KNIGHTS FERRY COMMUNITY SERVICES DISTRICT

SURFACE WATER TREATMENT PLANT IMPROVEMENT PROJECT

DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

KNIGHTS FERRY, CA
FEBRUARY 2026

PREPARED FOR:
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APPENDICES

Appendix A – CalEEMod and HARP2 Air Dispersion Output Files
Appendix B – Biological Resources Evaluation
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ACRONYMS & ABBREVIATIONS

AB ---------- Assembly Bill
BMP ---------- Best Management Practices
CalEEMod ---------- California Emissions Estimator Modeling (software)
CalFire ---------- California Department of Forestry and Fire Protection
CARB ---------- California Air Resources Board
CCAA ---------- California Clean Air Act
CCIC ---------- Central California Information Center
CDFW ---------- California Fish and Wildlife
CEQA ---------- California Environmental Quality Act
CGP ---------- Construction General Permit
CH_4 ---------- Methane
CHRIS ---------- California Historical Resources Information System
CNDDB ---------- California Natural Diversity Database
CNPS ---------- California Native Plant Society
CO ---------- Carbone Monoxide
CO_2 ---------- Carbon dioxide
County ---------- Stanislaus County
CRHR ---------- California Register of Historical Resources
District ---------- Knights Ferry Community Services District
DOC ---------- Department of Conservation
DSOD ---------- Division of Safety of Dams
DPM ---------- Diesel Particulate Matter
DTSC ---------- Department of Toxic Substances Control
EIR ---------- Environmental Impact Report
ESJCGA ---------- Eastern San Joaquin County Groundwater Authority
FEMA ---------- Federal Emergency Management Agency
FMMP ---------- Farmland Mapping and Monitoring Program
GHG ---------- Greenhouse Gas
GPM ---------- Gallons Per Minute
GSP ---------- Groundwater Sustainability Plan
GWP ---------- Global Warming Potential
KFCSD ---------- Knights Ferry Community Services District
IPaC ---------- U.S. Fish and Wildlife Service's Information for Planning and Consultation system
IS ---------- Initial Study
IS/MND ---------- Initial Study/Mitigated Negative Declaration
MMRP ---------- Mitigation Monitoring and Reporting Program
MND ---------- Mitigated Negative Declaration
MRZ ---------- Mineral Resource Zone
NAAQS ---------- National Ambient Air Quality Standards
NAHC ---------- Native American Heritage Commission
ND ---------- Negative Declaration
NO_2 ---------- Nitrogen dioxide
NOx ---------- Oxides of nitrogen
NRHP ---------- National Register of Historic Places
O_3 ---------- Ozone
Pb ---------- Lead
PM_{10} ---------- particulate matter 10 microns in size
$PM_{2.5}$ ---------- particulate matter 2.5 microns in size

ppb ---------- parts per billion
ppm ---------- parts per million
Project ---------- Surface Water Treatment Plant Improvement Project
ROG ---------- Reactive Organic Gases
SGMA ---------- Sustainable Groundwater Management Act
SJVAB ---------- San Joaquin Valley Air Basin
SJVAPCD ---------- San Joaquin Valley Air Pollution Control District
SMARA ---------- Surface Mining and Reclamation Act of 1975
SO_2 ---------- Sulfur Dioxide
SRA ---------- State Responsibility Area
SWPPP ---------- Storm Water Pollution Prevention Plan
SWRCB ---------- State Water Resources Control Board
SWTP ---------- Surface Water Treatment Plant
TPY ---------- tons per year
USEPA ---------- United States Environmental Protection Agency
USFWS ---------- United States Fish and Wildlife Service
USGS ---------- United States Geological Survey
µg/m3 ---------- micrograms per cubic meter

CHAPTER 1 INTRODUCTION

Provost & Pritchard Consulting Group (Provost & Pritchard) has prepared this Initial Study/Mitigated Negative Declaration (IS/MND) on behalf of the Knights Ferry Community Services District (KFCSD or District) to address the environmental effects of the Surface Water Treatment Plant Improvement Project (Project). This document has been prepared in accordance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq. The District is the CEQA lead agency for this Project.

The site and the Project are described in detail in Chapter 2 Project Description.

1.1 REGULATORY INFORMATION

An Initial Study (IS) is a document prepared by a lead agency to determine whether a project may have a significant effect on the environment. In accordance with California Code of Regulations Title 14 (Chapter 3, Section 15000, *et seq.*)-- also known as the CEQA Guidelines--Section 15064 (a)(1) states that an environmental impact report (EIR) must be prepared if there is substantial evidence in light of the whole record that the Project under review may have a significant effect on the environment and should be further analyzed to determine mitigation measures or project alternatives that might avoid or reduce project impacts to less than significant levels. A negative declaration (ND) may be prepared instead if the lead agency finds that there is no substantial evidence in light of the whole record that the project may have a significant effect on the environment. An ND is a written statement describing the reasons why a proposed Project, not otherwise exempt from CEQA, would not have a significant effect on the environment and, therefore, why it would not require the preparation of an EIR (CEQA Guidelines Section 15371). According to CEQA Guidelines Section 15070, a ND or *mitigated* ND shall be prepared for a project subject to CEQA when either:

a. The IS shows there is no substantial evidence, in light of the whole record before the agency, that the proposed Project may have a significant effect on the environment, or
b. The IS identified potentially significant effects, but:
    1. Revisions in the project plans or proposals made by or agreed to by the applicant before the proposed MND and IS is released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur is prepared, and
    2. There is no substantial evidence, in light of the whole record before the agency, that the proposed Project as revised may have a significant effect on the environment.

1.2 DOCUMENT FORMAT

This IS/MND contains six chapters Chapter 1 Introduction, provides an overview of the Project and the CEQA process Chapter 2 Project Description, provides a detailed description of proposed Project components and objectives. Chapter 3 Determination, the Lead Agency's determination based upon this initial evaluation. Chapter 4 Environmental Impact Analysis presents the CEQA checklist and environmental analysis for all impact areas, mandatory findings of significance, and feasible mitigation measures. If the Project does not have the potential to significantly impact a given issue area, the relevant section provides a brief discussion of the reasons why no impacts are expected. If the Project could have a potentially significant impact on a resource, the issue area discussion provides a description of potential impacts, and appropriate mitigation measures and/or permit requirements that would reduce those impacts to a less than significant level. Chapter 5 Mitigation, Monitoring, and Reporting Program (MMRP), provides the proposed mitigation measures, implementation timelines, and the entity/agency responsible for ensuring implementation. Chapter 6 References details the documents and reports this document relies upon to provide its analysis.

The CalEEMod Output Files and HARP2 Air Dispersion Output Files, Biological Resources Evaluation, and Phase I Cultural Resources Assessment, are provided as Appendix A, Appendix B, and Appendix C, respectively, at the end of this document.

CHAPTER 2 PROJECT DESCRIPTION

2.1 PROJECT BACKGROUND

2.1.1 LEAD AGENCY NAME AND ADDRESS

Knights Ferry Community Services District
P.O. Box 860
Knights Ferry, CA 95361

2.1.2 CONTACT PERSON AND PHONE NUMBER

Kathleen Feichter
Board of Directors, President
(209) 630-0879

2.1.3 CEQA CONSULTANT

Provost & Pritchard Consulting Group
Ryan McKelvey, Environmental Project Manager
(559) 636-1166

2.1.4 PROJECT LOCATION

The Project is located in the unincorporated community of Knights Ferry in Stanislaus County, approximately 65 miles southeast of Sacramento and 190 miles northwest of Bakersfield (see Figure 2-1 and Figure 2-2). The Project site is located approximately on Assessor's Parcel Number 002-039-010-000. The centroid of the Project site is 37° 49' 16.53" N, 120° 40' 16.27" W.

2.1.5 GENERAL PLAN DESIGNATION AND ZONING

Table 2-1: General Plan Designation and Zoning

Project Area	General Plan Designation	Zoning District
ONSITE	Historical	Historical
ADJACENT LANDS	North: Agriculture South: Historical East: Historical West: Agriculture, Historical	North: AG-40 (General Agriculture, 40-Acre Minimum) South: Historical East: Historical West: AG-40 (General Agriculture, 40-Acre Minimum); Historical

2.1.6 DESCRIPTION OF THE PROJECT

2.1.6.1 PROJECT BACKGROUND AND PURPOSE

Knights Ferry Community Services District (KFCSD) was established on August 5, 1970, under Section 61000 et. seq. of the Government Code to provide drinking water treatment and distribution services to the unincorporated community of Knights Ferry. Knights Ferry is a small community that encompasses approximately 92 acres. KFCSD currently supplies water to approximately 168 residents through three (3) metered commercial connections, two (2) metered recreational connections, and 64 metered residential connections. While the District owns rights to its water supply, the District's water system is delivered by the Oakdale Irrigation District via the Frymier Canal and the Stanislaus River. Once it is pumped into the

system it is treated at the Knights Ferry Water Treatment Plant (WTP) along Lynde St within the systems service area boundary. Substantial improvements to this plant occurred in 2002 and a new storage tank was installed in 2008. The system has since experienced wear and tear and is no longer operating efficiently. A Lead Action Level Exceedance was issued in 2020, and the plant has had historical issues with disinfection byproducts.

Knights Ferry has received Citation and Compliance Order due to Failure to Comply with Sanitary Survey Report. The Sanitary Survey indicated various regulatory concerns with the Knights Ferry water system.

Knights Ferry has an active violation from the Stanislaus County Department of Environmental Resources Local Primacy Agency for Lead Action Level Exceedance and Public Education Program since November of 2020 due to samples taken for lead resulting in detected levels exceeding the action level at 0.015 micrograms per liter (mg/L).

In 2017, the water system report detected levels of disinfection byproducts (DBPs) at elevated levels beyond the maximum contaminant level of 80 mg/L and received a notice of violation. The system has since achieved compliance for DBPs and continues to supply water within the Maximum Contaminant Level (MCL) for DBPs.

The Knights Ferry water service connections are supplied by the surface water treatment plant (SWTP), but years of wear and tear have resulted in many system failures and inconsistent flow. The system has experienced pump failure, line breaks, leaking tanks, inoperable SWTP equipment and other deficiencies that often exceed the technical, operational, and financial capability of the water system.

2.1.6.2 PROJECT DESCRIPTION

The Project proposes to construct improvements and/or replace existing infrastructure at the Knights Ferry SWTP. The Project proposes to add a package style water filtration system that includes an up-flow adsorption clarifier adjacent to a mixed media filter, such as the Tri-Mite Package Water Treatment Plant (Tri-Mite) system. The Tri-Mite treatment technology has been demonstrated to satisfy the operational and performance requirements necessary to be accepted as an alternative filtration technology under the California Surface Water Treatment Rule (CSWTR), in CCR, Title 22, Section 64665 (CCR, 2000).

The Project would include installation of the Tri-Mite treatment system as well as a pumping station to allow sufficient flow among the treatment system and for adequate storage to meet maximum day demand and fire flow. The existing 30,000-gallon storage tank onsite, which has been inoperable, would be demolished as part of the Project. With installation of the Tri-Mite system, the existing flocculation and sedimentation, chlorine contact tanks, and existing multi-media filters would no longer be necessary and would be demolished as well. Other improvements would include site modifications for safety and efficient operations such as parking and onsite security measures with lighting as needed.

The Project includes the following project components:

- Installation of the Tri-Mite packaged filter system consisting of one (1) 80-gallons per minute (gpm) unit
- A transfer pumping station
- Cleaning and recoating of the existing 110,000-gallon storage tank
- Installations of 100,000-gallon storage tank (for finished water)
- Construction of a chemical storage and filter building
- A high service pumping station
- A backwash pumping station
- Demolition of the existing 30,000-gallon finished water storage tank

- Demolition of the existing flocculation and sedimentation tanks
- Demolition of the existing chlorine contact tanks
- Demolition of the existing multi-media filters
- Disposal of disconnected water treatment infrastructure (i.e., the abandoned clarifier)

The following components/existing infrastructure would remain in place:

- The raw water intake pump station
- Raw water supply lines to the plant
- 5,000-gallon raw water storage tank
- The building housing the multi-media filters
- Residuals management system (sludge drying bed)
- Existing 110,000-gallon finished water storage tank
- Standby generator
- Existing storage shed

2.1.6.3 CONSTRUCTION SCHEDULE

Construction of the Project is assumed to be completed over the course of 24 months; however, active construction activities are anticipated to occur for approximately seven months.

2.1.6.4 EQUIPMENT

Construction equipment would likely include excavators, backhoes, graders, loaders, saws, compactors, hauling trucks, and water trucks. Generally, construction would occur between the hours of 7 am and 5 pm, Monday through Friday, excluding holidays.

2.1.6.5 OPERATION AND MAINTENANCE

The District has an existing contract with Sierra Sunrise Water Treatment Incorporated to operate and maintain their water system infrastructure. Typical water treatment infrastructure practices include inspecting water lines for leaks, damage and electrical hazards, and sampling water quality. Service meter readings are manually logged monthly. Flushing of valves, adjusting treatment chemical concentrations, and repairs as needed are also common practices from the operator on staff.

2.1.7 OTHER PUBLIC AGENCIES WHOSE APPROVAL MAY BE REQUIRED

- State Water Quality Resources Control Board
- San Joaquin Valley Air Pollution Control Board

2.1.8 CONSULTATION WITH CALIFORNIA NATIVE AMERICAN TRIBES

Public Resources Code Section 21080.3.1, *et seq. [codification of Assembly Bill (AB) 52, 2013-14]* requires that a lead agency, within 14 days of determining that it will undertake a project, must notify in writing any California Native American Tribe traditionally and culturally affiliated with the geographic area of the project if that Tribe has previously requested notification about projects in that geographic area. The notice must briefly describe the project and inquire whether the Tribe wishes to initiate request formal consultation. Tribes have 30 days from receipt of notification to request formal consultation. The lead agency then has 30 days to initiate the consultation, which then continues until the parties come to an agreement regarding necessary mitigation or agree that no mitigation is needed, or one or both parties determine that negotiation occurred in good faith, but no agreement will be made.

The District has not received any written correspondence from a Tribe pursuant to Public Resources Code Section 21080.3.1 requesting notification of proposed project.



Figure 2-1: Regional Location Map



Figure 2-2: Project Site Map

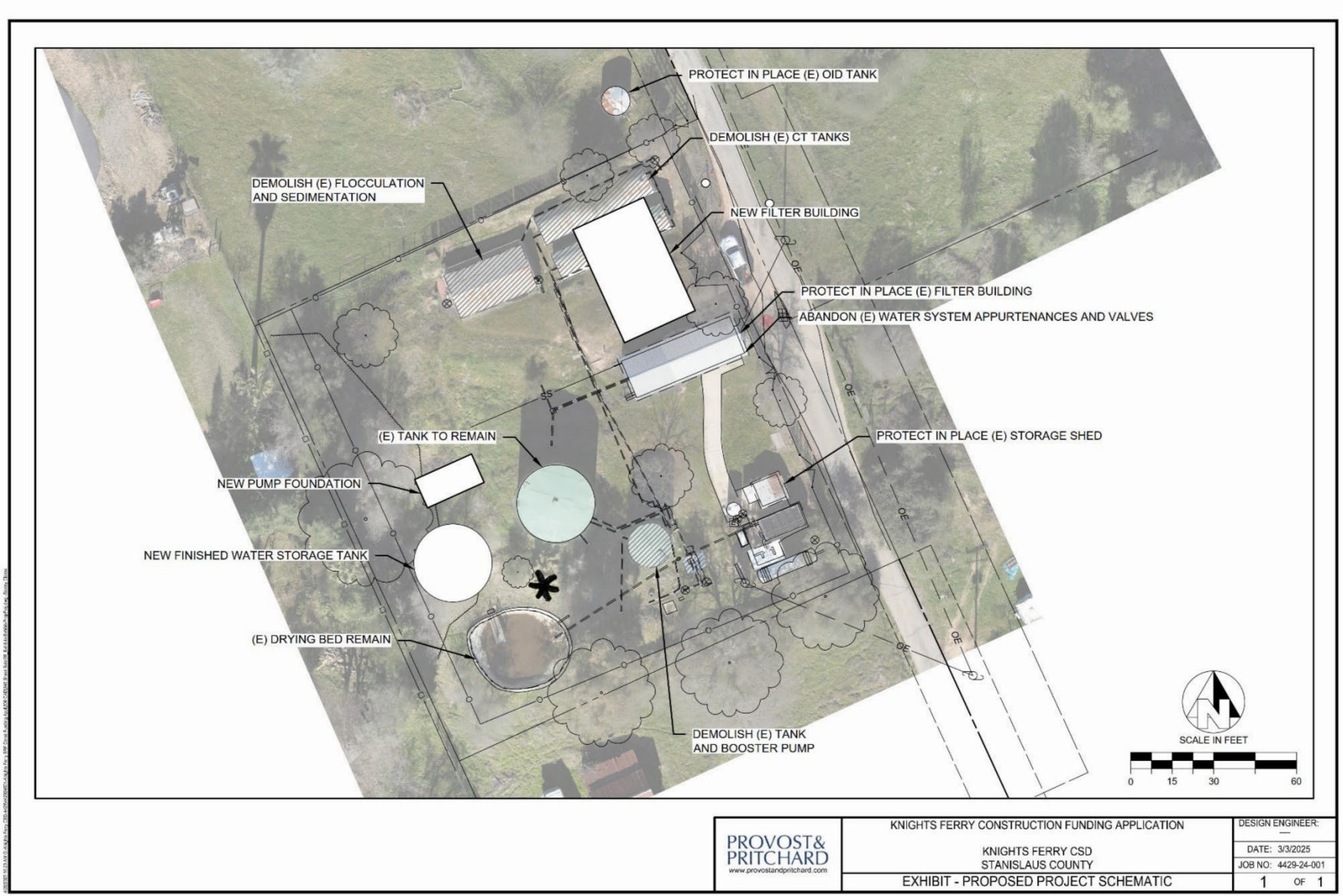


Figure 2-3: Site Plan

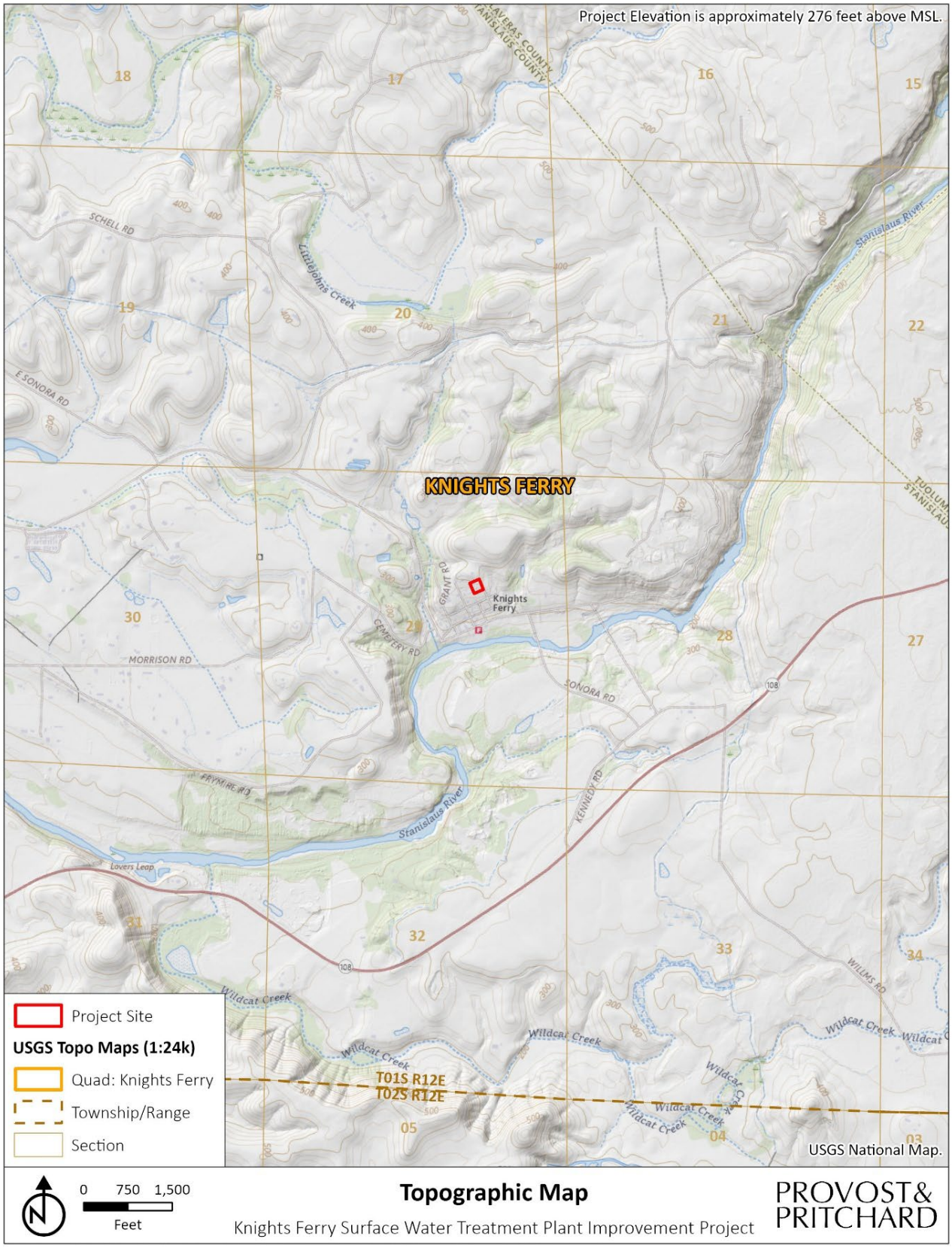


Figure 2-4: Topo Quad Map

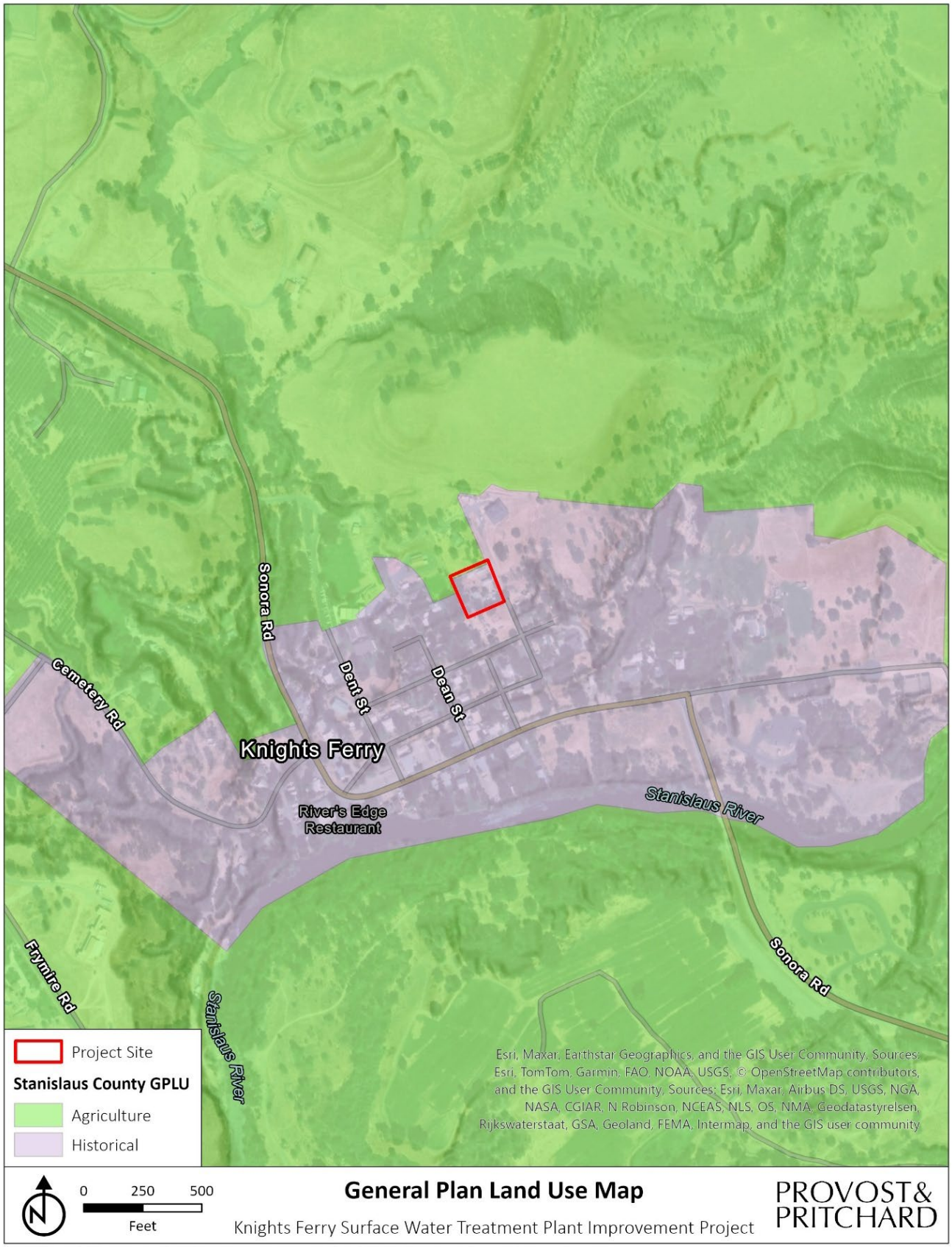


Figure 2-5: General Plan Land Use Designation Map

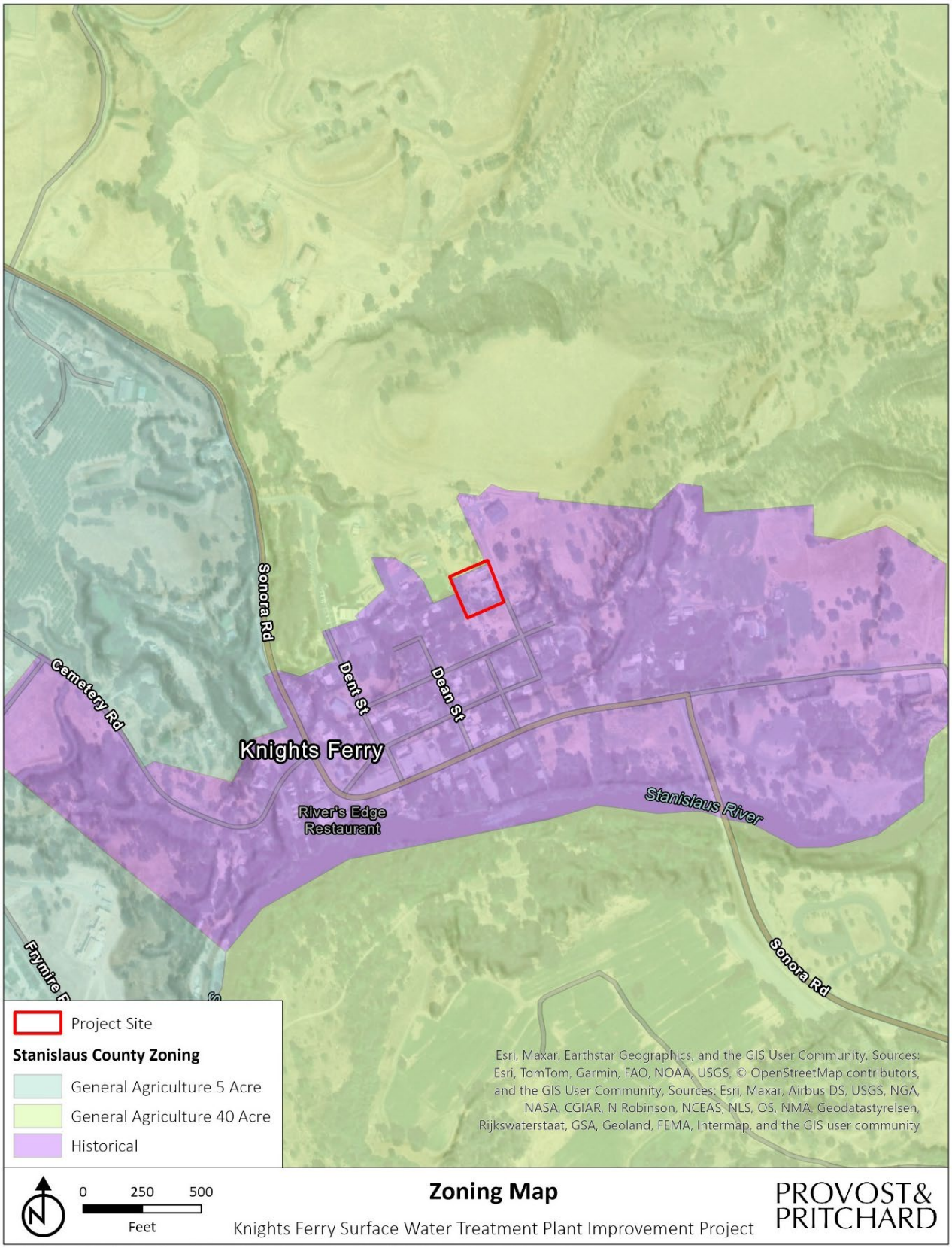


Figure 2-6: Zone District Map

CHAPTER 3 DETERMINATION

3.1 POTENTIAL ENVIRONMENTAL IMPACTS

As indicated by the discussions of existing and baseline conditions, and impact analyses that follow in this Chapter, environmental factors not checked below would have no impacts or less than significant impacts resulting from the project. Environmental factors that are. checked below would have potentially significant impacts resulting from the project. Mitigation measures are recommended for each of the potentially significant impacts that would reduce the impact to less than significant.

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

The analyses of environmental impacts in Chapter 4 Impact Analysis result in an impact statement, which shall have the following meanings.

Potentially Significant Impact. This category is applicable if there is substantial evidence that an effect may be significant, and no feasible mitigation measures can be identified to reduce impacts to a less than significant level. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

Less than Significant with Mitigation Incorporated. This category applies where the incorporation of mitigation measures would reduce an effect from a "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measure(s), and briefly explain how they would reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced).

Less than Significant Impact. This category is identified when the proposed Project would result in impacts below the threshold of significance, and no mitigation measures are required.

No Impact. This category applies when a project would not create an impact in the specific environmental issue area. "No Impact" answers do not require a detailed explanation if they are adequately supported by the information sources cited by the lead agency, which show that the impact does not apply to the specific project (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).

3.2 DETERMINATION

On the basis of this initial evaluation (to be completed by the Lead Agency):

☐ 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.

Kathleen Feichter — 2-16-26

Signature — Date

Kathleen Feichter BOD president

Printed Name/Position

CHAPTER 4 ENVIRONMENTAL IMPACT ANALYSIS

4.1 AESTHETICS

Table 4-1: Aesthetics Impacts

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 substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
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?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

4.1.1 BASELINE CONDITIONS

The Project is located in the unincorporated community of Knights Ferry in Stanislaus County. Knights Ferry is a historic community nestled in the foothills of the Sierra Nevada mountain range. It was founded in 1849 and named after Dr. William Knight.[1] The Project site is located at the existing KFCSD SWTP. The SWTP is surrounded by rural lands and rural residential development. The site is situated along the foothill slopes.

The nearest officially designated State Scenic Highway is State Route (SR) 29, located approximately 35 miles northeast of the Project site.[2] According to the Stanislaus County General Plan, there are no scenic vistas within the vicinity of the Project site.[3]

4.1.2 IMPACT ANALYSIS

a) Have substantial adverse effect on a scenic vista?

No Impact. The Project is not located within a scenic vista or a public viewshed of any sensitive aesthetic resources. The Project would be constructed within the confines of the existing SWTP and would not impact the surrounding properties, nor would it obstruct any views of the neighboring properties. There would be no impact.

[1] (Sunshine Rafting, 2025)
[2] (California Department of Transportation, 2023)
[3] (Stanislaus County, 2015)

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. There are no trees, rock outcroppings, or historical buildings near a designated State Scenic Highway that would be substantially damaged by the Project. As mentioned, the Project is not located near a State Scenic Highway as the closest one is SR 29, located approximately 35 miles northeast of the Project. Project activities would have no effect on SR 29 and therefore would not adversely affect the scenic qualities of the designated scenic highway. There would be no impact.

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?

Less than Significant Impact. The Project site is located at the existing KFCSD SWTP and is fully surrounded by rural residential uses. The proposed water treatment systems improvements would blend in with the existing infrastructure at the site and would be consistent with the development of the site and area, minimizing any potential visual impacts.. Impacts would be less than significant.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less than Significant Impact. The Project would include site lighting for security purposes. The new lighting would be developed in accordance with Stanislaus County lighting standards. Stanislaus County lighting standards are based on California's energy code, which focuses on shielding, glare reduction, and energy efficiency. Key requirements include fully shielding exterior lights to direct light down and away from neighboring properties and public rights-of-way, minimizing glare, and limiting lighting to what is necessary for safety, security, and aesthetics. Furthermore, none of the proposed Project materials for the infrastructure would cause glare as it would be painted in a manner to reduce any potential glaring effects. Therefore, the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Impacts would be less than significant.

4.2 AGRICULTURE AND FORESTRY RESOURCES

Table 4-2: Agriculture and Forest Impacts

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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
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))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

4.2.1 BASELINE CONDITIONS

The Project is located in Stanislaus County, a prominent farming county that is known for its significant agricultural industry. While Stanislaus County's total gross value of agricultural production in 2023 was $3.4 billion, this was a 10% decrease from 2022. The top three commodities for 2023 were almonds, milk, and poultry.[4] While Stanislaus County is a large player in the agricultural industry, the community of Knights Ferry, being located in the foothills outside of the fertile valley floor, is known for historical character.

Farmland Mapping and Monitoring Program: The Farmland Mapping and Monitoring Program (FMMP) produces maps and statistical data used for analyzing impacts to California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland. The maps are updated every two years with the use of a computer mapping system, aerial imagery, public review, and field reconnaissance. The California Department of Conservation's (DOC) 2018 FMMP is a non-regulatory program that produces "Important Farmland" maps and statistical data used for analyzing impacts on California's agricultural resources. The Important Farmland maps identify eight land use categories, five of which are agriculture related: prime farmland, farmland of statewide importance, unique farmland, farmland of local importance, and grazing land — rated according to soil quality and irrigation status. Each is summarized below:

- PRIME FARMLAND (P): Farmland with the best combination of physical and chemical features able to sustain long term agricultural production. This land has the soil quality, growing season, and

[4] (Stanislaus County, 2023)

moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

- FARMLAND OF STATEWIDE IMPORTANCE (S): Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
- UNIQUE FARMLAND (U): Farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated but may include non- irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date.
- FARMLAND OF LOCAL IMPORTANCE (L): Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee.
- GRAZING LAND (G): Land on which the existing vegetation is suited to the grazing of livestock. The minimum mapping unit for Grazing Land is 40 acres.
- URBAN AND BUILT-UP LAND (D): Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, institutional, public administrative purposes, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.
- OTHER LAND (X): Land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.
- WATER (W): Perennial water bodies with an extent of at least 40 acres.

