble bee, valley elderberry longhorn beetle, heartscale and subtle orache. There are no reported siting's of any of the aforementioned species on the project site; however, .37± miles to the north of the project site, located within the Riverbank Quad of the CNDDDB, there have been the following occurrences noted in the database: two Crotch's bumble bees were collected in 1946, 1956 and in the vicinity of the Modesto area; valley elderberry longhorn beetle exit holes observed; three adult American bumble bees were collected in 1957, one adult in 1964, eight adult males and two adult females in 1975 and one adult female in 1977; and the CNDDDB for the Riverbank Quad also notes information regarding possible collection of a moestan blister beetle, and separately, the collection of an obscure bumble bee in May of 1946. There is a very low likelihood that these species are present on the project site as it has already been disturbed for agricultural purposes and developed with various structures.

An Early Consultation project referral was sent to the California Department of Fish and Wildlife (formerly the Department of Fish and Game) and no response was received. The project will not conflict with a Habitat Conservation Plan, a Natural Community Conservation Plan, or other locally approved conservation plans. Impacts to endangered species or habitats, locally designated species, or wildlife dispersal or mitigation corridors are considered to be less than significant.

Mitigation: None.

References: Application information; California Department of Fish and Wildlife's Natural Diversity Database Quad Species List; California Natural Diversity Database, Planning and Community Development GIS, accessed August 6, 2026; Stanislaus County General Plan and Support Documentation¹.

V. CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in § 15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?			X	
c) Disturb any human remains, including those interred outside of formal cemeteries?			X	

Discussion: As this project is a General Plan Amendment it was referred to the tribes listed with the Native American Heritage Commission (NAHC), in accordance with SB 18, for a 90-day review period. No responses from the tribal contacts were received. The Muwekma Ohlone Tribe of the San Francisco (S.F.) Bay Area has requested consultation in accordance with AB 52 for all projects located west of the San Joaquin River. This project is not located in that area; accordingly, this project is not being sent to the Muwekma Ohlone S.F. Bay Area tribe. A records search for the project site formulated by the Central California Information Center (CCIC) indicated that there was a low probability of discovery of prehistoric resources, but there may be discovery of historical resources such as standing buildings 45 years or older and possibly subsurface historic-era archaeological features, such as domestic refuse and artifact deposits or building foundations, associated with earlier use on the project site. The CCIC recommended that a qualified historical resources consultant evaluate and formally record any building to be removed if it is 45 years old or older. The CCIC recommended further review for the possibility of identifying prehistoric or historic-era archaeological resources if ground disturbance is considered a part of the current project. No records were found that indicated the site contained any prehistoric, historic, or archeologic resources previously identified on-site. The report concluded that development standards be placed on the project requiring that if any historical resources are discovered during project-related activities, all work is to stop and the lead agency and a qualified professional are to be consulted to determine the importance and appropriate treatment of the find. If Native American remains are found, the County Coroner and the Native American Heritage Commission are to be notified immediately for recommended procedures. If human remains are uncovered, all work within 100 feet of the find should halt in compliance with Section 15064.5(e) (1) of the CEQA Guidelines and Public Resources Code Section 7060.5. Development standards will be added to the project to ensure these requirements are met.

Impacts to cultural resources are considered to be less than significant.

Mitigation: None.

References: Application information; Central California Information Center Report for the project site, dated July 2, 2024; Stanislaus County General Plan and Support Documentation¹.

VI. ENERGY. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

Discussion: The CEQA Guidelines Appendix F states that energy consuming equipment and processes, which will be used during construction or operation such as: energy requirements of the project by fuel type and end use, energy conservation equipment and design features, energy supplies that would serve the project, total estimated daily vehicle trips to be generated by the project, and the additional energy consumed per trip by mode, which shall be taken into consideration when evaluating energy impacts. Additionally, the project's compliance with applicable state or local energy legislation, policies, and standards must be considered.

All construction activities shall be in compliance with all SJVAPCD regulations and with Title 24, Green Building Code, which includes energy efficiency requirements. The operation at full-build out proposes to construct and install a 12-pump fueling station, a 4,000± square-foot convenience store on with an attached 2,500 square-foot car wash, a 7,500± square-foot quick-serve restaurant with a drive-through, two trash enclosures, four underground storage tanks, and 58 parking spaces all of which will require building and grading permits to be obtained. The 2016 California Green Building Standards Code (CALGreen Code) went into effect on January 1, 2017, and includes mandatory provisions applicable to all new residential, commercial, and school buildings. The intent of the CALGreen Code is to establish minimum statewide standards to significantly reduce the GHG emissions from new construction. With the requirements of meeting the Title 24, Green Building Code energy impacts from the project are considered to be less-than significant.

A Trip Generation & VMT Screening Analysis was prepared for the project by Fehr & Peers on July 29, 2025. The project is projected to generate approximately 6,600 daily trips, including 659 trips during the AM peak hour and 522 during the PM peak hour upon full build out of both phases of development. After accounting for internal and pass-by trip reductions, the net-new trip estimates are 4,930 daily trips, 473 AM peak hour trips, and 374 PM peak hour trips. As of July 1, 2020, CEQA Guidelines Section 15064.3(b) states that the recommended metric for the evaluation of transportation impacts is VMT. It outlines the criteria for analyzing a project's transportation impacts. For land use projects, this section states that "vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact". A technical advisory on evaluating transportation impacts in CEQA published by the Governor's Office of Planning and Research (OPR) in December of 2018 states that local-serving retail developments typically reduce VMT by redistributing and shortening trips rather than generating new ones. As a result, such developments

are generally considered to have a less-than-significant transportation impact. OPR defines locally serving retail as developments with a building floor area of less than 50,000 sq. ft. The proposed project, including the gas station, convenience store, carwash, and drive-through restaurant, has a combined floor area and gas station canopy under 50,000 sq. ft. Therefore, it can be categorized as a locally serving retail project and is presumed to have a less-than-significant VMT impact.

Energy consuming equipment and processes include construction and operational equipment, trucks, and the employee vehicles. As discussed in Section III – *Air Quality*, a referral response was received from the SJVAPCD indicating that emissions resulting from construction and operation of the project may exceed the District's thresholds of significance for carbon monoxide (CO), oxides of nitrogen (NOx), reactive organic gases (ROG), oxides of sulfur (SOx), (PM10), and particulate matter. The SJVAPCD recommended that a more detailed preliminary review of the project be conducted for the project's construction and operational emissions. An Air Quality, Health Risk Analysis, and Greenhouse Gas Technical Analysis (Analysis) was performed, dated February 16, 2026, by Richard Miller, Air Quality and Climate Change Specialist, Johnson Johnson and Miller Air Quality Consulting Services to study the health-related impacts and air quality impacts of the proposed project. Construction and operational emissions were analyzed with the California Emissions Estimator Model (CalEEMOD). The analysis evaluated construction and operational ROG, NOx, CO, SO2, PM10, and PM2.5 emissions. CalEEMod default equipment listing for general heavy industrial usages were utilized. Default horsepower, daily operating hours, and load factors were also used. The construction equipment evaluated included tractors, loaders, backhoes, rubber-tired dozers, graders, scrapers, pavers, paving equipment, rollers, cement and mortar mixers, cranes, forklifts, generator sets, welders, and air compressors. Construction vehicle trips were estimated to be 141 trips per-day including worker trips, vendor trips and haul trips per-day. The construction schedule used under the analysis includes 283 days of construction over the course of 12 months for the entirety of the project. Operational mobile sources include vehicle and truck trips as modeled under the Trip Generation & VMT Screening Analysis prepared by Fehr & Peers for the proposed project. The Analysis found that construction and operational health risks would be less than significant but found the project to potentially exceed the applicable health risk threshold; however this impact was determined to be less than significant with the application of mitigation which requires implementation of best practices. The construction equipment will be temporary in nature and is not anticipated to consume a significant amount of energy resources. The equipment to be utilized under the project will not have the potential to significantly contribute to an exceedance of state or federal Ambient Air Quality Standards. A more detailed discussion may be found in Section III – *Air Quality* of this document.

The GHG emissions resulting from the proposed project were also studied under the Analysis. The analysis identified GHG emissions resulting from both construction and operational activities under the proposed request. Construction emissions include contributions from on-site construction equipment, worker commutes, vendor trips, and material hauling to and from the project site. Operational emissions include long-term emissions resulting from the operation of the project, including utility usage and mobile sources as well. As discussed in further detail in Section VIII – *Greenhouse Gas Emissions*, the proposed project's GHG emissions resulting from construction are expected to be 320 MTCO2e per year. Total GHG emissions resulting from the operation of the project includes emissions from energy consumption, mobile vehicles, water usage, solid waste generation, refrigerants, and the amortized construction emissions divided over the life of the project which is estimated to be 30 years (320 MTCO2e/yr divided by 30 equals 10.7 MTCO2e/yr). Total operational emissions are estimated to be 4,973 MTCO2e/yr. Stanislaus County does not have locally adopted thresholds of significance regarding GHG emissions, therefore the Analysis evaluated

the consistency of the project with the State's 2030 target for GHG emissions, adopted State regulations, the SB 32 2017 Scoping Plan Update, and the 2022 Scoping Plan Actions and Strategies. The project's GHG emissions, both direct and indirect, would not result in a significant impact on the environment. In the absence of an adopted numeric GHG threshold consistent with the State's 2030 target, the determination of significance is based on the project's consistency with regulations and requirements adopted to implement statewide, regional, and local plans for the reduction or mitigation of GHG emissions. The project would comply with all applicable federal, State, and local regulations governing GHG emissions, including the California Building Standards (Title 24 and CALGreen).

The Analysis was referred to the SJVAPCD which responded on April 9, 2026, with a revised comment letter specifying that the project was not expected to exceed any of the significance thresholds identified by the SJVAPCD's GAMAQI and did not provide additional comments regarding significant impacts from GHG emissions or energy consumption. The SJVAPCD continued to recommend that a development standard be placed on the project requiring the assessment and potential installation of particular matter emission control systems for new large restaurants operating under-fired char broilers, urban greening, clean lawn and gardening equipment, on-site solar development and electric vehicle charging to be incorporated for the project. A development standard will be placed on the project requiring that the applicant be in compliance with the District's rules and regulations prior to issuance of a building, grading, or demolition permit, in addition to a development standard regarding the use of under-fired char broilers.

The project was referred to Turlock Irrigation District (TID) which responded that a 12kV distribution line is located along the north side of Keyes Road and is fed off a 12kV feeder line along the west side of Central Avenue. TID indicated that the developer may be responsible for offsite work for TID facilities to extend service to the northwest corner of Keyes Road and Central Avenue intersection. The developer will be responsible for providing and installing all substructures per TID design specifications. A ten-foot public utility easement must be dedicated along all street frontages. The owner/developer must apply for a facility change for any pole or electrical facility relocation, and facility changes are performed at developer's expense. TID requested the front building setback to be a minimum of 15-feet from the property line and a minimum of 15-feet from the back-of-sidewalk to enable the safe placement of utilities. TID's comments will be placed on the project as development standards.

It does not appear that this project will result in significant impacts to the wasteful, inefficient, or unnecessary consumption of energy resources. A development standard will be added to this project to address compliance with Title 24, Green Building Code, for projects that require energy efficiency. Additionally, a development standard will be added requiring any site lighting to meet industry standards for energy efficiency.

Impacts to energy are considered to be less than significant.

Mitigation: None.