As demonstrated in , the FMMP for the Project sites are designated as Urban and Built-Up Land or Vacant and Disturbed Land.[5]

4.2.2 IMPACT ANALYSIS

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?

No Impact. The Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as the site is not designated as such (see Figure 4-1). The Project site is designated as "Urban and Built-up Land". The Project would construct improvements to the deteriorating SWTP. The Project site is an existing disturbed property, and it is an area that does not contain farmland. Therefore, there would be no impact.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project site is not zoned for agricultural uses, nor does it contain a Williamson Act contract. The Project would have no impact on agriculture. Therefore. there would be no impact.

[5] (California Department of Conservation 2023)

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))?

No Impact. The Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. The Knights Ferry Community Plan has not designated any place in the Project area or surrounding lands as Forest Land, Timberland, or timberland zoned for Timberland Production. The Project would have construction activities in areas that have previously been disturbed and would not be in or near a forest or timberland environment. Therefore, there would be no impact.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Project is not located in or near any forest land. Therefore, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. There would be no impact.

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?

No Impact. The Project would not involve changes in the existing environment that would result in the conversion of farmland to non-agricultural use or the conversion of forest land to non-forest use. As mentioned, the Project site is not designated or used for farming activities. In addition, no land acquisition would be required for the completion of the Project. Therefore, there would be no impact.

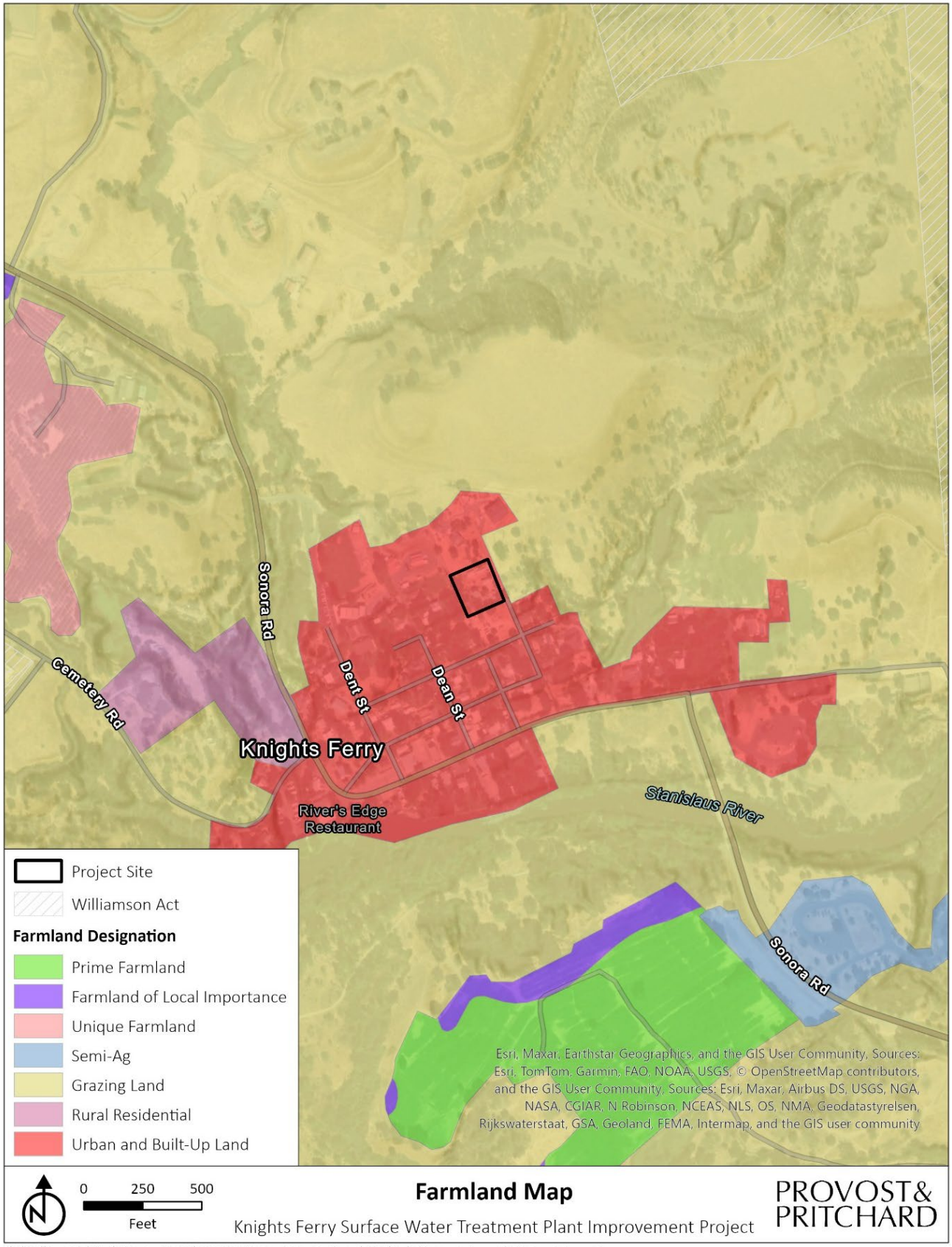


Figure 4-1: Farmland Designation Map

4.3 AIR QUALITY

Table 4-3: Air Quality Impacts

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?	☐	☐	☐	☒
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?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

4.3.1 BASELINE CONDITIONS

The Project site is located within the boundaries of the San Joaquin Valley Air Pollution Control District (SJVAPCD) and the San Joaquin Valley Air Basin (SJVAB). The SJVAB is positioned within the San Joaquin Valley of California. The San Joaquin Valley is bounded by the Sierra Nevada Mountain Range to the east and the Coastal Mountain Range to the west. Wind within the SJVAB typically channels south-southwest during the summer months, while wind flows to the north-northwest during the winter months. Wind velocity for the region is considered low for an area of such size.[6] Due to a lack of strong wind and the natural confinement of the mountain ranges surrounding the SJVAB, the region experiences some of the worst air quality in the world.

4.3.1.1 REGULATORY ATTAINMENT DESIGNATIONS

Under the California Clean Air Act (CCAA), the California Air Resources Board (CARB) is required to designate areas of the State as attainment, nonattainment, or unclassified with respect to applicable standards. An "attainment" designation for an area signifies that pollutant concentrations did not violate the applicable standard in that area. A "nonattainment" designation indicates that a pollutant concentration violated the applicable standard at least once, excluding those occasions when a violation was caused by an exceptional event, as defined in the criteria. Depending on the frequency and severity of pollutants exceeding applicable standards, the nonattainment designation can be further classified as serious nonattainment, severe nonattainment, or extreme nonattainment, with extreme nonattainment being the most severe of the classifications. An "unclassified" designation signifies that the data does not support either an attainment or nonattainment designation. The CCAA divides districts into moderate, serious, and severe air pollution categories, with increasingly stringent control requirements mandated for each category. The United States Environmental Protection Agency (USEPA) designates areas for ozone, carbon monoxide (CO), and nitrogen dioxide (NO_2) as "does not meet the primary standards," "cannot be classified," or "better than national standards." For sulfur dioxide (SO_2), areas are designated as "does not meet the primary standards," "does not meet the secondary standards," "cannot be classified," or "better than national standards." However, the CARB terminology of attainment, nonattainment, and unclassified is

[6] (San Joaquin Valley Air Pollution Control District, 2012)

more frequently used. The USEPA uses the same sub-categories for nonattainment status: serious, severe, and extreme. In 1991, USEPA assigned new nonattainment designations to areas that had previously been classified as Group I, II, or III for particulate matter 10 microns in size (PM_{10}) based on the likelihood that they would violate national PM_{10} standards. All other areas are designated "unclassified." According to the USEPA San Joaquin – Stanislaus County was in non-attainment for one pollutant concentration, with particulate matter 2.5 microns in size ($PM_{2.5}$) (2012) being classified as in serious non-attainment.[7]

Table 4-4: Summary of Ambient Air Quality Standards and Attainment Designation

Pollutant	Averaging Time	State Standard	Federal Standard	State Attainment Status	Federal Attainment Status
O_3	1 hour	0.09 ppm	N/A	Nonattainment/ Severe	N/A
O_3	8 hours	0.070 ppm	0.070 ppm (4^{th} highest in 3 years)	Nonattainment	Nonattainment/ Extreme
CO	1 hour	20 ppm	35 ppm	Attainment/ Unclassified	Attainment/ Unclassified
CO	8 hours	9.0 ppm	9 ppm	Attainment/ Unclassified	Attainment/ Unclassified
PM_{10}	24 hours	50 µg/m^3	150 µg/m^3 (expected number of days above standard < or equal to 1)	Nonattainment	Attainment
PM_{10}	Annual	20 µg/m^3	N/A	Nonattainment	N/A
$PM_{2.5}$	24 hours	N/A	35 µg/m^3	N/A	Nonattainment
$PM_{2.5}$	Annual	12 µg/m^3	12.0 µg/m^3	Nonattainment	Nonattainment
NO_2	1 hour	0.18 ppm	0.100 ppm	Attainment	Attainment/ Unclassified
NO_2	Annual	0.030 ppm	0.053 ppm	Attainment	Attainment/ Unclassified
SO_2	1 hour	0.25 ppm	0.075 ppm (99^{th} percentile over 3 years)	Attainment	Attainment/ Unclassified
SO_2	3 hours	N/A	0.5 ppm	N/A	Attainment/ Unclassified
SO_2	24 hours	0.04 ppm	0.14 ppm	Attainment	Attainment/ Unclassified
SO_2	Annual	N/A	0.030 ppm	N/A	Attainment/ Unclassified
Pb	Monthly	1.5 µg/m^3	N/A	Attainment	N/A
Pb	Rolling 3-month average	N/A	0.15 µg/m^3	N/A	Attainment/ Unclassified
Sulfates	24 hours	25 µg/m^3	N/A	Attainment	N/A
H_2S	1 hour	0.03 ppm	N/A	Unclassified	N/A
Visibility Reducing Particles (VRP)	8 hours	Visibility of 10 miles or more at relative humidity less than 70 %	N/A	Unclassified	N/A
Vinyl Chloride	24 hours	0.01 ppm	N/A	Attainment	N/A
µg/m3: micrograms per cubic meter					

** For more information on standards visit: https://ww3.arb.ca.gov/research/aaqs/aaqs2.pdf*
*** No Federal 1-hour standard. Reclassified extreme nonattainment for the Federal 8-hour standard [2025.*
****Secondary Standard*

4.3.1.1.1 CONSTRUCTION-GENERATED EMISSIONS

Construction of the Project is assumed to be completed over the course of 24 months; however, active construction activities are anticipated to occur for approximately seven months. Emissions associated with

[7] (United States Environmental Protection Agency, 2025)

the proposed Project were calculated using California Emissions Estimator Modeling (software) (CalEEMod), Version 2022.1.1.29. The emissions modeling includes emissions generated by off-road equipment, haul trucks, and worker commute trips. All other assumptions are based upon the default parameters contained in the model. Localized air quality impacts associated with the Project would be minor and were qualitatively assessed. Modeling assumptions and output files are included in Appendix A.

4.3.1.2 THRESHOLDS OF SIGNIFICANCE

Air pollutant emissions have regional effects and localized effects. This analysis assesses the regional effects of the Project's criteria pollutant emissions in comparison to SJVAPCD thresholds of significance for short-term construction activities and long-term operation of the proposed Project. Localized emissions from Project construction and operation are also assessed using concentration-based thresholds that determine if the proposed Project would result in a localized exceedance of any ambient air quality standards or would make a cumulatively considerable contribution to an existing exceedance. The primary pollutants of concern during Project construction and operation are ROG (reactive organic gases), NO_X, PM_{10}, and $PM_{2.5}$. The SJVAPCD Guide for Assessing and Mitigating Air Quality Impacts (GAMAQI) adopted in 2015 contains thresholds for ROG and Nitrogen Oxides (NO_X); Sulfur Oxides (SO_X), CO, PM_{10}, and $PM_{2.5}$. Ozone is a secondary pollutant that can be formed miles away from the source of emissions through reactions of ROG and NO_X emissions in the presence of sunlight.[8] Therefore, ROG and NO_X are termed ozone precursors. The SJVAB often exceeds the State and national ozone standards. Therefore, if the proposed Project emits a substantial quantity of ozone precursors, the Project may contribute to an exceedance of the ozone standard. The SJVAB also exceeds air quality standards for PM_{10}, and $PM_{2.5}$; therefore, substantial Project emissions may contribute to an exceedance for these pollutants.

The SJVAPCD adopted significance thresholds for construction-related and operational-related ROG, NO_X, PM_{10}, $PM_{2.5}$, CO, and SO_X, these thresholds are included in Table 4-5.

Table 4-5: Project-Level Air Quality CEQA Thresholds of Significance

Pollutant	Significance Threshold	
	Construction Emissions (tons/year)	Operational Emissions (tons/year)
CO	100	100
NO_x	10	10
ROG	10	10
SO_x	27	27
PM_{10}	15	15
$PM_{2.5}$	15	15

Source: SJVAPCD. 2015. Guidance for Assessing and Mitigating Air Quality Impacts. Website: https://ww2.valleyair.org/media/g4nl3p0g/gamaqi.pdf. Accessed July 18, 2025.

4.3.2 IMPACT ANALYSIS

4.3.2.1 CONSTRUCTION-GENERATED EMISSIONS

Estimated construction-generated emissions are summarized in Table 4-6. Due to the upgrades and improvements to the existing SWTP, long-term operational emissions would be negligible – and likely less significant than existing due to improved efficiencies – and would not exceed any set threshold governing air quality emission generation within the SJVAPCD.

[8] (District, 2015)

Table 4-6: Unmitigated Short-Term Construction Generated Emissions of Criteria Air Pollutants

Source	Annual Emissions (TPY[1])					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Maximum Annual Project Construction Emissions	0.03	0.22	0.33	<0.005	0.01	0.01
SJVAPCD Threshold	*10*	*10*	*100*	*27*	*15*	*15*
Threshold Exceeded?	No	No	No	No	No	No
[1]TPY – Tons per Year						

4.3.2.2 MAXIMUM DAILY EMISSIONS OF CRITERIA AIR POLLUTANTS

Daily construction emissions generated by the proposed Project are summarized in Table 4-7.

Table 4-7: Maximum Unmitigated Daily Emissions of Criteria Air Pollutants

Source	Daily Emissions Maximum (in pounds)					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Construction – Summer	0.75	5.92	7.08	0.02	0.9	0.32
Construction – Winter	1.01	6.36	8.11	0.03	0.33	0.32
SJVAPCD SJVAB Threshold	*100*	*100*	*100*	*100*	*100*	*100*
Threshold Exceeded?	No	No	No	No	No	No

After the proposed SWTP upgrade and modernization is completed, the design capacity and flows at the SWTP would remain generally the same, so there would not be any change in operational emissions. The number of personnel operating the SWTP and chemical truck deliveries would also remain the same after completion of construction. Therefore, there would be no combustion or particulate matter emissions that would be associated with additional personnel and delivery trucks traveling to the upgraded SWTP during operations.

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

No Impact. The Project would not conflict with or obstruct implementation of any applicable air quality plan. The Project would not exceed any threshold for air quality emissions that has been set by the SJVAPCD. Therefore, there would be no impact.

b) Would the project 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?

Less than Significant Impact. The Project would construct improvements and/or replace existing infrastructure at the Knights Ferry SWTP. There would not be a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment. As shown in Table 4-6 and Table 4-7, the Project would not exceed an emissions threshold which has been set by the SJVAPCD for construction related emissions. As the Project would be only replacing and/or improving the existing SWTP, long-term operational emissions would be similar or less than existing conditions and would not exceed any set threshold governing air quality emission generation within the SJVAPCD. Therefore, impacts would be less than significant.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact with Mitigation Incorporated. Sensitive Receptors are groups that would be more affected by air, noise, and light pollution, pesticides, and other toxic chemicals than others. This includes infants, children under 16, elderly over 65, athletes, and people with cardiovascular and

respiratory diseases. High concentrations of these groups would include daycares, residential areas, hospitals, elder care facilities, schools and parks. The Project would result in the construction of upgrades and/or improvements to the existing SWTP in the small community of Knights Ferry. As previously mentioned, the Project would not result in construction or operational emissions that would result in an exceedance of a set threshold.

However, due to the on-site and nearby sensitive receptors to the Project site, AERMOD (Version 24142) and the HARP2 air dispersion model (Version 22.118) were also run for the Project site to show the health risk the Project would have on sensitive receptors in the area. The exposure period to diesel particulate matter, whose amount was taken (averaged based on the seven months of construction activities) from the PM_{10} exhaust emissions found in the CalEEMod results, was set to the estimated construction period. No time away from home was modeled to ensure worst-case scenario. The model run, which can be viewed in Appendix A, indicates that the Project would result in a cancer risk of 7.11 in one million, with the implementation of Mitigation Measure AIR-1, which is less than the SJVAPCD's threshold of 20 in one million. The Project would also present a chronic hazard index of 0.06498, which would be less than the SJVAPCD's threshold of one. There are no acute impacts from diesel particulate matter, so the hazard index would be zero. Therefore, impacts would be less than significant.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant Impact. During construction activities, construction equipment exhaust, and other construction applications would temporarily emit odors. Construction would have a temporary effect on some rural residences which would be located near the construction area of the Project. Construction of the Project would be temporary, and odors would not remain after Project completion. Therefore, impacts would be less than significant.

4.3.3 MITIGATION

AIR-1 The Project shall implement Tier 4 Final diesel engines of 50 horsepower or larger or Tier 3 engines with level 3 Particulate Filters on diesel engines of 50 horsepower or larger.

4.4 BIOLOGICAL RESOURCES

Table 4-8: Biological Resources Impacts

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 Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
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 Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
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?	☐	☐	☐	☒

4.4.1 BASELINE CONDITIONS

4.4.1.1 GENERAL

A Biological Resources Evaluation report, dated July 2025, was prepared for the Project and can be found in this document as Appendix B. A reconnaissance-level field survey of the Project site was conducted on June 23, 2025, by a Provost & Pritchard biologist. The survey consisted of walking thoroughly through the Project site while identifying and noting land uses, biological habitats and communities, plant and animal species encountered and assessed for suitable habitats of various wildlife species.

The Project site is located in the community of Knights Ferry, located approximately nine miles northeast of the City of Oakdale in Stanislaus County. The Project area includes a water treatment plant and paved

roads. Surrounding lands on all sides of the Project site are rural residential neighborhoods with paved roads and pastures (see Figure 4-2 for photos of the Project site). The Project site is located within the *Knights Ferry* United States Geological Survey (USGS) 7.5-minute quadrangle within the central/ northeast corner of Section 29, Township 1 South, Range 12 East. The topography of the Project site was rolling hills within the facility that ranged from approximately 270 to 285 feet above mean sea level.

Like most of California, the Project site experiences a Mediterranean climate. Warm, dry summers are followed by cool, moist winters. In the summer, average high temperatures range between 90- and 100-degrees Fahrenheit (°F), but do not often exceed 110 °F, and the humidity is generally low. Winter temperatures are often below 60 °F during the day and rarely exceed 70 °F. On average, the Knights Ferry receives approximately 22 inches of precipitation in the form of rain yearly, most of which occurs between November and April, and the Project site would be expected to receive similar amounts of precipitation.[9]

[9] (The National Oceanic and Atmospheric Administration 2025)

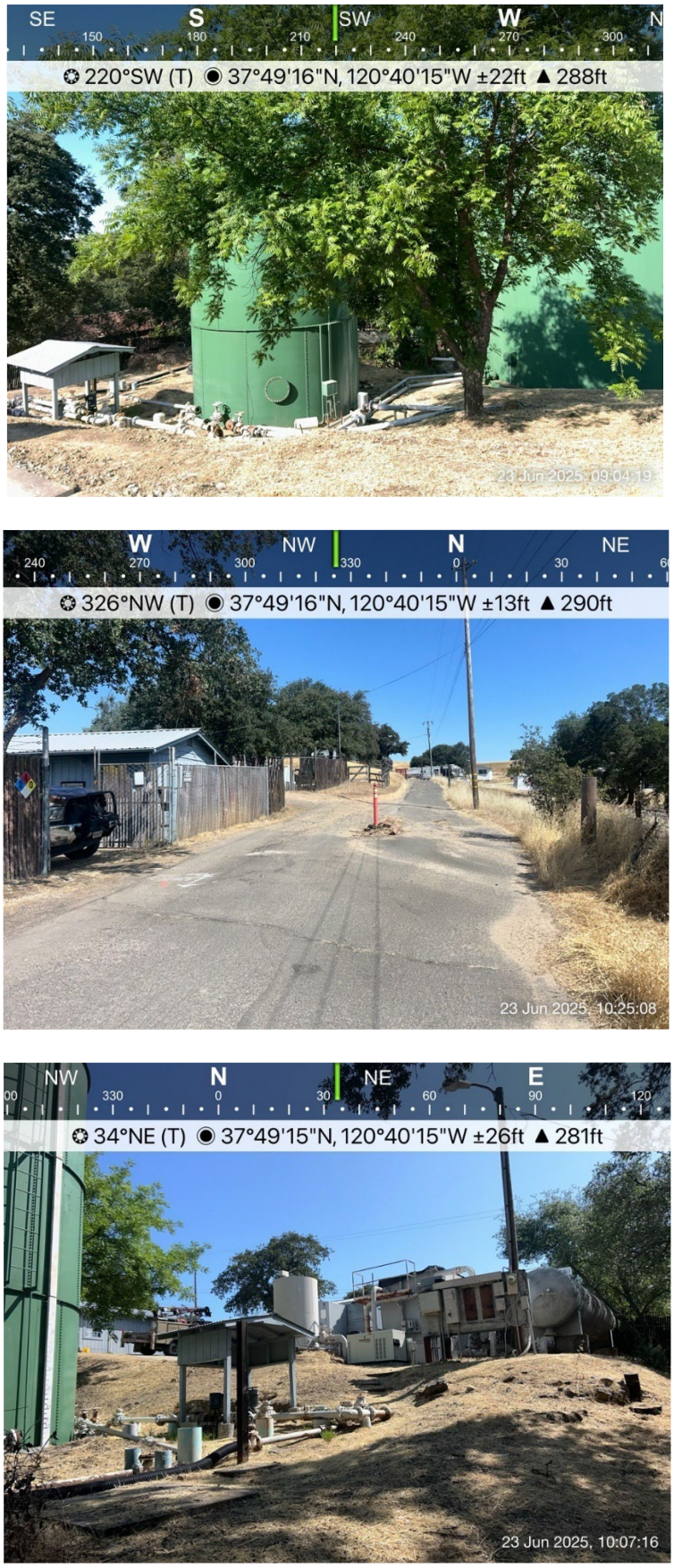


Figure 4-2: Project Site Photos

4.4.1.2 SOILS

One soil mapping unit representing a soil type was identified within the Project site and is listed in Table 4-9 (see Appendix D of Appendix B for the Web Soil Survey Report). The soil is displayed with its core properties in the table below, according to the Major Land Resource Area of California. This soil is used primarily for grazing.

Table 4-9: List of Soils Located on the Project Site and Their Basic Properties

Soil	Soil Map Unit	Percent of Project site	Hydric Unit	Hydric Minor Units	Drainage	Permeability	Runoff
Akers	Saline-Sodic, 0 to 2 percent slopes	31.7%	No	Yes	Well drained	Moderately slow	Negligible
Grangeville	Sandy loam, 0 to 2 percent slopes	68.3%	Yes	Yes	Poorly drained	Moderately rapid	Negligible to very low

Hydric soils are defined as soils that are saturated, flooded, or ponded long enough during the growing season to develop anaerobic conditions such that under sufficiently wet conditions, hydrophytic vegetation can be supported. Hydric soil ratings are derived from specific soil properties as well as climate, parent material, vegetation, landform type, and biological activity of a certain location. None of the major or minor soil mapping units located within the Project site were identified as hydric.

4.4.1.3 BIOTIC HABITATS

Four biotic habitats were observed within the Project site and included non-native annual grassland, residential, ruderal, and treatment pond (see Figure 4-3). These habitats and their constituent plant and animal species are described in more detail in the following sections.

Non-Native Annual Grassland

The non-native grassland habitat is the least prevalent of the four habitat types within the Project site and is found within the northeastern edge across Lynde Street from the water treatment plant. Mixed oak savannah and private properties with pastures were adjacent to this area outside of the Project site.

This habitat was dominated by slender wild oat (*Avena barbata*) with pitgland tarweed (*Holocarpha virgata*), short-pod mustard (*Hirschfeldia incana*), and turkey mullein (*Croton setiger*) sporadically along the road. Turkey vultures (*Cathartes aura*) were observed foraging through this area.

While the non-native grassland habitat within the Project site had tire marks and large, uncovered holes from past utility poles, the area and adjacent areas still offered expansive habitat to a variety of wildlife, year-round. The Project site serves foraging birds, including raptors, during the day, as well as bats, coyotes, and other nocturnal animals at night. This habitat also provides cover and foraging for prey species such as small rodents, reptiles, and other bird species.

Residential

The residential portion of the Project site contained houses, fencing, paved roads, landscaping, and pastures. Vegetation in this section of the Project site included ornamental plants surrounding houses, eucalyptus trees (*Eucalyptus* sp.), tall palm species (*Arecaceae*), and a variety of oaks that lined the shared fencing with the water treatment plant. The survey of this residential habitat resulted in the observation of acorn woodpeckers (*Melanerpes formicivorus*) seen creating cavities in palms and wooden fences within and adjacent to the Project site.

Ruderal

The ruderal habitat of the site was the most prevalent of the habitat types and contained a water treatment plant, fencing, and paved roads. Man-made "trenches" were observed at the water treatment plant dug near the southwest edge going east. Vegetation in this section of the site was dominated by mowed non-native grass with a variety of trees along the southwestern edge including blue oak (*Quercus douglasii*), interior live oak (*Quercus wislizeni*), Peruvian pepper tree (*Schinus molle*), Persian silk tree (*Albizia julibrissin*), Mexican fan palm (*Washingtonia robusta*), and Osage orange tree (*Maclura pomifera*). Herbaceous vegetation present within the ruderal habitat include common sow thistle (*Sonchus oleraceus*), dallis grass (*Paspalum dilatatum*), dotted knotweed (*Persicaria punctata*), lesser hawkbit (*Leontodon saxatilis*), redstem filaree (*Erodium cicutarium*), ripgut brome (*Bromus diandrus*), rose clover (*Trifolium hirtum*), scarlet pimpernel (*Lysimachia arvensis*), and Spanish clover (*Acmispon americanus*).

The survey of the ruderal habitat within the Project site resulted in the identification of numerus bird species including Anna's hummingbird (*Calypte anna*), black phoebe (*Sayornis nigricans*), bushtit (*Psaltriparus minimus*), California scrub jay (*Aphelocoma californica*), Eurasian collared dove (*Streptopelia decaocto*), house finch (*Haemorthous mexicanus*), house sparrow (*Passer domesticus*), lesser goldfinch (*Spinus psaltria*), and mourning dove (*Zenaida macroura*). Partially collapsed small mammal burrows were observed at the southern corner of the Project site near the treatment pond and were likely dug by Botta's pocket gopher (*Thomomys bottae*), which was not observed during the survey.

Treatment Pond

The treatment pond habitat included a singular concrete-lined treatment pond with approximately one-foot of water. No vegetation was found besides fibrous algal material in the water. American bullfrog (*Lithobates catesbeianus*) tadpoles and window skimmers (*Libellula luctuosa*) were observed within and around the treatment pond.

While the treatment pond was heavily disturbed from the surrounding areas, it is likely being used as water sources and foraging habitat for a wide variety of wildlife including birds, invertebrates, and small mammals.

4.4.1.4 NATURAL COMMUNITIES OF SPECIAL CONCERN AND RIPARIAN HABITAT

Natural communities of special concern are those that are of limited distribution, distinguished by significant biological diversity, or home to special status species. The California Fish and Wildlife (CDFW) has classified and mapped all natural communities in California. Just as the special status plant and animal species, these natural communities of special concern can be found within the California Natural Diversity Database (CNDDB). There are no recorded observations of a natural community of special concern mapped within the site and no natural communities of special concern were observed during the field survey.

Riparian habitat is composed of plant communities that occur along the banks, and sometimes over the banks, of most waterways and is an important habitat for numerous wildlife species. CDFW has jurisdiction over most riparian habitat in California. No waterways or riparian habitat were observed within or adjacent to the Project site during the field survey.

4.4.1.5 DESIGNATED CRITICAL HABITAT

The United States Fish and Wildlife Service (USFWS) often designates areas of "critical habitat" when it lists species as threatened or endangered. Critical habitat is a specific geographic area that contains features essential for the conservation of a threatened or endangered species, which may require special management and protection. Designated critical habitat is absent from the Project site but Greene's tuctoria critical habitat was located 1.2 miles northeast of Project site center.

4.4.1.6 WILDLIFE MOVEMENT CORRIDORS AND NATIVE WILDLIFE NURSERY SITES

Wildlife movement corridors are routes that animals regularly and predictably follow during seasonal migration, dispersal from native ranges, daily travel within home ranges, and inter-population movements. Movement corridors in California are typically associated with valleys, ridgelines, rivers, and creeks supporting riparian vegetation.

The non-native annual grassland habitat of the Project site and mixed oak savannah habitat in the surrounding areas consists of expansive open grassland where species could move through. Numerous small game trails (likely from squirrels and/or rabbits) were observed in the non-native annual grassland habitat during the field survey.

Native wildlife nursery sites are areas where a species or group of similar species raise their young in a concentrated place, such as maternity bat roosts. Large palm trees with woodpecker cavities were located adjacent to the Project site and could function as native wildlife nursery sites for acorn woodpeckers and other birds. The treatment pond at the water treatment plant was being used as wildlife nursery sites for amphibian species such as American bullfrog tadpoles which were observed during the survey.

4.4.1.7 SPECIAL STATUS PLANTS AND ANIMALS

A query of the CNDDB for occurrences of special status plant and animal species was conducted for the *Knights Ferry* USGS 7.5-minute quadrangles that contains the Project site, and for the 8 surrounding USGS quadrangles: *Bachelor Valley*, *Copperopolis, Cooperstown*, *Keystone*, *New Melones Dam*, *Oakdale*, *Paulsell*, and *Waterford*. A query of the Information for Planning and Consultation system (IPaC) was also completed for the Project site. These species, and their potential to occur within the Project site, are listed in Table 4-10 and Table 4-11, below. Other special status species that did not show up in the CNDDB query, but have the potential to occur in the vicinity, are also included in Table 3. Species lists obtained from CNDDB and IPaC are available in Appendix B and Appendix C, respectively of Appendix B. All relevant sources of information, as discussed in the Study Methodology section of this report, as well as field observations, were used to determine if any special status species have the potential to occur within the Project site.

Table 4-10: List of Special Status Plants with Potential to Occur on the Project site and/or in the Vicinity

Species	Status*	Habitat	Occurrence within the Project site
Beaked clarkia (*Clarkia rostrata*)	California Native Plant Society (CNPS) 1B	Found in woodlands and valley foothill grasslands on the west slope of the Sierra Nevada range, around 1,650 feet in elevation. Blooms April – May.	**Absent.** The Project site does not provide suitable habitat and is outside the current known elevational range of this species.
Chinese Camp brodiaea (*Brodiaea pallida*)	FT, CE, CNPS 1B	Found in valley and foothill grassland, and cismontane woodland habitats often in rocky, intermittent streambeds. This species is also associated with serpentinite. Grows at elevations between 500 and 1,300 feet. Blooms May – June.	**Absent.** The Project site does not provide suitable habitat and is outside the current known elevational range of this species.
Colusa grass (*Neostapfia colusana*)	FT, CE, CNPS 1B	Found in vernal pools within the San Joaquin Valley at elevations below 450 feet. Blooms May – August.	**Absent.** The Project site does not provide suitable vernal pool habitat to support this species.
Congdon's Lewisia (*Lewisia congdonii*)	CNPS 1B	Occurs in chaparral, valley and foothill grassland, lower montane coniferous forest, cismontane woodland, and upper montane coniferous forest. Found on north exposures, in crevices on slopes	**Absent.** The Project site does not provide suitable habitat and is outside the current known elevational range of this species.

Species	Status*	Habitat	Occurrence within the Project site
		among rocks, particularly granitic or metamorphic substrates. Found at elevations between 1,600 to 9,200 feet. Blooms April – June.	
Dwarf downingia (*Downingia pusilla*)	CNPS 2B	Found in vernal pools in valley and foothill grassland communities at elevations below 1,600 feet. Blooms March – May.	**Absent.** The Project site does not provide suitable vernal pool habitat to support this species.
Forked hare-leaf (*Lagophylla dichotoma*)	CNPS 1B	Found in cismontane woodland, and valley and foothill grassland communities at elevations between 600 and 1,100 feet. Blooms April – May.	**Absent.** The Project site does not provide suitable habitat and is outside the current known elevational range of this species.
Greene's tuctoria (*Tuctoria greenei*)	FE, CNPS 1B	Found in the San Joaquin Valley and other parts of California in vernal pools within valley grassland, wetland, and riparian communities at elevations below 3,500 feet. Blooms May – September.	**Absent.** The Project site does not provide suitable vernal pool habitat to support this species. CNDDB lists this species as "extirpated" from the region.
Hairy Orcutt grass (*Orcuttia pilosa*)	FE, CE, CNPS 1B	Found in vernal pools in valley grassland, wetland, and riparian communities at elevations below 650 feet. Blooms May – September.	**Absent.** The Project site does not provide suitable vernal pool habitat to support this species.
Hartweg's golden sunburst (*Pseudobahia bahifolia*)	FE, CE, CNPS 1B	Found in valley and foothill grassland and cismontane woodland communities in clay soils that are often acidic. Occurs predominantly on northern slopes, but also along shady creeks and near vernal pools at elevations between 300 and 650 feet. Blooms March – May.	**Absent.** The Project site does not provide suitable habitat and soil type to support this species.
Hoover's calycadenia (*Calycadenia hooveri*)	CNPS 1B	Found in valley and foothill grassland and cismontane woodland communities on exposed, rocky, barren soil at elevations between 300 and 1,300 feet. Blooms June – September.	**Absent.** The Project site does not provide suitable habitat and soil type to support this species.
Hoover's cryptantha (*Cryptantha hooveri*)	CNPS 1A	Presumed extirpated in California. Was historically found in valley and foothill grasslands and inland dunes in coarse sand at elevations below 250 feet. Blooms March – May.	**Absent.** The Project site does not provide suitable habitat and soil type to support this species.
Hoover's spurge (*Euphorbia hooveri*)	FT, CNPS 1B	Found in vernal pools within valley grassland, freshwater wetland, and riparian communities at elevations below 800 feet. Blooms July – September.	**Absent.** The Project site does not provide suitable vernal pool habitat to support this species.
Mariposa cryptantha (*Cryptantha mariposae*)	CNPS 1B	Usually occurs in chaparral communities. Can be found on rocky, semi barren ridges, dry slopes, and serpentine outcrops at elevations between 650 and 2,200 feet. Blooms April – June.	**Absent.** The Project site does not provide suitable habitat and is outside the current known elevational range of this species.

Species	Status*	Habitat	Occurrence within the Project site
Merced monardella (*Monardella leucocephala*)	CNPS 1A	Found in the San Joaquin Valley, associated with valley and foothill grasslands. Grows along rivers in moist, sandy soils at elevations between 150 and 350 feet. Blooms May – July.	**Absent.** CNDDB lists this species as "extirpated" from the region.
Patterson's navarretia (*Navarretia paradoxiclara*)	CNPS 1B	Found in open, seasonally wet meadows and seeps. Associated with drainages, openings, serpentinite, and vernally mesic soils at elevations between 500 and 1,400 feet. Blooms May – July.	**Absent.** The Project site does not provide suitable habitat and is outside the current known elevational range of this species.
Rawhide Hill onion (*Allium tuolumnense*)	CNPS 1B	Found in cismontane woodland. Restricted to serpentine soil, usually in grey pine chaparral. Associated with steep, rocky, south facing slopes or small drainages. Occurs at elevations between 1,000 and 2,000 feet. Blooms March – May.	**Absent.** The Project site does not provide suitable habitat and is outside the current known elevational range of this species.
Red Hills cryptantha (*Cryptantha spithamaea*)	CNPS 1B	Found in chaparral and cismontane woodland communities. Associated with serpentinite, streambeds, and openings at elevations between 900 and 1,500 feet. Blooms April – May.	**Absent.** The Project site does not provide suitable habitat and is outside the current known elevational range of this species.
Red Hills ragwort (*Senecio clevelandii* var. *heterophyllus*)	CNPS 1B	Found in cismontane woodland communities. Associated with ultramafic and drying serpentine soils. Is often found along streams. Found at elevations between 850 and 1,300 feet. Blooms June – July.	**Absent.** The Project site does not provide suitable habitat and is outside the current known elevational range of this species.
Red Hills soaproot (*Chlorogalum grandiflorum*)	CNPS 1B	Found in cismontane woodland, chaparral, and lower montane coniferous forest communities. Occurs frequently on serpentine or gabbro soils, as well as non-ultramafic substrates. Can be found on historically disturbed sites. Found at elevations between 800 and 5,600 feet. Blooms May – June.	**Absent.** The Project site does not provide suitable habitat and is outside the current known elevational range of this species.
Red Hills vervain (*Verbena californica*)	FT, CT, CNPS 1B	Occurs in cismontane woodland, as well as valley and foothill grassland communities. Associated with mesic sites on serpentine, usually serpentine seeps, or creeks. Found at elevations between 850 and 1,400 feet. Blooms May – September.	**Absent.** The Project site does not provide suitable habitat and is outside the current known elevational range of this species.
San Joaquin Valley Orcutt grass (*Orcuttia inaequalis*)	FT, CE, CNPS 1B	Found in the eastern San Joaquin Valley and the Sierra Nevada foothills in vernal pools within valley grassland, freshwater wetland, and wetland-riparian communities at elevations below 2,600 feet. Blooms April – September.	**Absent.** The Project site does not provide suitable vernal pool habitat to support this species.

Species	Status*	Habitat	Occurrence within the Project site
Shaggyhair lupine (*Lupinus spectabilis*)	CNPS 1B	Found in chaparral and cismontane woodland habitats. Associated with open rocky slopes of serpentine and grey pine woodland. Occurs at elevations between 850 and 2,700 feet. Blooms April – May.	**Absent.** The Project site does not provide suitable habitat and is outside the current known elevational range of this species.
Spicate calycadenia (*Calycadenia spicata*)	CNPS 1B	Found in valley and foothill grassland and cismontane woodland. Occurs on dry, adobe, clay, gravelly, rocky, and disturbed areas, often in openings and roadsides at elevations between 100 and 4,600 feet. Blooms May – September.	**Absent.** The Project site does not provide suitable habitat for this species.
Spiny-sepaled button-celery (*Eryngium spinosepalum*)	CNPS 1B	Found in the Sierra Nevada foothills and the San Joaquin Valley in vernal pools, swales, and roadside ditches. Often associated with clay soils in vernal pools within grassland communities. Occurs at elevations between 50 and 4,200 feet. Blooms April – July.	**Absent.** The Project site does not provide suitable aquatic habitat for this species.
Stanislaus monkeyflower (*Erythranthe marmorata*)	CNPS 1B	Found in cismontane woodland and lower montane coniferous forest communities at elevations between 300 and 3,000 feet. Blooms March – May.	**Absent.** The Project site does not provide suitable woodland habitat for this species.
Tongue-leaf copper moss (*Scopelophila cataractae*)	CNPS 2B	Found in cismontane woodland communities on metamorphic substrate. There is only one recorded occurrence of this species on California, at an elevation of 1310 feet.	**Absent.** The Project site does not provide suitable habitat and is outside the current known elevational range of this species.
Tuolumne button-celery (*Eryngium pinnatisectum*)	CNPS 1B	Found in cismontane woodland and lower montane coniferous forest communities, and vernal pools. Associated with volcanic soils, wetlands, and mesic sites within other natural communities at elevations between 200 and 3,000 feet. Blooms June – August.	**Absent.** The Project site does not provide suitable vernal pool habitat to support this species.
Veiny monardella (*Monardella venosa*)	CNPS 1B	Found in valley grassland, foothill grassland, and cismontane woodland communities. Occurs in heavy clay, mostly with grassland associates. Found at elevations between 200 and 1,400 feet. Blooms June – July.	**Unlikely.** The Project site does not provide suitable soil type to support this species. The nearest recorded observation of this species was a historical collection from Peoria Pass as noted in Jepson eFlora, 10.4 miles northeast of the site in 1935.

Table 4-11: List of Special Status Animals with Potential to Occur on the Project site and/or in the Vicinity

Species	Status*	Habitat	Occurrence within the Project site
Bald eagle (*Haliaeetus leucocephalus*)	CE, CFP	Resides in old growth forests as well as lower montane coniferous forests. Can also be found in open uplands in the winter. Nests are generally found in large trees within	**Unlikely.** Suitable nesting habitat for this species was absent from the Project site but the non-native grassland and adjacent pastureland habitat could be utilized for foraging. The nearest

Species	Status*	Habitat	Occurrence within the Project site
		a mile of water. Nests and winters along ocean shores, lake margins, and rivers.	recorded observation of this species within the vicinity was approximately 14.7 miles southeast of the Project site in 1992.
Burrowing owl (*Athene cunicularia*)	CC, CSSC	Resides in open, dry grasslands, deserts, scrublands, and other areas with low growing vegetation. Nests and roosts underground in existing burrows created by mammals, most often by ground squirrels, and human-made structures.	**Unlikely.** No burrows within the Project site had the dimensions to support this species, but the non-native grassland and pastureland habitats could be utilized for foraging. The nearest recorded observation of this species within the vicinity was approximately 10.3 miles west/southwest of the Project site in 1991.
California tiger salamander – central California DPS (*Ambystoma californiense*)	FT, CT	Requires vernal pools or seasonal ponds for breeding and small mammal burrows for aestivation. Generally found in grassland and oak savannah plant communities in central California from sea level to 1,500 feet in elevation. Can migrate up to 1.3 miles to breed.	**Unlikely.** While there were a few small mammal burrows present near the treatment pond at the water treatment plant, the Project site and adjacent areas are very disturbed by landscaping and residential areas. The nearest recorded observation was at two temporary ponds on the opposite side of Highway SR-120, approximately 2.2 miles southwest of the Project site in 1993.
Conservancy fairy shrimp (*Branchinecta conservatio*)	FE	Found in large, turbid freshwater vernal pools in the Central Valley, from Tehama County in the north to Merced County in the south, with one outlying population in Ventura County's Interior Coast Ranges.	**Absent.** Suitable vernal pool habitats required by this species were absent from the Project site and surrounding areas.
Crotch's bumble bee (*Bombus crotchii*)	CCE	Occurs throughout coastal California, as well as east to the Sierra Nevada-Cascade crest, and south into Mexico. Food plant genera include snapdragons, scorpionweeds, primroses, poppies, and buckwheats. Nests are often located underground in abandoned rodent nests, or above ground in tufts of grass, old bird nests, rock piles, or cavities in dead trees. This species overwinters under leaf litter or soft soil.	**Unlikely.** The water treatment plant had small mammal burrows where this species could nest and overwinter; however, the constant landscaping and maintenance around the facility would likely disturb this species. The Project site had limited foraging opportunity for this species. The nearest recorded observation of this species in a large, non-specific area that overlaps the Project site from 1961.
Green sturgeon (Ac*ipenser medirostris*)	FT	Spawning occurs primarily in cool (51- 59 °F) sections of mainstem rivers in deep pools (26- 30 feet) with substrate containing small to medium sized sand, gravel, cobble, or boulders, such as the Sacramento, Feather, and Yuba Rivers. Presence in upper Stanislaus and San Joaquin Rivers may indicate spawning. Non-spawning adults occupy marine/estuarine waters. The Delta Estuary is important for rearing juveniles.	**Absent.** The Project site does not provide suitable aquatic habitat to support this species.

Species	Status*	Habitat	Occurrence within the Project site
Hardhead (*Mylopharodon conocephalus*)	CSSC	Occurs in low- to mid-elevation streams in the Sacramento-San Joaquin drainage. Clear, deep pools with sand-gravel-boulder bottoms and slow-moving water are required. This species is often sympatric with Sacramento pikeminnow and Sacramento sucker. Hardhead are typically absent from streams occupied by sunfishes and from heavily altered habitats.	**Absent.** The Project site does not provide suitable aquatic habitat to support this species.
Least Bell's vireo (*Vireo bellii pusillus*)	FE, CE	This migratory species breeds in southern California. Breeding habitat consists of dense, low, shrubby, riparian vegetation in the vicinity of water or dry river bottoms. By the early 1980s, this species was extirpated from most of its historic range in California, including the Central Valley.	**Absent.** The Project site does not provide suitable riparian habitat to support this species.
Monarch butterfly (*Danaus plexippus*)	FPT	Roosts in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby. Larval host plants consist of milkweeds. Winter roost sites extend along the Pacific Coast from northern Mendocino to Baja California, Mexico.	**Unlikely.** This species could travel through the Project site during breeding season. Potential roosting habitat was present with the eucalyptus trees within the adjacent private properties but was marginal and highly disturbed with routine landscaping. The Project site is outside the overwintering range for this species. No narrow leaf milkweed plants were observed within/ adjacent to the Project site during the survey and since the survey was conducted during the narrow leaf milkweed blooming period (June – September), the plant would have been observed if present. The nearest recorded observation of this species was within a private residence on iNaturalist, 6.6 miles southwest of the Project site in 2019.
Northwestern pond turtle (*Actinemys marmorata*)	FPT, CSSC	An aquatic turtle of ponds, marshes, slow-moving rivers, streams, and irrigation ditches with riparian vegetation. Requires adequate basking sites and sandy banks or grassy open fields to deposit eggs.	**Unlikely.** While this species could use the lawn surrounding the treatment pond for basking, the pond was almost empty during the survey and was concrete-lined with constant landscaping in the immediate vicinity. The nearest recorded observation of this species within the vicinity overlaps the Project site in 1879.
Pallid bat (*Antrozous pallidus*)	CSSC	Found in grasslands, chaparral, and woodlands, where it feeds on ground- and vegetation-dwelling arthropods, and occasionally takes insects in flight. Prefers to roost in rock crevices, but may also use tree cavities, caves, bridges, and other human-made structures.	**Unlikely.** While this species could utilize the non-native annual grassland habitat within the Project site for foraging and the trees adjacent to the Project site for roosting, this area is highly disturbed with operations from the water treatment plant as well as the routine landscaping from the facility and neighboring private residences. The

Species	Status*	Habitat	Occurrence within the Project site
			nearest recorded observation of this species within the vicinity was at Stanislaus River approximately 0.4 miles east/southeast of the Project site in 1999. That record included acoustic recordings taken within riparian habitat, which is absent from the Project site.
San Joaquin kit fox (*Vulpes macrotis mutica*)	FE, CT	Opportunistically forages in a variety of habitats. Dens in burrows within alkali sink, valley grassland, and woodland habitats in valleys and adjacent foothills and in human-made structures in cities, rangeland, and agricultural areas. Occurs in the San Joaquin Valley and other smaller valleys to the west.	**Unlikely.** While the non-native grassland and pastureland habitat within the Project site offer foraging and possible denning habitat, no potential kit fox dens were identified during the survey. The closest satellite population (Livermore) is 38 miles west of the Project site. The nearest recorded observation of this species was a carcass east of Modesto Reservoir on iNaturalist, 10.6 miles south of the Project site in 2024.
Steelhead – Central Valley DPS (*Oncorhynchus mykiss irideus* pop.11)	FT	This winter-run fish begins migration to fresh water during peak flows during December through February. The spawning season is typically from February to April. After hatching, this species will move to deeper, mid-channel habitats in late summer and fall. In general, both juveniles and adults prefer complex habitat with boulders, submerged clay, undercut banks, and large woody debris.	**Absent.** The Project site does not provide suitable aquatic habitat to support this species.
Swainson's hawk (*Buteo swainsoni*)	CT	Nests in large trees in open areas adjacent to grasslands, grain or alfalfa fields, or livestock pastures suitable for supporting rodent populations.	**Unlikely.** Trees capable of supporting the dimensions of this species' nests were absent from the Project site but the non-native grassland and pastureland habitats could be utilized for foraging. The nearest recorded observation of this species within the vicinity was approximately 7 miles southwest of the Project site in 2010.
Townsend's big-eared bat (*Corynorhinus townsendii*)	CSSC	Occurs in a variety of habitats, but prefers cool, dark roost sites, and is often found in caves and mines. They roost in the open, hanging from walls and ceilings. Western populations typically forage on moths in areas of dense foliage.	**Unlikely.** The non-native annual grassland habitat within the Project site and mixed oak savannah adjacent to the Project site can provide foraging habitat for this species. This species can roost at the decommissioned Oakdale-Knights Ferry Gold Mine is located 4.6 miles southwest from the Project site but are unlikely to roost within the Project site due to the lack of caves and mines. The nearest recorded observation of this species within the vicinity was at riparian habitat, which is absent from the Project site. That record included acoustic recordings taken within cottonwoods and western sycamore trees.

Species	Status*	Habitat	Occurrence within the Project site
Tricolored blackbird (*Agelaius tricolor*)	CT, CSSC	Nests colonially near fresh water in dense cattails or tules, or in thickets of riparian shrubs. Forages in grassland and cropland. Large colonies are often found foraging in dairy farm feed fields.	**Unlikely.** Suitable nesting habitat for this species was absent from the Project site. The nearest recorded observation of this species within the vicinity was approximately 7.2 miles southeast of the Project site in 2014.
Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*)	FT	Lives in mature elderberry shrubs in the Central Valley and adjacent foothills from Tehama County south through Merced and Mariposa Counties with two scattered populations in Madera and Fresno Counties. Adults are active from March to June.	**Absent.** Elderberry shrubs required by this species were absent from the Project site.
Vernal pool fairy shrimp (*Branchinecta lynchi*)	FT	Occupies vernal and seasonal pools, with clear to tea-colored water, in grass or mud-bottomed swales, and basalt depression pools.	**Absent.** Suitable vernal pool habitats required by this species were absent from the Project site and surrounding areas.
Vernal pool tadpole shrimp (*Lepidurus packardi*)	FE	Occurs in vernal pools, clear to tea-colored water, in grass or mud-bottomed swales, and basalt depression pools.	**Absent.** Suitable vernal pool habitats required by this species were absent from the Project site and surrounding areas.
Western mastiff bat (*Eumops perotis californicus*)	CSSC	Found in open, arid to semi-arid habitats, including dry desert washes, flood plains, chaparral, oak woodland, open ponderosa pine forest, grassland, and agricultural areas, where it feeds on insects in flight. Roosts most commonly in crevices in cliff faces but may also use high buildings and tunnels.	**Unlikely.** While the non-native annual grassland habitat within the Project site and pastureland/ mixed oak savannah adjacent to the Project site can provide foraging habitat for this species, there are no cliffs or high buildings for this species to roost. The nearest recorded observation of this species within the vicinity was approximately 57 feet southwest of the Project site in 1999. That record included acoustic recordings taken near a small grove of cottonwoods and western sycamore tree, which have been mostly cleared since the original record.
Western red bat (*Lasiurus blossevillii*)	CSSC	Roosts primarily in trees, 2–40 feet above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.	**Absent.** The Project site does not provide suitable conifer forest habitat to support this species.
Western spadefoot (*Spea hammondii*)	FPT, CSSC	The majority of the time this species is terrestrial and occurs in small mammal burrows and soil cracks, sometimes in the bottom of dried pools. Prefers open areas with sandy or gravelly soils, in a variety of habitats including mixed woodlands, grasslands, coastal sage scrub, chaparral, sandy washes, lowlands, river floodplains, alluvial fans, playas, alkali flats, foothills, and mountains. Vernal or seasonal pools, that hold water for a minimum of	**Unlikely.** While there were a few small mammal burrows present near the treatment pond at the water treatment plant, the Project site and adjacent areas are very disturbed by the water treatment plant operations, landscaping, and residential areas. The treatment pond was being utilized by American bullfrogs, which would deter this species from occupying the Project site. The nearest recorded observation was at a temporary pond on the opposite side of Highway SR-120

Species	Status*	Habitat	Occurrence within the Project site
		three weeks, are necessary for breeding.	approximately 2.2 miles southwest of the Project site in 1993.
Yellow breasted chat (*Icteria virens*)	CSSC	Inhabits riparian thickets of willow and other brushy tangles near watercourses. Nests in low, dense riparian vegetation, consisting of willow, blackberry, and wild grape. Forages and nests within 10 ft of ground.	**Absent.** The Project site does not provide suitable riparian habitat to support this species.

***EXPLANATION OF OCCURRENCE DESIGNATIONS AND STATUS CODES**

Present:	Species observed on the APE at time of field surveys or during recent past.
Likely:	Species not observed on the APE, but it may reasonably be expected to occur there on a regular basis.
Possible:	Species not observed on the APE, but it could occur there from time to time.
Unlikely:	Species not observed on the APE, and would not be expected to occur there except, perhaps, as a transient.
Absent:	Species not observed on the APE and precluded from occurring there due to absence of suitable habitat.

STATUS CODES

FE	Federally Endangered	CE	California Endangered
FT	Federally Threatened	CCE	California Endangered (Candidate)
FPT	Federally Threatened (Proposed)	CT	California Threatened
		CFP	California Fully Protected)
		CFP	California Fully Protected
		CSSC	California Species of Special Concern

CNPS LISTING

1A	Plants presumed extinct in California.	2B	Plants rare, threatened, or endangered in California, but more common elsewhere.
1B	Plants rare, threatened, or endangered in California and elsewhere.		

4.4.2 IMPACT ANALYSIS

a) Would the project 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 Wildlife or U.S. Fish and Wildlife Service?

Less than Significant Impact with Mitigation Incorporated. Of the 28 regionally occurring special status plant species, all 28 are considered absent from or unlikely to occur within the APE due to past or ongoing disturbance and/or the absence of suitable habitat. Since it is unlikely that these species would occur onsite, implementation of the project should have no impact on these 28 special status species through construction mortality, disturbance, or loss of habitat. Mitigation measures are not warranted.

Of the 23 regionally occurring special status animal species, all 23 are considered absent from or unlikely to occur within the APE due to past or ongoing disturbance and/or the absence of suitable habitat. Since it is unlikely that these species would occur onsite, implementation of the project should have no impact on these 23 special status species through construction mortality, disturbance, or loss of habitat. Mitigation measures are not warranted.

While all of the regionally occurring species are considered absent from the Project site, BIO-1, which consists of best management practices to implement during construction, will be implemented.. These practices are required of all construction workers performing any work for the Project.

Project-Related Mortality and/or Nest Abandonment of Migratory Birds, Raptors, and Special Status Birds

The Project site and adjacent areas contain suitable nesting and foraging habitat for a variety of protected bird species, such as migratory birds and raptors. It is anticipated that during the nesting bird season, protected birds could nest on the ground or in shrubs and trees within, and adjacent to, the Project site and forage within the Project site. Protected birds located within or adjacent to the Project site during construction have the potential to be injured or killed by project-related activities. In addition to the direct "take" of protected birds within the site and adjacent areas, these birds nesting in these areas could be disturbed by project-related activities resulting in nest abandonment. While potential foraging habitat for protected birds and raptors is present on the Project site, suitable foraging habitat is located adjacent to the site and marginally within the vicinity of the Project site. Loss of the foraging habitat from implementation of the Project is not considered a significant impact. However, implementation of the mitigation measures BIO-2, BIO-3, and BIO-4 will further reduce any potential impacts to protected nesting birds to a less than significant level under CEQA and will help the Project comply with state and federal laws protecting these bird species.

b) Would the project 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 Wildlife or U.S. Fish and Wildlife Service?

No Impact. Riparian habitat is absent from the Project site and adjacent lands. There are no CNDDB-designated "natural communities of special concern" recorded within the APE or surrounding lands. Mitigation measures are not warranted and there would be no impact.

c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. Typical wetlands, vernal pools, and other waters were absent from the APE. There are no designated wild and scenic rivers within the project site; therefore, the project would not result in direct impacts to wild and scenic rivers. Mitigation measures are not warranted and there would be no impact.

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?

Less than Significant Impact with Mitigation Incorporated. Most of the Project site does not contain features that would be likely to function as wildlife movement corridors. Furthermore, the Project is located in an area regularly disturbed by humans which would discourage dispersal and migration.

The Project site has suitable features (trees) that could be used by nesting birds, which are considered native wildlife nursery sites. The potential impacts to nesting birds have been addressed in Mitigation Measures BIO-2 and BIO-3. While the treatment pond had tadpoles present, the species was determined to be the invasive species American bullfrog and not protected under CEQA. It is unlikely other native species would utilize any features of the APE as a wildlife nursery site. With implementation of Mitigation Measures BIO-2 and BIO-3, impacts would be less than significant.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The Project appears to be consistent with the goals and policies of the Stanislaus County General Plan. There are no known Habitat Conservation Plans (HCPs) or Natural Communities

Conservation Plan (NCCPs) in the Project vicinity. Mitigation measures are not warranted and there would be no impact.

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?

No Impact. The Project is not located within the boundaries of an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan. Mitigation measures are not warranted and there would be no impact.

4.4.3 MITIGATION

BIO-1 ***(BMPs)***: The Project proponent will require that all workers employ the following best management practices (BMPs) in order to avoid and minimize potential impacts to special status species:

- Vehicles will observe a 15-mph speed limit while on unpaved access routes.
- All open trenches, holes, sumps, and other excavations greater than 6-inches with sidewalls steeper than a 1:1 (45 degree) slope will have an escape ramp of earth or a non-slip material with a less than 1:1 slope or these will be covered with barrier material such that animals are unable to dig or squeeze under the barrier and become entrapped.
- Workers will inspect areas beneath parked vehicles, equipment, and materials prior to mobilization. If special status species are detected, the individual will either be allowed to leave of its own volition or will be captured by the qualified biologist (must possess appropriate collecting/handling permits) and relocated out of harm's way to the nearest suitable habitat beyond the influence of the project work area. "Take" of a state or federal special status (rare, California Species of Special Concern, threatened, or endangered) species is prohibited without the necessary federal or state take permit(s).
- The presence of any special status species will be reported to the project's qualified biologist, who will submit the occurrence to the CNDDB. If necessary, the biologist will report the occurrence to CDFW and/or USFWS.

BIO-2 **(*Avoidance*):** The Project's construction activities will occur, if feasible, between September 1 and January 31 (outside of the nesting bird season) to avoid impacts to nesting birds.

BIO-3 **(*Pre-construction Surveys*):** If activities must occur within the nesting bird season (February 1 to September 15), a qualified biologist (someone able to identify these species) will conduct a pre-construction survey for active nests within ten (10) calendar days prior to the start of construction. It will be completed within the APE, and up to 50 feet outside of the APE for nesting migratory birds and up to 450 feet outside of the APE for nesting raptors. Raptor nests are considered "active" upon the nest-building stage. If no active nests are observed, no further mitigation is required.

(*Avoidance Buffers*): On discovery of any active nests or breeding colonies near work areas, a qualified biologist will determine appropriate avoidance buffer distances based

on applicable CDFW and/or USFWS guidelines, the biology of the species, conditions of the nest(s), and the level of project disturbance.



Figure 4-3: Habitat Map

4.5 CULTURAL RESOURCES

Table 4-12: Cultural Resources Impacts

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?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

4.5.1 BASELINE CONDITIONS

4.5.1.1 ARCHAEOLOGICAL PEDESTRIAN SURVEY

A Phase I Cultural Resources Assessment, prepared by Taylored Archaeology, for the Project (see Appendix C). On June 28, 2025, Taylored Archaeology archaeologist an intensive pedestrian survey of the ground surface at the Project site. The Project area consists of a shed, water tanks, and storage facility. The survey consisted of parallel transects spaced 5 meters apart. Scraping away dry grasses allowed for increased visibility in areas of dense coverage. All exposed ground surfaces were examined for evidence of cultural resources (e.g., prehistoric and historical archaeological sites, isolated artifacts, features and structures).

No evidence of prehistoric archaeological sites, isolated artifacts, or features were identified within the Project site during the survey. While past development activities may have potentially destroyed or obscured ground surface evidence of archaeological resources within the Project site, intact archaeological resources may potentially exist below the ground surface. The existing workshed (P-50-000082) was observed and present within the APE as part of the Knights Ferry facility. The resource was recorded on a Department of Parks and Recreation (DPR) form as an update.

4.5.1.2 RECORDS SEARCH

On June 19, 2025, Taylored Archaeology requested a cultural resource records search from the Central California Information Center (CCIC) of the California Historical Resources Information System (CHRIS) at California State University in Turlock, California. The purpose of this request was to identify and review prior cultural resource investigations completed in or near the Project site and identify any prehistoric or historical resources that had been previously recorded within the Project site and a 0.5-mile radius of the surrounding area. CCIC staff researched historical USGS topographic maps, reports of previous cultural resource investigations, archaeological site and survey base maps, cultural resource records (DPR forms) as well as listings of the Historic Properties Directory of the Office of Historic Preservation, General Land Office Maps, Archaeological Determinations of Eligibility, and the California Inventory of Historic Resources.

The records search results identified three prior cultural resource studies within the Project area and 13 additional studies completed within a ½-mile of the Project area. One prior study, ST-2802, was an archaeological survey and report conducted directly on the Project site in 1996. That investigation resulted in recording cultural resource P-50-000082.

According to the records search results, two cultural resources (P-50-000082 and P-50-000545) were previously recorded within the Project area, and 38 were recorded within a ½-mile radius of the Project site. Both cultural resources were historic-era – one a building and the other was a district. P-50-000082 is the KFCSD's outbuilding and is within the Project site. This resource is a former pre-1930's outhouse which was relocated to the Project site in 1970, placed on a concrete slab, and expanded to serve as a storage shed. The storage shed was previously recorded but not evaluated for inclusion in the National Register of Historic Places (NRHP) or the California Register of Historical Resources. P-50-0000545 is the Knights Ferry District, which covers the entire town including the Project site. According to report ST-00921, Knights Ferry District was nominated for the NRHP in March of 1975 and placed on the Register on April 23, 1975. Also, it was stated in ST-00921 that the value of Knights Ferry has also been recognized by the State of California as California State Registered Landmark Number 347 (see Appendix C).

4.5.1.3 ARCHIVAL RESEARCH

Archival research was conducted to investigate the historical background for any potential archaeological deposits, historical deposits or built environment properties that may exist in the Project site. Historical maps, historical aerial photographs, historical USGS topographic maps, Google Street View photos, books, scholarly articles, and other records were used to better understand the prehistory and history of the Project site and surrounding area. Research data was used to identify potential areas within the Project site where archaeological deposits may exist, or historical buildings, structures or objects may exist.

The first available historical photograph of Knights Ferry dates from 1863. The photograph shows the community of Knights Ferry from a hill west of the town, with the view facing east. The community and the Knights Ferry Covered Bridge are shown in the photograph. The Project site is shown as an empty hillside north of the town. A 1957 historic aerial image shows the Project site as an empty hillside surrounded by residences to the west and south. Historic aerial photographs between 1959 to 1983 show the Project site and surrounding area in a similar configuration. In a 1984 aerial image the Project site appears to have a small water treatment facility in a similar configuration to the buildings presently on site in the southeast corner of the Project site. By 2003, the Project site looks similar to its present-day configuration (see Appendix C).

4.5.1.4 NATIVE AMERICAN OUTREACH

Taylored Archaeology requested a Sacred Lands File (SLF) search from the Native American Heritage Commission (NAHC) on June 19, 2025. The SLF search was requested to identify whether there are previously known or recorded sensitive or sacred tribal cultural resources in the vicinity of the Project site that could be affected by the proposed Project. The NAHC also included contact information of local Native American representatives who may have knowledge or interest in sharing information of resources of sacred significance present in or near the Project site. On July 2, 2025, an outreach letter and a map describing the Project and its location was sent to the following representatives from the list provided by NAHC. Follow-up communication was performed via email as appropriate. Consultation with the Northern Valley Yokut/Ohlone Tribe took place on Friday, October 17, 2025. A summary of said consultation can be found in Section 4.18 Tribal Cultural Resources. The SLF can be found in Appendix C.

4.5.2 IMPACT ANALYSIS

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to in § 15064.5?

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less than Significant Impact with Mitigation Incorporated. No prehistoric resources were found on the ground surface in the APE during the pedestrian survey. According to the CHRIS search results, one previously recorded cultural resource (storage shed/P-50-000082) was confirmed present and intact with no modification since its previous recording. Taylored Archaeology did not discover any other historic-era resources during the pedestrian survey. As part of the Project, the storage shed would remain in place with no proposed modifications. To further affirm that no change would be made to the storage shed, mitigation measure CUL-1 will be implemented.

It is not anticipated that the Project would impact any cultural resources. However, in the improbable event that unknown cultural resources are encountered during proposed Project construction, implementation of mitigation measure CUL-2 outlined below will reduce impacts to any historical or archaeological resource to less than significant.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant Impact with Mitigation Incorporated. There is no evidence in the record that indicates the proposed Project has the potential to be an unknown burial site or the site of buried human remains. In the unlikely event of such a discovery, mitigation shall be implemented. With incorporation of mitigation measure CUL-2 outlined below, impacts resulting from the discovery of remains interred on the Project area will be less than significant.

4.5.3 MITIGATION

CUL-1 Should the storage shed (P-50-000082) be moved or changed in any way, the resource should be further recorded and evaluated by a qualified architectural historian.

CUL-2 *(Archaeological Remains)*: If previously unidentified archaeological resources are encountered during development or ground-moving activities in the APE, all work should be halted until a qualified archaeologist can identify the discovery and assess its significance.

CUL-3 *(Human Remains)*: If human remains are uncovered during construction, the local county coroner is to be notified to investigate the remains and arrange proper treatment and disposition. If the remains are identified on the basis of archaeological context, age, cultural associations, or biological traits to be those of a Native American, California Health and Safety Code 7050.5 and PRC 5097.98 require that the coroner notify the NAHC within 24 hours of discovery. The NAHC will then identify the Most Likely Descendent who will be afforded an opportunity to make recommendations regarding the treatment and disposition of the remains.

4.6 ENERGY

Table 4-13: Energy Impacts

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?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

4.6.1 BASELINE CONDITIONS

The Project site is situated south of the community of Poplar, a rural residential area in Stanislaus County. Pacific Gas & Electricity supplies electricity and natural gas to the Project area.[10]

4.6.2 IMPACT ANALYSIS

a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact. Fuel consumed by construction equipment would be the primary energy resource expended over the course of Project construction. California Code of Regulations Title 13, Motor Vehicles, Section 2449(d)(2), Idling, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel because of unproductive idling of construction equipment. In addition, the energy consumption for construction activities would not be ongoing as they would be limited to the duration of Project construction. During operations, it is anticipated that energy consumption would be more efficient after the improvements resulting from the Project. Therefore, impacts would be less than significant.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. State and local authorities regulate energy use and consumption. These regulations at the State level are intended to reduce energy use and Greenhouse Gas (GHG) emissions. These include, among others, AB 1493 – Light-Duty Vehicle Standards; California Code of Regulations Title 24, Part 6 – Energy Efficiency Standards; and California Code of Regulations Title 24, Parts 6 and 11 – California Energy Code and Green Building Standards. The proposed Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Therefore, there would be no impact.

[10] (Pacific Gas & Electric, 2014)

4.7 GEOLOGY AND SOILS

Table 4-14: Geology and Soils Impacts

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:				
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.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☒	☐
f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	☐	☐	☒	☐

4.7.1 BASELINE CONDITIONS

4.7.1.1 GEOLOGY AND SOILS

The Project is located in the northern region of the San Joaquin Valley, specifically in a portion of Stanislaus County. Stanislaus County is located within the Sierra Nevada foothills. Stanislaus County spans three geomorphic provinces: the Great Valley, the Coast Ranges, and the Sierra Nevada geomorphic provinces. The largest area of the county is in the San Joaquin Valley portion of the Great Valley geomorphic province, which is in the flat, lowland center of the county; a narrow band on the eastern edge of the county is the

Sierra Nevada foothills of the Sierra Nevada geomorphic province; and a broad band on the west side of the county is the steeper Coast Ranges geomorphic province.[11]

4.7.1.2 FAULTS AND SEISMICITY

The Project site is not located within an Alquist-Priolo Earthquake Fault Zone and no known faults cut through the soil at the site.[12] The San Andreas Fault, one of the largest faults in California, is located over 80 miles southwest of the Project site. The San Andreas Fault is the dominant active tectonic feature of the Coast Ranges and represents the boundary of the North American and Pacific plates. A smaller fault zone, the Negro Jack Point fault, is approximately 7.5 miles northeast of the site.