References: Application information; Trip Generation & VMT Screening Analysis for Proposed Keyes-Central Commercial Development in Stanislaus County, performed by Fehr & Peers, dated July 29, 2025; Air Quality, Health Risk Analysis, and Greenhouse Gas Technical Analysis, performed by Richard Miller, Air Quality and Climate Change Specialist, Johnson Johnson and Miller Air Quality Consulting Services, dated February 16, 2026; San Joaquin Valley Air Pollution Control District

(SJVAPCD) referral response, dated November 10, 2025 and as revised on April 9, 2026; Referral response from Turlock Irrigation District (TID), dated November 21, 2025; Governor's Office of Planning and Research Technical Advisory, December 2018; San Joaquin; 2016 California Green Building Standards Code Title 24, Part 11(Cal Green); 2016 California Energy Code Title 24, Part 6; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: The USDA Natural Resources Conservation Service's Eastern Stanislaus County Soil Survey indicates that approximately 75% of the project site is comprised of Dinuba sandy loam (DsA), with zero to one percent slopes, and 25% Dinuba sandy loam (DrA), with zero to one percent slopes. As contained in Chapter 5 of the General Plan Support Documentation, the areas of the County subject to significant geologic hazard are located in the Diablo Range, west of Interstate 5; however, as per the California Building Code, all of Stanislaus County is located within a geologic hazard zone (Seismic Design Category D, E, or F) and a soils test may be required at building permit application. Results from the soils test will determine if unstable or expansive soils are present. If such soils are present, special engineering of the structure will be required to compensate for the soil deficiency. Any structures resulting from this project will be designed and built according to building standards appropriate to withstand shaking for the area in which they are constructed. A grading permit will be required for the project subject to Public Works review and Standards and Specifications. Additionally, as part of the grading permit submittal, a WDID (Waste Discharge Identification) Number issued by the State of California and a copy of the Notice of Intent (NOI) will be required to be submitted prior to plan approval and/or issuance of a grading permit. Likewise, any addition or expansion of a well or septic tank would require the approval of the Department of Environmental Resources (DER) through the building permit process, which also takes soil type into consideration within the specific design requirements. DER, Public Works, and the Building Permits Division review and approve any building or grading permit to ensure their standards are met. Development standards regarding these standards will be applied to the project and will be triggered when a grading or building permit is requested.

It does not appear that this project will result in significant impacts to any paleontological resources or unique geologic features. Development standards applicable to development of the parcels regarding the discovery of such resources during the construction process will be added to the project. The project site is not located near an active fault or within a high earthquake zone. Landslides are not likely due to the flat terrain of the area. Impacts to Geology and Soils are considered to be less than significant.

Mitigation: None.

References: Application information; Referral response from the Department of Environmental Resources (DER), dated November 10, 2025; Stanislaus County General Plan and Support Documentation¹.

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

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

Phase 1 of the proposed project will include the demolition of the existing 3,000 square-foot produce stand and construction of a 12-pump fueling station, a 4,000± square-foot convenience store with an attached 2,500 square-foot car wash, a trash enclosure, four underground storage tanks, and 21 parking spaces. The fueling station is proposed to be open seven days a week, 24 hours per-day. A total of 10-12 employees are anticipated for the convenience store, with a maximum shift of four employees, with up to three shifts per-day. Construction under Phase 1 is anticipated to begin within two years of approval, if approved. Phase 2 will consist of construction of a 7,500± square-foot quick-serve restaurant with a drive-through, a trash enclosure, and 37 parking spaces. The quick-serve restaurant is proposed to operate seven days a week from 8:00 a.m. to 10:00 p.m. and with a total of 10-15 employees (five to six on a maximum shift with up to three shifts per-day). The development Construction under Phase 2 is anticipated to begin within five years of approval, after the completion of Phase 1.

A Trip Generation & VMT Screening Analysis was prepared for the project by Fehr & Peers on July 29, 2025. The project is projected to generate approximately 6,600 daily trips, including 659 trips during the AM peak hour and 522 during the PM peak hour upon full build out of both phases of development. After accounting for internal and pass-by trip reductions, the net-new trip estimates are 4,930 daily trips, 473 AM peak hour trips, and 374 PM peak hour trips. As required by CEQA Guidelines Section 15064.3, potential impacts regarding Green House Gas Emissions should be evaluated using Vehicle Miles Traveled (VMT). The calculation of VMT is the number of cars/trucks

multiplied by the distance traveled by each car/truck. Stanislaus County has currently not adopted any significant thresholds for VMT, and projects are treated on a case-by-case basis for evaluation under CEQA. However, the State of California - Office of Planning and Research (OPR) has issued guidelines regarding VMT significance under CEQA. One of the guidelines, presented in the December 2018 document Technical Advisory on Evaluating Transportation Impacts in CEQA, states that local-serving retail developments typically reduce VMT by redistributing and shortening trips rather than generating new ones. As a result, such developments are generally considered to have a less-than-significant transportation impact. OPR defines locally serving retail as developments with a building floor area of less than 50,000 square feet. The proposed project, including the gas station, convenience store, carwash, and drive-through restaurant, has a combined floor area and gas station canopy under 50,000 square feet. Therefore, it can be categorized as a locally serving retail project and is presumed to have a less-than-significant VMT impact.

As mentioned in Section III – *Air Quality*, a referral response was received from the SJVAPCD which recommended that a more detailed preliminary review of the project be conducted for the project's construction and operational emissions to determine if the project would exceed any of the significance thresholds as identified in the SJVAPCD's Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI), including: 100 tons per-year of carbon monoxide (CO), ten tons per-year of oxides of nitrogen (NOx), ten tons per-year of reactive organic gases (ROG), 27 tons per-year of oxides of sulfur (SOx), 15 tons per-year of particulate matter of ten microns or less in size (PM10), or 15 tons per-year of particulate matter of 2.5 microns or less in size (PM2.5). The SJVAPCD response indicated the project will be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) which requires an Authority to Construct (ATC) and Permit to Operate (PTO) permit for the project, Rule 9510 (Indirect Source Review) which requires the submittal of an Air Impact Application (AIA), Rule 4002 (National Emissions Standards for Hazardous Air Pollutants), Rule 4601 (Architectural Coatings), District Regulation VIII (Fugitive PM10 Prohibitions) which requires submittal of a dust control plan pursuant to District Rule 8021 (Construction, Demolition, Excavation, and Other Earthmoving Activities), and may be subject to Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations).

In response to the SJVAPCD's comments, an Air Quality, Health Risk Analysis, and Greenhouse Gas Technical Analysis (Analysis) was performed, dated February 16, 2026, by Richard Miller, Air Quality and Climate Change Specialist, Johnson Johnson and Miller Air Quality Consulting Services. The Analysis evaluated whether the estimated criteria air pollutant, ozone precursor, toxic air contaminant (TAC), and/or greenhouse gas (GHG) emissions generated from construction and/or operation of the project would cause significant impacts to air resources in the project area. As mentioned in Section III – *Air Quality* the project is not anticipated to exceed significance thresholds for impacts on ambient air quality; however, the Analysis found that the maximum cancer risk from the project's combined construction and operational emissions would be 24.82 in one million parts which would exceed the applicable threshold of 20 in one million parts. The Analysis proposed a mitigation measure requiring implementation of enhanced construction equipment standards, including the use of Tier 4 Final off-road engines and electric-powered small equipment when available, to reduce DPM emissions and associated health risks. With the mitigation in place, total exposure from combined project construction and operation would be 16.80 in one million parts which is below the threshold of 20 in one million parts. Therefore, the combined construction and operational exposure was found by the Analysis to be less than significant after mitigation.

GHGs identified in the Analysis included those identified by AB 32, which includes carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃). The proposed project would generate a variety of GHGs, including several defined by AB 32 such as CO₂, CH₄, and N₂O. Certain GHGs defined by AB 32 would not be emitted by the proposed commercial project. HFCs, PFCs, SF₆, and NF₃ are typically used in industrial applications, none of which would be used for typical commercial or gasoline and diesel fueling operations. GHG emissions associated with the proposed project construction, as well as future operations were estimated using CO₂ equivalent (CO₂e) emissions as a proxy for all GHG emissions. Construction GHG emissions were amortized over the lifetime of the proposed project. In order to obtain the CO₂e, an individual GHG is multiplied by its Global Warming Potential (GWP). The GWP designates on a pound for pound basis the potency of the GHG compared to CO₂. TACs assessed under the Analysis included Diesel Particulate Matter (DPM) represented as particulate matter that is 10 micrometers in diameter (PM₁₀), asbestos, and Benzene. The analysis identified GHG emissions resulting from both construction and operational activities under the proposed request. Construction emissions include contributions from on-site construction equipment, worker commutes, vendor trips, and material hauling to and from the project site. Operational emissions include long-term emissions resulting from the operation of the project, including utility usage and mobile sources as well. The proposed project's GHG emissions resulting from construction are expected to be 320 MTCO₂e per year. Total GHG emissions resulting from the operation of the project includes emissions from energy consumption, mobile vehicles, water usage, solid waste generation, refrigerants, and the amortized construction emissions divided over the life of the project which is estimated to be 30 years (320 MTCO₂e/yr divided by 30 equals 10.7 MTCO₂e/yr). Total operational emissions are estimated to be 4,973 MTCO₂e/yr. Stanislaus County does not have locally adopted thresholds of significance regarding GHG emissions, therefore the Analysis evaluated the consistency of the project with the State's 2030 target for GHG emissions, adopted State regulations, and both the 2017 and 2022 Scoping Plan Actions and Strategies. The Analysis found that the project's GHG emissions, both direct and indirect, would not result in a significant impact on the environment. In the absence of an adopted numeric GHG threshold consistent with the State's 2030 target, the determination of significance is based on the project's consistency with regulations and requirements adopted to implement statewide, regional, and local plans for the reduction or mitigation of GHG emissions. The project would comply with all applicable federal, State, and local regulations governing GHG emissions, including the California Building Standards (Title 24 and CALGreen). Given the project's adherence to applicable regulatory requirements and its consistency with relevant GHG reduction plans, the Analysis concluded that impacts related to GHG emissions are considered less than significant.

The Analysis was referred to the SJVAPCD which responded on April 9, 2026 with a revised comment letter specifying that the project was not expected to exceed any of the significance thresholds identified by the SJVAPCD's GAMAQI and did not provide additional comments regarding significant impacts from GHG emissions. A development standard will be placed on the project requiring that the applicant be in compliance with the District's rules and regulations prior to issuance of a building, grading, or demolition permit, in addition to a development standard regarding the use of under-fired char broilers. Consequently, GHG emissions associated with this project are considered to be less than significant.

Mitigation: None.

References: Application information; Trip Generation & VMT Screening Analysis for Proposed Keyes-Central Commercial Development in Stanislaus County, performed by Fehr & Peers, dated July 29, 2025; Air Quality, Health Risk Analysis, and Greenhouse Gas Technical Analysis, performed by Richard Miller, Air Quality and Climate Change Specialist, Johnson Johnson and Miller Air Quality Consulting Services, dated February 16, 2026; San Joaquin Valley Air Pollution Control District (SJVAPCD) referral response, dated November 10, 2025 and as revised on April 9, 2026; Referral response from Turlock Irrigation District (TID), dated November 21, 2025; Governor's Office of Planning and Research Technical Advisory, December 2018; San Joaquin; 2016 California Green Building Standards Code Title 24, Part 11(Cal Green); 2016 California Energy Code Title 24, Part 6; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: This request includes the demolition of the existing 3,000 square-foot produce stand and construction of a 12-pump fueling station, a 4,000± square-foot convenience store with an attached 2,500 square-foot car wash, a trash enclosure, four underground storage tanks, and 21

parking spaces under Phase 1. Phase 2 will consist of construction of a 7,500± square-foot quick-serve restaurant with a drive-through, a trash enclosure, and 37 parking spaces.

The Stanislaus County Department of Environmental Resources (DER) is responsible for overseeing hazardous materials. A referral response from the DER Hazardous Materials (Haz Mat) Division is requiring the developer conduct a Phase I or Phase II study prior to the issuance of a grading permit to determine if organic pesticides or metals exist on the project site. The Haz Mat requested that they be contacted should any underground storage tanks, buried chemicals, buried refuse, or contaminated soil be discovered during grading or construction. These comments will be reflected through the application of development standards. The facility will be required to obtain all required hazardous materials permits through Haz Mat, including but not limited to submission of hazardous materials Business information into the California Electronic Reporting System (CERS), preparation of a Risk Management Prevention Program which must be implemented prior to operation of the facility, and compliance with the County's UST/AST program.

Gasoline and diesel tanks are heavily regulated by the federal Environmental Protection Agency (EPA) and State Water Resources Control Board, as well as the local regulatory agency, such as, the Haz Mat Division and Fire Departments. As the lead entity for the Underground Storage Tank (UST) and Above Storage Tank (AST) Programs, Haz Mat reviews, approves, and monitors the construction, operation, repair and removals of UST or AST systems in Stanislaus County. The UST and AST programs are in place in order to protect the environment and groundwater from contamination resulting from UST/ASTs. Each UST/AST site is inspected annually as mandated by State law. Depending on the end uses, the gas station may include EV charging stations. At the time of construction, including the installation of fuel tanks, all applicable building, fire, and hazardous material codes will need to be met as part of the permitting process. Permitting and compliance with Haz Mat's UST/AST Programs and all applicable state or federal permitting will be applied to the project as development standards.

The retail and convenience store will be subject to submitting food facility plans to DER for review and approval, which would require conformance with any local or State requirements for grease interceptors or char broilers. The food facility will also need to meet the Air District's standards for chain-driven (CD) and underfired (UF) char broilers and for Gasoline dispensing facilities (GDFs). These requirements will be applied as development standards for the project.

A referral from the DER Environmental Health Division was also received regarding wastewater generated from the carwash. DER stated that the resulting wastewater cannot be disposed into the on-site waste treatment system (OWTS); only domestic wastewater may be discharged to the OWTS. DER requires a closed-loop system for the carwash should be used, and if unfeasible, the wastewater resulting from the carwash must be tested for possible contaminants. The comments received from DER will be added to the project as development standards.

Pesticide exposure is a risk in areas located in the vicinity of agriculture. Sources of exposure include contaminated groundwater from drift from spray applications. Application of sprays is strictly controlled by the Agricultural Commissioner and can only be accomplished after first obtaining permits. Additionally, agricultural buffers are intended to reduce the risk of spray exposure to surrounding people. The County's Agricultural Element's Agricultural Buffer Guidelines states that new or expanding uses approved by discretionary permit in the A-2 zoning district or on a parcel adjoining the A-2 zoning district should incorporate a minimum 150-foot-wide agricultural buffer setback, or 300-foot-wide buffer setback for people intensive uses, to physically avoid conflicts

between agricultural and non-agricultural uses. Public roadways, utilities, drainage facilities, rivers and adjacent riparian areas, landscaping, parking lots, and similar low people intensive uses are permitted uses within the buffer setback area. Based on the proposed use a 300-foot-wide buffer for people intensive uses would be required, however, the applicant has proposed an alternative buffer for compliance with the policy. The proposed project meets the 300-foot-wide buffer to the east of the development; however, the project will not meet the buffer requirements on the north, west, or south sides of the project area. The applicant proposes an alternative buffer of 150-foot setback area from the parcels across Central Avenue to the west and across East Keyes Road to the south, as well as an evergreen hedge, and a variety of trees and shrubs along the frontage of Central Avenue and East Keyes Road, as their alternative. To the north, the applicant proposes a no-buffer alternative and is not proposing landscaping along the property line or fencing as the TID canal abuts the proposed parcel to the north of the development creating a barrier between the parcel to be developed and the adjacent proposed remainder parcel to the north. The project was referred to the Stanislaus County Agricultural Commissioner, and no comments have been received to date.

The project site is not listed on the EnviroStor database managed by the CA Department of Toxic Substances Control or within the vicinity of any airport. The site is located in a Local Responsibility Area (LRA) for fire protection and is served by Keyes Fire Protection District. The project was referred to the Keyes Fire Protection District, and no comments have been received to date. The project site is not within the vicinity of any wildlands. With permitting requirements in place, hazards and hazardous materials impacts from the project are considered to be less than significant.

Mitigation: None.

References: Application information; Referral response received from the Department of Environmental Resources, Hazardous Materials Division, dated November 10, 2025; Referral response received from the Department of Environmental Resources, Environmental Health Division, dated November 10, 2025; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: The project has proposed a new well and private onsite septic system to serve the use of the commercial development, which includes a convenience market, gas station, car wash, drive-through restaurant, and irrigation of landscaped area. The well will be required to be permitted as a new public water system. Stormwater capture for off-site stormwater runoff will take place within a proposed French drain along the southwest corner of the proposed 7.16± acre parcel. On-site

stormwater runoff is proposed to be handled under two options which include a French drain along the north property line, or a retention basin located within the middle of the 7.16± acre parcel.

A development standard will be added to the project requiring that the Stanislaus County Department of Public Works review and approve a grading, drainage, and erosion/sediment control plan for the project including a Storm Water Pollution Prevention Plan (SWPPP). Additionally, any construction will be reviewed under the Building Permit process and must be reviewed and approved by DER and adhere to current Local Agency Management Program (LAMP) standards which requires minimum setbacks between septic systems and wells to prevent negative impacts to groundwater quality.

The Sustainable Groundwater Management Act (SGMA), passed in 2014 requires the formation of local Groundwater Sustainability Agencies (GSAs) to oversee the development and implementation of Groundwater Sustainability Plans (GSPs), with the ultimate goal of achieving sustainable management of the state's groundwater basins. Stanislaus County is a participating member in five GSAs across four groundwater subbasins, including: the Eastern San Joaquin Groundwater Subbasin, which covers a portion of Stanislaus County occurring north of the Stanislaus River; commonly referred to as the "northern triangle"; the Modesto Groundwater Subbasin, which covers an area of land located between the Stanislaus and Tuolumne rivers, occurring west of the Sierra Nevada foothills and east of the San Joaquin River; the Turlock Groundwater Subbasin which covers an area of land located between the Tuolumne and Merced rivers, occurring west of the Sierra Nevada Foothills and occurring east of the San Joaquin River; and the Delta-Mendota Groundwater Subbasin which covers an area of land within Stanislaus County located west of the San Joaquin River and east of the basement rock of the Coast Range. Public and private water agencies and user groups within each of the four groundwater subbasins work together as GSAs to implement SGMA. The project site is located in West Turlock Subbasin, which is administered by the West Turlock Subbasin GSA. The project was referred to the West Turlock Subbasin GSA, and no comments were received regarding the proposed project.

Stanislaus County adopted a Groundwater Ordinance in November 2014 (Chapter 9.37 of the County Code, hereinafter, the "Ordinance") that codifies requirements, prohibitions, and exemptions intended to help promote sustainable groundwater extraction in unincorporated areas of the County. The Ordinance prohibits the unsustainable extraction of groundwater and makes issuing permits for new wells, which are not exempt from this prohibition, discretionary. For unincorporated areas covered in an adopted GSP pursuant to SGMA, the County can require holders of permits for wells it reasonably concludes are withdrawing groundwater unsustainably to provide substantial evidence that continued operation of such wells does not constitute unsustainable extraction and has the authority to regulate future groundwater extraction.

The California Safe Drinking Water Act (California Health and Safety Code (CHSC) Section 116275(h)) defines a Public Water System as a system for the provision of water for human consumption through pipes or other constructed conveyances that has 15 or more service connections or regularly serves at least 25 individuals daily at least 60 days out of the year. A public water system includes the following:

1. Any collection, treatment, storage, and distribution facilities under control of the operator of the system that are used primarily in connection with the system.

2. Any collection or pretreatment storage facilities not under the control of the operator that are used primarily in connection with the system.
3. Any water system that treats water on behalf of one or more public water systems for the purpose of rendering it safe for human consumption.

A referral response received from DER indicated that the proposed well for the project site will meet the definition of a Public Water System as defined in California Health and Safety Code Section 116275(h). To become a Public Water System, the applicant must submit an application for a water supply permit with the associated technical report to Stanislaus County DER which will determine if the well water meets State of California mandated standards for water quality and must also obtain concurrence from the State of California Water Resources Control Board (SWRCB), Drinking Water Division, in accordance to CHSC Section 116527 (SB1263). If the well water does not meet State of California standards, the applicant may need to either drill a new well or install a water treatment system for the new well. Title 22 compliant well testing will take place during the initial drilling process. Potential contaminants of concern that would require treatment include Total Dissolved Solids and similar naturally occurring minerals, Hexavalent Chromium, Arsenic, organic compounds, and Nitrates. This requirement of issuance for a water supply permit will be added as a development standard, to be met prior to issuance of a building permit.

Areas subject to flooding have been identified in accordance with the Federal Emergency Management Act (FEMA). The project site is located in FEMA Flood Zone X, which includes areas determined to be outside the 0.2 percent annual chance floodplains and, as such, exposure to people or structures to a significant risk of loss/injury/death involving flooding due to levee/dam failure and/or alteration of a watercourse, at this location is not an issue with respect to this project. Flood zone requirements are enforced through the building permit process. The Building Permits Division also reviews building permits and determines if geotechnical reports are required with submission of building permits. A requirement to obtain all applicable building permits will be incorporated into the project's development standards.

The Central Valley Regional Water Quality Control Board (CVRWQCB) provided a referral response requesting that the applicant coordinate with their agency to determine if any permits or Water Board requirements be obtained/met prior to operation. Development standards will be added to the project requiring the applicant comply with this request prior to issuance of a building or grading permit.

The project site is bisected by the Lower Lateral 2 ½ Turlock Irrigation District (TID) canal and receives irrigation water from TID. The project was referred to TID which responded requiring a minimum 6-foot-tall solid masonry or concrete wall, to be installed next to TID's right-of-way along the canal, per District standards and specifications; that an easement centered on a private pipeline located on the east side of the northern proposed remainder parcel be recorded for the benefit of downstream users; that TID review and approve all maps and plans of the project; and that any improvements to this property which impact irrigation facilities be subject to TID's approval and meet all standards and specifications. If it is determined that irrigation facilities will be impacted, the applicant will need to provide irrigation improvement plans and enter into an Irrigation Improvements Agreement for the required irrigation facility modifications. Additionally, TID commented that all work on irrigation facilities only be performed during the non-irrigation season (typically from November 1 – March 1). TID's comments will be placed on the project as Development Standards.

Impacts to hydrology and water quality are considered to be less-than significant.

Mitigation: None.

References: Application information; Central Valley Regional Water Quality Control Board (CVRWQCB), dated November 5, 2025; West Turlock Subbasin and East Turlock Subbasin Groundwater Sustainability Agencies (GSAs) Turlock Subbasin Groundwater Sustainability Plan (GSP) First Annual Report Water Year 2022; Referral response received from the Department of Environmental Resources – Environmental Health Division, dated November 10, 2025; Referral response from the Department of Environmental Resources – Groundwater Division, dated November 17, 2025; County General Plan and Support Documentation¹.

XI. LAND USE AND PLANNING. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?			X	
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X	

Discussion: This is a request to amend the General Plan and zoning designation of a 7.16± acre portion of a 17.6± acre parcel from Agriculture and General Agriculture (A-2-40) to Planned Development (P-D), and to subdivide the parcel into a 7.16± acre parcel and a 10.44± acre designated remainder. The project proposes to develop the 7.16± acres, located on the northeast corner of the Keyes Road and Central Avenue intersection, with a 12-pump fueling station, a 4,000± square-foot convenience store with an attached 2,500 square-foot car wash, and a 7,500± square-foot quick-serve restaurant with a drive-through, in two phases. The remainder will remain designated as Agriculture and zoned General Agriculture (A-2-40); no improvements are proposed on the remainder under this request.

As stated by the Introduction to the General Plan, General Plan Amendments affect the entire County and any evaluation must give primary concern to the County as a whole; therefore, a fundamental question must be asked in each case: "Will this amendment, if adopted, generally improve the economic, physical and social well-being of the County in general?" Additionally, the County in reviewing General Plan amendments shall consider how the levels of public and private service might be affected; as well as how the proposal would advance the long-term goals of the County. In each case, in order to take affirmative action regarding a General Plan Amendment application, it must be found that the General Plan Amendment will maintain a logical land use pattern without detriment to existing and planned land uses and that the County and other affected government agencies will be able to maintain levels of service consistent with the ability of the government agencies to provide a reasonable level of service. In the case of a proposed amendment to the Land Use diagrams of the

Land Use Element, an additional finding that the amendment is consistent with the goals and policies of the General Plan must also be made. Additionally, Goal 2 of the Land Use Element aims to ensure compatibility between land uses.

The Land Use Element describes the Planned Development designation as a designation intended for land which, because of demonstrably unique characteristics, may be suitable for a variety of uses without detrimental effects on other property. The Land Use Element also requires that the Agricultural Element's Conversion Criteria (Goal 2, Policy 2.7) be met when converting agricultural land to non-agricultural uses. The project is subject to the agricultural buffer requirements included in Appendix A of the Agricultural Element. Section II – *Agricultural Resources* contains the full discussion on the Stanislaus County's General Plan Conversion Criteria and ag buffer requirements.

The project will not physically divide an established community nor conflict with any habitat conservation plans.