4.7.1.3 LIQUEFACTION

The potential for liquefaction, which is the loss of soil strength due to seismic forces, is dependent on soil types and density, the groundwater table, and the duration and intensity of ground shaking. According to the DOC, the Project site is not affected by liquefaction.[13]

4.7.1.4 SOIL SUBSIDENCE

There are two types of Subsidence: Land subsidence and hydrocompaction subsidence. Hydrocompaction subsidence occurs when a large land area settles due to over-saturation. These areas are typically composed of open-textured soils that become saturated, high in silt or clay content. Land subsidence occurs when an extensive amount of ground water, oil, or natural gas is withdrawn from below the ground surface. In Stanislaus County, there is potential for liquefaction, but the potential is located in the western portion of the County, the opposite end of where the Project is located.[14]

4.7.1.5 DAM AND LEVEE FAILURE

The nearest flooding inundation zone would come from unexpected releases from Goodwin Dam Reservoir and Tulloch Reservoir. Goodwin Dam Reservoir is located 3.6 miles northeast of the Project site and the Tulloch Reservoir is located approximately 5.3 miles northeast of the Project site. The California Division of Safety of Dams (DSOD) is responsible for regulating dams to prevent failure, safeguard life, and protect property. DSOD provides oversight to the design, construction, and maintenance of dams.

4.7.2 IMPACT ANALYSIS

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

ii. Strong seismic ground shaking?

Less than Significant Impact. The Project site is located in an area traditionally characterized by relatively low seismic activity. The Project site is not located in an Alquist-Priolo Earthquake Fault Zone as established by the Alquist-Priolo Fault Zoning Act. The nearest major fault is the San Andreas Fault, located approximately 80 miles southwest of the Project site. All proposed Project features would be

[11] (ICF International 2016)
[12] (California Department of Conservation, 2023)
[13] Ibid.
[14] (ICF International 2016)

constructed in a manner to handle seismic events, as required by the CBC. This would result in less than significant impacts. In addition, the Project would not include habitable structures; therefore, the Project would not result in potential substantial adverse effects, including the risk of loss, injury, or death. Impacts would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction occurs when loose, water-saturated sediments lose strength and fail during strong ground shaking. Generally, liquefiable areas covered by Quaternary-age alluvial deposits, Holocene soil deposits, current river channels, and active wash deposits and their historic floodplains, marshes, and dry lakes. Specific liquefaction hazard areas have not been identified in the Project area. The Project site is not located within a wetland area, and it is located in an area in the County where liquefaction risk is considered low to moderate. Impacts would be less than significant.

iv. Landslides?

No Impact. While the Project site is situated on a slope, there are no areas that are susceptible to landslides. There would be no impact.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. Earthmoving activities associated with the Project would include excavation. These activities could expose soils to the erosion process and the extent of erosion would vary depending on slope steepness/stability, vegetation/cover, concentration of runoff, and weather conditions. Dischargers whose projects disturb one (1) or more acres of soil, or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit (CGP) Order 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The CGP requires the development of a Storm Water Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP Developer. Since the Project site has relatively flat terrain with a low potential for soil erosion and would comply with the SWRCB requirements of implementing a SWPPP, the impact would be less than significant.

c) Would the project 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?

Less than Significant Impact. The Project is not anticipated to adversely affect soil stability or increase the potential for local or regional landslides, subsidence, liquefaction, or collapse. As discussed previously, the Project site is in an area that is not reasonably assumed to contain conditions conducive to liquefaction hazards. The Project would not exacerbate hazards related to unstable soil and would not result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. Impacts would be less than significant.

d) Would the project 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?

Less than Significant Impact. The Project would not contain any facilities that could be affected by expansive soils, nor would substantial grading change the topography such that the Project would

generate substantial risks to life or property. In addition, the Project site does not include soils that are conducive to expanding and contracting; therefore, impacts would be less than significant

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Less than Significant Impact. The Project would not include any habitable structures; therefore, new septic installation or alternative wastewater disposal systems are not necessary for the Project. There would be no impact.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

Less than Significant Impact. Paleontological resources are fossilized remains of flora and fauna and associated deposits. Most fossils are found in sedimentary rock. Sedimentary rock is formed by dirt (sand, silt, or clay) and debris that settles to the bottom of an ocean or lake and compresses for such a long time that it becomes hard as a rock. CEQA requires that a determination be made as to whether a project would directly or indirectly destroy a unique paleontological resource or site or unique geological feature (CEQA Appendix G(v)(c)). If an impact is significant, CEQA requires feasible measures to minimize the impact (CCR Title 14(3) Section 15126.4(a)(1)). PRC Section 5097.5 (see above) also applies to paleontological resources.

The Project would require grading and excavation activities on a previously disturbed site. The Project would comply with California Public Resources Code Section 5097.5 which pertains to the protection of paleontological resources. With compliance with said regulation, impacts would be less than significant.

4.8 GREENHOUSE GAS EMISSIONS

Table 4-15: Greenhouse Gas Emissions Impacts

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?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

4.8.1 BASELINE CONDITIONS

Commonly identified GHG emissions and sources include the following:

Carbon dioxide (CO_2) is an odorless, colorless natural greenhouse gas. CO_2 is emitted from natural and anthropogenic sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic out gassing. Anthropogenic sources include the burning of coal, oil, natural gas, and wood.

Methane (CH_4) is a flammable greenhouse gas. A natural source of methane is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain methane, which is extracted for fuel. Other sources are from landfills, fermentation of manure, and ruminants such as cattle.

Nitrous oxide (N_2O), also known as laughing gas, is a colorless greenhouse gas. Nitrous oxide is produced by microbial processes in soil and water, including those reactions that occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load.

Water vapor is the most abundant, and variable greenhouse gas. It is not considered a pollutant; in the atmosphere, it maintains a climate necessary for life.

Ozone (O_3) is known as a photochemical pollutant and is a greenhouse gas; however, unlike other greenhouse gases, ozone in the troposphere is relatively short-lived and, therefore, is not global in nature. O_3 is not emitted directly into the atmosphere but is formed by a complex series of chemical reactions between volatile organic compounds, nitrogen oxides, and sunlight.

Aerosols are suspensions of particulate matter in a gas emitted into the air through burning biomass (plant material) and fossil fuels. Aerosols can warm the atmosphere by absorbing and emitting heat and can cool the atmosphere by reflecting light.

Chlorofluorocarbons (CFCs) are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. CFCs destroy stratospheric ozone; therefore, their production was stopped as required by the Montreal Protocol in 1987.

Hydrofluorocarbons (HFCs) are synthetic chemicals that are used as a substitute for CFCs. Of all the greenhouse gases, HFCs are one of three groups (the other two are perfluorocarbons and sulfur hexafluoride) with the highest global warming potential. HFCs are human-made for applications such as air conditioners and refrigerants.

Perfluorocarbons (PFCs) have stable molecular structures and do not break down through the chemical processes in the lower atmosphere; therefore, PFCs have long atmospheric lifetimes, between 10,000 and 50,000 years. The two main sources of PFCs are primary aluminum production and semiconductor manufacture.

Sulfur hexafluoride (SF_6) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It has the highest global warming potential of any gas evaluated. Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

There are uncertainties as to exactly what the climate changes will be in various local areas of the earth, and what the effects of clouds will be in determining the rate at which the mean temperature will increase. There are also uncertainties associated with the magnitude and timing of other consequences of a warmer planet: sea level rise, spread of certain diseases out of their usual geographic range, the effect on agricultural production, water supply, sustainability of ecosystems, increased strength and frequency of storms, extreme heat events, air pollution episodes, and the consequence of these effects on the economy.

Emissions of GHGs contributing to global climate change are largely attributable to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. About three-quarters of human emissions of CO_2 to the global atmosphere during the past 20 years are due to fossil fuel burning. Atmospheric concentrations of CO_2, CH_4, and N_2O have increased by at least 40 percent, 150 percent, and 20 percent respectively since the year 1750. GHG emissions are typically expressed in carbon dioxide-equivalents (CO_2e), based on the GHG's Global Warming Potential (GWP). The GWP is dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. For example, one ton of CH_4 has the same contribution to the greenhouse effect as approximately 25 tons of CO_2. Therefore, CH_4 is a much more potent GHG than CO_2. In accordance with SJVAPCD's CEQA Greenhouse Gas Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects proposed projects complying with Best Performance Standards (BPS) would be determined to have a less-than significant impact.[15] Projects not complying with BPS would be considered less than significant if operational GHG emissions would be reduced or mitigated by a minimum of 29 percent, in comparison to business-as-usual (year 2004) conditions. In addition, project-generated emissions complying with an approved plan or mitigation program would also be determined to have a less-than-significant impact.

4.8.2 IMPACT ANALYSIS

Construction of the proposed Project is assumed to be completed over the course of approximately 24 months; however active construction activities is anticipated to occur for approximately seven months. Emissions associated with the proposed Project were calculated using CalEEMod Air Quality Model, Version 2022.1.1.29. The emissions modeling includes emissions generated by off-road equipment, haul trucks, and worker commute trips. All other assumptions are based upon the default parameters contained in the model. Localized air quality impacts associated with the proposed Project would be minor and were qualitatively assessed. Modeling assumptions and output files are included in Appendix A.

[15] (San Joaquin Valley Air Pollution Control District, 2009)

Estimated construction-generated emissions are summarized in Table 4-16. GHGs impact the environment over time as they increase and contribute to climate change. Any changes in operational emissions would be negligible compared to the existing operations, and the upgrades would be expected to improve operational efficiencies.

Table 4-16: Short-Term Construction Related GHG Emissions

	Emissions (MT CO2e) in TPY
Maximum Annual Construction CO_2e Emissions	113
AB 32 Consistency Threshold for Land-Use Development Projects*	1,100
AB 32 Consistency Threshold for Stationary Source Projects*	10,000
Threshold Exceeded?	No

* As published in the Bay Area Air Quality Management District's CEQA Air Quality Guidelines Avalaible online at http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed July 18, 2025.

Construction related generation of GHGs would be a maximum of 113 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year, while operational are expected to be negligible due to the passive nature of the proposed use. The proposed Project would not exceed the AB 32 consistency threshold for land use projects for both short-term construction emissions and long-term operational emissions as a result.

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant Impact. The Project would not generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment. As shown in Table 4-16, the proposed Project is not expected to result in the generation of GHG emissions that would exceed the AB 32 consistency threshold of 1,100 $MTCO_2e$ annually during construction activities. Therefore, impacts would be less than significant.

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

No Impact. The proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. The proposed Project would be in compliance with all SJVAPCD policies and regulations and would not exceed an applicable threshold for GHG emissions. Therefore, there would be no impact.

4.9 HAZARDS AND HAZARDOUS MATERIALS

Table 4-17: Hazards and Hazardous Materials Impacts

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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

4.9.1 BASELINE CONDITIONS

4.9.1.1 HAZARDOUS MATERIALS

The Hazardous Waste and Substances Sites (Cortese) List is a planning document used by the State, local agencies, and developers to comply with CEQA requirements in providing information about the location of hazardous materials release sites. Government Code Section 65962.5 requires the California Environmental Protection Agency to develop at least annually an updated Cortese List. The Department of Toxic Substances Control (DTSC) is responsible for a portion of the information contained in the Cortese List. Other State and local government agencies are required to provide additional hazardous material release information for the Cortese List. DTSC's EnviroStor database provides DTSC's component of Cortese List data. In addition to the EnviroStor database, the SWRCB GeoTracker database provides information on

regulated hazardous waste facilities in California, including underground storage tank (UST) cases and non-UST cleanup programs, including Spills-Leaks-Investigations-Cleanups sites, Department of Defense (DOD) sites, and Land Disposal program. A search of the DTSC EnviroStor database and the SWRCB GeoTracker performed on August 2, 2025, determined that there are no known active hazardous waste generators or hazardous material spill sites within the Project site.[16]

4.9.1.2 AIRPORTS

The Oakdale Municipal Airport is located approximately 8.5 miles southwest of the Project.

4.9.1.3 EMERGENCY RESPONSE PLAN

The Stanislaus County Office of Emergency Services coordinates the development and maintenance of the Stanislaus County Emergency Operations Plan.

4.9.1.4 SENSITIVE RECEPTORS

Common sensitive receptors typically consist of residences, schools, day care centers, hospitals, and nursing homes. The nearest sensitive receptors to the Project site would be the residences surrounding the Project site, with the closest being 75 feet away.

4.9.2 IMPACT ANALYSIS

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

b) Would the project 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?

a and b) Less than Significant Impact. There are no designated hazardous materials transportation routes in the vicinity of the Project site. Additionally, there would be no transport, use, or disposal of hazardous materials associated with the construction, with the exception of diesel fuel for construction equipment. Any potential accidental hazardous materials spills during Project construction are the responsibility of the contractor to remediate in accordance with industry BMPs and State and Stanislaus County regulations. Impacts would therefore be less than significant.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less than Significant Impact. Knights Ferry Elementary School is located approximately 400 feet west of the Project area. However, since the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste, the Project would not result in hazardous materials impacts. The Project would require the handling of diesel for construction equipment; however, diesel would be handled in accordance with industry BMPs and State and Stanislaus County regulations. Impacts would be less than significant

[16] (California Department of Toxic Substances Control, 2024); (California State Waterboards, 2024)

d) Would the project 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?

Less than Significant Impact. The Project does not involve land that is actively listed as a hazardous materials site pursuant to Government Code Section 65962.5 and is not included on a list compiled by the DTSC. Both the SWRCB's GeoTracker and DTSC's EnviroStor websites were checked for contaminated groundwater or sites in the area. There would be no impact.

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?

No Impact. The Project is not located within an airport land use plan or within two miles of a public or public use airport. Therefore, there would be no impact.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project would not provide any physical barriers or disturb any roadways in such a way that would impede emergency or hazards response. All work would take place on the subject property. Therefore, the Project would not interfere with implementation of any existing or future emergency response plans or evacuation plans of the area. There would be no impact.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less than Significant Impact. According to the California Department of Forestry and Fire Protection (CalFire), the Project site is located in a State Responsibility Area (SRA), meaning CalFire assumes responsibility for fire protection. The Project site is in a moderate fire hazard severity zone. While the Project site is located in an SRA, the Project site has access for fire equipment in the case of a wildland fire occurring. Furthermore, the Project does not include any habitable structures that would result in people permanently or temporarily residing at the site. The potential to increase the risk for death and injury due to a wildfire would be less than significant.

4.10 HYDROLOGY AND WATER QUALITY

Table 4-18: Hydrology and Water Quality Impacts

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?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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:				
i. result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
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	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

4.10.1 BASELINE CONDITIONS

A portion of Knights Ferry is located within the Eastern San Joaquin Subbasin boundary. This subbasin is managed by the Eastern San Joaquin County Groundwater Authority (ESJCGA). The ESJCGA was established following the enaction of the Sustainable Groundwater Management Act (SGMA). SGMA requires local agencies to form Groundwater Sustainability Agencies to develop and implement Groundwater Sustainability Plans (GSPs) for medium and high-priority groundwater basins. The goal of SGMA is to prevent overdraft and achieve long-term groundwater sustainability within 20 years, ensuring the availability of groundwater for communities, agriculture, and the environment.

The nearest surface water to the Project is the concrete-lined treatment pond within the APE. While not within the APE, an unnamed ephemeral creek is located 0.12 miles east of the Project stie, Wildcat Creek is 0.15 miles west, and the Stanislaus River is 0.16 miles south.

Wildcat Creek receives water from Littlejohns Creek, which receives stormwater runoff from Carmen Peak and runs south. The unnamed ephemeral creek is fed water from the mountains to the direct east of Knights Ferry and runs south into Stanislaus River. The Stanislaus River begins at the New Melones Lake and flows southwest into Tulloch Reservoir. It runs west until it drains into the San Joaquin River. The San Joaquin River then continues into irrigation canals, Suisan Bay, San Francisco Bay, and the Pacific Ocean.

4.10.2 IMPACT ANALYSIS

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less than Significant Impact. Construction activities may result in a potential impact through the erosion of soils and the build-up of silt and debris in runoff areas; however, under California Construction General Permit (CGP) 2022-0057-DWQ guidelines, implementing a SWPPP would be required prior to construction, handling, and transportation of hazardous materials within the Project site area. The Project would involve construction activities that include trenching, grading, and excavation over an area exceeding one (1) acre. Projects that have such activities over an area of one acre must develop and implement a SWPPP. In addition, construction activities could result in accidental spills of fuels, paints, and other hazardous materials entering storm drains and other runoff areas. Through a SWPPP carried out by the contractor and a Qualified SWPPP Developer, the Project would design and utilize BMPs in order to stabilize any sedimentation and erosion from leaving the Project site. Construction would be temporary, which would result in improved water quality and reliability for the community of Knights Ferry. Therefore, impacts would be less than significant

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less than Significant Impact. Implementation of the Project would not increase the water demand, nor would it decrease groundwater supplies. The calculated Average Day Demand is 17,375 gallons per day, or 12 gpm. No growth is anticipated for Knights Ferry, therefore demands are not expected to increase. The proposed improvements should be sufficiently designed to distribute water supply to the users. Therefore, impacts would be less than significant.

c) Would the project 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:

i. result in substantial erosion or siltation on- or off-site;

Less than Significant Impact. Construction impacts would be minimized by following California CGP 2022-0057-DWQ guidelines and implementing a SWPPP in accordance with the SWRCB prior to construction activities beginning. Because the Project would comply with applicable SWRCB requirements such as implementation of a SWPPP, impacts related to soil and erosion pollution would be less than significant.

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less than Significant Impact. Stormwater runoff from the Project site would be directed to existing south of the site, following the natural grade of the environment. Implementation of the Project would not result in a significant increase the impermeability of the Project site as the site already contains impermeable structures/concrete pads making up the existing SWTP. Impacts would be less than significant.

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

Less than Significant Impact. The Project would not 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. There would be a less than significant impact.

iv. impede or redirect flood flows?

Less than Significant Impact. The Project is not located in a flood zone. The Project would not impede or redirect flood flows. There would be no impact.

d) Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundations?

Less than Significant Impact. The Project is not located within or near a body of water; therefore, it is not located in a tsunami or seiche zone. According to the Federal Emergency Management Agency (FEMA) Flood Map Service Center, the Project site is also slightly located in a flood hazard zone (see Figure 4-4). Any improvements would be required to be constructed above elevation to avoid impacts from potential flooding. Therefore, impacts would be less than significant.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant Impact. The Project would not involve withdrawals from an aquifer or groundwater table and would not interfere with groundwater recharge. As mentioned earlier in this section, no growth is anticipated for Knights Ferry, therefore demands are not expected to increase. In addition, any potential impacts to water quality have been discussed and the Project would be subject to a SWRCB National Pollutant Discharge Elimination System General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (CGP) and all of its requirements. Therefore, the Project would not be in conflict with sustainable groundwater management plans such as the ESJCGA GSP. Impacts would be less than significant.

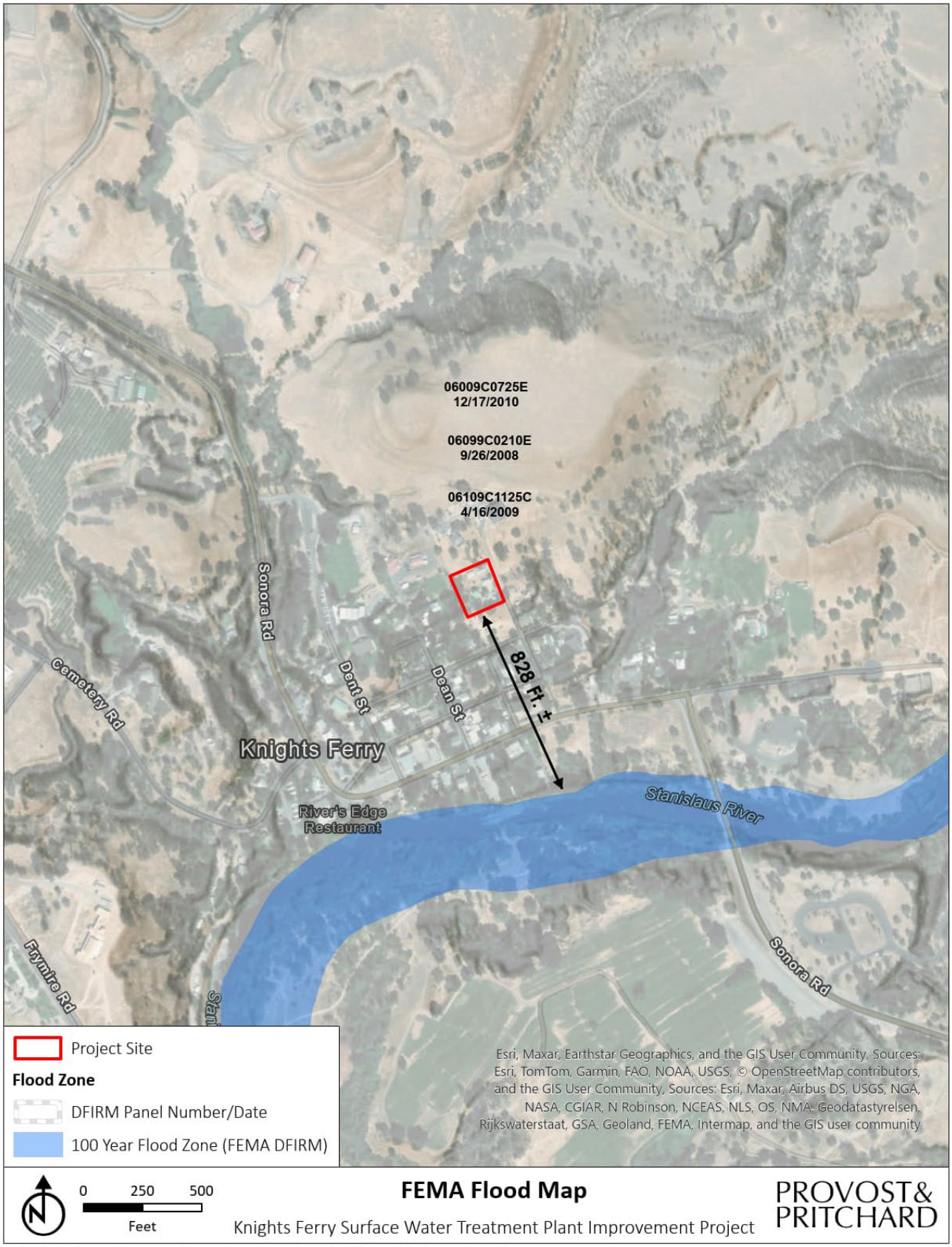


Figure 4-4: FEMA Flood Map

4.11 LAND USE AND PLANNING

Table 4-19: Land Use and Planning Impacts

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☐	☒

4.11.1 BASELINE CONDITIONS

The Project is located in the community of Knights Ferry in Stanislaus County. According to the Knights Ferry Community Plan, the entire community has a land use designation as Historical.[17] While the entire community has one designation of Historical, Stanislaus County maintains the *Knights Ferry Historical Standards* document that requires all development to have particular development standards to preserve and enhance the unique historic and physical setting and for Knights Ferry heritage to remain.[18]

4.11.2 IMPACT ANALYSIS

a) Would the project physically divide an established community?

No Impact. The Project would take place at the existing SWTP. No barriers or other structures that might result in a physical division of the community would take place. The Project would not require the vacation or abandonment of any streets or sidewalks. Therefore, the Project would have no impact associated with the physical division of established land uses in the community. Consolidation of these sewer systems and infrastructure will benefit the Community. There would be no impact.

b) Would the project cause a significant environmental conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. The Project would not introduce new construction materials into the community that is incompatible with the character of Knights Ferry. The historic properties of the community would be maintained with implementation of the Project. There would be no impact.

[17] (Stanislaus County, 1987; Updated 2016)
[18] (Stanislaus County, 2015)

4.12 MINERAL RESOURCES

Table 4-20: Mineral Resources Impacts

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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

4.12.1 BASELINE CONDITIONS

The primary mineral resource in Stanislaus County is aggregate (sand and gravel). Aggregate resources are important because they are necessary for most construction, they are non-renewable meaning they cannot be replaced, and they are most economical when used close to the area where they are mined due to high transportation costs. Stanislaus County has 12 active mines, which occur primarily along river and stream drainages.[19]

Stanislaus County recognizes the Surface Mining and Reclamation Act of 1975 (SMARA) classification system. SMARA provides for the evaluation of an area's mineral resources using a system of Mineral Resource Zone (MRZ) classifications that reflect the known or inferred presence and significance of a given mineral resource. The MRZ classifications are based on available geologic information for the area. The MRZ classifications are defined as follows:

- MRZ-1 – *areas where adequate information indicates that no significant mineral deposits are present or where it is judged that little likelihood exists for their presence*
- MRZ-2 – *areas where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists*
- MRZ-3 – *areas containing mineral deposits, the significance of which cannot be evaluated from available data*
- MRZ-4 – *areas where available information is inadequate for assignment into any other MRZ*

According to the California DOC Mines and Mineral Resources map viewer, the Project site does not have an MRZ classification; therefore, it can be presumed that the area would be classified as MRZ-4, an area where available information is inadequate for assignment into any other. Furthermore, the Project site does not contain an active mine or a water body that could support aggregate deposits such as a river or stream.

[19] (ICF International, 2016)

4.12.2 IMPACT ANALYSIS

a) Would the project 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?

b) Would the project 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?

a-b) No Impact. As noted above, the Project site is presumably in area classified as MRZ-4, which is an area where available information is inadequate for assignment into any other MRZ. Due to the site being developed with a SWTP, the lack of a river or stream traversing the site, the Project site is not located in an area containing known mineral resources of value. Therefore, implementation of the Project would not result in any impacts to mineral resources. There would be no impact.

4.13 NOISE

Table 4-21: Noise Impacts

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?	☐	☐	☒	☐
b) Generation of excessive ground borne vibration or ground borne noise levels?	☐	☐	☒	☐
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?	☐	☐	☐	☒

4.13.1 BASELINE CONDITIONS

The Project is located in the unincorporated community of Knights Ferry in Stanislaus County. The Project site is located at the existing KFCSD SWTP. The SWTP is surrounded by rural lands and rural residential development.

4.13.2 IMPACT ANALYSIS

a) Would the project result in 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?

Less than Significant Impact. The nearest sensitive receptors to the Project site are the residences surrounding the Project site, with the closest being 75 feet away. Project construction-related activities would involve temporary, short-term, and intermittent noise sources including site preparation. The construction phase of the Project would involve temporary noise sources originating predominantly from construction equipment included, but not limited to, the ones identified in Table 4-22. Table 4-22 provides a summary of these typical noise levels of construction equipment as measured at a distance of 50 feet from the operating equipment.[20]

[20] (U.S. Department of Transportation, 2006)

Table 4-22: Typical Noise Levels of Construction Equipment

Type of Equipment	Impact Device?	Specification Maximum Sound Levels for Analysis (50 feet)
Auger Drill Rig	No	85
Backhoe	No	80
Compactor	No	82
Dozer	No	85
Excavator	No	85
Grader	No	85

Construction-related noise levels would be higher than existing ambient noise levels in the Project site but would not occur after construction-related activities are completed. Construction of the Project is assumed to be completed over the course of approximately 24 months; however active construction activities are anticipated to occur for approximately seven months. Operation and maintenance noise would be similar in character to existing noise in the area as the SWTP is existing and implementation of the Project would not change the noise setting. According to Section 10.46.080 of the Stanislaus County Noise Ordinance, construction or maintenance activities performed by or at the direction of any public entity or public utility is exempt. Therefore, construction of the Project does not have to comply with noise ordinance set forth by Stanislaus County. Impacts would be less than significant.

b) Would the project result in generation of excessive ground borne vibration or ground borne noise levels?

Less than Significant Impact. There are no federal or State standards that address construction noise or vibration. Additionally, Stanislaus County does not have regulations that define acceptable levels of vibration. However, the Federal Transit Administration (FTA) publication concerning noise and vibration impact assessment from transit activities has vibration standards suggestions. Although the FTA guidelines are to be applied to transit activities and construction, they may be reasonably applied to the assessment of the potential for annoyance or structural damage resulting from other activities. To prevent vibration annoyance in residences, a level of 80 VdB (vibration velocity level in dB) or less is suggested when there are fewer than 70 vibration events per day. A level of 100 VdB or less is suggested by the FTA guidelines to prevent damage to fragile buildings. Table 4-23 describes the typical construction equipment vibration levels. While these construction-related activities would result in ground borne vibration, such ground borne noise or vibration would attenuate rapidly from the source and would not be generally perceptible outside of the construction-related areas. In addition, there would not be any vibrational impacts from operation and maintenance activities.

Table 4-23. Typical Construction Equipment Vibration Sources Levels

Equipment	PPV at 25 ft, in/sec	Approximate Lv* at 25 ft
Large bulldozer	0.089	87
Caisson drilling	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58

*RMS velocity in decibels, VdB re 1 micro-in/sec
Source: (John A. Volpe National Transportation Systems Center, 2018)

Construction-related activities in general can have the potential to create ground borne vibrations. However, based on the soil types found in the general Project vicinity, there would not be any blasting or pile-driving necessary in connection with construction of the Project. Therefore, the potential for ground borne vibrations to occur as part of construction-related activities of the Project would not be significant. Additionally, operation of the Project would not contain any activities that would create excessive ground borne vibrations. The Project would not result in exposure of persons to, or generation of excessive ground borne vibration or ground borne noise levels. Therefore, impacts would be less than significant.

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?

No Impact. The Project would not be located within an airport land use plan or within two miles of an airport. The nearest airport, Oakdale Municipal Airport, is located approximately 8.5 miles southwest of the Project. Furthermore, the Project would not involve the development of habitable structures or require the presence of permanent staff onsite. There would be no impact.

4.14 POPULATION AND HOUSING

Table 4-24: Population and Housing Impacts

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)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

4.14.1 BASELINE CONDITIONS

According to the 2020 Census, the community of Knights Ferry has an estimated population of 112.[21] Additionally, it is estimated that Knights Ferry contains approximately 53 housing units.[22] The nearest incorporated city to the Project is the City of Oakdale, located approximately nine miles southwest.

4.14.2 IMPACT ANALYSIS

a) Would the project 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)?

No Impact. While the Project would increase the amount of water stored by constructing a new 100,000 gallon water storage tank, this is not to support additional connections than what is present. The proposed water storage tank would support fire flow requirements, which requires 1,500 gpm for 2 hours, or 180,000 gallons available in storage. Furthermore, as cited in the Knights Ferry Community Plan, no growth is anticipated for Knights Ferry. Therefore, the Project would not induce substantial unplanned population growth in an area. There would be no impact.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project would be constructed on the existing SWTP site and no housing structures exist onsite. Therefore, the Project would not result in displacing or demolishing housing. The only structures to be demolished would be the 30,000-gallon finished water storage tank, the existing flocculation and sedimentation tanks, existing chlorine contact tanks, and the existing multi-media filters. Therefore, there would be no impact.

[21] (United States Census Bureau, 2025)
[22] Ibid.

4.15 PUBLIC SERVICES

Table 4-25: Public Services

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in 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:				
i. Fire protection?	☐	☐	☐	☒
ii. Police protection?	☐	☐	☐	☒
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public facilities?	☐	☐	☐	☒

4.15.1 BASELINE CONDITIONS

Fire Protection: The community of Knights Ferry is served by the Modesto Fire Department for its fire protection services. The closest fire station is Knights Ferry Fire Station No. 2, located approximately 0.1 miles south of the Project site.

Police Protection: The Stanislaus County Sheriff's Department provides police protection for the community of Knights Ferry. The closest sheriff's station is the Riverbank Substation, located approximately 15.5 miles southwest of the Project site.

Schools: Knights Ferry Elementary School is the closest school to the Project, located approximately 500 feet southwest of the Project site.

Parks: The nearest park to the Project site is Knights Ferry Recreation Area, located approximately 0.2 miles southeast of the Project site.

Landfills: The nearest Stanislaus County landfill is the Fink Road Landfill, located approximately 39 miles southwest of the Project site.

4.15.2 IMPACT ANALYSIS

a) Would the project result in 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:

i. Fire Protection:

ii. Police Protection:

iii. Schools:

iv. Parks:

v. Other public facilities:

No Impact. The Project would not require new or altered governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives for public services. The Project involves the construction of new SWTP improvements to replace existing deteriorating facilities to provide clean and reliable drinking water to the community of Knights Ferry. The Project would not result in unplanned population growth as no increase in water capacity or service connections would be proposed as part of the Project. There would be no impact to the listed public services.

4.16 RECREATION

Table 4-26: Recreation Impacts

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
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?	☐	☐	☐	☒

4.16.1 BASELINE CONDITIONS

Recreational amenities in Stanislaus County includes a range of state and local recreational facilities. Stanislaus County categorizes parks and recreational facilities as fishing access areas, neighborhood parks, or regional parks. Neighborhood parks are generally oriented toward the needs of families and typically include sport facilities and picnic areas. Regional parks are intended to serve a region larger than an individual community. The community of Knights Ferry contains one park – the Knights Ferry Recreation Area. The Knights Ferry Recreation Area is located at the southeastern corner of the community at the intersection of Covered Bridge Road and Sonora Road. This facility contains a public restroom, picnic benches and tables, and open space.

4.16.2 IMPACT ANALYSIS

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?

No Impact. The Project proposes to replace deteriorating facilities at the SWTP. Proposed Project features would not increase the use or demand of any existing neighborhood park, regional park, or any other recreational facilities of any kind. Population growth is not anticipated or associated with the Project. Therefore, there would be no impact.

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?

No Impact. The Project would not include recreational facilities, nor would it propose the expansion of any existing recreational facilities. There would be no impact.

4.17 TRANSPORTATION

Table 4-27: Transportation Impacts

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?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

4.17.1 BASELINE CONDITIONS

The Project site is located to the west of Lynde Street, which is the closest roadway to the Project. Lynde Street is not a through-street and it terminates approximately 240 feet north of the Project site. Lynde Street is a paved road, somewhat deteriorating, and is approximately 12-15 wide. The roadway is one-lane road, but it used for both ingress and egress for residents living along the street. Sonora Street, the largest thoroughfare in Knights Ferry, is the closest two-way, striped road to the Project. Access to the Project site would require the use of Sonora Road.

4.17.2 IMPACT ANALYSIS

a) Would the project conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?

a and b) Less than Significant Impact. The Project includes the construction and abandonment of drinking water facilities at the existing SWTP. Construction of the Project is assumed to be completed over the course of 24 months; however, active construction activities are anticipated to occur for approximately seven months. Construction traffic associated with the Project would be minimal and temporary. Operational traffic consists of as-needed maintenance trips to the site, which are already occurring as part of current SWTP operations. No road improvements are proposed as a part of the Project. There would not be a significant adverse effect to existing roadways in the area.