Mitigation: None.

References: Application information; Stanislaus County Zoning Ordinance (Title 21); Stanislaus County General Plan and Support Documentation¹.

XII. MINERAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?			X	
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?			X	

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

Mitigation: None.

References: Application information; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: The proposed development anticipates the hours of operation for the fueling station to be seven days a week, 24 hours per-day. The convenience store is anticipated to be open seven days a week from 5:00 a.m. to midnight. A total of 10-12 employees are anticipated for the convenience store, with a maximum shift of four employees, with up to three shifts per-day. The drive-through restaurant under Phase 2 is proposed to operate seven days a week from 8:00 a.m. to 10:00 p.m. The drive-through restaurant is expected to have a total of 10-15 employees with a maximum shift of five to six employees at a time, with up to three shifts per-day. The project is projected to generate approximately 6,600 daily trips, including 659 trips during the AM peak hour and 522 during the PM peak hour upon full build out of both phases of development.

The Stanislaus County General Plan identifies noise levels up to 75 dB Ldn (or CNEL) as the normally acceptable level of noise for industrial and agricultural uses. The Stanislaus County General Plan identifies noise levels for residential or other noise-sensitive land uses of up to 55 hourly Leq, dBA and 75 Lmax, dBA from 7 a.m. to 10 p.m. and 45 hourly Leq, dBA and 65 Lmax, dBA from 10 p.m. to 7 a.m. Pure tone noises, such as music, shall be reduced by five dBA; however, when ambient noise levels exceed the standards, the standards shall be increased to the ambient noise levels. The closest sensitive noise receptors is a residence located approximately 108± feet from the proposed development to the west across Central Avenue. On-site grading and construction may result in a temporary increase in the area's ambient noise levels; however, noise impacts associated with on-site activities and traffic are not anticipated to exceed the normally acceptable level of noise.

The site itself is impacted by noise generated by vehicular traffic on Central Avenue and Keyes Road, and neighboring agricultural operations.

The site is not located within an airport land use plan. Impacts associated with noise are considered to be less than significant.

Mitigation: None.

References: Application information; Stanislaus County Noise Ordinance; Trip Generation & VMT Screening Analysis for Proposed Keyes-Central Commercial Development in Stanislaus County, performed by Fehr & Peers, dated July 29, 2025; Stanislaus County General Plan and Support Documentation¹.

XIV. POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?			X	

Discussion: The site is not included in the vacant sites inventory for the 2023 Stanislaus County Housing Element, which covers the 6th cycle Regional Housing Needs Allocation (RHNA) for the County and will therefore not impact the County's ability to meet their RHNA. No population growth will be induced, nor will any existing housing be displaced as a result of this project.

Mitigation: None.

References: Application information; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: This project was circulated to all applicable school, fire, police, irrigation, and public works departments and districts during the early consultation referral period including Keyes Fire Protection District, the Stanislaus County Sheriff's Office, Ceres Unified School District, Stanislaus County Public Works Department, Caltrans and the Turlock Irrigation District (TID).

As discussed in full within Section X – *Hydrology and Water Quality*, the project has proposed to develop a public water system for the use of the commercial development, which would include a convenience market, gas station, car wash, drive-through restaurant, and irrigation of landscaped area. The well will require a water supply permit to be obtained. A Water Supply permit is required to be obtained from the Stanislaus County Department of Environmental Resources prior to issuance of a certificate of occupancy. Additionally, the proposed buildings/any new building will require a new OTWS to be designed according to DER standards and shall be by individual Primary and Secondary wastewater treatment units, operated under conditions and guidelines established by Measure X. All applicable Local Agency Management Program (LAMP) standards and required setbacks are to be met. Additionally, Wastewater generated from the carwash cannot be disposed into the OWTS. The comments received from DER will be added to the project as development standards.

The project was referred to the Stanislaus County Department of Public Works; however, no response was received. Standard requirements will be applied to the project as development standards such as roadway dedication and improvement requirements, improvements to facilitate adequate storm water drainage and retention, and encroachment permits needing to be obtained for driveway approaches at all points of ingress and egress on the project site. A development standard requiring the Parcel Map be prepared by a licensed land surveyor or a registered civil engineer licensed to practice land surveying in California, and that all structures not shown on the parcel map

or on lot lines shall be removed prior to the parcel map being recorded will also be added to the project.

The project site is currently served by the Turlock Irrigation District (TID) for irrigation water and is bisected by the Lower Lateral 2 ½ Turlock Irrigation District (TID) canal. The project was referred to TID. As was discussed in Section II- *Agriculture and Forest Resources*, TID responded to the project requiring that a minimum six-foot-tall solid masonry or concrete wall, be installed next to TID's right-of-way along the canal, per District standards and specifications; that an easement centered on a private pipeline located on the east side of the northern proposed remainder parcel be recorded for the benefit of downstream users; that TID review and approve all maps and plans of the project; and that any improvements to this property which impact irrigation facilities be subject to TID's approval and meet all standards and specifications. If it is determined that irrigation facilities will be impacted, the applicant will need to provide irrigation improvement plans and enter into an Irrigation Improvements Agreement for the required irrigation facility modifications. Additionally, TID commented that all work on irrigation facilities only be performed during the non-irrigation season (typically from November 1 – March 1). Additionally, TID mentioned that a 12kV distribution line is located along the north side of Keyes Road and is fed off a 12kV feeder line along the west side of Central Avenue. TID indicated that the developer may be responsible for offsite work for TID facilities to extend service to the northwest corner of Keyes Road and Central Avenue intersection. The developer will be responsible for providing and installing all substructures per TID design specifications. A ten-foot public utility easement must be dedicated along all street frontages. The owner/developer must apply for a facility change for any pole or electrical facility relocation, and facility changes are performed at developer's expense. TID requested the front building setback to be a minimum of 15-feet from the property line and a minimum of 15-feet from the back-of-sidewalk to enable the safe placement of utilities. TID's comments will be placed on the project as development standards. TID's comments will be placed on the project as Development Standards.

The County has adopted Public Facilities Fees, which includes fees for parks, libraries, public safety, and roads, to address impacts to public services which will be required to be paid at the time of building permit issuance; school and fire fees are also collected through the building permit process.

Mitigation: None.

References: Application information; Referral response received from the Department of Environmental Resources – Environmental Health Division, dated November 10, 2025; Referral response from the Department of Environmental Resources – Groundwater Division, dated November 17, 2025; Referral response from the Turlock Irrigation District, dated February 13, 2026; Email received from Turlock Irrigation District, dated November 21, 2025; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: This project will not increase demands for recreational facilities, as such impacts typically are associated with residential development. However, public facility fees will be required to be paid as building permits are obtained, which includes fees for Stanislaus County parks.

Impacts to recreation are considered to be less than significant.

Mitigation: None.

References: Application information; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: The project is a request to amend the General Plan and zoning designation of a 7.16± acre portion of a 17.6± acre parcel from Agriculture and General Agriculture (A-2-40) to Planned Development (P-D), and to subdivide the parcel into a 7.16± acre parcel and a 10.44± acre designated remainder. The project proposes to develop the 7.16± acres, located on the northeast corner of the Keyes Road and Central Avenue intersection, with a 12-pump fueling station, a 4,000± square-foot convenience store with an attached 2,500 square-foot car wash, and a 7,500± square-foot quick-serve restaurant with a drive-through, in two phases. The remainder will remain designated as Agriculture and zoned General Agriculture (A-2-40); no improvements are proposed on the remainder under this request. County-maintained S. Central Avenue is classified as 80-foot-wide major collector road and Keyes Road is classified as a 110-foot-wide minor arterial road.

In addition to the subdivision of the property, Phase 1 of the proposed project will include the demolition of the existing 3,000 square-foot produce stand and construction of a fueling station, convenience store, car wash, trash enclosure, four underground storage tanks, and a parking lot with 21 parking spaces. The fueling station is proposed to be open seven days a week, 24 hours per-day. A total of 10-12 employees is anticipated for the convenience store, with a maximum shift of four employees, with up to three shifts per-day. Access for the development under Phase 1 is proposed from Central Avenue via a 25-foot-wide driveway and from Keyes Road via a 36-foot-wide driveway. Construction under Phase 1 is anticipated to begin within two years of approval, if approved. Phase 2 will consist of construction of a quick-serve restaurant with a drive-through, a trash enclosure, and 37 additional parking spaces. Access for the development under Phase 2 will be taken from Central Avenue via a 25-foot-wide driveway. The quick-serve restaurant is proposed to operate seven days a week from 8:00 a.m. to 10:00 p.m. and with a total of 10-15 employees (five to six on a maximum shift with up to three shifts per-day). The development Construction under Phase 2 is anticipated to begin within five years of approval, after the completion of Phase 1.

A Trip Generation & VMT Screening Analysis was prepared for the project by Fehr & Peers on July 29, 2025. The project is projected to generate approximately 6,600 daily trips, including 659 trips during the AM peak hour and 522 during the PM peak hour upon full build out of both phases of development. After accounting for internal and pass-by trip reductions, the net-new trip estimates are 4,930 daily trips, 473 AM peak hour trips, and 374 PM peak hour trips. As of July 1, 2020, CEQA Guidelines Section 15064.3(b) states that the recommended metric for the evaluation of transportation impacts is VMT. It outlines the criteria for analyzing a project's transportation impacts. For land use projects, this section states that "vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact." A technical advisory on evaluating transportation impacts in CEQA published by the Governor's Office of Planning and Research (OPR) in December of 2018 states that local-serving retail developments typically reduce VMT by redistributing and shortening trips rather than generating new ones. As a result, such developments are generally considered to have a less-than-significant transportation impact. OPR defines locally serving retail as developments with a building floor area of less than 50,000 sq. ft. The proposed project, including the gas station, convenience store, carwash, and restaurant, has a combined floor area and gas station canopy under 50,000 sq. ft. Therefore, it can be categorized as a locally serving retail project and is presumed to have a less-than-significant VMT impact.

The project was referred to Caltrans and Caltrans responded with no comments.

Stanislaus County's Public Works Department requirements will be applied to the project such as: a requirement that an encroachment permit be obtained for work being done in County or state right-of-way, right-of-way dedication, roadway improvements, approval of a grading and drainage plan, and requirements related to parking, loading and unloading of vehicles in the right-of-way. A development standard requiring the Parcel Map be prepared by a licensed land surveyor or a registered civil engineer licensed to practice land surveying in California, and that all structures not shown on the parcel map or on lot lines shall be removed prior to the parcel map being recorded will also be added to the project. These requirements will be placed as development standards for the project.

Impacts associated with *Transportation* are expected to have a less than significant impact with mitigation included.

Mitigation: None.

References: Application information; Trip Generation & VMT Screening Analysis for Proposed Keyes-Central Commercial Development in Stanislaus County, performed by Fehr & Peers, dated July 29, 2025; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: As this project is a General Plan Amendment it was referred to the tribes listed with the Native American Heritage Commission (NAHC), in accordance with SB 18, for a 90-day review period. The Muwekma Ohlone Tribe of the San Francisco (S.F.) Bay Area has requested consultation in accordance with AB 52 for all projects located west of the San Joaquin River. This project is not located in that area. Accordingly, this project is not being sent to the Muwekma Ohlone S.F. Bay Area Tribe. No responses from the tribal contacts were received. A records search conducted by the Central California Information Center (CCIC) indicated that there are no historical, cultural, or archeological resources recorded on-site. The project site is currently improved with a

manufactured home, and a produce stand currently in use on the property. The balance of the current parcel is planted in almond trees and is bisected by the Lower Lateral 2 ½ Turlock Irrigation District (TID) canal. The parcel has been ripped and planted for many years for agricultural production. A development standard will be added to the project which requires if any cultural or tribal resources are discovered during project-related activities, all work is to stop, and the lead agency and a qualified professional are to be consulted to determine the importance and appropriate treatment of the find.

If any resources are found during construction, construction activities would halt until a qualified survey takes place and the appropriate authorities are notified. A development standard regarding the discovery of cultural resources during any future construction process will be added to the project.

Tribal Cultural Resources are considered to be less-than significant.

Mitigation: None.

References: Application information; Central California Information Center Report for the project site, dated July 2, 2024; Stanislaus County General Plan and Support Documentation¹.

XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

Discussion: Limitations on providing services have not been identified. The project has proposed to develop an individual potable domestic well for use of the commercial development, which would include a convenience market, drive-through restaurant and car wash uses, and irrigation of landscaped area, as well as private onsite septic systems. Stormwater capture for off-site stormwater runoff will take place within a proposed French drain along the southwest corner of the proposed 7.16± acre parcel. On-site stormwater runoff is proposed to be handled under two options which include a French drain along the north property line, or a retention basin located within the middle of the 7.16± acre parcel.

The project was referred to the Stanislaus County Department of Public Works which did not respond to the project; however, standard development standards will be applied to the project requiring a grading, drainage, and erosion/sediment control plan for the project subject to Public Works review and Standards and Specifications will be required, as well as the submittal of a Storm Water Pollution Prevention Plan (SWPPP) prior to the approval of any grading plan. The submittal and approval of the grading, drainage, erosion/sediment control plan and SWPPP will be made development standards for this project prior to issuance of a building permit. Runoff associated with the construction at the proposed project site will be reviewed as part of the grading review process and be required to be maintained on-site.

Any construction will be reviewed under the Building Permit process and must be reviewed and approved by DER and adhere to current well permitting, public water system, Measure X, and Local Agency Management Program (LAMP) standards, which include minimum setback from wells and septic systems to prevent negative impacts to groundwater quality. As discussed in Section X – *Hydrology and Water Quality* the proposed well for the project site will meet the definition of a Public Water System as defined in California Health and Safety Code Section 116275(h). To become a Public Water System, the applicant must submit an application for a water supply permit with the associated technical report to Stanislaus County DER which will determine if the well water meets State of California mandated standards for water quality and must also obtain concurrence from the State of California Water Resources Control Board (SWRCB), Drinking Water Division, in accordance to CHSC Section 116527 (SB1263). If the well water does not meet State of California standards, the applicant may need to either drill a new well or install a water treatment system for the new well. Title 22 compliant well testing will take place during the test well process. Potential contaminants of concern that would require treatment include Total Dissolved Solids and similar naturally occurring minerals, Hexavalent Chromium, Arsenic, organic compounds, and Nitrates. This requirement of issuance of a water supply permit will be added as a development standard, to be met prior to issuance of a building permit.

The project site is located within the Turlock Irrigation District (TID), is bisected by the Lower Lateral 2 ½ Turlock Irrigation District (TID) canal, and receives irrigation water from TID. The project was referred to TID which responded requiring a minimum six-foot-tall solid masonry or concrete wall, to be installed next to TID's right-of-way along the canal, per District standards and specifications; that an easement centered on a private pipeline located on the east side of the northern proposed remainder parcel be recorded for the benefit of downstream users; that TID review and approve all maps and plans of the project; and that any improvements to this property which impact irrigation facilities be subject to TID's approval and meet all standards and specifications. If it is determined that irrigation facilities will be impacted, the applicant will need to provide irrigation improvement plans and enter into an Irrigation Improvements Agreement for the required irrigation facility modifications. Additionally, TID commented that all work on irrigation facilities only be performed during the non-irrigation season (typically from November 1 – March 1). TID's comments will be placed on the project as Development Standards.

The project is not anticipated to have a significant impact to utilities and service systems.

Mitigation: None.

References: Application information; Referral response from Turlock Irrigation District, dated November 21, 2025; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: The Stanislaus County Local Hazard Mitigation Plan identifies risks posed by disasters and identifies ways to minimize damage from those disasters. The project site is in a non-urbanized area with no wildlands located in the vicinity of the project site. In addition, the project site is not located within a designated high or very high fire hazard severity zone, near state responsibility areas, or lands classified as very high fire hazard severity zones. The terrain of the site is relatively flat, and the site has access to a County maintained road. The resulting parcels will continue to have access to County-maintained roads. The site is located in a Local Responsibility Area (LRA) for fire protection and is served by Keyes Fire Protection District. The project was referred to the District, and no comments have been received to date. California Building and Fire Code establishes minimum standards for the protection of life and property by increasing the ability of a building to resist intrusion of flame and burning embers. Building permits will be required for the proposed structures, if approved, which will be reviewed by the County's Building Permits Division and Fire Prevention Bureau to ensure all State of California Building and Fire Code requirements are met prior to construction.

Wildfire risk and risks associated with postfire land changes are considered to be less-than significant.

Mitigation: None.

References: Application information; California Fire Code Title 24, Part 9; California Building Code Title 24, Part 2, Chapter 7; Stanislaus County Local Hazard Mitigation Plan; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: The project includes a request to amend the General Plan and zoning designation of a 7.16± acre portion of a 17.6± acre parcel from Agriculture and General Agriculture (A-2-40) to Planned Development (P-D), and to subdivide the parcel into a 7.16± acre parcel and a 10.44± acre designated remainder. The project proposes to develop the 7.16± acres, located on the northeast corner of the Keyes Road and Central Avenue intersection, with a 12-pump fueling station, a 4,000± square-foot convenience store with an attached 2,500 square-foot car wash, and a 7,500± square-

foot quick-serve restaurant with a drive-through, in two phases. The remainder will remain designated as Agriculture and zoned General Agriculture (A-2-40); no improvements are proposed on the remainder under this request. The project site is currently improved with a manufactured home, and a produce stand currently in use on the property which was permitted under Use Permit No. 92-40 – Sarbjit Singh Athwal and modified under Staff Approval Permit No. 95-18 – Sarbjit S. Athwal. The balance of the current parcel is planted in almond trees and is bisected by the Lower Lateral 2 ½ Turlock Irrigation District (TID) canal.

The project is located at 5956 Central Avenue, between Turner Road and Keyes Road, in the Ceres area. The surrounding area consists of orchards to the north, east and south; an almond hulling and shelling facility, and the City of Ceres to the northeast; the community of Keyes to the east; a horse boarding facility to the southwest; ranchettes to the south and west of the project site; and a winery to the west. The nearest parcels in production agriculture are a 55± acre farmed parcel immediately adjacent to the project site to the east, a 38± acre farmed parcel to the south across East Keyes Road, and two 18± acre farmed parcels west across Central Avenue. The nearest parcels enrolled in a Williamson Act Contract are the 38± acre farmed parcel to the south, and one of the 18± acre farmed parcels to the west. Similarly situated parcels of 17± acres or more currently zoned General Agriculture (A-2-40) are located within the immediately surrounding area.

The current parcel has a zoning designation of General Agriculture (A-2-40). A rezone to a Planned Development district is necessary for the development of the project as the use is not permitted under the current A-2 zoning. The General Plan designation of the parcel is Agriculture and must be consistent with the proposed zoning district of Planned Development; accordingly, the application includes a General Plan amendment to Planned Development as well. As discussed in Section II - *Agriculture and Forest Resources*, Goal 2 of the Agricultural Element requires specific criteria be met when redesignating the General Plan designation of a property from Agricultural to a non-agricultural designation. Additionally, mitigation has been applied to the project to address the loss of prime and unique farmland. Farmland mitigation shall be provided based on a 1:1 ratio to the amount of farmland converted (7.16 acres) through either a long-term agricultural easement or through the payment of an in-leu fee to a land trust, determined to be acceptable by the County Planning Director prior to issuance of a building or grading permit.

As discussed in Section III – Air Quality, an Air Quality, Health Risk Analysis, and Greenhouse Gas Technical Analysis (Analysis) was performed, dated February 16, 2026, by Richard Miller, Air Quality and Climate Change Specialist, Johnson Johnson and Miller Air Quality Consulting Services. The Analysis found that the maximum cancer risk from the project's combined construction and operational emissions would be 24.82 in one million parts which would exceed the applicable SJVAPCD threshold of 20 in one million parts. A Mitigation Measure has been added to the project requiring the implementation of enhanced construction equipment standards, including the use of Tier 4 Final off-road engines and electric-powered small equipment when available, to reduce DPM emissions and associated health risks. With the Mitigation Measure in place, total exposure from combined project construction and operation would be 16.80 which is below the threshold of 20 in one million parts. Therefore, the combined construction and operational exposure would be less than significant after mitigation.

Impacts to endangered species or habitats, locally designated species, or wildlife dispersal or mitigation corridors are considered to be less than significant.

Review of this project has not indicated any features which might significantly impact the environmental quality of the site and/or the surrounding area. Land surrounding the project site are designated as Agricultural in the County's General Plan and have a zoning designation of A-2-40. Surrounding lands would be required to obtain land use entitlements and conduct environmental review before developing their property with anything other than uses permitted in the A-2-40 zoning district.

Mitigation: None.

References: Initial Study; Stanislaus County General Plan and Support Documentation¹.

¹Stanislaus County General Plan and Support Documentation adopted in August 23, 2016, as amended. **Housing Element** adopted on December 9, 2025.

DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

1010 10th Street, Suite 3400, Modesto, CA 95354

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Stanislaus County

Planning and Community Development

Mitigation Monitoring and Reporting Program

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

August 12, 2026

1. Project title and location: General Plan Amendment, Rezone, and Parcel Map Application No. PLN2025-0015 – Keyes-Central

5956 Central Avenue, between Turner Road and Keyes Road, in the Ceres area (APNs: 041-038-014 and 041-038-015).
2. Project Applicant name and address: Navjot Athwal, Athwal Investments, LP
2561 4th Street
Ceres, CA 95307
3. Person Responsible for Implementing Mitigation Program (Applicant): Navjot Athwal, Athwal Investments, LP
Developer/Property Owner
4. Contact person at County: Emily DeAnda, Associate Planner
(209) 525-6330

MITIGATION MEASURES AND MONITORING PROGRAM:

List all Mitigation Measures by topic as identified in the Mitigated Negative Declaration and complete the form for each measure.

II. AGRICULTURE AND FOREST RESOURCES

- No. 1 Mitigation Measure: Farmland mitigation shall be provided based on a 1:1 ratio to the amount of farmland converted (7.16 acres). The mitigation may be met through direct acquisition of an agricultural easement or through the payment of an in-lieu fee. The easement or in-lieu fee shall be administered by a land trust, determined to be acceptable by the County Planning Director and shall meet all criteria, including location and characteristic criteria of the County's adopted Farmland Mitigation Program

Guidelines, in effect at the time of project approval, as determined to be applicable by the Planning Director. Agricultural mitigation land shall be:

- Located in Stanislaus County;
- Designated Agriculture by the Land Use Element of the Stanislaus County General Plan;
- Zoned A-2 (General Agriculture);
- Located outside a Local Agency Formation Commission (LAFCO) adopted Sphere of Influence of a city;
- Agricultural Mitigation land shall be in conformance with the A-2 zoning district;
- The type of agricultural related activity allowed on mitigation land shall be specified as part of the agricultural conservation easement and shall not be less restrictive than the A-2 zoning district;
- Land already effectively encumbered by a conservation easement of any nature is not eligible to qualify as agricultural mitigation land;
- The agricultural mitigation land shall be of equal or better soil quality than the agricultural land whose use is being changed to nonagricultural uses. Priority shall be given to lands designated as 'prime farmland', 'farmland of statewide importance' and 'unique farmland' by the California Department of Conservation's Farmland Mapping and Monitoring Program; and
- The agricultural mitigation land shall have an adequate water supply to support the agricultural use of the land. The water rights on the agricultural mitigation land shall be protected in the farmland conservation easement.

Who Implements the Measure:	Applicant/Developer
When should the measure be implemented:	Prior to issuance of a grading or building permit
When should it be completed:	Prior to issuance of a grading or building permit
Who verifies compliance:	Stanislaus County Department of Planning and Community Development
Other Responsible Agencies:	None.

III. AIR QUALITY

- No. 2 Mitigation Measure: The project applicant/developer shall submit documentation to the Stanislaus County Planning and Community Development Department demonstrating compliance with the following requirements:
- Where portable diesel engines are used during construction, all off-road equipment with engines greater than 75 horsepower shall meet U.S. Environmental Protection Agency (EPA) or California Air Resources Board (CARB) Tier 4 Final off-road emission standards, unless otherwise specified herein. If Tier 4 Final equipment is not commercially available, the construction contractor shall use the next cleanest available off-road equipment (e.g., Tier 4 Interim) that is commercially available. For purposes of this measure, “commercially available” shall mean equipment that can be obtained taking into consideration factors such as (i) critical-path construction timing and (ii) geographic proximity of equipment suppliers to the project site. If Tier 4 Final equipment is determined to be unavailable, the contractor shall provide written documentation from at least two equipment rental companies for each applicable piece of equipment demonstrating

that Tier 4 Final equipment is not commercially available.