Construction associated with the Project would be restricted to the SWTP site and would not intersect any roadways or pedestrian/bicycle paths. Construction-related impacts would be temporary and there would be no impacts to the surrounding transportation network. Road closures and detours are not anticipated as part of construction.

There is no population growth associated with the Project, nor would implementation of the Project result in an increase of KFCSD staff or drivers utilizing roadways in the area. Therefore, implementation of the Project would not increase the demand for any changes to congestion management programs or interfere with existing level of service standards during the operational phase. Construction-related roadway interferences would be less than significant.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than Significant Impact. No new roadway design features are associated with the Project. Therefore, there would be no impact.

d) Would the project result in inadequate emergency access?

Less than Significant Impact. As mentioned above in Impact Assessments a, b, and c, the Project would not propose new roadway design features or permanent alterations to roadways. All potential disturbances to roadways during construction would be temporary. Road closures and detours are not anticipated as part of the construction phase of the Project. The operational phase of the Project would have no effect on roadways or emergency access. Therefore, overall potential Project-related impacts to emergency access on local roadways would be considered less than significant.

4.18 TRIBAL CULTURAL RESOURCES

Table 4-28: Tribal Cultural Resources Impacts

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 tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

4.18.1 BASELINE CONDITIONS

As noted in Section 4.5 Cultural Resources, a Phase I Cultural Resources Assessment was prepared for the Project. The following ethnographic history of the Project area, and Knights Ferry as a whole, derives wholly from the Phase I Cultural Resources Assessment and the research that took place to prepare the report (see Appendix C).

The ethnography of the region surrounding Knights Ferry is a complex one, as it is often placed at the ethnographic division between the Central Sierra Miwok and the Northern Valley Yokuts. To further complicate matters, the area surrounding Knight's Ferry in the 1800's served as a refuge for many displaced Native Americans from the region, further serving as a melting pot for Yokut, Miwok, and other groups. Though ethnographers such as Levy (1978) align the Project site near the western boundary of the Central Sierra Miwok, multiple other ethnographers have placed the area within the Northern Valley Yokuts. While group boundaries were never static, the ethnography of the Northern Valley Yokuts is presented below.

The Yokuts were generally divided into three major groups, the Northern Valley Yokuts, the Southern Valley Yokuts, and the Foothill Yokuts. The Yokuts are a sub-group of the Penutian language that covers much of

coastal and central California and Oregon. The Yokuts language contained multiple dialects spoken throughout the region, though many of them were mutually understandable.

The Yokuts have been extensively researched and recorded by ethnographers, including Powers (1877), Kroeber (1925), Gifford and Schenck (1926, 1929), Gayton (1930, 1945), Driver (1937), Harrington (1957), Latta (1977), and Wallace (1978). Much of the research from these ethnographers focuses on the central Yokuts tribes due to the northernmost tribes being impacted by Euro-Americans during the California Gold Rush of the mid 1800s, and by the southernmost tribes often being removed and relocated by the Spanish to various Bay Area or coastal missions. The central Yokuts tribes, and especially the western Sierra Nevada foothill tribes, were the most intact at the time of ethnographic study. Based upon Kroeber's map of Southern and Central Yokuts (1925), the area of Knights Ferry is likely the site of village of Tuyiwu-nu and the Takin Rancheria. Primary Yokuts villages were typically located along lakeshores and major stream courses, with scattered secondary or temporary camps and settlements located near gathering areas in the foothills. The Yokuts were known for using controlled burns to actively maintain tule grass marshlands, clover fields, oak savannas for hunting, gathering, and land management practices (Anderson 2005).

Each local tribe was a land-owning group that was organized around a central village and shared common territory and ancestry. Most local tribe populations ranged from 150 to 500 people (Kroeber 1925). These local tribes were often led by a chief, who was often advised by a variety of assistants including the winatum, who served as a messenger and assistant chief (Gayton 1930). Early studies by Kroeber (1925), Gifford and Schenck (1926), and Gayton (1930) concluded that social and political authority within local tribes was derived from male lineage and patriarchy. However, more recent reexaminations (Dick-Bissonnette 1998) argue that this assumption of patriarchal organization was based on male bias by early 20th century researchers, and instead the Yokuts sociopolitical authority was matriarchal in nature and centered around matrilineal use-rights and women's work groups.

4.18.1.1 NATIVE AMERICAN OUTREACH

The District, as a public lead agency, has not received any written correspondence from a Tribe pursuant to Public Resources Code Section 21080.3.1 requesting notification of a proposed project.

Taylored Archaeology requested a Sacred Lands File (SLF) search from the Native American Heritage Commission (NAHC) on June 19, 2025. The SLF search was requested to identify whether there are previously known or recorded sensitive or sacred tribal cultural resources in the vicinity of the Project site that could be affected by the proposed Project. The NAHC also included contact information of local Native American representatives who may have knowledge or interest in sharing information of resources of sacred significance present in or near the Project site. On July 2, 2025, an outreach letter and a map describing the Project and its location was sent to the following representatives from the list provided by NAHC:

1. Vice-Chairperson Ed Ketchum of Amah Mutsun Tribal Band
2. Chairperson Valentin Lopez of Amah Mutsun Tribal Band
3. Tribal Historic Preservation Officer (THPO) Jesse Galvan of Buena Vista Rancheria of Me-Wuk Indians
4. Chairperson Jessalynn Pastran of Buena Vista Rancheria of Me-Wuk Indians
5. Tribal Cultural Resources Specialist Debra Grimes of Calaveras Band of Mi-Wuk Indians
6. Chairperson Gloria Grimes of Calaveras Band of Mi-Wuk Indians
7. Tribal Cultural Resources Assistant Adam Lewis of Calaveras Band of Mi-Wuk Indians
8. Interim Chairperson Antoinette Del Rio of California Valley Miwok Tribe
9. Cultural Specialist Lawrence Wilson Jr. of California Valley Miwok Tribe

10. Treasurer Anthony Wilson of California Valley Miwok Tribe
11. Cultural Manager Cynthia Reyes of Chicken Ranch Rancheria of Me-Wuk
12. Environment & Planning Manager Jaonna Portillo-Hsu of Chicken Ranch Rancheria of Me-Wuk Indians
13. Tribal Administrator Monica Fox of Chicken Ranch Rancheria of Me-Wuk Indians
14. Community & Resources Development Director Stephanie Suess of Chicken Ranch Rancheria of Me-Wuk Indians
15. Cultural Resources Coordinator Jereme Dutschke of Ione Band of Miwok Indians
16. Chairperson Sara Dutschke of Ione Band of Miwok Indians
17. Cultural Preservation Representative Rolland Fillmore of Jackson Rancheria Band of Miwuk Indians
18. Chairperson Adam Dalton of Jackson Rancheria Band of Miwuk Indians
19. Chairperson Cosme Valdez Dominguez of Nashville Enterprise Miwok-Maidu-Nishinam Tribe
20. Cultural Resources Leland Valdez of Nashville Enterprise Miwok-Maidu-Nishinam Tribe
21. Chairperson Katherine Perez of Northern Valley Yokut/Ohlone Tribe
22. Tribal Compliance Officer Timothy Perez of the Northern Valley Yokut/Ohlone Tribe
23. Chairperson Tina Goodwin of the Pakan'yani Maidu of Strawberry Valley Rancheria
24. Chairperson Neil Peyron of the Tule River Tribe
25. Environmental Department Kerri Vera of the Tule River Indian Tribe
26. Cultural Preservation Department of Wilton Rancheria
27. Tribal Historic Preservation Officer Steven Hutchason of Wilton Rancheria
28. Executive Director of Cultural Preservation Michelle St. Clair of Wilton Rancheria
29. Chairperson Kenneth Woodrow of the Wuksachi Indian Tribe/Eshom Valley Band

As part of this archaeological investigation, nongovernmental outreach letters and location maps were sent to each individual listed above on July 2, 2025. The letter was followed up via email on July 15, 2025.

On July 2, 2025, an email was received from Valentin Lopez, Chairperson of the Amah Mutsun Tribal Band, stated that this project is outside of the tribe's territory and they have no comments.

On July 2, 2025, an email was received from Katherine Perez, Chairperson of the Northern Valley Yokut/Ohlone Tribe, stated that the Northern Valley Yokut/Costanoan Tribe would like to consult on the proposed project. They are aware of the cultural sensitivity of the area and the tribe is recommending that the prosed project implement cultural awareness training and have a qualified archaeologist and a Native American monitor on board during all ground disturbance as part of the mitigation measures.

On July 2, 2025, an email was received from the Wilton Rancheria Department of Cultural Preservation stating that while the Project is within the ancestral territory of the Wilton Rancheria, they do not have any comment or additional information. The rancheria also requested to be contacted if there were any Project updates or changes.

On July 3, 2025, an email was received from Adam Lewis, Cultural Resources Assistant of the Calaveras Band of Mi-Wuk Indians, stated that the information the tribe holds is of great importance. The ground disturbance should be looked at thoroughly.

On July 21, 2025, an email was received from Jereme Dutschke, Cultural Resources Coordinator of the Ione Band of Miwok Indians, stated that the Ione Band of Miwok Indians has no comment on this project.

On July 23, 2025, an email was received from Jesse Galvan, THPO of the Buena Vista Rancheria of Me-Wuk Indians, stated that the tribe want to extend this opportunity to local tribes in the area. The tribe also stated that if any cultural resources are inverted to not hesitate to contact the Buena Vasta Rancheria of Me-Wuk Indians and to take further measures to ensure that the cultural resources are handled and protected.

On October 17, 2025, a consultation meeting was held between the Northern Valley Yokut/Ohlone Tribe, represented by Katherine Perez, and KFCSD members along with their consultants. An agreement was made between the interested parties to include tribal monitoring during ground disturbing activities.

4.18.2 IMPACT ASESSMENT

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

vi. Listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code section 5020.1(k), or

vii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less than Significant Impact. No prehistoric resources were found on the ground surface in the APE during the pedestrian survey. One previously recorded cultural resource (storage shed/P-50-000082) was confirmed present and intact with no modification since its previous recording. This resource would not be impacted, and it is not considered a tribal cultural resource as it does not hold any cultural value to a California Native American tribe.

The District, as a public lead agency, has not received any written correspondence from a Tribe pursuant to Public Resources Code Section 21080.3.1 requesting notification of a proposed project.

Outreach letters and follow-up emails were sent to tribal organizations using the NAHC list to further identify Native American interests and concerns in the Project area. Through the outreach letters process, a consultation meeting between the District and the Northern Valley Yokut/Ohlone Tribe took place to discuss the Project and its potential impacts. Based on discussion amongst the Northern Valley Yokut/Ohlone Tribe and the District, it was agreed upon due to the cultural sensitivity of the area, tribal monitoring would take place during ground disturbing activities related to the Project. This will be implemented and is memorialized as **TCR-1**, seen below in Section 4.18.3. Furthermore, in the improbable event that unknown cultural resources are encountered during Project construction, implementation of mitigation measures **CUL-1**, **CUL-2**, and **CUL-3**, described in Section 4.5, are recommended in the event cultural materials or human remains are unearthed during excavation or construction. Implementation of mitigation measures referenced above will reduce impacts to tribal cultural resources to less than significant.

4.18.3 MITIGATION

TCR-1 *(Monitoring)*: The District will continue to collaborate with the Northern Valley Yokut/Ohlone Tribe to identify areas that may require tribal monitoring during ground disturbing activities. Once areas have been identified within the Project area and agreed upon by both parties, a qualified representative will monitor for tribal resources during ground disturbing activities, as needed. Tribal monitoring will end at the conclusion of the ground disturbance activities, including Project site grading and ground excavation/trenching activities.

See additional mitigation measures CUL-1, CUL-2, and CUL-3, described in Section 4.5.

4.19 UTILITIES AND SERVICE SYSTEMS

Table 4-29: Utilities and Service Systems Impacts

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?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

4.19.1 BASELINE CONDITIONS

The Project site is located in the unincorporated community of Knights Ferry in Stanislaus County. The District provides drinking water to Knights Ferry. There is no sanitary sewer system that supports the community; Knights Ferry residents rely on private septic tanks. For gas and electricity, Knights Ferry relies on PG&E. For solid waste services, curbside pickup is provided by Gilton Solid Waste Management under contract with Stanislaus County. Solid waste is managed and processed at the Fink Road Sanitary Landfill.

4.19.2 IMPACT ANALYSIS

a) Would the project 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?

Less than Significant Impact. The primary purpose of the Project is to provide high quality and reliable drinking water to a community that has dealt with water quality and reliability issues for years. The Project has been analyzed in this IS/MND and has been found to not result in any significant or potentially significant impacts. Therefore, impacts would be less than significant.

b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less than Significant Impact. The Project in and of itself is a drinking water facilities improvement project. The Project would not require water supplies as it's implementation would result in the provision of clean and reliable drinking water to Knights Ferry. Therefore, the Project would have sufficient water supplies. Impacts would be less than significant.

c) Would the project 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?

Less than Significant Impact. The Project does not require wastewater treatment, so analysis of capacity is not warranted. There would be no impact.

d) Would the project 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?

Less than Significant Impact. The Project would generate minor amounts of solid waste during construction; however, it would be temporary and properly disposed of during construction and upon completion. No solid waste would be generated during operation and maintenance. Any impacts with regard to solid waste would be less than significant.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. The Project would continue to comply with any federal, State, and local regulations related to solid waste. There would be no impact.

4.20 WILDFIRE

Table 4-30: Wildfire Impacts

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?	☐	☐	☒	☐
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 uncontrollable spread of wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
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?	☐	☐	☒	☐

4.20.1 BASELINE CONDITIONS

According to the California Department of Forestry and Fire Protection (CalFire), the Project site is located in a State Responsibility Area (SRA), meaning CalFire assumes responsibility for fire protection. The Project site is in a moderate fire hazard severity zone.

4.20.2 IMPACT ANALYSIS

a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. All Project work would take place on the SWTP site and no substantial impacts would be made to the roadway. Full access along Lynde Street and all other nearby streets would be maintained. There would be no impact.

b) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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?

No Impact. The Project would not increase the potential for wildfires to occur in the region. The Project would include a 100,000 gallon water storage tank that, coupled with the existing water storage tank,

would be sufficient to meet fire flow requirements. Fire flow requirements are 1,500 gpm for 2 hours, or 180,000 gallons available in storage. Implementation of the Project would bolster the communities ability to combat potential wildfire threats. There would be no impact.

c) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project would not require the installation or maintenance of any new roads, fuel breaks, emergency water sources, or power lines. While the Project is located in an SRA, it is not located in a very high fire hazard severity zone. Furthermore, the Project would bolster the community's ability to fight fire due to the addition of a 100,000 gallon water storage tank. There would be no impact.

d) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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?

Less than Significant Impact. While the Project would increase the amount of impermeable surfaces on the site, the amount would not be a significant addition compared to what already exists. The site houses the SWTP, which currently contains structures sitting atop concrete pads. All drainage is directed south of the site, which follows the natural grade of the environment. Impacts would be less than significant.

4.21 CEQA MANDATORY FINDINGS OF SIGNIFICANCE

Table 4-31: CEQA Mandatory Findings of Significance

Does the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) 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?	☐	☒	☐	☐
b) 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)?	☐	☐	☒	☐
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

4.21.1 STATEMENT OF FINDINGS

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?

Less than Significant Impact with Mitigation Incorporated. The analysis conducted in this IS/MND results in a determination that the Project, with incorporation of mitigation measures, would have a less than significant effect on the environment. The potential for impacts to air quality, biological resources, cultural resources, and tribal cultural resources from the implementation of the Project would be less than significant with the incorporation of the mitigation measures discussed in Chapter 5 Mitigation, Monitoring, and Reporting Program. Accordingly, the Project would involve no potential for significant impacts through the degradation of the quality of the environment, the reduction in the habitat or population of fish or wildlife, including endangered plants or animals, the elimination of a plant or animal community or example of a major period of California history or prehistory.

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)?

Less than Significant Impact. CEQA Guidelines Section 15064(i) States that a Lead Agency shall consider whether the cumulative impact of a project is significant and whether the effects of the project are cumulatively considerable. The assessment of the significance of the cumulative effects of a project must, therefore, be conducted in connection with the effects of past projects, other current projects, and probable future projects. The Project proposes to construct improvements and/or replace existing infrastructure at the Knights Ferry SWTP. No additional roads would be constructed as a result of the Project, nor would any additional public services be required. The Project would not result in direct or indirect population growth. Therefore, implementation of the Project would not result in significant cumulative impacts and all potential impacts would be reduced to less than significant through the implementation of mitigation measures and basic regulatory requirements incorporated into future Project design.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact. The Project would ultimately provide the community of Knights Ferry with reliable and high quality drinking water. The Project in and of itself would not create a significant hazard to the public or the environment. On the contrary, implementation of the Project would improve the quality of life for the residents as they would have a reliable and clean water supply. Construction-related air quality/dust exposure impacts could occur temporarily as a result of construction. However, implementation of basic regulatory requirements and **AIR-1** identified in this IS/MND would ensure that impacts are less than significant. Therefore, the Project would not have any direct or indirect adverse impacts on humans. This impact would be less than significant.

CHAPTER 5 MITIGATION, MONITORING, AND REPORTING PROGRAM

This Mitigation Monitoring and Reporting Program (MMRP) has been formulated based upon the findings of the Initial Study/Mitigated Negative Declaration (IS/MND) for the Project in the Stanislaus County. The MMRP lists mitigation measures recommended in the IS/MND for the Project and identifies monitoring and reporting requirements.

Table 5-1: Mitigation, Monitoring, and Reporting Program presents the mitigation measures identified for the Project. Each mitigation measure is numbered with a symbol indicating the topical section to which it pertains, a hyphen, and the impact number. For example, AIR-2 would be the second mitigation measure identified in the Air Quality analysis of the IS/MND.

The first column of Table 5-1: Mitigation, Monitoring, and Reporting Program identifies the mitigation measure. The second column, entitled "When Monitoring is to Occur," identifies the time the mitigation measure should be initiated. The third column, "Frequency of Monitoring," identifies the frequency of the monitoring of the mitigation measure. The fourth column, "Agency Responsible for Monitoring," names the party ultimately responsible for ensuring that the mitigation measure is implemented. The last columns will be used by the Lead and Responsible Agencies to ensure that individual mitigation measures have been complied with and monitored

Table 5-1: Mitigation, Monitoring, and Reporting Program

Mitigation, Monitoring, and Reporting Program						
Item	Mitigation Measure	When Monitoring is to Occur	Frequency of Monitoring	Agency Responsible for Monitoring	Method to Verify Compliance	Verification of Compliance
Air Quality						
AIR-1	The Project shall implement Tier 4 Final diesel engines of 50 horsepower or larger or Tier 3 engines with level 3 Particulate Filters on diesel engines of 50 horsepower or larger.	During construction activities	Continuously	KFCSD	Report	
Biological Resources						
BIO-1	*(BMPs):* The Project proponent will require that all workers employ the following BMPs in order to avoid and minimize potential impacts to special status species: • Vehicles will observe a 15-mph speed limit while on unpaved access routes. • All open trenches, holes, sumps, and other excavations greater than 6-inches with sidewalls steeper than a 1:1 (45 degree) slope will have an escape ramp of earth or a non-slip material with a less than 1:1 slope or these will be covered with barrier material such that animals are unable to dig or squeeze under the barrier and become entrapped. • Workers will inspect areas beneath parked vehicles, equipment, and materials prior to mobilization. If special status species are detected, the individual will either be allowed to leave of its own volition or will be captured by the qualified biologist (must possess appropriate collecting/handling permits) and relocated out of harm's way to the nearest suitable habitat beyond the influence of the project work area. "Take" of a state or federal special status (rare, California Species of Special Concern, threatened, or endangered) species is	Prior to the start of any construction activities	Continuously	KFCSD	Report	

Mitigation, Monitoring, and Reporting Program						
Item	Mitigation Measure	When Monitoring is to Occur	Frequency of Monitoring	Agency Responsible for Monitoring	Method to Verify Compliance	Verification of Compliance
	prohibited without the necessary federal or state take permit(s). • The presence of any special status species will be reported to the project's qualified biologist, who will submit the occurrence to the CNDDB. If necessary, the biologist will report the occurrence to CDFW and/or USFWS.					
BIO-2	**(*Avoidance*):** The Project's construction activities will occur, if feasible, between September 16 and January 31 (outside of the nesting bird season) to avoid impacts to nesting birds	September 16 to January 31	Once, as determined by qualified biologist during construction activities	KFCSD with assistance of a qualified biological subconsultant	Report	
BIO-3	**(*Pre-construction Surveys*):** If activities must occur within the nesting bird season (February 1 to September 15), a qualified biologist (someone able to identify these species) will conduct a pre-construction survey for active nests within ten (10) calendar days prior to the start of construction. It will be completed within the APE, and up to 50 feet outside of the APE for nesting migratory birds and up to 450 feet outside of the APE for nesting raptors. Raptor nests are considered "active" upon the nest-building stage. If no active nests are observed, no further mitigation is required	Ten (10) days prior to the start of construction activities	Once, as determined by qualified biologist during construction activities	KFCSD with assistance of a qualified biological subconsultant	Report	
BIO-4	**(*Avoidance Buffers*):** On discovery of any active nests or breeding colonies near work areas, a qualified biologist will determine appropriate avoidance buffer distances based on applicable CDFW and/or USFWS guidelines, the biology of the species, conditions of the nest(s), and the level of project disturbance.	Upon discovery of any active nests or breeding colonies	Once, as determined by qualified biologist during construction activities	KFCSD with assistance of a qualified biological subconsultant	Report	
Cultural Resources						
CUL-1	Should the storage shed (P-50-000082) be moved or changed in any way, the resource should be	Once	Once	KFCSD	Report	

Mitigation, Monitoring, and Reporting Program						
Item	Mitigation Measure	When Monitoring is to Occur	Frequency of Monitoring	Agency Responsible for Monitoring	Method to Verify Compliance	Verification of Compliance
	further recorded and evaluated by a qualified architectural historian.					
CUL-2	***(Archaeological Remains)***: If previously unidentified archaeological resources are encountered during development or ground-moving activities in the APE, all work should be halted until a qualified archaeologist can identify the discovery and assess its significance	Daily during construction activities	Continuously	KFCSD	Report	
CUL-3	***(Human Remains)***: If human remains are uncovered during construction, the local county coroner is to be notified to investigate the remains and arrange proper treatment and disposition. If the remains are identified on the basis of archaeological context, age, cultural associations, or biological traits to be those of a Native American, California Health and Safety Code 7050.5 and PRC 5097.98 require that the coroner notify the NAHC within 24 hours of discovery. The NAHC will then identify the Most Likely Descendent who will be afforded an opportunity to make recommendations regarding the treatment and disposition of the remains.	Daily during construction activities	Continuously	KFCSD	Report	
Tribal Cultural Resources						
TCR-1	***(Monitoring):*** The District will continue to collaborate with the Northern Valley Yokut/Ohlone Tribe to identify areas that may require tribal monitoring during ground disturbing activities. Once areas have been identified within the Project area and agreed upon by both parties, a qualified representative will monitor for tribal resources during ground disturbing activities, as needed. Tribal monitoring will end at the conclusion of the ground disturbance activities, including Project site grading and ground excavation/trenching activities.	Daily during ground construction activities	Continuously	KFCSD	Report	

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Knights Ferry CSD
Construction Start Date	1/1/2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.10
Precipitation (days)	16.4
Location	37.82133319685752, -120.67130704615286
County	Stanislaus
City	Unincorporated
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2227
EDFZ	4
Electric Utility	Modesto Irrigation District
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.30

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Other Non-Asphalt Surfaces	0.90	Acre	0.90	0.00	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-6	Use Diesel Particulate Filters

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.88	0.75	5.92	7.08	0.02	0.33	0.06	0.39	0.30	0.01	0.32	—	1,899	1,899	0.08	0.02	0.22	1,906
Mit.	0.88	0.75	5.92	7.08	0.02	0.05	0.06	0.11	0.05	0.01	0.06	—	1,899	1,899	0.08	0.02	0.22	1,906
% Reduced	—	—	—	—	—	85%	—	72%	85%	—	81%	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.20	1.01	6.36	8.11	0.03	0.33	0.06	0.39	0.30	0.01	0.32	—	3,763	3,763	0.15	0.03	0.01	3,777
Mit.	1.20	1.01	6.36	8.11	0.03	0.05	0.06	0.11	0.05	0.01	0.06	—	3,763	3,763	0.15	0.03	0.01	3,777
% Reduced	—	—	—	—	—	85%	—	72%	85%	—	81%	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.22	0.19	1.20	1.82	0.01	0.05	0.01	0.06	0.05	< 0.005	0.05	—	682	682	0.03	0.01	0.02	685
Mit.	0.22	0.19	1.20	1.82	0.01	0.01	0.01	0.02	0.01	< 0.005	0.01	—	682	682	0.03	0.01	0.02	685
% Reduced	—	—	—	—	—	85%	—	65%	85%	—	81%	—	—	—	—	—	—	—

Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.04	0.03	0.22	0.33	< 0.005	0.01	< 0.005	0.01	0.01	< 0.005	0.01	—	113	113	< 0.005	< 0.005	< 0.005	113
Mit.	0.04	0.03	0.22	0.33	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	113	113	< 0.005	< 0.005	< 0.005	113
% Reduced	—	—	—	—	—	85%	—	65%	85%	—	81%	—	—	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.64	0.54	3.56	7.08	0.02	0.14	0.06	0.20	0.13	0.01	0.15	—	1,899	1,899	0.08	0.02	0.22	1,906
2027	0.88	0.75	5.92	6.19	0.01	0.33	0.06	0.39	0.30	0.01	0.32	—	1,355	1,355	0.05	0.01	0.20	1,360
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.20	1.01	6.36	8.11	0.03	0.23	0.06	0.29	0.21	0.01	0.23	—	3,763	3,763	0.15	0.03	0.01	3,777
2027	0.91	0.77	6.02	7.10	0.02	0.33	0.06	0.39	0.30	0.01	0.32	—	2,680	2,680	0.11	0.02	0.01	2,689
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.22	0.19	1.20	1.82	0.01	0.05	0.01	0.06	0.04	< 0.005	0.04	—	682	682	0.03	0.01	0.02	685
2027	0.17	0.14	1.13	1.27	< 0.005	0.05	< 0.005	0.06	0.05	< 0.005	0.05	—	416	416	0.02	< 0.005	0.01	417
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.04	0.03	0.22	0.33	< 0.005	0.01	< 0.005	0.01	0.01	< 0.005	0.01	—	113	113	< 0.005	< 0.005	< 0.005	113
2027	0.03	0.03	0.21	0.23	< 0.005	0.01	< 0.005	0.01	0.01	< 0.005	0.01	—	68.8	68.8	< 0.005	< 0.005	< 0.005	69.0

2.3. Construction Emissions by Year, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.64	0.54	3.56	7.08	0.02	0.02	0.06	0.08	0.02	0.01	0.03	—	1,899	1,899	0.08	0.02	0.22	1,906
2027	0.88	0.75	5.92	6.19	0.01	0.05	0.06	0.11	0.05	0.01	0.06	—	1,355	1,355	0.05	0.01	0.20	1,360
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.20	1.01	6.36	8.11	0.03	0.03	0.06	0.09	0.03	0.01	0.05	—	3,763	3,763	0.15	0.03	0.01	3,777
2027	0.91	0.77	6.02	7.10	0.02	0.05	0.06	0.11	0.05	0.01	0.06	—	2,680	2,680	0.11	0.02	0.01	2,689
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.22	0.19	1.20	1.82	0.01	0.01	0.01	0.02	0.01	< 0.005	0.01	—	682	682	0.03	0.01	0.02	685
2027	0.17	0.14	1.13	1.27	< 0.005	0.01	< 0.005	0.01	0.01	< 0.005	0.01	—	416	416	0.02	< 0.005	0.01	417
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.04	0.03	0.22	0.33	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	113	113	< 0.005	< 0.005	< 0.005	113
2027	0.03	0.03	0.21	0.23	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	68.8	68.8	< 0.005	< 0.005	< 0.005	69.0

3. Construction Emissions Details

3.1. Demolition (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.60	0.51	3.54	6.70	0.02	0.14	—	0.14	0.13	—	0.13	—	1,839	1,839	0.07	0.01	—	1,845

Demoliti	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.60	0.51	3.54	6.70	0.02	0.14	—	0.14	0.13	—	0.13	—	1,839	1,839	0.07	0.01	—	1,845
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.06	0.43	0.81	< 0.005	0.02	—	0.02	0.02	—	0.02	—	222	222	0.01	< 0.005	—	222
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.08	0.15	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	36.7	36.7	< 0.005	< 0.005	—	36.8
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.37	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	60.1	60.1	< 0.005	< 0.005	0.22	61.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.29	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	53.7	53.7	< 0.005	< 0.005	0.01	54.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.67	6.67	< 0.005	< 0.005	0.01	6.77
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.10	1.10	< 0.005	< 0.005	< 0.005	1.12
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.2. Demolition (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm	0.60	0.51	3.54	6.70	0.02	0.02	—	0.02	0.02	—	0.02	—	1,839	1,839	0.07	0.01	—	1,845
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.60	0.51	3.54	6.70	0.02	0.02	—	0.02	0.02	—	0.02	—	1,839	1,839	0.07	0.01	—	1,845
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.06	0.43	0.81	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	222	222	0.01	< 0.005	—	222
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.08	0.15	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	36.7	36.7	< 0.005	< 0.005	—	36.8
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.37	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	60.1	60.1	< 0.005	< 0.005	0.22	61.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.29	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	53.7	53.7	< 0.005	< 0.005	0.01	54.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.67	6.67	< 0.005	< 0.005	0.01	6.77
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.10	1.10	< 0.005	< 0.005	< 0.005	1.12
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Grading (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.17	0.98	6.33	7.82	0.03	0.23	—	0.23	0.21	—	0.21	—	3,710	3,710	0.15	0.03	—	3,722
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.12	0.76	0.94	< 0.005	0.03	—	0.03	0.03	—	0.03	—	447	447	0.02	< 0.005	—	449
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.14	0.17	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	74.0	74.0	< 0.005	< 0.005	—	74.3
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.29	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	53.7	53.7	< 0.005	< 0.005	0.01	54.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.67	6.67	< 0.005	< 0.005	0.01	6.77
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.10	1.10	< 0.005	< 0.005	< 0.005	1.12
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.4. Grading (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	1.17	0.98	6.33	7.82	0.03	0.03	—	0.03	0.03	—	0.03	—	3,710	3,710	0.15	0.03	—	3,722
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.12	0.76	0.94	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	447	447	0.02	< 0.005	—	449
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.14	0.17	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	74.0	74.0	< 0.005	< 0.005	—	74.3
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.29	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	53.7	53.7	< 0.005	< 0.005	0.01	54.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.67	6.67	< 0.005	< 0.005	0.01	6.77
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.10	1.10	< 0.005	< 0.005	< 0.005	1.12
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.91	0.77	6.02	7.10	0.02	0.25	—	0.25	0.23	—	0.23	—	2,680	2,680	0.11	0.02	—	2,689
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.09	0.73	0.86	< 0.005	0.03	—	0.03	0.03	—	0.03	—	323	323	0.01	< 0.005	—	324
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.13	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	53.5	53.5	< 0.005	< 0.005	—	53.7
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.6. Building Construction (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.91	0.77	6.02	7.10	0.02	0.04	—	0.04	0.03	—	0.03	—	2,680	2,680	0.11	0.02	—	2,689
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.09	0.73	0.86	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	323	323	0.01	< 0.005	—	324
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.13	0.16	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	53.5	53.5	< 0.005	< 0.005	—	53.7
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Paving (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.85	0.72	5.91	5.85	0.01	0.33	—	0.33	0.30	—	0.30	—	1,296	1,296	0.05	0.01	—	1,300
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.85	0.72	5.91	5.85	0.01	0.33	—	0.33	0.30	—	0.30	—	1,296	1,296	0.05	0.01	—	1,300
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.05	0.40	0.40	< 0.005	0.02	—	0.02	0.02	—	0.02	—	88.8	88.8	< 0.005	< 0.005	—	89.1
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	14.7	14.7	< 0.005	< 0.005	—	14.7
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.34	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	58.8	58.8	< 0.005	< 0.005	0.20	59.8
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.26	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	52.5	52.5	< 0.005	< 0.005	0.01	53.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.71	3.71	< 0.005	< 0.005	0.01	3.77
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.61	0.61	< 0.005	< 0.005	< 0.005	0.62
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.8. Paving (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.85	0.72	5.91	5.85	0.01	0.05	—	0.05	0.05	—	0.05	—	1,296	1,296	0.05	0.01	—	1,300
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.85	0.72	5.91	5.85	0.01	0.05	—	0.05	0.05	—	0.05	—	1,296	1,296	0.05	0.01	—	1,300
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.05	0.40	0.40	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	88.8	88.8	< 0.005	< 0.005	—	89.1
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	14.7	14.7	< 0.005	< 0.005	—	14.7
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.34	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	58.8	58.8	< 0.005	< 0.005	0.20	59.8
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.26	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	52.5	52.5	< 0.005	< 0.005	0.01	53.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.71	3.71	< 0.005	< 0.005	0.01	3.77
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.61	0.61	< 0.005	< 0.005	< 0.005	0.62
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	9/1/2026	10/30/2026	5.00	44.0	—
Grading	Grading	10/31/2026	12/31/2026	5.00	44.0	—
Building Construction	Building Construction	1/1/2027	3/3/2027	5.00	44.0	—
Paving	Paving	3/4/2027	4/7/2027	5.00	25.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

Demolition	Excavators	Diesel	Average	1.00	8.00	270	0.37
Demolition	Rubber Tired Loaders	Diesel	Average	1.00	1.00	350	0.40
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	110	0.73
Grading	Rubber Tired Loaders	Diesel	Average	1.00	8.00	350	0.40
Grading	Excavators	Diesel	Average	2.00	8.00	350	0.37
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	350	0.37
Building Construction	Trenchers	Diesel	Average	1.00	8.00	350	0.45
Paving	Other Construction Equipment	Diesel	Average	1.00	8.00	200	0.37
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	110	0.42
Paving	Trenchers	Diesel	Average	1.00	8.00	50.0	0.38

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Excavators	Diesel	Average	1.00	8.00	270	0.37
Demolition	Rubber Tired Loaders	Diesel	Average	1.00	1.00	350	0.40
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	110	0.73
Grading	Rubber Tired Loaders	Diesel	Average	1.00	8.00	350	0.40
Grading	Excavators	Diesel	Average	2.00	8.00	350	0.37
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	350	0.37
Building Construction	Trenchers	Diesel	Average	1.00	8.00	350	0.45
Paving	Other Construction Equipment	Diesel	Average	1.00	8.00	200	0.37
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	110	0.42
Paving	Trenchers	Diesel	Average	1.00	8.00	50.0	0.38

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	7.50	10.8	LDA,LDT1,LDT2
Demolition	Vendor	—	7.17	HHDT,MHDT
Demolition	Hauling	0.00	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	7.50	10.8	LDA,LDT1,LDT2
Grading	Vendor	—	7.17	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	0.00	10.8	LDA,LDT1,LDT2
Building Construction	Vendor	0.00	7.17	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	7.50	10.8	LDA,LDT1,LDT2
Paving	Vendor	—	7.17	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—

Demolition	Worker	7.50	10.8	LDA,LDT1,LDT2
Demolition	Vendor	—	7.17	HHDT,MHDT
Demolition	Hauling	0.00	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	7.50	10.8	LDA,LDT1,LDT2
Grading	Vendor	—	7.17	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	0.00	10.8	LDA,LDT1,LDT2
Building Construction	Vendor	0.00	7.17	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	7.50	10.8	LDA,LDT1,LDT2
Paving	Vendor	—	7.17	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Ton of Debris)	Material Exported (Ton of Debris)	Acres Graded (acres)	Material Demolished (Ton of Debris)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	0.00	—
Grading	0.00	0.00	30.0	0.00	—
Paving	0.00	0.00	0.00	0.00	0.90

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Other Non-Asphalt Surfaces	0.90	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	478	0.03	< 0.005
2027	0.00	478	0.03	< 0.005

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Per construction schedule provided.
Construction: Off-Road Equipment	Per construction equipment provided.