- Electric-powered equipment shall be used for small equipment (i.e., less than 50 horsepower), when such equipment is readily available and feasible for the intended construction activity.

The applicant/developer shall be responsible for providing, to the satisfaction of the Planning Director, documentation of the implementation of the aforementioned requirements. The applicant/developer shall be responsible for paying the County's actual costs of verifying compliance, based on the fully burdened weighted labor rates at the time of services rendered. If the County finds any of the applicable requirements have not been implemented, the applicant/developer shall implement said requirements within the time frame specified in writing by the County.

Who Implements the Measure:	Applicant/Developer
When should the measure be implemented:	Prior to issuance of a grading or building permit
When should it be completed:	Prior to issuance of a grading or building permit
Who verifies compliance:	Stanislaus County Department of Planning and Community Development
Other Responsible Agencies:	None

I, the undersigned, do hereby certify that I understand and agree to be responsible for implementing the Mitigation Program for the above listed project.

Signature on File _____

August 11, 2026 _____

Signature

Date

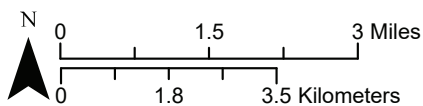
KEYES-CENTRAL

GPA, REZ & PM PLN2025-0015

AREA MAP

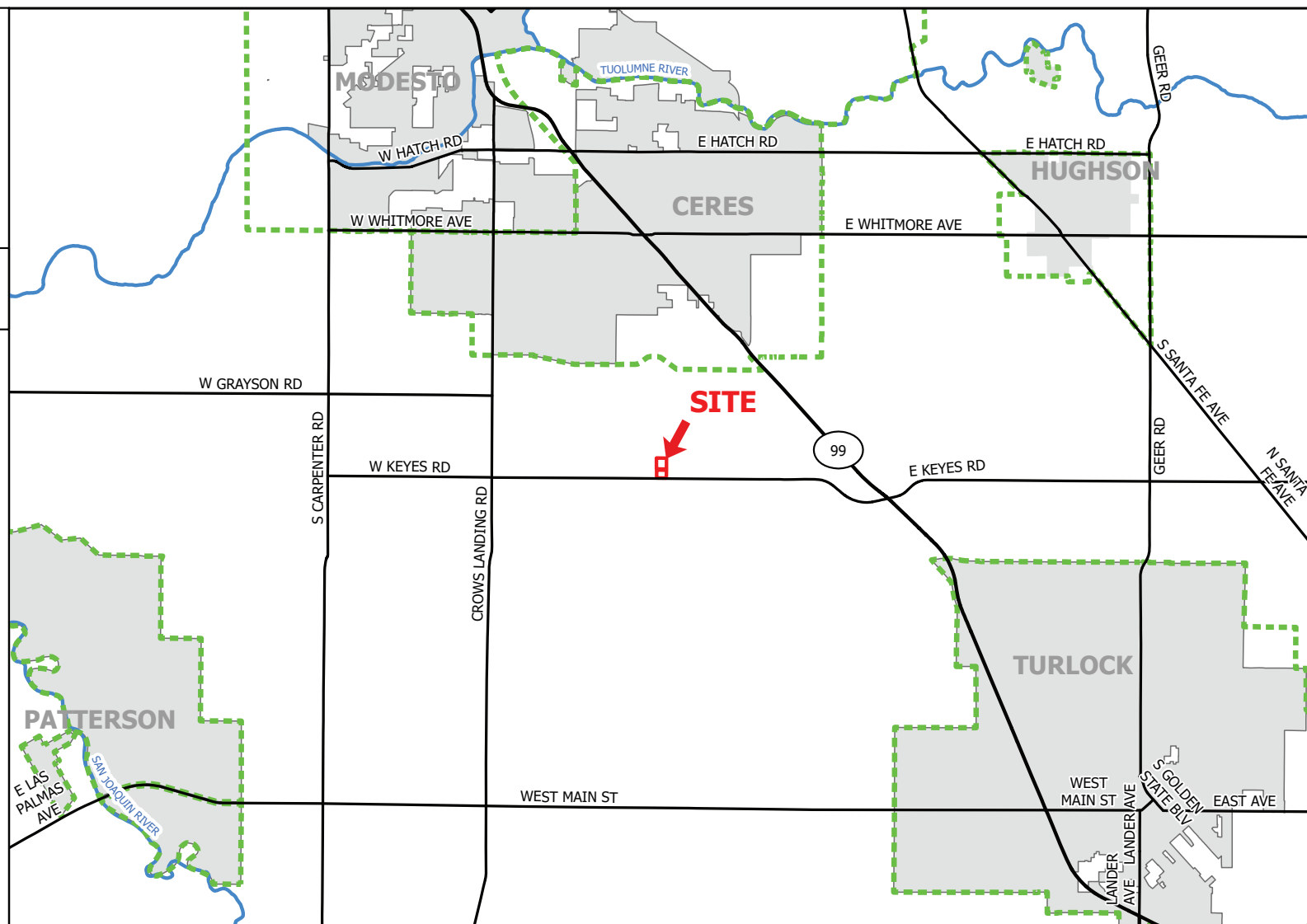
LEGEND

-  Project Site
-  Sphere of Influence
-  Highway
-  Major Road
-  River



Source: Planning Department GIS

Date Exported: 9/22/2025



KEYES-CENTRAL

GPA, REZ & PM PLN2025-0015

GENERAL PLAN MAP

LEGEND

 Project Site

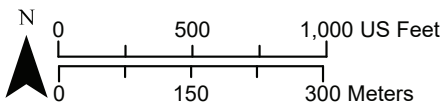
 Parcel

 Street

 Canal

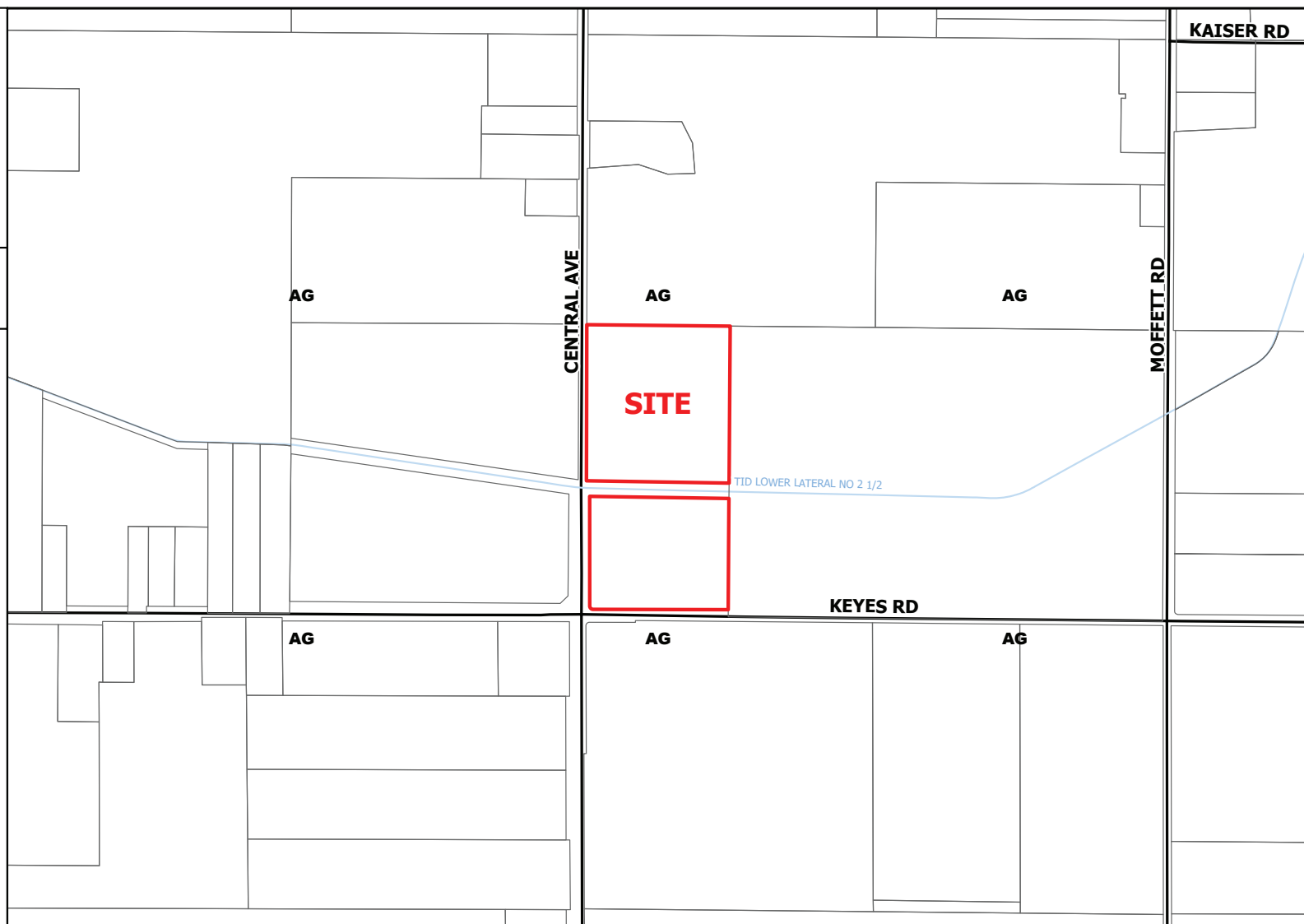
General Plan

 Agriculture (AG)



Source: Planning Department GIS

Date Exported: 9/22/2025



KEYES-CENTRAL

GPA, REZ & PM PLN2025-0015

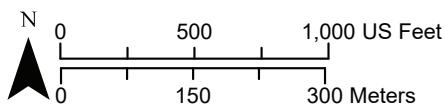
ZONING MAP

LEGEND

-  Project Site
-  Parcel
-  Street
-  Canal

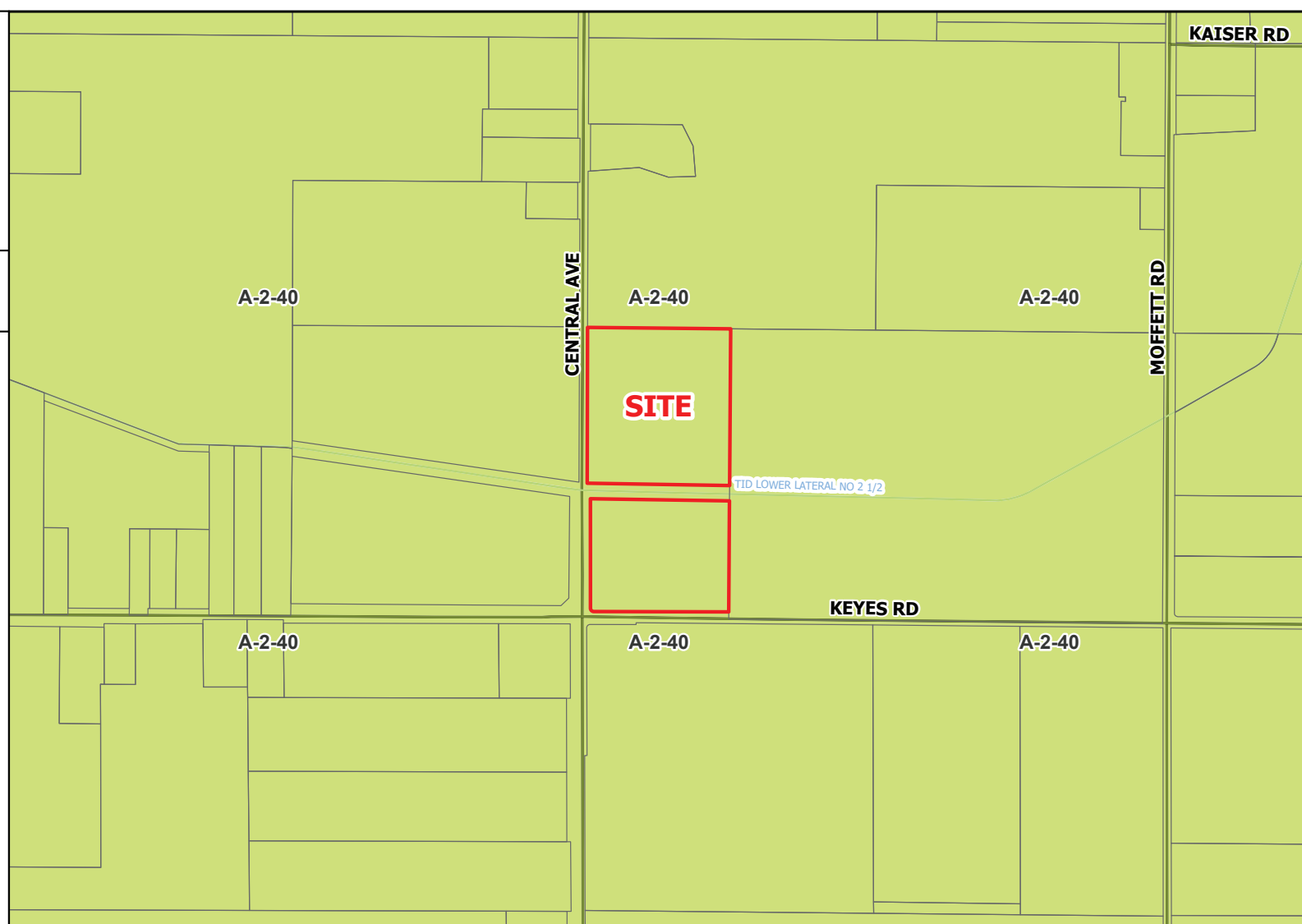
Zoning Designation

-  General AG 40 Acre (A-2-40)



Source: Planning Department GIS

Date Exported: 9/22/2025



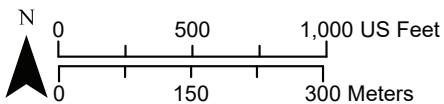
KEYES-CENTRAL

GPA, REZ & PM PLN2025-0015

ACREAGE MAP

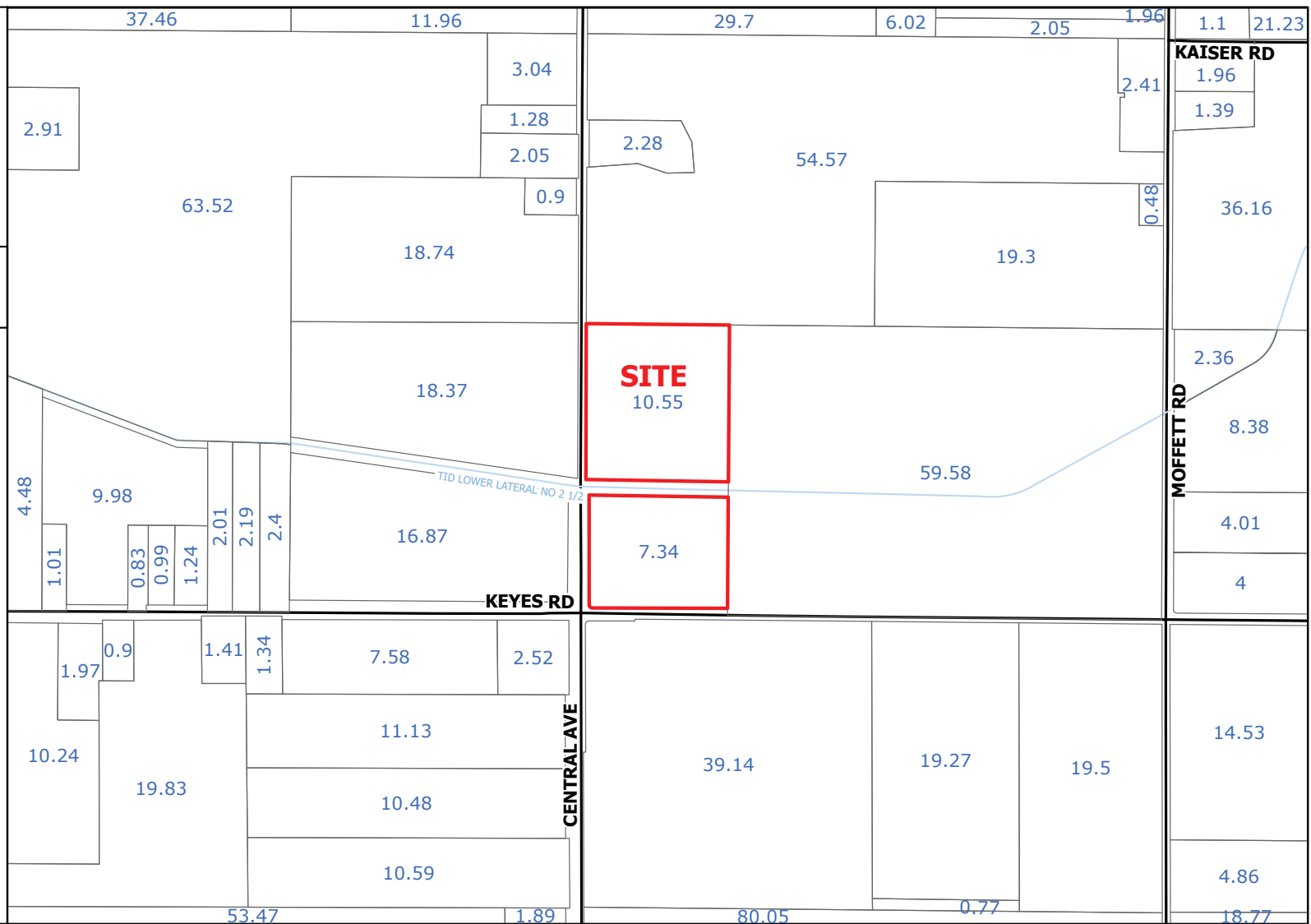
LEGEND

-  Project Site
-  Parcel
-  Street
-  Canal



Source: Planning Department GIS

Date Exported: 9/22/2025



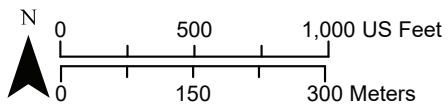
KEYES-CENTRAL

GPA, REZ & PM PLN2025-0015

2023 AERIAL AREA MAP

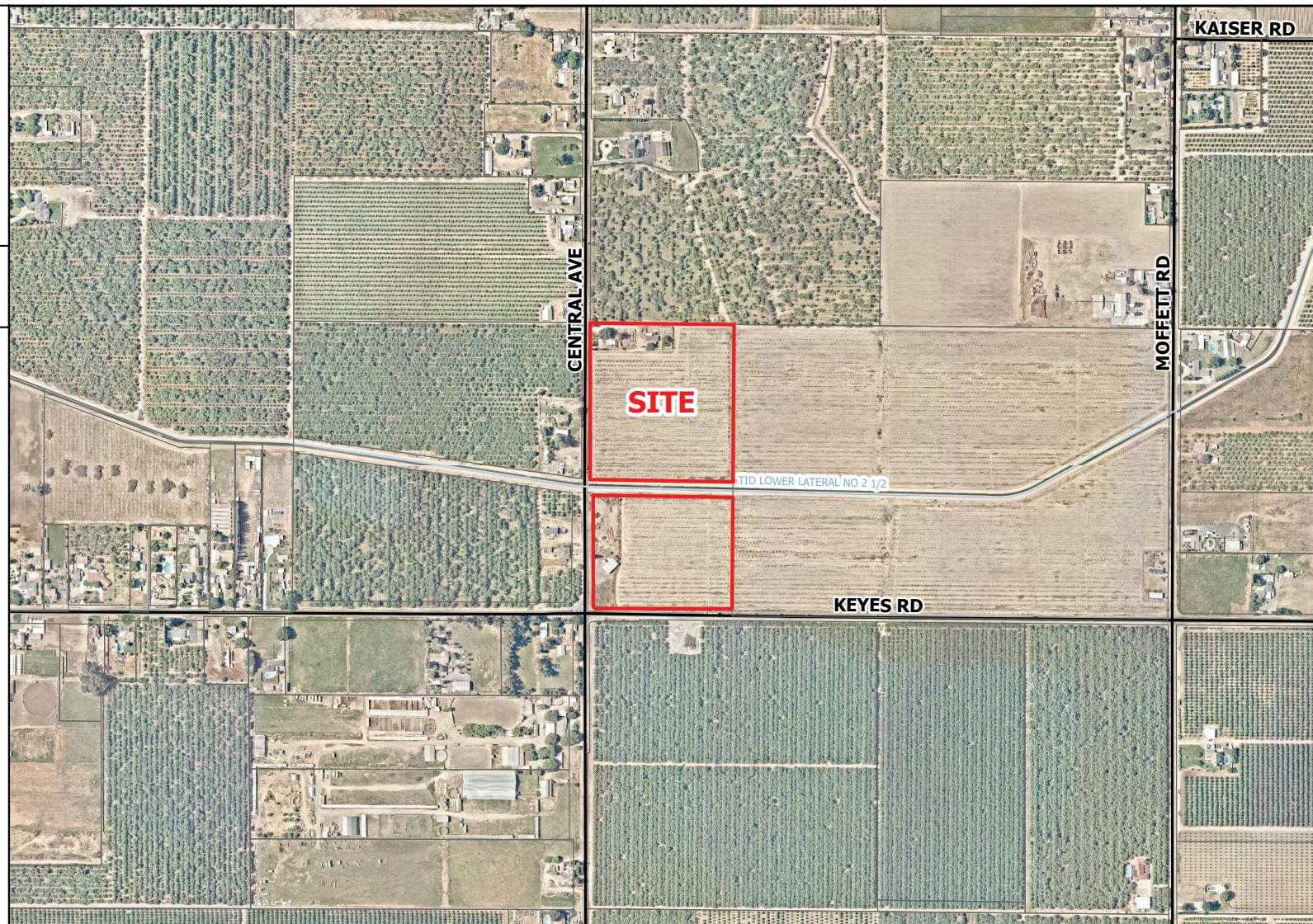
LEGEND

-  Project Site
-  Parcel
-  Street
-  Canal



Source: Planning Department GIS

Date Exported: 9/22/2025



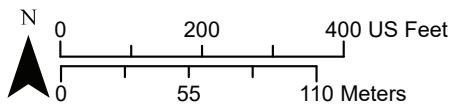
KEYES-CENTRAL

**GPA, REZ & PM
PLN2025-0015**

2023 AERIAL SITE MAP

LEGEND

-  Project Site
-  Parcel
-  Street
-  Canal



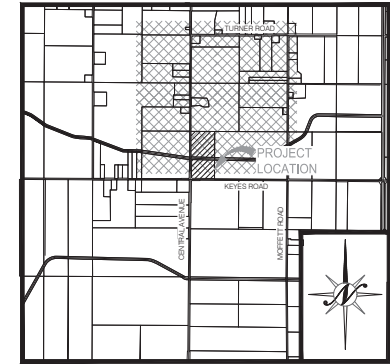
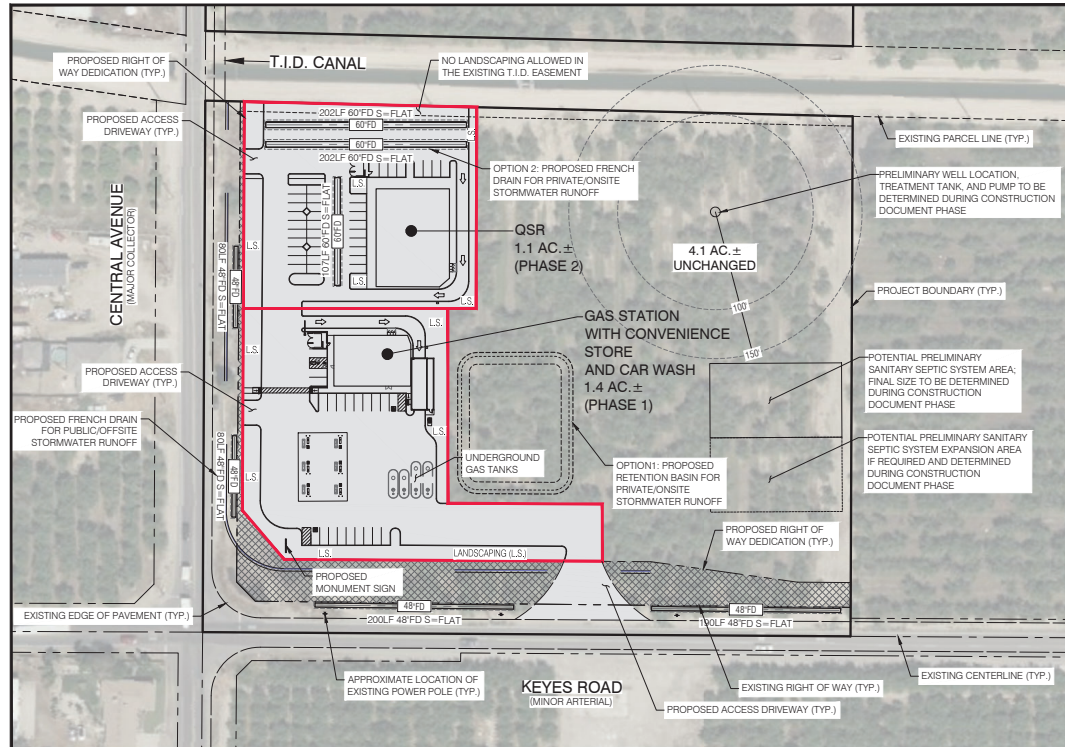
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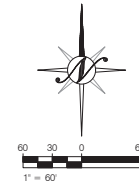


SITE PLAN FOR KEYES ROAD AND CENTRAL AVENUE COMMERCIAL STANISLAUS COUNTY, CALIFORNIA

EXISTING STRUCTURE EXHIBIT



VICINITY MAP
N.T.S.