Appendix B – Biological Resources Evaluation

KNIGHTS FERRY COMMUNITY SERVICES DISTRICT

SURFACE WATER TREATMENT PLANT IMPROVEMENT PROJECT BIOLOGICAL EVALUATION

KNIGHTS FERRY, CA
JULY 2025

PREPARED FOR:
Knights Ferry Community Services District
Knights Ferry, CA

PREPARED BY:
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455 W. Fir Ave, Clovis, California 93612

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ACRONYMS AND ABBREVIATIONS

APE ..... Area of Potential Effect
BMP ..... Best Management Practices
CDFW ..... California Department of Fish and Wildlife
CEQA ..... California Environmental Quality Act
CNDDB ..... California Natural Diversity Database
CNPS ..... California Native Plant Society
County ..... Stanislaus County
EFH ..... Essential Fish Habitat
EPA ..... Environmental Protection Agency
°F ..... degrees Fahrenheit
HCP ..... Habitat Conservation Plan
IPaC ..... United States Fish and Wildlife Service's Information for Planning and Consultation system
MBTA ..... Migratory Bird Treaty Act
NCCP ..... Natural Community Conservation Plan
NEPA ..... National Environmental Policy Act
NMFS ..... National Marine Fisheries Service
NPDES ..... National Pollutant Discharge Elimination System
NRCS ..... Natural Resources Conservation Service
Project ..... Surface Water Treatment Plant Improvement Project
Provost & Pritchard ..... Provost & Pritchard Consulting Group
RWQCB ..... Regional Water Quality Control Board
SWPPP ..... Storm Water Pollution Prevention Plan
SWRCB ..... State Water Resources Control Board
USACE ..... United States Army Corps of Engineers
USC ..... United States Code
USFWS ..... United States Fish and Wildlife Service
USGS ..... United States Geological Survey
WOTUS ..... Waters of the United States

1 INTRODUCTION

This Biological Evaluation, prepared by Provost & Pritchard Consulting Group (Provost & Pritchard) in compliance with the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA), includes descriptions of the biological resources present or with potential to occur within the Knights Ferry Community Services District Surface Water Treatment Plant Improvement Project (or "project") and surrounding areas, potential project-related impacts or effects to those resources, and mitigation measures to reduce these impacts and effects to a less-than-significant level under CEQA and NEPA.

1.1 PROJECT DESCRIPTION

The project site (or "site") is located in Knights Ferry, 9.2 miles northeast of the City of Oakdale and 13.3 miles west of the City of Chinese Camp in the northeast portion of Stanislaus County, California (see Figure 1). The project's Area of Potential Effect (APE) includes approximately 0.71 acres with an additional 50-foot buffer surrounding the project site (see Figure 2). The APE includes a water treatment plant, and paved roads. Surrounding lands on all sides of the APE are rural residential neighborhoods with paved roads and pastures.

The project involves constructing a transfer pumping station, chemical storage and filter building, high service pumping station, and backwash pumping station; installing the Tri-Mite packaged filter system and 100,000-gallon storage tank; cleaning/ recoating the existing 110,000-gallon storage tank; and demolishing a 30,000-gallon finished water storage tank, flocculation and sedimentation tanks, CT tanks, and multi-media filters, and disconnected water treatment infrastructure.

1.2 REPORT OBJECTIVES

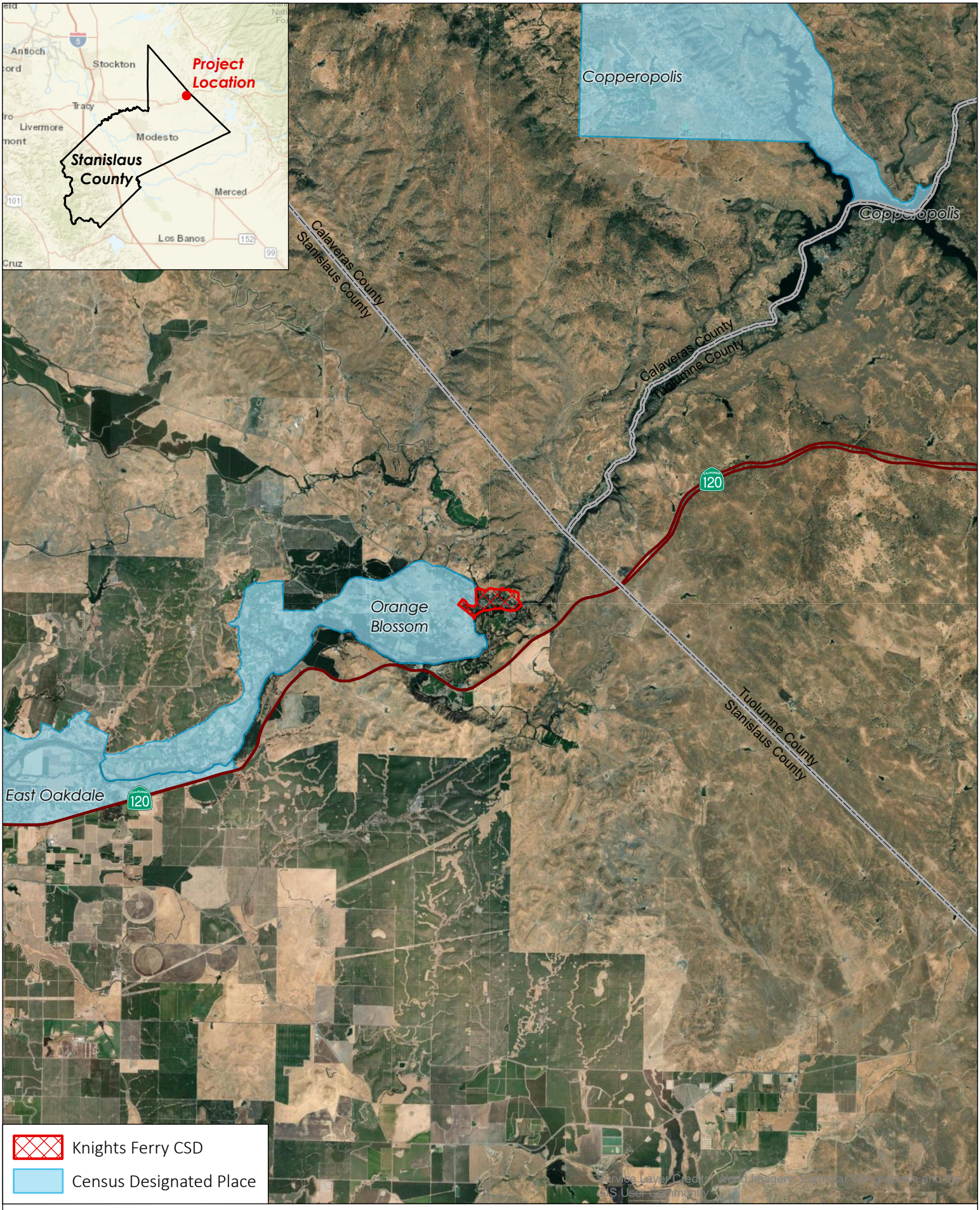
Construction activities such as those proposed by the project could potentially change biological resources or habitats that are critical for sensitive plant and wildlife species. In cases such as these, development may be regulated by state or federal agencies, and/or addressed by local regulatory agencies.

This report addresses issues related to the following:

- The presence of sensitive biological resources within the APE, or those with the potential to occur within the APE.
- The federal, state, and local regulations regarding these resources.
- Mitigation measures that may be required to reduce the magnitude of anticipated impacts and/or comply with permit requirements of state and federal resource agencies.

Therefore, the objectives of this report are to:

- Summarize all APE-specific information related to existing biological resources.
- Make reasonable inferences about the biological resources that could occur on the APE based on habitat suitability and the proximity of the APE to a species' known range.
- Summarize all state and federal natural resource protection laws that may be relevant to implementation of the project.
- Identify and discuss project impacts and effects to biological resources likely to occur onsite within the context of CEQA, NEPA, and/or state or federal laws.
- Identify and prescribe a set of avoidance and minimization measures that would reduce impacts to a less-than-significant level (as identified by CEQA) or avoid and minimize effects (as identified by NEPA) and are generally consistent with recommendations of the resource agencies for affected biological resources.



0 1 2

Miles

Regional Location Map

Knights Ferry Surface Water Treatment Plant Improvement Project

PROVOST& PRITCHARD

7/1/2025 \\EgnyteDrive\Clients\Knights Ferry CSD-4429\442924001-Knights Ferry SRF Const Funding Appl\400 GIS\Map\KnightsFerry_Environmental\KnightsFerry_Environmental.aprx



0 250 500

Feet

Area of Potential Effect Map

Knights Ferry Surface Water Treatment Plant Improvement Project

PROVOST& PRITCHARD

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1.3 STUDY METHODOLOGY

A reconnaissance-level field survey of the APE was conducted on June 23, 2025, by Provost & Pritchard biologist, Olivia Arredondo. The survey consisted of walking and driving throughout the project site and visually surveying areas outside of the project site but within the 50-foot buffer of the APE while identifying and noting land uses, biological habitats and communities, and plant and animal species encountered. Habitats were also assessed to help with determining if they could be suitable for various rare or protected plant and animal species. Representative photographs of the site were taken and are presented in Appendix A.

Ms. Arredondo then utilized the results of the field survey to analyze potential project-related impacts to biological resources based on the resources known to occur or with the potential to occur within the APE. Sources of information used in preparation of this analysis included: California Department of Fish and Wildlife's California Natural Diversity Database (CNDDB; see Appendix B for the species list) and California Wildlife Habitat Relationships database; California Native Plant Society's (CNPS) Online Inventory of Rare and Endangered Vascular Plants of California; CalFlora's online database of California native plants; Jepson Herbarium's online database (i.e., Jepson eFlora); United States Fish and Wildlife Service's (USFWS) Environmental Conservation Online System, Information for Planning and Consultation (IPaC; see Appendix C for the species list) system, and National Wetlands Inventory (NWI); iNaturalist; NatureServe Explorer's online database; United States Department of Agriculture Natural Resources Conservation Service's (NRCS) Web Soil Survey (see Appendix D for the Web Soil Survey Report); California Herps website; and various manuals, reports, and references related to plants and animals of the San Joaquin Valley region.

The field survey did not include focused surveys for special status species. The field survey conducted included the appropriate level of detail to assess the significance of potential impacts to sensitive biological resources resulting from implementing the project. Furthermore, the field survey was sufficient to generally describe aquatic features of the APE that could be claimed as jurisdictional by federal and/or state agencies, such as the United States Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), Regional Water Quality Control Board (RWQCB), and the State Water Resources Control Board (SWRCB). If project activities resulted in impacts to aquatic resources and aquatic habitats, this report would be sufficient to support required permit applications, if needed, for the project.

2 EXISTING CONDITIONS

2.1 REGIONAL SETTINGS

2.1.1 TOPOGRAPHY

The APE is located within the *Knights Ferry* United States Geological Survey (USGS) 7.5-minute quadrangle within the central/ northeast corner of Section 29, Township 1 South, Range 12 East. The topography of the APE was rolling hills within the facility that ranged from approximately 270 to 285 feet above mean sea level (see Figure 3).

2.1.2 CLIMATE

Like most of California, the APE experiences a Mediterranean climate. Warm, dry summers are followed by cool, moist winters. In the summer, average high temperatures range between 90- and 100-degrees Fahrenheit (°F), but do not often exceed 110 °F, and the humidity is generally low. Winter temperatures are often below 60 °F during the day and rarely exceed 70 °F. On average, the Knights Ferry receives approximately 22 inches of precipitation in the form of rain yearly, most of which occurs between November and April, and the APE would be expected to receive similar amounts of precipitation (The National Oceanic and Atmospheric Administration 2025).

2.1.3 HYDROLOGY

The nearest surface water to the project is the concrete-lined treatment pond within the APE. While not within the APE, an unnamed ephemeral creek is 0.12 miles east of the APE, Wildcat Creek is 0.15 miles west of the APE, and Stanislaus River 0.16 miles south of the APE.

Wildcat Creek receives water from Littlejohns Creek, which receives stormwater runoff from Carmen Peak and runs south. The unnamed ephemeral creek is fed water from the mountains to the direct east of Knights Ferry and runs south into Stanislaus River. The Stanislaus River begins at the New Melones Lake and flows southwest into Tulloch Reservoir. It runs west until it drains into the San Joaquin River. The San Joaquin River then continues into irrigation canals, Suisan Bay, San Francisco Bay, and the Pacific Ocean

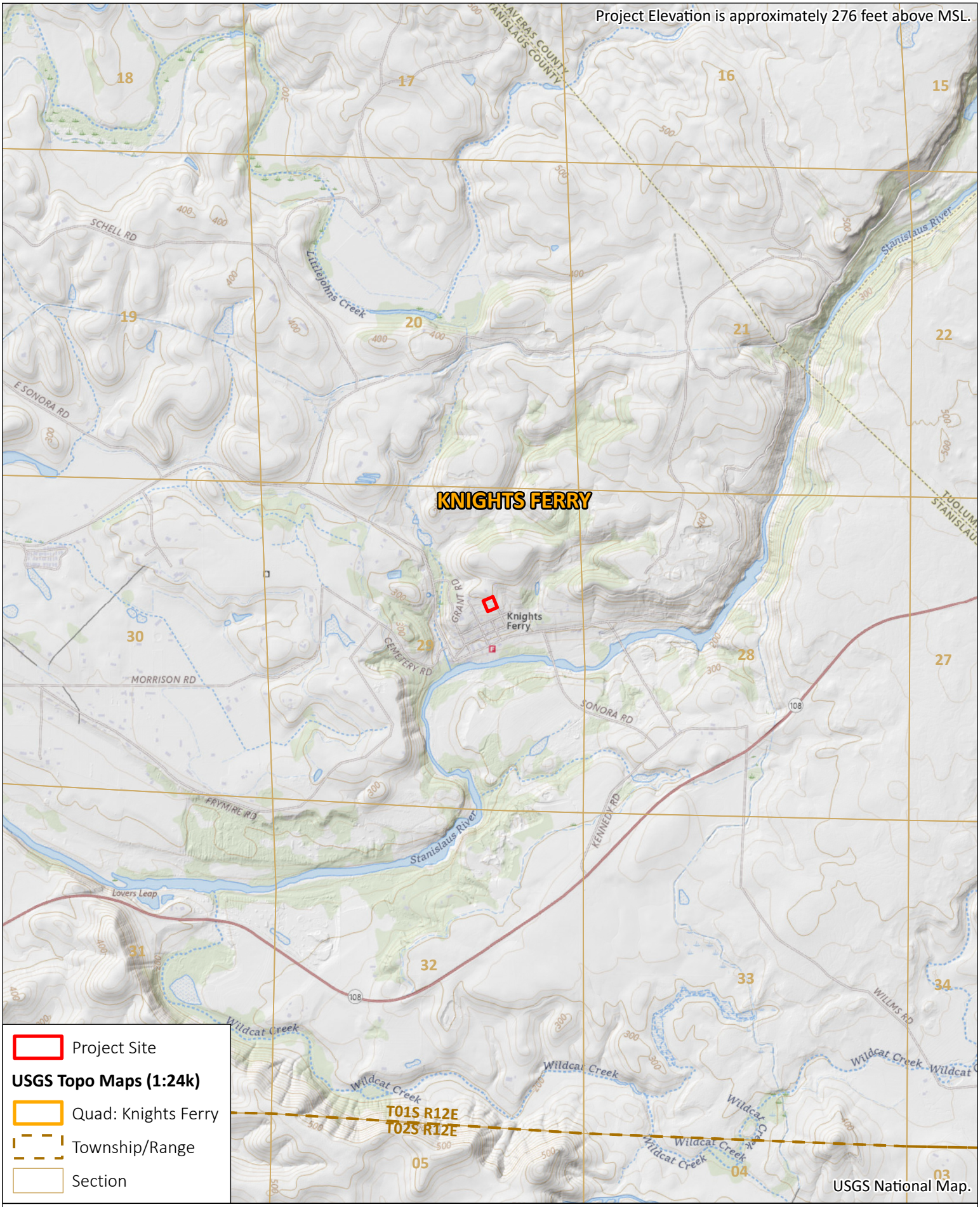
2.1.4 SOILS

One soil mapping unit representing a soil type was identified within the APE and is listed in Table 1 (see Appendix D for the Web Soil Survey Report). The soil is displayed with its core properties in the table below, according to the Major Land Resource Area of California. This soil is used primarily for grazing.

Table 1: List of Soils Located on the APE and Their Basic Properties

Soil	Soil Map Unit	Percent of APE	Hydric Soil Category	Drainage	Permeability	Runoff
Miltonhills-Amador	complex, 15 to 45 percent slopes	100%	Nonhydric	Well drained	Very low to moderately low	Low

Hydric soils are defined as soils that are saturated, flooded, or ponded long enough during the growing season to develop anaerobic conditions such that under sufficiently wet conditions, hydrophytic vegetation can be supported. Hydric soil ratings are derived from specific soil properties as well as climate, parent material, vegetation, landform type, and biological activity of a certain location. None of the major or minor soil mapping units located within the APE were identified as hydric.



Topographic Map

Knights Ferry Surface Water Treatment Plant Improvement Project

PROVOST& PRITCHARD

2.2 BIOTIC HABITATS

Four biotic habitats were observed within the APE and included non-native annual grassland, residential, ruderal, and treatment pond (see Figure 4). These habitats and their constituent plant and animal species are described in more detail in the following sections.

2.2.1 NON-NATIVE ANNUAL GRASSLAND

The non-native grassland habitat is the least prevalent of the four habitat types within the APE and is found within the northeastern edge across Lynde Street from the water treatment plant. Mixed oak savannah and private properties with pastures were adjacent to this area outside of the APE.

This habitat was dominated by slender wild oat (*Avena barbata*) with pitgland tarweed (*Holocarpha virgata*), short-pod mustard (*Hirschfeldia incana*), and turkey mullein (*Croton setiger*) sporadically along the road. Turkey vultures (*Cathartes aura*) were observed foraging through this area.

While the non-native grassland habitat within the APE had tire marks and large, uncovered holes from past utility poles, the area and adjacent areas still offered expansive habitat to a variety of wildlife, year-round. The APE serves foraging birds, including raptors, during the day, as well as bats, coyotes, and other nocturnal animals at night. This habitat also provides cover and foraging for prey species such as small rodents, reptiles, and other bird species.

2.2.2 RESIDENTIAL

The residential portion of the APE contained houses, fencing, paved roads, landscaping, and pastures. Vegetation in this section of the APE included ornamental plants surrounding houses, eucalyptus trees (*Eucalyptus* sp.), tall palm species (*Arecaceae*), and a variety of oaks that lined the shared fencing with the water treatment plant. The survey of this residential habitat resulted in the observation of acorn woodpeckers (*Melanerpes formicivorus*) seen creating cavities in palms and wooden fences within and adjacent to the APE.

2.2.3 RUDERAL

The ruderal habitat of the site was the most prevalent of the habitat types and contained a water treatment plant, fencing, and paved roads. Man-made “trenches” were observed at the water treatment plant dug near the southwest edge going east. Vegetation in this section of the site was dominated by mowed non-native grass with a variety of trees along the southwestern edge including blue oak (*Quercus douglasii*), interior live oak (*Quercus wislizeni*), Peruvian pepper tree (*Schinus molle*), Persian silk tree (*Albizia julibrissin*), Mexican fan palm (*Washingtonia robusta*), and Osage orange tree (*Maclura pomifera*). Herbaceous vegetation present within the ruderal habitat include common sow thistle (*Sonchus oleraceus*), dallis grass (*Paspalum dilatatum*), dotted knotweed (*Persicaria punctata*), lesser hawkbit (*Leontodon saxatilis*), redstem filaree (*Erodium cicutarium*), ripgut brome (*Bromus diandrus*), rose clover (*Trifolium hirtum*), scarlet pimpernel (*Lysimachia arvensis*), and Spanish clover (*Acmispon americanus*).

The survey of the ruderal habitat within the APE resulted in the identification of numerus bird species including Anna’s hummingbird (*Calypte anna*), black phoebe (*Sayornis nigricans*), bushtit (*Psaltriparus minimus*), California scrub jay (*Aphelocoma californica*), Eurasian collared dove (*Streptopelia decaocto*), house finch (*Haemorthous mexicanus*), house sparrow (*Passer domesticus*), lesser goldfinch (*Spinus psaltria*), and mourning dove (*Zenaida macroura*). Partially collapsed small mammal burrows were observed at the southern corner of the APE near the treatment pond and were likely dug by Botta’s pocket gopher (*Thomomys bottae*), which was not observed during the survey.

2.2.4 TREATMENT POND

The treatment pond habitat included a singular concrete-lined treatment pond with approximately one-foot of water. No vegetation was found besides fibrous algal material in the water. American bullfrog

(*Lithobates catesbeianus*) tadpoles and window skimmers (*Libellula luctuosa*) were observed within and around the treatment pond.

While the treatment pond was heavily disturbed from the surrounding areas, it is likely being used as water sources and foraging habitat for a wide variety of wildlife including birds, invertebrates, and small mammals.



Habitats Map

Knights Ferry Surface Water Treatment Plant Improvement Project

PROVOST& PRITCHARD

2.3 NATURAL COMMUNITIES OF SPECIAL CONCERN AND RIPARIAN HABITAT

Natural communities of special concern are those that are of limited distribution, distinguished by significant biological diversity, or home to special status species. CDFW has classified and mapped all natural communities in California. Just as the special status plant and animal species (see Section 2.6), these natural communities of special concern can be found within the CNDDB. There are no recorded observations of a natural community of special concern mapped within the site and no natural communities of special concern were observed during the field survey.

Riparian habitat is composed of plant communities that occur along the banks, and sometimes over the banks, of most waterways and is an important habitat for numerous wildlife species. CDFW has jurisdiction over most riparian habitat in California. No waterways or riparian habitat were observed within or adjacent to the APE during the field survey.

2.4 DESIGNATED CRITICAL HABITAT

The USFWS often designates areas of "critical habitat" when it lists species as threatened or endangered. Critical habitat is a specific geographic area that contains features essential for the conservation of a threatened or endangered species, which may require special management and protection. Designated critical habitat is absent from the APE but Greene's tuctoria critical habitat was located 1.2 miles northeast of APE center.

2.5 WILDLIFE MOVEMENT CORRIDORS AND NATIVE WILDLIFE NURSERY SITES

Wildlife movement corridors are routes that animals regularly and predictably follow during seasonal migration, dispersal from native ranges, daily travel within home ranges, and inter-population movements. Movement corridors in California are typically associated with valleys, ridgelines, rivers, and creeks supporting riparian vegetation.

The non-native annual grassland habitat of the APE and mixed oak savannah habitat in the surrounding areas consists of expansive open grassland where species could move through. Numerous small game trails (likely from squirrels and/or rabbits) were observed in the non-native annual grassland habitat during the field survey.

Native wildlife nursery sites are areas where a species or group of similar species raise their young in a concentrated place, such as maternity bat roosts. Large palm trees with woodpecker cavities were located adjacent to the APE and could function as native wildlife nursery sites for acorn woodpeckers and other birds. The treatment pond at the water treatment plant was being used as wildlife nursery sites for amphibian species such as American bullfrog tadpoles which were observed during the survey.

2.6 SPECIAL STATUS PLANTS AND ANIMALS

California contains several rare plant and animal species. In this context, "rare" is defined as a species known to have low populations or limited distributions. Conversion of habitats to accommodate human population growth in turn reduces the already-limited suitable habitat for rare species. This results in rare and sensitive species becoming increasingly more vulnerable to extirpation. State and federal regulations have provided the CDFW and USFWS with mechanisms for conserving and protecting the diversity of plant and animal species native to California. Numerous native plants and animals have been formally designated as "threatened" or "endangered" under state and federal endangered species legislation. Other formal designations include "candidate" for listing or "species of special concern" by CDFW. The CNPS has its list of native plants considered rare, threatened, or endangered. Collectively these animals and plants are referred to as "special status species."

A query of the CNDDB for occurrences of special status plant and animal species was conducted for the *Knights Ferry* USGS 7.5-minute quadrangles that contains the APE, and for the 8 surrounding USGS quadrangles: *Bachelor Valley*, *Copperopolis, Cooperstown*, *Keystone*, *New Melones Dam*, *Oakdale*, *Paulsell*, and *Waterford*. A query of the IPaC was also completed for the APE. These species, and their potential to occur within the APE, are listed in Table 2 and Table 3, below. Other special status species that did not show up in the CNDDB query, but have the potential to occur in the vicinity, are also included in Table 3. Species lists obtained from CNDDB and IPaC are available in Appendix B and Appendix C, respectively. All relevant sources of information, as discussed in the Study Methodology section of this report, as well as field observations, were used to determine if any special status species have the potential to occur within the APE.

Table 2: List of Special Status Plants with Potential to Occur on the APE and/or in the Vicinity

Species	Status*	Habitat	Occurrence within the APE
Beaked clarkia (*Clarkia rostrata*)	CNPS 1B	Found in woodlands and valley foothill grasslands on the west slope of the Sierra Nevada range, around 1,650 feet in elevation. Blooms April – May.	**Absent.** The APE does not provide suitable habitat and is outside the current known elevational range of this species.
Chinese Camp brodiaea (*Brodiaea pallida*)	FT, CE, CNPS 1B	Found in valley and foothill grassland, and cismontane woodland habitats often in rocky, intermittent streambeds. This species is also associated with serpentinite. Grows at elevations between 500 and 1,300 feet. Blooms May – June.	**Absent.** The APE does not provide suitable habitat and is outside the current known elevational range of this species.
Colusa grass (*Neostapfia colusana*)	FT, CE, CNPS 1B	Found in vernal pools within the San Joaquin Valley at elevations below 450 feet. Blooms May – August.	**Absent.** The APE does not provide suitable vernal pool habitat to support this species.
Congdon's Lewisia (*Lewisia congdonii*)	CNPS 1B	Occurs in chaparral, valley and foothill grassland, lower montane coniferous forest, cismontane woodland, and upper montane coniferous forest. Found on north exposures, in crevices on slopes among rocks, particularly granitic or metamorphic substrates. Found at elevations between 1,600 to 9,200 feet. Blooms April – June.	**Absent.** The APE does not provide suitable habitat and is outside the current known elevational range of this species.
Dwarf downingia (*Downingia pusilla*)	CNPS 2B	Found in vernal pools in valley and foothill grassland communities at elevations below 1,600 feet. Blooms March – May.	**Absent.** The APE does not provide suitable vernal pool habitat to support this species.
Forked hare-leaf (*Lagophylla dichotoma*)	CNPS 1B	Found in cismontane woodland, and valley and foothill grassland communities at elevations between 600 and 1,100 feet. Blooms April – May.	**Absent.** The APE does not provide suitable habitat and is outside the current known elevational range of this species.

Species	Status*	Habitat	Occurrence within the APE
Greene's tuctoria (*Tuctoria greenei*)	FE, CNPS 1B	Found in the San Joaquin Valley and other parts of California in vernal pools within valley grassland, wetland, and riparian communities at elevations below 3,500 feet. Blooms May – September.	**Absent.** The APE does not provide suitable vernal pool habitat to support this species. CNDDB lists this species as "extirpated" from the region.
Hairy Orcutt grass (*Orcuttia pilosa*)	FE, CE, CNPS 1B	Found in vernal pools in valley grassland, wetland, and riparian communities at elevations below 650 feet. Blooms May – September.	**Absent.** The APE does not provide suitable vernal pool habitat to support this species.
Hartweg's golden sunburst (*Pseudobahia bahifolia*)	FE, CE, CNPS 1B	Found in valley and foothill grassland and cismontane woodland communities in clay soils that are often acidic. Occurs predominantly on northern slopes, but also along shady creeks and near vernal pools at elevations between 300 and 650 feet. Blooms March – May.	**Absent.** The APE does not provide suitable habitat and soil type to support this species.
Hoover's calycadenia (*Calycadenia hooveri*)	CNPS 1B	Found in valley and foothill grassland and cismontane woodland communities on exposed, rocky, barren soil at elevations between 300 and 1,300 feet. Blooms June – September.	**Absent.** The APE does not provide suitable habitat and soil type to support this species.
Hoover's cryptantha (*Cryptantha hooveri*)	CNPS 1A	Presumed extirpated in California. Was historically found in valley and foothill grasslands and inland dunes in coarse sand at elevations below 250 feet. Blooms March – May.	**Absent.** The APE does not provide suitable habitat and soil type to support this species.
Hoover's spurge (*Euphorbia hooveri*)	FT, CNPS 1B	Found in vernal pools within valley grassland, freshwater wetland, and riparian communities at elevations below 800 feet. Blooms July – September.	**Absent.** The APE does not provide suitable vernal pool habitat to support this species.
Mariposa cryptantha (*Cryptantha mariposae*)	CNPS 1B	Usually occurs in chaparral communities. Can be found on rocky, semi barren ridges, dry slopes, and serpentine outcrops at elevations between 650 and 2,200 feet. Blooms April – June.	**Absent.** The APE does not provide suitable habitat and is outside the current known elevational range of this species.
Merced monardella (*Monardella leucocephala*)	CNPS 1A	Found in the San Joaquin Valley, associated with valley and foothill grasslands. Grows along rivers in moist, sandy soils at elevations between 150 and 350 feet. Blooms May – July.	**Absent.** CNDDB lists this species as "extirpated" from the region.

Species	Status*	Habitat	Occurrence within the APE
Patterson's navarretia (*Navarretia paradoxiclara*)	CNPS 1B	Found in open, seasonally wet meadows and seeps. Associated with drainages, openings, serpentinite, and vernally mesic soils at elevations between 500 and 1,400 feet. Blooms May – July.	**Absent.** The APE does not provide suitable habitat and is outside the current known elevational range of this species.
Rawhide Hill onion (*Allium tuolumnense*)	CNPS 1B	Found in cismontane woodland. Restricted to serpentine soil, usually in grey pine chaparral. Associated with steep, rocky, south facing slopes or small drainages. Occurs at elevations between 1,000 and 2,000 feet. Blooms March – May.	**Absent.** The APE does not provide suitable habitat and is outside the current known elevational range of this species.
Red Hills cryptantha (*Cryptantha spithamaea*)	CNPS 1B	Found in chaparral and cismontane woodland communities. Associated with serpentinite, streambeds, and openings at elevations between 900 and 1,500 feet. Blooms April – May.	**Absent.** The APE does not provide suitable habitat and is outside the current known elevational range of this species.
Red Hills ragwort (*Senecio clevelandii* var. *heterophyllus*)	CNPS 1B	Found in cismontane woodland communities. Associated with ultramafic and drying serpentine soils. Is often found along streams. Found at elevations between 850 and 1,300 feet. Blooms June – July.	**Absent.** The APE does not provide suitable habitat and is outside the current known elevational range of this species.
Red Hills soaproot (*Chlorogalum grandiflorum*)	CNPS 1B	Found in cismontane woodland, chaparral, and lower montane coniferous forest communities. Occurs frequently on serpentine or gabbro soils, as well as non-ultramafic substrates. Can be found on historically disturbed sites. Found at elevations between 800 and 5,600 feet. Blooms May – June.	**Absent.** The APE does not provide suitable habitat and is outside the current known elevational range of this species.
Red Hills vervain (*Verbena californica*)	FT, CT, CNPS 1B	Occurs in cismontane woodland, as well as valley and foothill grassland communities. Associated with mesic sites on serpentine, usually serpentine seeps, or creeks. Found at elevations between 850 and 1,400 feet. Blooms May – September.	**Absent.** The APE does not provide suitable habitat and is outside the current known elevational range of this species.

Species	Status*	Habitat	Occurrence within the APE
San Joaquin Valley Orcutt grass (*Orcuttia inaequalis*)	FT, CE, CNPS 1B	Found in the eastern San Joaquin Valley and the Sierra Nevada foothills in vernal pools within valley grassland, freshwater wetland, and wetland-riparian communities at elevations below 2,600 feet. Blooms April – September.	**Absent.** The APE does not provide suitable vernal pool habitat to support this species.
Shaggyhair lupine (*Lupinus spectabilis*)	CNPS 1B	Found in chaparral and cismontane woodland habitats. Associated with open rocky slopes of serpentine and grey pine woodland. Occurs at elevations between 850 and 2,700 feet. Blooms April – May.	**Absent.** The APE does not provide suitable habitat and is outside the current known elevational range of this species.
Spicate calycadenia (*Calycadenia spicata*)	CNPS 1B	Found in valley and foothill grassland and cismontane woodland. Occurs on dry, adobe, clay, gravelly, rocky, and disturbed areas, often in openings and roadsides at elevations between 100 and 4,600 feet. Blooms May – September.	**Absent.** The APE does not provide suitable habitat for this species.
Spiny-sepaled button-celery (*Eryngium spinosepalum*)	CNPS 1B	Found in the Sierra Nevada foothills and the San Joaquin Valley in vernal pools, swales, and roadside ditches. Often associated with clay soils in vernal pools within grassland communities. Occurs at elevations between 50 and 4,200 feet. Blooms April – July.	**Absent.** The APE does not provide suitable aquatic habitat for this species.
Stanislaus monkeyflower (*Erythranthe marmorata*)	CNPS 1B	Found in cismontane woodland and lower montane coniferous forest communities at elevations between 300 and 3,000 feet. Blooms March – May.	**Absent.** The APE does not provide suitable woodland habitat for this species.
Tongue-leaf copper moss (*Scopelophila cataractae*)	CNPS 2B	Found in cismontane woodland communities on metamorphic substrate. There is only one recorded occurrence of this species on California, at an elevation of 1310 feet.	**Absent.** The APE does not provide suitable habitat and is outside the current known elevational range of this species.
Tuolumne button-celery (*Eryngium pinnatisectum*)	CNPS 1B	Found in cismontane woodland and lower montane coniferous forest communities, and vernal pools. Associated with volcanic soils, wetlands, and mesic sites within other natural communities at elevations between 200 and 3,000 feet. Blooms June – August.	**Absent.** The APE does not provide suitable vernal pool habitat to support this species.

Species	Status*	Habitat	Occurrence within the APE
Veiny monardella (*Monardella venosa*)	CNPS 1B	Found in valley grassland, foothill grassland, and cismontane woodland communities. Occurs in heavy clay, mostly with grassland associates. Found at elevations between 200 and 1,400 feet. Blooms June – July.	**Unlikely.** The APE does not provide suitable soil type to support this species. The nearest recorded observation of this species was a historical collection from Peoria Pass as noted in Jepson eFlora, 10.4 miles northeast of the site in 1935.

Table 3: List of Special Status Animals with Potential to Occur on the APE and/or in the Vicinity

Species	Status*	Habitat	Occurrence within the APE
Bald eagle (*Haliaeetus leucocephalus*)	CE, CFP	Resides in old growth forests as well as lower montane coniferous forests. Can also be found in open uplands in the winter. Nests are generally found in large trees within a mile of water. Nests and winters along ocean shores, lake margins, and rivers.	**Unlikely.** Suitable nesting habitat for this species was absent from the APE but the non-native grassland and adjacent pastureland habitat could be utilized for foraging. The nearest recorded observation of this species within the vicinity was approximately 14.7 miles southeast of the APE in 1992.
Burrowing owl (*Athene cunicularia*)	CC, CSSC	Resides in open, dry grasslands, deserts, scrublands, and other areas with low growing vegetation. Nests and roosts underground in existing burrows created by mammals, most often by ground squirrels, and human-made structures.	**Unlikely.** No burrows within the APE had the dimensions to support this species, but the non-native grassland and pastureland habitats could be utilized for foraging. The nearest recorded observation of this species within the vicinity was approximately 10.3 miles west/southwest of the APE in 1991.
California tiger salamander – central California DPS (*Ambystoma californiense*)	FT, CT	Requires vernal pools or seasonal ponds for breeding and small mammal burrows for aestivation. Generally found in grassland and oak savannah plant communities in central California from sea level to 1,500 feet in elevation. Can migrate up to 1.3 miles to breed.	**Unlikely.** While there were a few small mammal burrows present near the treatment pond at the water treatment plant, the APE and adjacent areas are very disturbed by landscaping and residential areas. The nearest recorded observation was at two temporary ponds on the opposite side of Highway SR-120, approximately 2.2 miles southwest of the APE in 1993.
Conservancy fairy shrimp (*Branchinecta conservatio*)	FE	Found in large, turbid freshwater vernal pools in the Central Valley, from Tehama County in the north to Merced County in the south, with one outlying population in Ventura County's Interior Coast Ranges.	**Absent.** Suitable vernal pool habitats required by this species were absent from the APE and surrounding areas.
Crotch's bumble bee (*Bombus crotchii*)	CCE	Occurs throughout coastal California, as well as east to the Sierra Nevada-Cascade crest, and south into Mexico. Food plant genera include snapdragons, scorpionweeds,	**Unlikely.** The water treatment plant had small mammal burrows where this species could nest and overwinter; however, the constant landscaping and maintenance around the facility would likely

Species	Status*	Habitat	Occurrence within the APE
		primroses, poppies, and buckwheats. Nests are often located underground in abandoned rodent nests, or above ground in tufts of grass, old bird nests, rock piles, or cavities in dead trees. This species overwinters under leaf litter or soft soil.	disturb this species. The APE had limited foraging opportunity for this species. The nearest recorded observation of this species in a large, non-specific area that overlaps the APE from 1961.
Green sturgeon (Ac*ipenser medirostris*)	FT	Spawning occurs primarily in cool (51- 59 °F) sections of mainstem rivers in deep pools (26- 30 feet) with substrate containing small to medium sized sand, gravel, cobble, or boulders, such as the Sacramento, Feather, and Yuba Rivers. Presence in upper Stanislaus and San Joaquin Rivers may indicate spawning. Non-spawning adults occupy marine/estuarine waters. The Delta Estuary is important for rearing juveniles.	**Absent.** The APE does not provide suitable aquatic habitat to support this species.
Hardhead (*Mylopharodon conocephalus*)	CSSC	Occurs in low- to mid-elevation streams in the Sacramento-San Joaquin drainage. Clear, deep pools with sand-gravel-boulder bottoms and slow-moving water are required. This species is often sympatric with Sacramento pikeminnow and Sacramento sucker. Hardhead are typically absent from streams occupied by sunfishes and from heavily altered habitats.	**Absent.** The APE does not provide suitable aquatic habitat to support this species.
Least Bell's vireo (*Vireo bellii pusillus*)	FE, CE	This migratory species breeds in southern California. Breeding habitat consists of dense, low, shrubby, riparian vegetation in the vicinity of water or dry river bottoms. By the early 1980s, this species was extirpated from most of its historic range in California, including the Central Valley.	**Absent.** The APE does not provide suitable riparian habitat to support this species.
Monarch butterfly (*Danaus plexippus*)	FPT	Roosts in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby. Larval host plants consist of milkweeds. Winter roost sites extend along	**Unlikely.** This species could travel through the APE during breeding season. Potential roosting habitat was present with the eucalyptus trees within the adjacent private properties but was marginal and

Species	Status*	Habitat	Occurrence within the APE
		the Pacific Coast from northern Mendocino to Baja California, Mexico.	highly disturbed with routine landscaping. The APE is outside the overwintering range for this species. No narrow leaf milkweed plants were observed within/ adjacent to the APE during the survey and since the survey was conducted during the narrow leaf milkweed blooming period (June – September), the plant would have been observed if present. The nearest recorded observation of this species was within a private residence on iNaturalist, 6.6 miles southwest of the APE in 2019.
Northwestern pond turtle (*Actinemys marmorata*)	FPT, CSSC	An aquatic turtle of ponds, marshes, slow-moving rivers, streams, and irrigation ditches with riparian vegetation. Requires adequate basking sites and sandy banks or grassy open fields to deposit eggs.	**Unlikely.** While this species could use the lawn surrounding the treatment pond for basking, the pond was almost empty during the survey and was concrete-lined with constant landscaping in the immediate vicinity. The nearest recorded observation of this species within the vicinity overlaps the APE in 1879.
Pallid bat (*Antrozous pallidus*)	CSSC	Found in grasslands, chaparral, and woodlands, where it feeds on ground- and vegetation-dwelling arthropods, and occasionally takes insects in flight. Prefers to roost in rock crevices, but may also use tree cavities, caves, bridges, and other human-made structures.	**Unlikely.** While this species could utilize the non-native annual grassland habitat within the APE for foraging and the trees adjacent to the APE for roosting, this area is highly disturbed with operations from the water treatment plant as well as the routine landscaping from the facility and neighboring private residences. The nearest recorded observation of this species within the vicinity was at Stanislaus River approximately 0.4 miles east/southeast of the APE in 1999. That record included acoustic recordings taken within riparian habitat, which is absent from the APE.
San Joaquin kit fox (*Vulpes macrotis mutica*)	FE, CT	Opportunistically forages in a variety of habitats. Dens in burrows within alkali sink, valley grassland, and woodland habitats in valleys and adjacent foothills and in human-made structures in cities, rangeland, and agricultural areas. Occurs in the San Joaquin Valley and other smaller valleys to the west.	**Unlikely.** While the non-native grassland and pastureland habitat within the APE offer foraging and possible denning habitat, no potential kit fox dens were identified during the survey. The closest satellite population (Livermore) is 38 miles west of the APE. The nearest recorded observation of this species was a

Species	Status*	Habitat	Occurrence within the APE
			carcass east of Modesto Reservoir on iNaturalist, 10.6 miles south of the APE in 2024.
Steelhead – Central Valley DPS (*Oncorhynchus mykiss irideus* pop.11)	FT	This winter-run fish begins migration to fresh water during peak flows during December through February. The spawning season is typically from February to April. After hatching, this species will move to deeper, mid-channel habitats in late summer and fall. In general, both juveniles and adults prefer complex habitat with boulders, submerged clay, undercut banks, and large woody debris.	**Absent.** The APE does not provide suitable aquatic habitat to support this species.
Swainson's hawk (*Buteo swainsoni*)	CT	Nests in large trees in open areas adjacent to grasslands, grain or alfalfa fields, or livestock pastures suitable for supporting rodent populations.	**Unlikely.** Trees capable of supporting the dimensions of this species' nests were absent from the APE but the non-native grassland and pastureland habitats could be utilized for foraging. The nearest recorded observation of this species within the vicinity was approximately 7 miles southwest of the APE in 2010.
Townsend's big-eared bat (*Corynorhinus townsendii*)	CSSC	Occurs in a variety of habitats, but prefers cool, dark roost sites, and is often found in caves and mines. They roost in the open, hanging from walls and ceilings. Western populations typically forage on moths in areas of dense foliage.	**Unlikely.** The non-native annual grassland habitat within the APE and mixed oak savannah adjacent to the APE can provide foraging habitat for this species. This species can roost at the decommissioned Oakdale-Knights Ferry Gold Mine is located 4.6 miles southwest from the APE but are unlikely to roost within the APE due to the lack of caves and mines. The nearest recorded observation of this species within the vicinity was at riparian habitat, which is absent from the APE. That record included acoustic recordings taken within cottonwoods and western sycamore trees.
Tricolored blackbird (*Agelaius tricolor*)	CT, CSSC	Nests colonially near fresh water in dense cattails or tules, or in thickets of riparian shrubs. Forages in grassland and cropland. Large colonies are often found foraging in dairy farm feed fields.	**Unlikely.** Suitable nesting habitat for this species was absent from the APE. The nearest recorded observation of this species within the vicinity was approximately 7.2 miles southeast of the APE in 2014.

Species	Status*	Habitat	Occurrence within the APE
Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*)	FT	Lives in mature elderberry shrubs in the Central Valley and adjacent foothills from Tehama County south through Merced and Mariposa Counties with two scattered populations in Madera and Fresno Counties. Adults are active from March to June.	**Absent.** Elderberry shrubs required by this species were absent from the APE.
Vernal pool fairy shrimp (*Branchinecta lynchi*)	FT	Occupies vernal and seasonal pools, with clear to tea-colored water, in grass or mud-bottomed swales, and basalt depression pools.	**Absent.** Suitable vernal pool habitats required by this species were absent from the APE and surrounding areas.
Vernal pool tadpole shrimp (*Lepidurus packardi*)	FE	Occurs in vernal pools, clear to tea-colored water, in grass or mud-bottomed swales, and basalt depression pools.	**Absent.** Suitable vernal pool habitats required by this species were absent from the APE and surrounding areas.
Western mastiff bat (*Eumops perotis californicus*)	CSSC	Found in open, arid to semi-arid habitats, including dry desert washes, flood plains, chaparral, oak woodland, open ponderosa pine forest, grassland, and agricultural areas, where it feeds on insects in flight. Roosts most commonly in crevices in cliff faces but may also use high buildings and tunnels.	**Unlikely.** While the non-native annual grassland habitat within the APE and pastureland/ mixed oak savannah adjacent to the APE can provide foraging habitat for this species, there are no cliffs or high buildings for this species to roost. The nearest recorded observation of this species within the vicinity was approximately 57 feet southwest of the APE in 1999. That record included acoustic recordings taken near a small grove of cottonwoods and western sycamore tree, which have been mostly cleared since the original record.
Western red bat (*Lasiurus blossevillii*)	CSSC	Roosts primarily in trees, 2–40 feet above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.	**Absent.** The APE does not provide suitable conifer forest habitat to support this species.
Western spadefoot (*Spea hammondii*)	FPT, CSSC	The majority of the time this species is terrestrial and occurs in small mammal burrows and soil cracks, sometimes in the bottom of dried pools. Prefers open areas with sandy or gravelly soils, in a variety of habitats including mixed woodlands, grasslands, coastal sage scrub, chaparral, sandy washes, lowlands, river floodplains, alluvial fans, playas,	**Unlikely.** While there were a few small mammal burrows present near the treatment pond at the water treatment plant, the APE and adjacent areas are very disturbed by the water treatment plant operations, landscaping, and residential areas. The treatment pond was being utilized by American bullfrogs, which would deter this species from occupying the APE. The nearest recorded

Species	Status*	Habitat	Occurrence within the APE
		alkali flats, foothills, and mountains. Vernal or seasonal pools, that hold water for a minimum of three weeks, are necessary for breeding.	observation was at a temporary pond on the opposite side of Highway SR-120 approximately 2.2 miles southwest of the APE in 1993.
Yellow breasted chat (*Icteria virens*)	CSSC	Inhabits riparian thickets of willow and other brushy tangles near watercourses. Nests in low, dense riparian vegetation, consisting of willow, blackberry, and wild grape. Forages and nests within 10 ft of ground.	**Absent.** The APE does not provide suitable riparian habitat to support this species.

***EXPLANATION OF OCCURRENCE DESIGNATIONS AND STATUS CODES**

Present:	Species observed on the APE at time of field surveys or during recent past.
Likely:	Species not observed on the APE, but it may reasonably be expected to occur there on a regular basis.
Possible:	Species not observed on the APE, but it could occur there from time to time.
Unlikely:	Species not observed on the APE, and would not be expected to occur there except, perhaps, as a transient.
Absent:	Species not observed on the APE and precluded from occurring there due to absence of suitable habitat.

STATUS CODES

FE	Federally Endangered	CE	California Endangered
FT	Federally Threatened	CCE	California Endangered (Candidate)
FPT	Federally Threatened (Proposed)	CT	California Threatened
		CFP	California Fully Protected)
		CFP	California Fully Protected
		CSSC	California Species of Special Concern

CNPS LISTING

1A	Plants presumed extinct in California.	2B	Plants rare, threatened, or endangered in California, but more common elsewhere.
1B	Plants rare, threatened, or endangered in California and elsewhere.		

3 IMPACTS AND MITIGATION

3.1 SIGNIFICANCE CRITERIA

3.1.1 CEQA

General plans, area plans, and specific projects are subject to the provisions of CEQA. The purpose of CEQA is to assess the impacts of proposed projects on the environment prior to project implementation. Impacts to biological resources are just one type of environmental impact assessed under CEQA and vary from project to project in terms of scope and magnitude. Projects requiring removal of vegetation may result in the mortality or displacement of animals associated with this vegetation. Animals adapted to humans, roads, buildings, and pets may replace those species formerly occurring on a site. Plants and animals that are rare may be destroyed or displaced. Sensitive habitats such as wetlands and riparian woodlands may be altered or destroyed. Such impacts may be considered either "significant" or "less than significant" under CEQA. According to *CEQA Statute and Guidelines* (AEP 2023), "significant effect on the environment" means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic interest. Specific project impacts to biological resources may be considered "significant" if they would:

- 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 CDFW or USFWS;
- 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 CDFW or USFWS;
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (CWA) (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- 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;
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
- Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state HCP.

Furthermore, CEQA Guidelines Section 15065(a) states that a project may trigger the requirement to make a "mandatory finding of significance" if the project has 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, reduce the number or restrict the range of an endangered, rare or threatened species, or eliminate important examples of the major periods of California history or prehistory."

3.1.2 NEPA

Federal projects are subject to the provisions of NEPA. The purpose of NEPA is to assess the effects of a proposed action on the human environment, assess the significance of those effects, and recommend measures that if implemented would mitigate those effects. As used in NEPA, a determination that certain

effects on the human environment are "significant" requires considerations of both context and intensity (40 Code of Federal Regulations (CFR) 1508.27).

For the purposes of assessing effects of an action on biological resources, the relevant context is often local. The analysis may, however, require a comparison of the action area's biological resources with the biological resources of an entire region. Project activities must have a federal nexus and discuss federally listed species, and/or designated critical habitat that may be affected in the action area.

Federal agencies are required to determine whether their actions may affect listed or proposed species and designated critical habitat. The primary role of this document is to provide agencies conclusion and the rationale to support those conclusions regarding the effects of any proposed actions of the project on protected resources. Document content and recommended elements are identified in 50 CFR 402.12(f).

Under section 7 of the Endangered Species Act, federal agencies must consult with NOAA Fisheries or the USFWS, depending on the species, through an informal or formal consultation when any action the agency carries out, funds, or authorizes may affect either a species listed as threatened or endangered under the Act, or any critical habitat designated for it.

Once resources are assessed an Endangered Species Act Section 7 finding needs to be made regarding proposed or listed species and/or designated critical habitat that may be present in the project area. This report will provide the necessary information for the lead federal agency to make a determination on affects. This finding may result in one of the following determinations:

- *"*No effect*"* - means there will be no impacts, positive or negative, to listed or proposed resources. Generally, this means no listed resources will be exposed to action and its environmental consequences. Concurrence from the Service is not required.

- *"*May affect, but not likely to adversely affect" means that all effects are beneficial, insignificant, or discountable. Beneficial effects have contemporaneous positive effects without any adverse effects to the species or habitat. Insignificant effects relate to the size of the impact and include those effects that are undetectable, not measurable, or cannot be evaluated. Discountable effects are those extremely unlikely to occur. These determinations require written concurrence from the Service.

- *"*May affect, likely to adversely affect" means that listed resources are likely to be exposed to the action or its environmental consequences and will respond in a negative manner to the exposure.

3.2 RELEVANT GOALS, POLICIES, AND LAWS

3.2.1 STANISLAUS COUNTY ORDINANCE

The Stanislaus County (or "County) General Plan contains the following goals and policies related to the project:

3.2.1.1.1 CONSERVATION/ OPEN SPACE ELEMENT

Policy 2: The County shall assure compatibility between natural areas and development by reviewing zoning regulations and landscaping requirements for compatibility between proposed development and natural areas, including protection from invasive plants and review all development requests to ensure that sensitive areas (e.g., riparian habitats, vernal pools, rare plants) are left undisturbed or that mitigation measures acceptable to appropriate state and federal agencies are included in the project.

Policy 3: The County shall assure areas of sensitive wildlife habitat and plant life (e.g., vernal pools, riparian habitats, flyways and other waterfowl habitats, etc.) including those habitats and plant species listed by state or federal agencies shall be protected from development and/or disturbance by reviewing all development requests to ensure that sensitive areas (e.g., riparian habitats, vernal pools, rare plants, flyways, etc.) are left undisturbed or that mitigation measures acceptable to appropriate state and federal agencies are included in the project, notify the State Department of Fish and Wildlife and the U.S. Fish and Wildlife Service as required by the California Native Plant Protection Act, and any ground disturbing activities on lands previously undisturbed that will potentially impact riparian habitat and/or vernal pools or other sensitive areas shall include mitigation measures for protecting that habitat, as required by the State Department of Fish and Wildlife.

Policy 29: The County shall assure Habitats of rare and endangered fish and wildlife species, including special status wildlife and plants, shall be protected by utilizing the CEQA process to ensure that development does not occur that would be detrimental to fish, plant life, or wildlife species, utilizing the California State Department of Fish and Wildlife's California Natural Diversity Data Base and the California's Native Plant Society plant lists as the primary sources of information on special status wildlife and plants, and protecting sensitive wildlife habitat and plant life through the strategies identified under Policy Three of this element.

3.2.2 THREATENED AND ENDANGERED SPECIES

Permits may be required from CDFW and/or USFWS if activities associated with a project have the potential to result in the "take" of a species listed as threatened or endangered under the California Endangered Species Act (CESA) and/or Endangered Species Act (ESA), respectively. Take is defined by CESA as, "to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill" (California Fish and Game Code, Section 86). Take is more broadly defined by the ESA to include "harm" (16 USC, Section 1532(19), 50 CFR, Section 17.3). CDFW and USFWS are responsible agencies under CEQA and NEPA. Both agencies review CEQA and NEPA documents in order to determine the adequacy of the treatment of endangered species issues and to make project-specific recommendations for their conservation.

3.2.3 DESIGNATED CRITICAL HABITAT

When species are listed as threatened or endangered, the USFWS often designates areas of "critical habitat" as defined by section 3(5)(A) of the ESA. Critical habitat is a term defined in the ESA as a specific geographic area that contains features essential for the conservation of a threatened or endangered species and that may require special management and protection. Critical habitat is a tool that supports the continued conservation of imperiled species by guiding cooperation with the federal government. Designations only affect federal agency actions or federally funded or permitted activities. Critical habitat does not prevent activities that occur within the designated area. Only activities that involve a federal permit, license, or funding and are likely to destroy or adversely modify critical habitat will be affected.

3.2.4 MIGRATORY BIRDS

The Migratory Bird Treaty Act (MBTA: 16 USC 703-712) prohibits killing, possessing, or trading in any bird species covered in one of four international conventions to which the United States is a party, except in accordance with regulations prescribed by the Secretary of the Interior. The name of the act is misleading, as it covers almost all bird's native to the United States, even those that are non-migratory. The MBTA encompasses whole birds, parts of birds, and bird nests and eggs. Additionally, California Fish and Game Code makes it unlawful to take or possess any non-game birds covered by the MBTA (Section 3513), as well as any other native non-game birds (Section 3800).

3.2.5 BIRDS OF PREY

Birds of prey are protected in California under provisions of California Fish and Game Code (Section 3503.5), which states that it is unlawful to take, possess, or destroy any birds in the order Falconiformes (hawks and eagles) or Strigiformes (owls), as well as their nests and eggs. The bald eagle and golden eagle are afforded additional protection under the Bald and Golden Eagle Protection Act (16 USC 668), which makes it unlawful to kill birds or their eggs, or take feathers or nests, without a permit issued by the U.S. Secretary of the Interior.

3.2.6 NESTING BIRDS

In California, protection is afforded to the nests and eggs of all birds. California Fish and Game Code (Section 3503) states that it is "unlawful to take, possess, or needlessly destroy the nest or eggs of any bird except as otherwise provided by this code or any regulation adopted pursuant thereto." Breeding-season disturbance that causes nest abandonment and/or loss of reproductive effort is considered a form of "take" by the CDFW.

3.2.7 WETLANDS AND OTHER "JURISDICTIONAL WATERS"

Aquatic resources, including wetlands, streams, rivers, and lakes, are among the important biological resources that are protected by local, state, and federal laws and regulations. Activities that impact these "jurisdictional waters" may be regulated and require permits which aim to avoid or minimize adverse impacts to "jurisdictional waters" to the greatest extent possible. The definition of a jurisdictional water may vary depending on the regulatory agency, and the limits of jurisdiction for each agency are described below.

The USACE, pursuant to Section 404 of the Clean Water Act (CWA), upholds a set of guidelines to regulate activities that could result in the discharge of pollutants into "waters of the United States" ("WOTUS"). The legal definition of WOTUS has significantly evolved since the passage of the CWA in 1972 as a result of administrative rulings and litigation involving federal jurisdiction over water resources. Thus, the reach and extent of USACE and United States Environmental Protection Agency (EPA) jurisdiction over aquatic features has continually been subject to revision.

The current administrative definition of WOTUS is described in the Biden Administration's 2023 "Conforming Rule." The extent of jurisdiction has been defined in the Code of Federal Regulations (CFR) but is also subject to interpretation by the federal courts. Jurisdictional waters generally include the following categories defined by section 328.3, subdivision (a) of title 33 of the CFR:

1) *Traditional Navigable Waters, the territorial seas, or interstate waters (not including interstate wetlands);*
2) *Impoundments of waters of the United States;*
3) *Tributaries of:*
    a. *Traditional Navigable Waters, territorial seas, or interstate waters (not including interstate wetlands); or*
    b. *Impoundments of water of the United States when the tributaries meet the relatively permanent standard.*
4) *Wetlands:*
    a. *Adjacent to Traditional Navigable Waters, the territorial seas, or interstate waters;*
    b. *Adjacent to and with a continuous surface connection to relatively permanent impoundments of waters of the United States*
    c. *Adjacent to and with a continuous surface connection to relatively permanent jurisdictional tributaries.*

5) *Intrastate lakes and ponds not identified in items 1 through 4 of this section that are relatively permanent, standing or continuously flowing bodies of water with a continuous surface connection to the waters identified in items 1 or 3 above.*

Exclusions under the new definition include the following:

1) *Waste treatment systems, including treatment ponds or lagoons, designed to meet the requirements of the CWA;*
2) *Prior converted cropland designated by the Secretary of Agriculture. The exclusion would cease upon a change of use, which means that the area is no longer available for the production of agricultural commodities. Notwithstanding the determination of an area's status as prior converted cropland by any other Federal agency, for the purposes of the CWA, the final authority regarding CWA jurisdiction remains with USEPA;*
3) *Ditches (including roadside ditches) excavated wholly in and draining only dry land and that do not carry a relatively permanent flow of water;*
4) *Artificially irrigated areas that would revert to dry land if the irrigation ceased;*
5) *Artificial lakes or ponds created by excavating or diking dry land to collect and retain water and which are used exclusively for such purposes as stock watering, irrigation, settling basins, or rice growing;*
6) *Artificial reflecting or swimming pools or other small ornamental bodies of water created by excavating or diking dry land to retain water for primarily aesthetic reasons;*
7) *Waterfilled depressions created in dry land incidental to construction activity and pits excavated in dry land for the purpose of obtaining fill, sand, or gravel unless and until the construction or excavation operation is abandoned and the resulting body of water meets the definition of waters of the United States; and*
8) *Swales and erosional features (e.g., gullies, small washes) characterized by low volume, infrequent, or short duration flow.*

The Department of the Army, acting through the USACE, regulates the filling or excavation of jurisdictional waters and is authorized to issue permits for activities within WOTUS under the authority of Section 404 of the CWA. The extent of jurisdiction is defined by an “ordinary high-water mark” on opposing channel banks.

The State of California also asserts jurisdiction over drainages, wetlands, and other aquatic features. The limits of State jurisdiction differ from those of the EPA and USACE, often being more inclusive of water resources. The CDFW has jurisdiction over the bed and bank of rivers, natural drainages, streams, and lakes and regulates alteration to these features pursuant to the provisions of Section 1601 and 1602 of the California Fish and Game Code. Activities to alter these features would require a Lake or Streambed Alteration Agreement from CDFW, which could include mitigation measures for aquatic and biological resources that could be affected by project activities.

The SWRCB, under the Porter-Cologne Water Quality Control Act of 1969, holds regulatory authority over activities affecting water quality of all surface water and groundwater in California, collectively known as “waters of the state.” Discharges into waters of the state that are also WOTUS require a CWA Section 401 Water Quality Certification from the appropriate regional office as a prerequisite to obtaining certain federal permits, such as a CWA Section 404 permit. Discharges into all Waters of the State, even those that are not also WOTUS, require waste discharge requirements (WDRs), or waivers of WDRs, from the RWQCB. The RWQCB also administers the Construction Storm Water Program and the federal National Pollutant Discharge Elimination System (NPDES) program. Projects that disturb one acre or more of soil must obtain a Construction General Permit under the Construction Storm Water Program. A prerequisite for this permit is the development of a Storm Water Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP

Developer. Projects that discharge wastewater, storm water, or other pollutants into a WOTUS may require an NPDES permit.

3.3 POTENTIALLY SIGNIFICANT PROJECT-RELATED IMPACTS AND MITIGATION

Species protected by California Fish and Game Code, CDFW, USFWS, CEQA, or NEPA that have the potential to be impacted by project activities including migratory nesting birds. Corresponding mitigation measures can be found below.

3.3.1 GENERAL PROJECT-RELATED IMPACTS

The project has the potential to impact a number of sensitive resources, as described in more detail in the following sections. Impacts on these resources would be a violation of state and federal laws or considered a potentially significant impact under CEQA and NEPA. Implementation of the following measures will help reduce potential impacts to these resources to a less than significant level under CEQA and NEPA and will help with complying with state and federal laws protecting these resources:

> Mitigation Measure BIO-1a (*BMPs*): The project proponent will require that all workers employ the following best management practices (BMPs) in order to avoid and minimize potential impacts to special status species:
>
> - Vehicles will observe a 15-mph speed limit while on unpaved access routes.
> - All open trenches, holes, sumps, and other excavations greater than 6-inches with sidewalls steeper than a 1:1 (45 degree) slope will have an escape ramp of earth or a non-slip material with a less than 1:1 slope or these will be covered with barrier material such that animals are unable to dig or squeeze under the barrier and become entrapped.
> - Workers will inspect areas beneath parked vehicles, equipment, and materials prior to mobilization. If special status species are detected, the individual will either be allowed to leave of its own volition or will be captured by the qualified biologist (must possess appropriate collecting/handling permits) and relocated out of harm's way to the nearest suitable habitat beyond the influence of the project work area. "Take" of a state or federal special status (rare, California Species of Special Concern, threatened, or endangered) species is prohibited without the necessary federal or state take permit(s).
> - The presence of any special status species will be reported to the project's qualified biologist, who will submit the occurrence to the CNDDB. If necessary, the biologist will report the occurrence to CDFW and/or USFWS.

3.3.2 PROJECT-RELATED MORTALITY AND/OR NEST ABANDONMENT OF MIGRATORY BIRDS, RAPTORS, AND SPECIAL STATUS BIRDS

The site and adjacent areas contain suitable nesting and foraging habitat for a variety of protected bird species, such as migratory birds and raptors. It is anticipated that during the nesting bird season, protected birds could nest on the ground or in shrubs and trees within, and adjacent to, the site and forage within the site. Protected birds located within or adjacent to the site during construction have the potential to be injured or killed by project-related activities. In addition to the direct "take" of protected birds within the site and adjacent areas, these birds nesting in these areas could be disturbed by project-related activities resulting in nest abandonment. Projects that adversely affect the nesting success of protected birds or

result in the mortality of these birds would be a violation of state and federal laws and considered a potentially significant impact under CEQA and NEPA.

While potential foraging habitat for protected birds and raptors is present on the site, suitable foraging habitat is located adjacent to the site and marginally within the vicinity of the site. Loss of the foraging habitat from implementation of the project is not considered a significant impact.

Implementation of the following measures will reduce potential impacts to protected nesting birds to a less than significant level under CEQA and NEPA and will help the project comply with state and federal laws protecting these bird species.

> Mitigation Measure BIO-2a (*Avoidance*): The project's construction activities will occur, if feasible, between September 1 and January 31 (outside of the nesting bird season) to avoid impacts to nesting birds.
>
> Mitigation Measure BIO-2b (*Pre-construction Surveys*): If activities must occur within the nesting bird season (February 1 to September 15), a qualified biologist (someone able to identify these species) will conduct a pre-construction survey for active nests within ten (10) calendar days prior to the start of construction. It will be completed within the APE, and up to 50 feet outside of the APE for nesting migratory birds and up to 450 feet outside of the APE for nesting raptors. Raptor nests are considered "active" upon the nest-building stage. If no active nests are observed, no further mitigation is required.
>
> Mitigation Measure BIO-2c (*Avoidance Buffers*): On discovery of any active nests or breeding colonies near work areas, a qualified biologist will determine appropriate avoidance buffer distances based on applicable CDFW and/or USFWS guidelines, the biology of the species, conditions of the nest(s), and the level of project disturbance.

3.3.3 PROJECT-RELATED IMPACTS TO WILDLIFE MOVEMENT CORRIDORS AND NATIVE WILDLIFE NURSERY SITES

Most of the APE does not contain features that would be likely to function as wildlife movement corridors. Furthermore, the project is located in an area regularly disturbed by humans which would discourage dispersal and migration.

The APE has suitable features (trees) that could be used by nesting birds, which are considered native wildlife nursery sites. The potential impacts to nesting birds have been addressed in Mitigation Measures BIO-2a and BIO-2b. While the treatment pond had tadpoles present, the species was determined to be the invasive species American bullfrog and not protected under CEQA or NEPA. It is unlikely other native species would utilize any features of the APE as a wildlife nursery site.

Therefore, the project would have no impact on wildlife movement corridors or other native wildlife nursery sites, and no additional mitigation measures are warranted.

3.4 SECTION 7 DETERMINATIONS

In addition to the occurrence analysis performed in Table 2 and Table 3 of this document, Table 4 summarizes project effect determinations for federally-listed species found on the CNDDB list generated on June 19, 2025, and the USFWS IPaC list generated on June 19, 2025 (see Appendix B and Appendix C, respectively), in accordance with Section 7 of the Endangered Species Act.

Table 4: Section 7 Determinations

Species	Determination	Rationale for Determination
California tiger salamander *(Ambystoma californiense)*	No effect	**Habitat absent.** No vernal pools were present for breeding and the APE was highly disturbed.
Chinese Camp brodiaea (*Brodiaea pallida*)	No effect	**Habitat absent.** The APE is outside the elevational range of this species
Colusa grass (*Neostapfia colusana*)	No effect	**Habitat absent**. Vernal pool habitat was absent within the APE and surrounding lands.
Conservancy fairy shrimp *(Branchinecta conservatio)*	No effect	**Habitat absent**. Vernal pool habitat was absent within the APE and surrounding lands.
Green sturgeon (*Acipenser medirostris*)	No effect	**Habitat absent**. Suitable aquatic habitat was absent within the APE.
Greene's tuctoria *(Tuctoria greenei)*	No effect	**Habitat absent**. Species is extirpated from the region where the APE is located, and no vernal pools were present.
Hairy Orcutt grass (*Orcuttia pilosa*)	No effect	**Habitat absent**. Vernal pool habitat was absent within the APE and surrounding lands.
Hartweg's golden sunburst (*Pseudobahia bahifolia*)	No effect	**Habitat absent**. Foothill grassland and cismontane woodland habitat with clay soil were absent within the APE and surrounding lands.
Hoover's spurge (*Euphorbia hooveri*)	No effect	**Habitat absent**. Vernal pool habitat was absent within the APE and surrounding lands.
Least Bell's vireo (*Vireo bellii pusillus*)	No effect	**Habitat absent.** APE is outside of the known distribution range of this species.
Monarch butterfly (*Danaus plexippus*)	No effect	**Habitat absent.** While the site contained possible roosting habitat, it was marginal and highly disturbed from the development within and adjacent to the APE. No milkweed was present within and adjacent to the APE. Additionally, the site is outside of the overwintering range for this species.
Northwestern pond turtle (*Actinemys marmorata*)	No effect	**Habitat absent**. The upland and aquatic habitat this species could use included the lawn surrounding the treatment pond for basking, however, the pond was almost empty during the survey and was concrete-lined with constant landscaping in the immediate vicinity.
San Joaquin kit fox (*Vulpes macrotis mutica*)	No effect	**Habitat absent.** The APE and surrounding areas contained disturbed grassland habitat that can be used for denning and foraging but this species would not be expected to occupy the APE due to the distance from the nearest satellite population.
San Joaquin Valley Orcutt grass *(Orcuttia inaequalis)*	No effect	**Habitat absent**. Vernal pool habitat was absent within the APE and surrounding lands.
Steelhead – Central Valley DPS (*Oncorhynchus mykiss irideus* pop.11)	No effect	**Habitat absent.** Riverine habitat and historically anadromous streams were absent within the APE.