LEGEND

	PROPOSED PROJECT AREA BOUNDARY, BY PHASE
	PROPOSED PROJECT AREA
	RIGHT OF WAY DEDICATION (TO BE CLEARED OF ALL TREES AND STRUCTURES)

EXISTING CONDITION NOTES

- EXISTING BUILDING TO BE DEMOLISHED
- EXISTING TREES WITHIN AREA TO BE IMPROVED TO BE REMOVED

PARKING TABLE

TOTAL PARKING SPACES REQUIRED (1 PER 300 S.F.) = 29
TOTAL PARKING SPACES PROPOSED = 55

LAND DESIGNATION

EXISTING ZONING: GENERAL PLAN GENERAL AG 40 ACRE/AGRICULTURE
PROPOSED ZONING: GENERAL PLAN PLANNED DEVELOPMENT

PREPARED FOR

CLIENT: NAPA FARMS, LLC 2561 4TH STREET CERES, CA 95307 TEL: (209) 691-7094
CONTACT: NAV ATWAL

PREPARED BY

ENGINEER: NORTH STAR ENGINEERING GROUP, INC. 800 10TH STREET MODESTO, CA 95354 TEL: (209) 504-3525
CONTACT: MILLORE FENRICH

PROJECT LOCATION

APR: 041-038-014 (NOT A PART) AND 015 STANISLAUS COUNTY, CA 95307
--

SITE PLAN

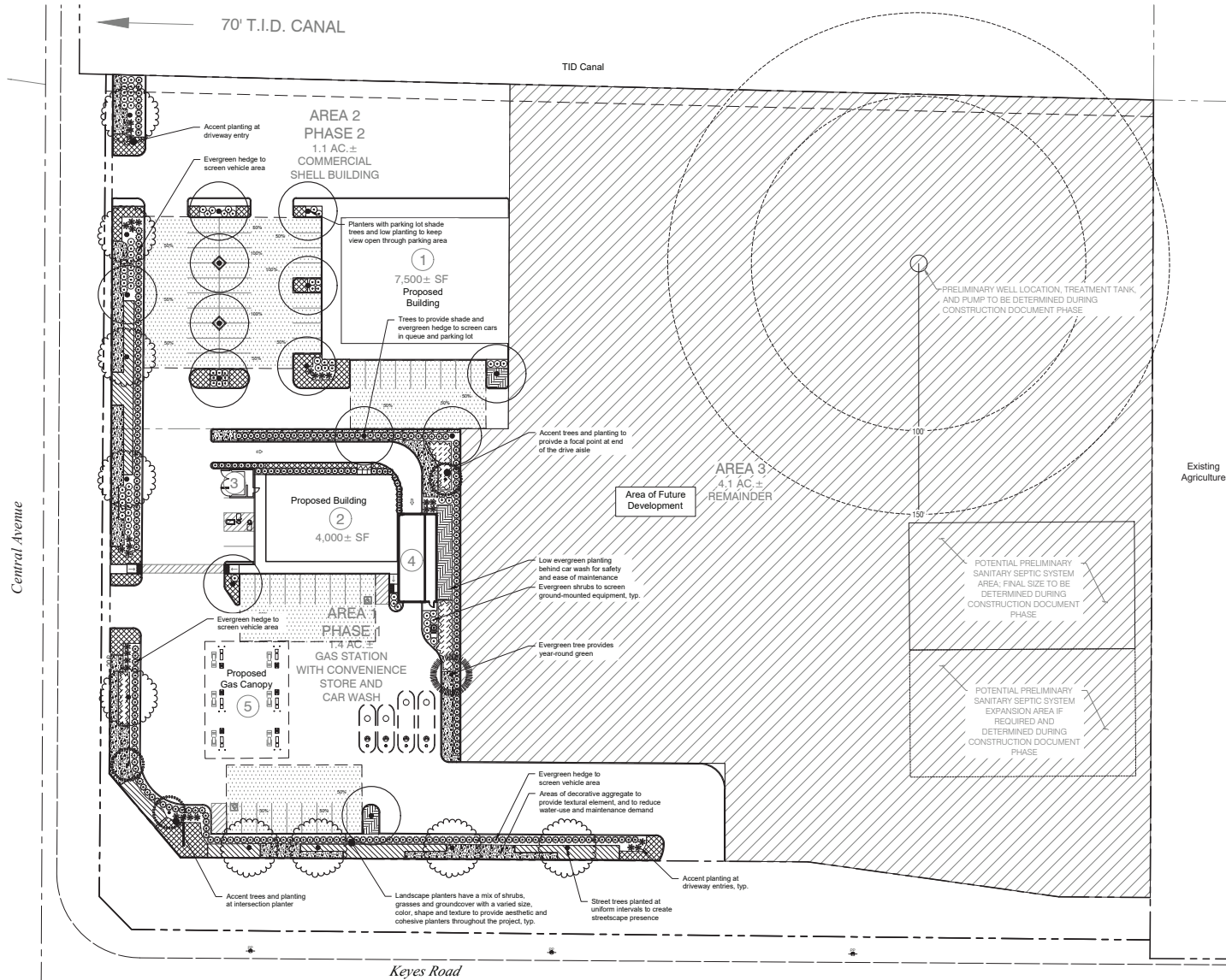
KEYES ROAD AND CENTRAL AVENUE
STANISLAUS COUNTY, CALIFORNIA



JOB #	23-0415
DATE	10/23/2023
SCALE	AS SHOWN
DRAWN BY	MM
DESIGN	MM
CHECK	MM

SHEET NUMBER

EX1



CONCEPT PLANT SCHEDULE

	PARKING LOT SHADE TREE Trees along street frontages, 70' spacing. Species will match existing to continue the frontage appearance, or another species as approved by County.	13	15 gal., 30', Moderate	20' o.c.
	STREET TREE Trees along street frontages, 70' spacing. Species will match existing to continue the frontage appearance, or another species as approved by County.	9	15 gal., 35', Low	35' o.c.
	ACCENT TREE Trees along street frontages, 70' spacing. Species will match existing to continue the frontage appearance, or another species as approved by County.	3	15 gal., 25', Moderate	20' o.c.
	EVERGREEN / SCREEN TREE Trees along street frontages, 70' spacing. Species will match existing to continue the frontage appearance, or another species as approved by County.	1	15 gal., 25', Low	20' o.c.
	EVERGREEN SHRUB/HEDGE Medium evergreen shrub for foundation planting or hedges for screening and borders.	274	5 gal., 4', Low	4' o.c.
	INFILL SHRUB Medium shrubs for mass plantings.	80	5 gal., 3', Low	3' o.c.
	ACCENT SHRUB Medium shrub with interesting form, texture, or flowers, located at high visibility area and entrance.	30	5 gal., 4', Low	4' o.c.
	ORNAMENTAL GRASS Medium shrub with interesting form, texture, or flowers, located at high visibility area and entrance.	614 sf	1 gal., 3', Low	36' o.c.
	ACCENT GROUND COVER Low shrubs for mass planting with interesting form, texture, or flowers, 12"-24" tall.	2,705 sf	1 gal., 30', Moderate	36' o.c.
	LOW EVERGREEN GROUND COVER Low growing, spreading evergreen ground cover for mass planting, 6"-24" tall.	2,211 sf	1 gal., 48", Low	48' o.c.
	DECORATIVE GRAVEL 1" minus, tan/white color, Sonoma Gold or equal	3,914 sf	1 gal., 48", Low	48' o.c.
	DECOMPOSED GRANITE 1/2" layer of tan color GCS	822 sf	1 gal., 48", Low	48' o.c.

WELO COMPLIANCE

This project has been designed to conform with the State's Model Water Efficient Landscape Ordinance (MWELO).

IRRIGATION DESIGN

The irrigation on the site will use drip irrigation, will meet the City's requirements, and will comply with the requirements of WELO. Equipment will include dedicated irrigation meter, smart controller, weather sensor, and efficient irrigation emitters, nozzles, and other equipment.

PLANTING DESIGN

The landscape design uses water-wise plant species suitable for this region and that are low maintenance and durable, uses trees to shade paved areas, and plants have been grouped into hydro-zones. References used for the landscape design include published information from the local jurisdiction, Sunset Western Garden Book and WUCOLS.

PRELIMINARY WELO CALCULATIONS

The calculations provided below are an initial estimate of water usage for the planting and irrigation design being proposed with this plan. Hydrozones are approximated and may change with the final design, but the overall intent will remain and compliance with WELO will be achieved.

City (ETo):	Ceres (50.2)					
Plant Type	Water Use Factor (WUCOLS)	Type of Irrigation (ET)	Plant Factor	Hydrozone Area (sf)	ETWU (gal)	
Shrubs	Moderate	Drip (0.81)	0.4	5,485 sf	84,304	
Shrubs	Low	Drip (0.81)	0.3	12,745 sf	146,917	
Total:				18,230 sf	231,221	

Estimated Total Water Use (ETWU):

231,221 gal.

Maximum Applied Water Allowance (MAWA):

255,328 gal.

Estimated Average ETAF:

0.41

Maximum Allowable ETAF:

0.45

PARKING LOT SHADE CALCULATIONS

Shade area on plans is identified with the hatch symbol shown here and conforms to the municipality's guidelines. Tree diameters per species is based on published City documentation or the Sunset Western Garden Book.

Tree Type	Area at 100% (sf)	100%		75%		50%		25%		Subtotal
		sf	qty.	sf	qty.	sf	qty.	sf	qty.	
Parking Lot Shade Tree	962	2,886	3	0	0	4,810	10	0	0	7,696
Street Tree	962	0	0	0	0	1,924	4	0	0	1,924
Total shade provided:										9,620
Parking area:										19,143
Percentage of shade provided (0.50 min. req'd):										0.50

LANDSCAPE AREA CALCULATIONS

AREA 1	
Total Site Area:	62,072 sf
Total Landscape Area:	13,328 sf
Percentage of Total Site as Landscape:	21 %

AREA 2	
Total Site Area:	49,599 sf
Total Landscape Area:	4,902 sf
Percentage of Total Site as Landscape:	10 %

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23 April 2025

Conceptual Landscape Plan

Keyes Road Gas Station - Ceres, CA



FULL INITIAL STUDY INCLUDING THE VMT AND TRAFFIC ANALYSIS, AIR QUALITY, HRA AND
GHG ANALYSIS, AND THE CCIC REPORT

ON FILE WITH THE DEPARTMENT OF PLANNING & COMMUNITY DEVELOPMENT

AND ARE AVAILABLE AT THE FOLLOWING LINK

https://www.stancounty.com/planning/pl/act-proj/PLN2025-0015_30_Day.pdf