Species	Determination	Rationale for Determination
Succulent owl's-clover (*Castilleja campestris* var. *succulenta*)	No effect	**Habitat absent**. Vernal pool habitat was absent within the APE and surrounding lands.
Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*)	No effect	**Habitat absent**. Elderberry plants were absent from the APE and surrounding lands.
Vernal pool fairy shrimp (*Branchinecta lynchi*)	No effect	**Habitat absent**. Vernal pool habitat was absent within the APE and surrounding lands.
Vernal pool tadpole shrimp (*Lepidurus packardi*)	No effect	**Habitat absent**. Vernal pool habitat was absent within the APE and surrounding lands.
Western spadefoot (*Spea hammondii*)	No effect	**Habitat absent.** The APE and surrounding areas contained aquatic and upland habitat this species could utilize but is highly disturbed.

3.5 LESS THAN SIGNIFICANT PROJECT-RELATED IMPACTS

3.5.1 PROJECT-RELATED IMPACTS TO SPECIAL STATUS PLANT SPECIES ABSENT FROM, OR UNLIKELY TO OCCUR ON, THE PROJECT SITE

Of the 28 regionally occurring special status plant species, all 28 are considered absent from or unlikely to occur within the APE due to past or ongoing disturbance and/or the absence of suitable habitat.

Since it is unlikely that these species would occur onsite, implementation of the project should have no impact on these 28 special status species through construction mortality, disturbance, or loss of habitat. Mitigation measures are not warranted.

3.5.2 PROJECT-RELATED IMPACTS TO SPECIAL STATUS ANIMAL SPECIES ABSENT FROM, OR UNLIKELY TO OCCUR ON, THE PROJECT SITE

Of the 23 regionally occurring special status animal species, all 23 are considered absent from or unlikely to occur within the APE due to past or ongoing disturbance and/or the absence of suitable habitat.

Since it is unlikely that these species would occur onsite, implementation of the project should have no impact on these 23 special status species through construction mortality, disturbance, or loss of habitat. Mitigation measures are not warranted.

3.5.3 PROJECT-RELATED IMPACTS TO RIPARIAN HABITAT AND NATURAL COMMUNITIES OF SPECIAL CONCERN

Riparian habitat is absent from the APE and adjacent lands. There are no CNDDB-designated "natural communities of special concern" recorded within the APE or surrounding lands. Mitigation is not warranted.

3.5.4 PROJECT-RELATED IMPACTS TO REGULATED WATERS, WETLANDS, AND WATER QUALITY

Typical wetlands, vernal pools, and other waters were absent from the APE. There are no designated wild and scenic rivers within the project site; therefore, the project would not result in direct impacts to wild and scenic rivers. Mitigation measures are not warranted.

3.5.5 PROJECT-RELATED IMPACTS TO CRITICAL HABITAT

Greene's tuctoria critical habitat was located 1.2 miles northeast of APE center. Since no project activities are expected to impact this critical habitat, no mitigation measures are required.

3.5.6 LOCAL POLICIES OR HABITAT CONSERVATION PLANS

The project appears to be consistent with the goals and policies of the Stanislaus County General Plan. There are no known HCPs or NCCPs in the project vicinity. Mitigation measures are not warranted

3.5.7 COASTAL ZONE AND COASTAL BARRIERS RESOURCES ACT

The project would not be located within the coastal zone. The project would not impact or be located within or near the Coastal Barrier Resources System or its adjacent wetlands, marshes, estuaries, inlets, and near-shore waters. Mitigation measures are not warranted.

3.5.8 PROJECT-RELATED IMPACT TO ESSENTIAL FISH HABITAT

Essential Fish Habitat (EFH) and Habitat Areas of Particular Concern are absent from the project site and surrounding lands, and consultation with the National Marine Fisheries Service (NMFS) would not be required. Query results of the NMFS EHF Mapper can be found in Appendix E at the end of this document. Mitigation measures are not warranted.

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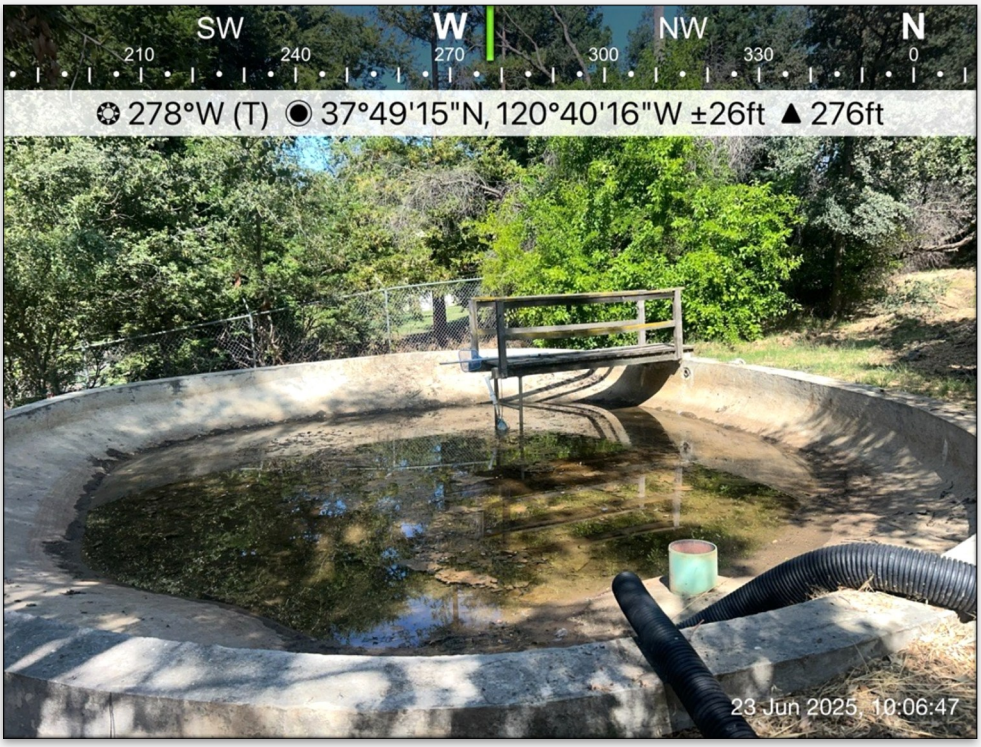
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APPENDIX A: REPRESENTATIVE PHOTOS OF THE APE



Photograph 1

An overview of the structures at the water treatment plant within the APE. The maintained grass, occasional weeds, and planted trees were present in the ruderal habitat.



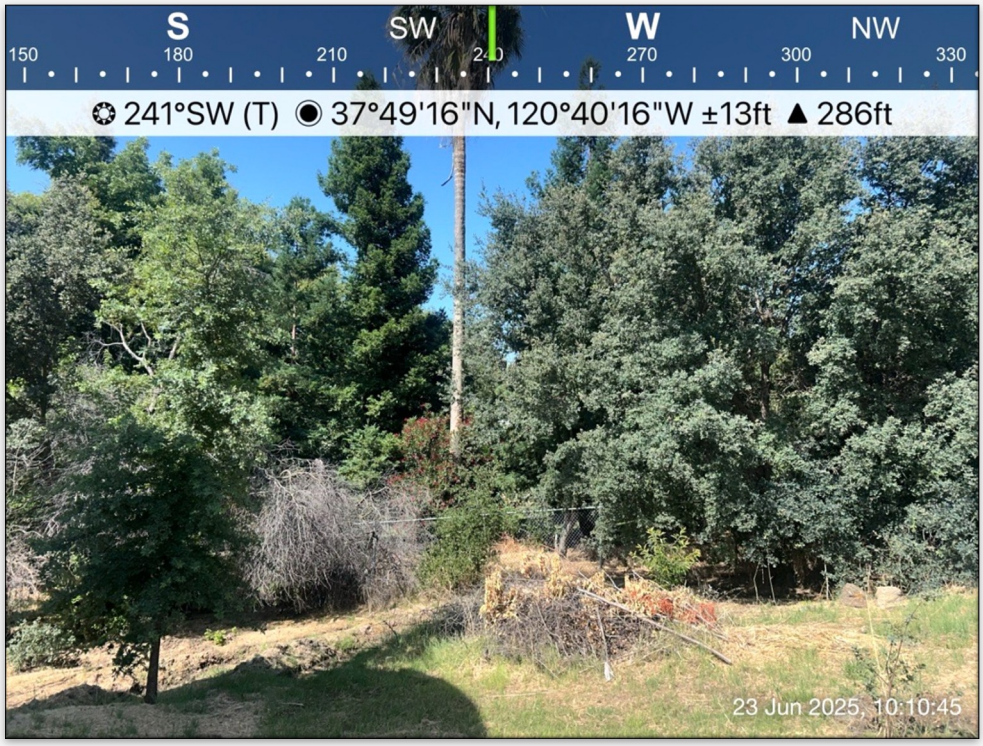
Photograph 2

The concrete-lined treatment pond with shallow water, fibrous algal material, American bullfrog tadpoles, and window skimmers.



Photograph 3

An overview of the rolling hills, mowed lawn, and water treatment structures from the southeastern edge facing the center of the APE.



Photograph 4

Overview of the southwestern edge where the water treatment plant and a private residence share a fence line., which is highly vegetated by a variety of tree species.



Photograph 5

Overview of the APE's center from the northeastern edge. Includes water tanks, various water treatment structures, the mowed lawn, and a Peruvian pepper tree occupied this area.



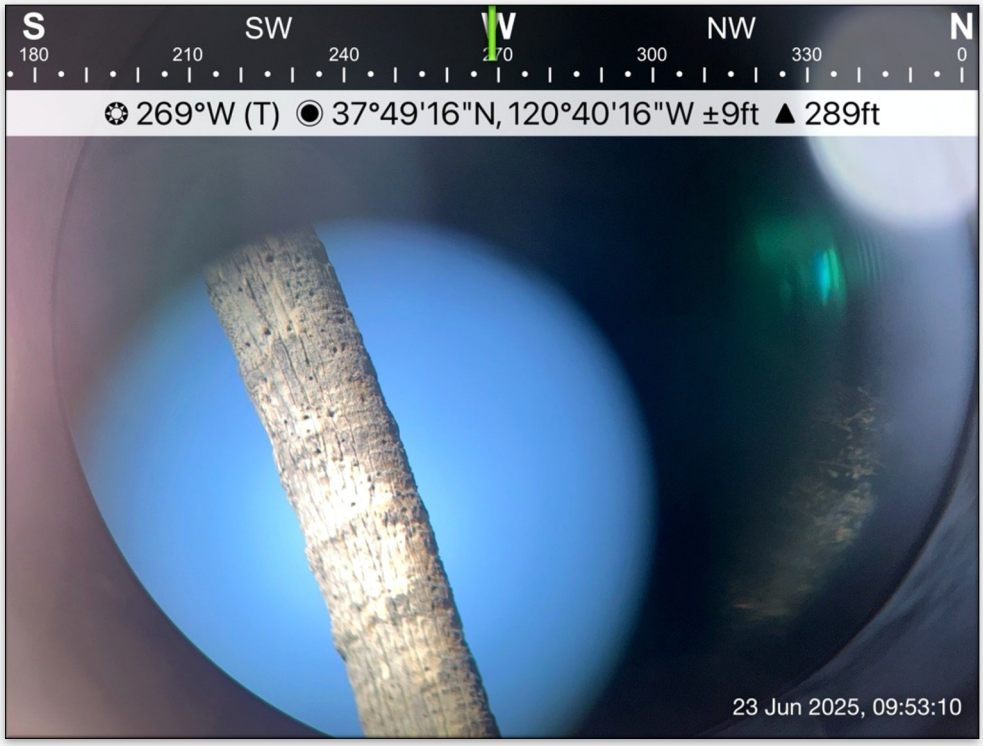
Photograph 6

A northwestern overview of Lynde Street, which runs parallel to the northwestern edge of the APE. Includes the entrance of the water treatment plant, adjacent private residences, and the beginning of the non-native annual grassland.



Photograph 7

An overview of the non-native annual grassland that occupies the northeastern edge of the APE. This area was dominated by wild slender oat with oaks dispersed further north. The area had pastures from private properties.



Photograph 8

A close view of the cavities created by acorn woodpeckers on one of the palm trees along the fence line between the water treatment plant and a private property along the APE's southwestern edge.



Photograph 9

A south/southeastern overview of Lynde Street, which runs parallel to the northwestern edge of the APE. Includes adjacent private residences, the fence line of the water treatment plant, and oaks lining the road further south.



Photograph 10

A small mammal burrow observed adjacent to the treatment pond in the southern corner of the APE. While partially collapsed and unoccupied during the survey, it is likely to have been created by Botta's pocket gopher.



Photograph 11

The man-made "trenches" observed at the southwest edge of the APE and were extended to the east.



Photograph 12

One of the two uncovered holes within the non-native annual grassland. It likely supported a utility pole in the past but was unoccupied and covered in spider web-bing during the survey.

APPENDIX B: CNDDB 9-QUAD SPECIES LIST

Selected Elements by Common Name

California Department of Fish and Wildlife

California Natural Diversity Database

Query Criteria: Quad IS (Bachelor Valley (3712087) OR Copperopolis (3712086) OR New Melones Dam (3712085) OR Oakdale (3712077) OR Knights Ferry (3712076) OR Keystone (3712075) OR Waterford (3712067) OR Paulsell (3712066) OR Cooperstown (3712065))

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
American bumble bee *Bombus pensylvanicus*	IIHYM24260	None	None	G3G4	S2	
bald eagle *Haliaeetus leucocephalus*	ABNKC10010	Delisted	Endangered	G5	S3	FP
beaked clarkia *Clarkia rostrata*	PDONA050Y0	None	None	G2G3	S2S3	1B.3
burrowing owl *Athene cunicularia*	ABNSB10010	None	Candidate Endangered	G4	S2	SSC
Button's Sierra sideband *Monadenia mormonum buttoni*	IMGASC7071	None	None	G2T1T2	S1S2	
California floater *Anodonta californiensis*	IMBIV04220	None	None	G3	S2?	
California horned lark *Eremophila alpestris actia*	ABPAT02011	None	None	G5T4Q	S4	WL
California linderiella *Linderiella occidentalis*	ICBRA06010	None	None	G2G3	S2S3	
California tiger salamander - central California DPS *Ambystoma californiense pop. 1*	AAAAA01181	Threatened	Threatened	G2G3T3	S3	WL
Chinese Camp brodiaea *Brodiaea pallida*	PMLIL0C0C0	Threatened	Endangered	G1	S1	1B.1
Colusa grass *Neostapfia colusana*	PMPOA4C010	Threatened	Endangered	G1	S1	1B.1
Congdon's lomatium *Lomatium congdonii*	PDAPI1B0B0	None	None	G2	S2	1B.2
Crotch's bumble bee *Bombus crotchii*	IIHYM24480	None	Candidate Endangered	G2	S2	
dwarf downingia *Downingia pusilla*	PDCAM060C0	None	None	GU	S2	2B.2
forked hare-leaf *Lagophylla dichotoma*	PDAST5J070	None	None	G2	S2	1B.1
green sturgeon - southern DPS *Acipenser medirostris pop. 1*	AFCAA01031	Threatened	None	G2T1	S1	SSC
Greene's tuctoria *Tuctoria greenei*	PMPOA6N010	Endangered	Rare	G1	S1	1B.1
hairy Orcutt grass *Orcuttia pilosa*	PMPOA4G040	Endangered	Endangered	G1	S1	1B.1

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
hardhead *Mylopharodon conocephalus*	AFCJB25010	None	None	G3	S3	SSC
Hartweg's golden sunburst *Pseudobahia bahiifolia*	PDAST7P010	Endangered	Endangered	G1	S1	1B.1
Henderson's bent grass *Agrostis hendersonii*	PMPOA040K0	None	None	G2Q	S2	3.2
hirsute Sierra sideband *Monadenia mormonum hirsuta*	IMGASC7072	None	None	G2T1	S1	
hoary bat *Lasiurus cinereus*	AMACC05032	None	None	G3G4	S4	
Hoover's calycadenia *Calycadenia hooveri*	PDAST1P040	None	None	G2	S2	1B.3
Hoover's cryptantha *Cryptantha hooveri*	PDBOR0A190	None	None	GH	SH	1A
Hoover's spurge *Euphorbia hooveri*	PDEUP0D150	Threatened	None	G1	S1	1B.2
least Bell's vireo *Vireo bellii pusillus*	ABPBW01114	Endangered	Endangered	G5T2	S3	
Mariposa cryptantha *Cryptantha mariposae*	PDBOR0A1Q0	None	None	G2G3	S2S3	1B.3
Merced monardella *Monardella leucocephala*	PDLAM180C0	None	None	GX	SX	1A
North American porcupine *Erethizon dorsatum*	AMAFJ01010	None	None	G5	S3	
Northern Hardpan Vernal Pool *Northern Hardpan Vernal Pool*	CTT44110CA	None	None	G3	S3.1	
northwestern pond turtle *Actinemys marmorata*	ARAAD02031	Proposed Threatened	None	G2	SNR	SSC
pallid bat *Antrozous pallidus*	AMACC10010	None	None	G4	S3	SSC
Patterson's navarretia *Navarretia paradoxiclara*	PDPLM0C150	None	None	G2	S2	1B.3
Rawhide Hill onion *Allium tuolumnense*	PMLIL022W0	None	None	G2	S2	1B.2
Red Hills cryptantha *Cryptantha spithamaea*	PDBOR0A2M2	None	None	G2	S2	1B.3
Red Hills ragwort *Senecio clevelandii var. heterophyllus*	PDAST8H0R2	None	None	G4?T2Q	S2	1B.2
Red Hills roach *Hesperoleucus symmetricus serpentinus*	AFCJB19028	None	None	GNRT1	S1	SSC
Red Hills soaproot *Chlorogalum grandiflorum*	PMLIL0G020	None	None	G3	S3	1B.2

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Red Hills vervain *Verbena californica*	PDVER0N050	Threatened	Threatened	G2	S2	1B.1
San Joaquin Valley giant flower-loving fly *Rhaphiomidas trochilus*	IIDIP05010	None	None	G1	S1	
San Joaquin Valley Orcutt grass *Orcuttia inaequalis*	PMPOA4G060	Threatened	Endangered	G1	S1	1B.1
shaggyhair lupine *Lupinus spectabilis*	PDFAB2B3P0	None	None	G2	S2	1B.2
silver-haired bat *Lasionycteris noctivagans*	AMACC02010	None	None	G3G4	S3S4	
spicate calycadenia *Calycadenia spicata*	PDAST1P090	None	None	G3?	S3	1B.3
spiny-sepaled button-celery *Eryngium spinosepalum*	PDAPI0Z0Y0	None	None	G2	S2	1B.2
Stanislaus harvestman *Calicina breva*	ILARAU8020	None	None	G1	S1	
Stanislaus monkeyflower *Erythranthe marmorata*	PDPHR01130	None	None	G2?	S2?	1B.1
steelhead - Central Valley DPS *Oncorhynchus mykiss irideus pop. 11*	AFCHA0209K	Threatened	None	G5T2Q	S2	SSC
stinkbells *Fritillaria agrestis*	PMLIL0V010	None	None	G3	S3	4.2
succulent owl's-clover *Castilleja campestris var. succulenta*	PDSCR0D3Z1	Threatened	Endangered	G4?T2T3	S2S3	1B.2
Swainson's hawk *Buteo swainsoni*	ABNKC19070	None	Threatened	G5	S4	
tongue-leaf copper moss *Scopelophila cataractae*	NBMUS6U010	None	None	G3G4	S1	2B.2
Townsend's big-eared bat *Corynorhinus townsendii*	AMACC08010	None	None	G4	S2	SSC
tricolored blackbird *Agelaius tricolor*	ABPBXB0020	None	Threatened	G1G2	S2	SSC
Tuolumne button-celery *Eryngium pinnatisectum*	PDAPI0Z0P0	None	None	G2	S2	1B.2
valley elderberry longhorn beetle *Desmocerus californicus dimorphus*	IICOL48011	Threatened	None	G3T3	S3	
veiny monardella *Monardella venosa*	PDLAM18082	None	None	G1	S1	1B.1
vernal pool fairy shrimp *Branchinecta lynchi*	ICBRA03030	Threatened	None	G3	S3	
vernal pool tadpole shrimp *Lepidurus packardi*	ICBRA10010	Endangered	None	G3	S3	

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
western mastiff bat *Eumops perotis californicus*	AMACD02011	None	None	G4G5T4	S3S4	SSC
western red bat *Lasiurus frantzii*	AMACC05080	None	None	G4	S3	SSC
western spadefoot *Spea hammondii*	AAABF02020	Proposed Threatened	None	G2G3	S3S4	SSC
yellow-breasted chat *Icteria virens*	ABPBX24010	None	None	G5	S4	SSC
Yuma myotis *Myotis yumanensis*	AMACC01020	None	None	G5	S4	

Record Count: 65

APPENDIX C: IPAC SPECIES LIST

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Sacramento Fish And Wildlife Office
Federal Building
2800 Cottage Way, Room W-2605
Sacramento, CA 95825-1846
Phone: (916) 414-6600 Fax: (916) 414-6713

In Reply Refer To: 06/19/2025 20:59:51 UTC
Project Code: 2025-0111852
Project Name: Knights Ferry Community Services District Surface Water Treatment Plant Improvement Project

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see https://www.fws.gov/program/migratory-bird-permit/what-we-do.

It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see https://www.fws.gov/library/collections/threats-birds.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit https://www.fws.gov/partner/council-conservation-migratory-birds.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of

this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Sacramento Fish And Wildlife Office
Federal Building
2800 Cottage Way, Room W-2605
Sacramento, CA 95825-1846
(916) 414-6600

PROJECT SUMMARY

Project Code: 2025-0111852

Project Name: Knights Ferry Community Services District Surface Water Treatment Plant Improvement Project

Project Type: Wastewater Facility - Maintenance / Modification

Project Description: The Project proposes to construct improvements and/or replace exist infrastructure at the Knights Ferry Water Treatment Plant. The Project proposes to add a package style water filtration system that includes an up-flow adsorption clarifier adjacent to a mixed media filter, such as the Tri-Mite Package Water Treatment Plant (Tri-Mite) system. The Tri-Mite treatment technology has been demonstrated to satisfy the operational and performance requirements necessary to be accepted as an alternative filtration technology under the California Surface Water Treatment Rule (CSWTR), in CCR, Title 22, Section 64665 (CCR, 2000).

The Project would include installation of the Tri-Mite treatment system as well as a pumping station to allow sufficient flow among the treatment system and for adequate storage to meet maximum day demand and fire flow. The existing 30,000-gallon storage tank onsite, which has been inoperable, would be demolished as part of the Project. With installation of the Tri-Mite system, the existing flocculation and sedimentation, chlorine contact tanks, and existing multi-media filters would no longer be necessary and would be demolished as well. Other improvements would include site modifications for safety and efficient operations such as parking and onsite security measures with lighting as needed.

Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@37.821248999999995,-120.67119683846605,14z



Counties: Stanislaus County, California

ENDANGERED SPECIES ACT SPECIES

There is a total of 11 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

---

1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
San Joaquin Kit Fox *Vulpes macrotis mutica* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/2873	Endangered

REPTILES

NAME	STATUS
Northwestern Pond Turtle *Actinemys marmorata* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1111	Proposed Threatened

AMPHIBIANS

NAME	STATUS
California Tiger Salamander *Ambystoma californiense* Population: U.S.A. (Central CA DPS) There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/2076	Threatened
Western Spadefoot *Spea hammondii* Population: Northern DPS No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/5425	Proposed Threatened

INSECTS

NAME	STATUS
Monarch Butterfly *Danaus plexippus* There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened
Valley Elderberry Longhorn Beetle *Desmocerus californicus dimorphus* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/7850	Threatened

CRUSTACEANS

NAME	STATUS
Conservancy Fairy Shrimp *Branchinecta conservatio* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8246	Endangered
Vernal Pool Fairy Shrimp *Branchinecta lynchi* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/498	Threatened

NAME	STATUS
Vernal Pool Tadpole Shrimp *Lepidurus packardi*	Endangered

There is **final** critical habitat for this species. Your location does not overlap the critical habitat.
Species profile: https://ecos.fws.gov/ecp/species/2246

FLOWERING PLANTS

NAME	STATUS
Colusa Grass *Neostapfia colusana*	Threatened

There is **final** critical habitat for this species. Your location does not overlap the critical habitat.
Species profile: https://ecos.fws.gov/ecp/species/5690

Hartweg's Golden Sunburst *Pseudobahia bahiifolia*	Endangered

No critical habitat has been designated for this species.
Species profile: https://ecos.fws.gov/ecp/species/1704

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Olivia Arredondo
Address: 455 W. Fir Ave.
City: Clovis
State: CA
Zip: 93611
Email oarredondo@ppeng.com
Phone: 8312970074

APPENDIX D: NRCS WEB SOIL SURVEY REPORT

Soil Map—Stanislaus County, California, Northern Part
(Knights Ferry - W Treatment Plant)



Map Scale: 1:618 if printed on A portrait (8.5" x 11") sheet.

N

Meters
0 5 10 20 30

Feet
0 30 60 120 180

Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 10N WGS84

MAP LEGEND

Area of Interest (AOI)
- Area of Interest (AOI)

Soils
- Soil Map Unit Polygons
- Soil Map Unit Lines
- Soil Map Unit Points

Special Point Features
- Blowout
- Borrow Pit
- Clay Spot
- Closed Depression
- Gravel Pit
- Gravelly Spot
- Landfill
- Lava Flow
- Marsh or swamp
- Mine or Quarry
- Miscellaneous Water
- Perennial Water
- Rock Outcrop
- Saline Spot
- Sandy Spot
- Severely Eroded Spot
- Sinkhole
- Slide or Slip
- Sodic Spot
- Spoil Area
- Stony Spot
- Very Stony Spot
- Wet Spot
- Other
- Special Line Features

Water Features
- Streams and Canals

Transportation
- Rails
- Interstate Highways
- US Routes
- Major Roads
- Local Roads

Background
- Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:24,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL:
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Stanislaus County, California, Northern Part
Survey Area Data: Version 16, Sep 8, 2024

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Mar 11, 2022—May 30, 2022

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
5013	Miltonhills-Amador complex, 15 to 45 percent slopes	0.9	100.0%
Totals for Area of Interest		**0.9**	**100.0%**

APPENDIX E: NMFS EFH MAPPER

EFH Mapper Report

EFH Data Notice

Essential Fish Habitat (EFH) is defined by textual descriptions contained in the fishery management plans developed by the regional fishery management councils. In most cases mapping data can not fully represent the complexity of the habitats that make up EFH. This report should be used for general interest queries only and should not be interpreted as a definitive evaluation of EFH at this location. A location-specific evaluation of EFH for any official purposes must be performed by a regional expert. Please refer to the following links for the appropriate regional resources.

West Coast Regional Office

Query Results

Degrees, Minutes, Seconds: Latitude = 37º 49' 16" N, Longitude = 121º 19' 44" W
Decimal Degrees: Latitude = 37.821, Longitude = -120.671

The query location intersects with spatial data representing EFH and/or HAPCs for the following species/management units.

EFH

No additional Essential Fish Habitats (EFH) were identified at the report location.

Pacific Salmon EFH

Link	HUC Name	Species/Management Unit	Lifestage(s) Found at Location	Management Council	FMP
	Upper Stanislaus - Below Goodwin	Chinook Salmon	All	Pacific	Pacific Coast Salmon Plan

Atlantic Salmon

No Atlantic Salmon were identified at the report location.

HAPCs

No Habitat Areas of Particular Concern (HAPC) were identified at the report location.

EFH Areas Protected from Fishing

No EFH Areas Protected from Fishing (EFHA) were identified at the report location.

Spatial data does not currently exist for all the managed species in this area. The following is a list of species or management units for which there is no spatial data. ****For links to all EFH text descriptions see the complete data inventory: open data inventory -->**
Pacific Coastal Pelagic Species, Jack Mackerel, Pacific (Chub) Mackerel, Pacific Sardine, Northern Anchovy - Central Subpopulation, Northern Anchovy - Northern Subpopulation, **Pacific Highly Migratory Species**, Bigeye Thresher Shark - North Pacific,

Spatial data does not currently exist for all the managed species in this area. The following is a list of species or management units for which there is no spatial data. ****For links to all EFH text descriptions see the complete data inventory: open data inventory -->**
Bluefin Tuna - Pacific, Dolphinfish (Dorado or Mahimahi) - Pacific, Pelagic Thresher Shark - North Pacific, Swordfish - North Pacific

Appendix C – Phase I Cultural Resources Assessment

Phase I Cultural Resources Assessment for the Knights Ferry Community Services District Project, Knights Ferry, Stanislaus County, California

Consuelo Y. Sauls

Prepared By

Taylored Archaeology
6083 N. Figarden Dr., Ste 616
Fresno, CA 93722

Prepared For
Provost & Pritchard Consulting Group
455 W. Fir Ave
Clovis, CA 93611

August 2025

USGS Knights Ferry, California 7.5' topographic quadrangle
0.90-acres approximately; Intensive pedestrian survey of the APE
Keywords: Knights Ferry District (P-50-000545) and Outhouse (P-50-000082)

EXECUTIVE SUMMARY

Taylored Archaeology completed a Phase I Cultural Resources Assessment for the Knights Ferry Community Services District Project (Project) in Knights Ferry, a census-designated place, in Stanislaus County, California. The Project is seeking Drinking Water State Revolving funding from the United States Environmental Protection Agency (EPA). The Project proposes to construct improvements and/or replace exist infrastructure at the Knights Ferry Water Treatment Plant (WTP). The Project proposes to add a package style water filtration system that includes an up-flow adsorption clarifier adjacent to a mixed media filter, such as the Tri-Mite Package Water Treatment Plant (Tri-Mite) system.

To meet federal and state standards, Taylored Archaeology completed a cultural resources assessment under contract with Provost & Pritchard Consulting Group to identify potential historic properties within the Area of Potential Effects (APE). The investigation consisted of (1) a records search from the Central California Information Center (SSJVIC) of the California Historical Resources Information System (CHRIS), (2) archival research, (3) a search of the Native American Heritage Commission's (NAHC) Sacred Lands File, a request for Native American local contact information, and nongovernmental Native American outreach; (4) an archaeological pedestrian survey of the APE; and (5) preparation of the California Department of Parks and Recreation (DPR) 523 series cultural resource record forms.

The CCAIC reported two cultural resources that were previously recorded within the APE and 38 within a ½-mile radius of the APE. The CCAIC also reported that three cultural resources studies were previously conducted within the APE and 13 within the ½ mile buffer. The two previously recorded cultural resources within the APE were P-50-000082 and P-50-0000545. P-50-000082 is the KFCSD's outbuilding and is within the APE. This resource is a former pre-1930's outhouse which was relocated to the APE in 1970, placed on a concrete slab, and expanded to serve as a storage shed (Francis 1996). The storage shed was previously recorded but not evaluated for inclusion in the NRHP or the CRHR. P-50-0000545 is the Knights Ferry District which covers the entire town including the Project APE. This district is listed on the NRHP and is also a California State Registered Landmark.

The NAHC's Sacred Lands File search results were positive and outreach to Native American representatives listed by the NAHC resulted in six responses. The Amah Mutsun Tribal Band stated the Project is outside the tribe's territory and had no further comment. The Northern Valley Yokut/Ohlone Tribe stated they would like to consult on the Project; the area is culturally sensitive and requested a cultural awareness training and archaeological and Native American monitoring during ground disturbing activities. The Wilton Rancheria Department of Cultural Preservation stated the Project area is within their ancestral territory but the tribe has no comments. The Calaveras Band of Mi-Wuk Indians stated the area is of great importance and ground disturbance should be carefully examined. The Ione Bank of Miwok Indians state they had no comment. Finally, the THPO of the Buena Vista Rancheria of Me-Wuk Indians deferred to more

local tribes near the Project site and asked to be contacted if cultural resources are discovered during construction.

No prehistoric resources were found on the ground surface in the APE during the pedestrian survey. One previously recorded cultural resource (storage shed/P-50-000082) was confirmed present and intact with no modification since its previous recording. Taylored Archaeology did not discover any other historic-era resources during the pedestrian survey. According to the Project description, the storage shed will remain in place with no proposed modifications.

The undertaking is anticipated to result in a finding of no historic properties affected under Section 106 of the NHPA.

Based on the results of this investigation, Taylored Archaeology recommends the following best management practices be implemented during Project construction:

- Should the storage shed (P-50-000082) is moved or changed in any way, the resource should be further recorded and evaluated by a qualified architectural historian.

- If previously unidentified archaeological resources are encountered during development or ground-moving activities in the APE, all work should be halted until a qualified archaeologist can identify the discovery and assess its significance.

- If human remains are uncovered during construction, the local county coroner is to be notified to investigate the remains and arrange proper treatment and disposition. If the remains are identified on the basis of archaeological context, age, cultural associations, or biological traits to be those of a Native American, California Health and Safety Code 7050.5 and PRC 5097.98 require that the coroner notify the NAHC within 24 hours of discovery. The NAHC will then identify the Most Likely Descendent who will be afforded an opportunity to make recommendations regarding the treatment and disposition of the remains.

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1
INTRODUCTION

Taylored Archaeology performed a Phase I Cultural Resources Assessment for the Knights Ferry Community Services District (CSD) Project (Project) in Knights Ferry, a census-designated place, in Stanislaus County, California under contract to Provost & Pritchard Consulting Group. The Project is seeking Drinking Water State Revolving funding from the United States Environmental Protection Agency (EPA). As such, the CSD must comply with Section 106 of the National Historic Preservation Act (NHPA). Environmental review for the Project under the California Environmental Quality Act (CEQA) has already been completed. Because the Project will use federal funds, it is considered an undertaking subject to the requirements of the NHPA and 36 Code of Federal Regulations (CFR) 800. U.S. EPA is the lead federal agency for this undertaking responsible for compliance with Section 106.

1.1 PROJECT LOCATION AND DESCRIPTION

The Project is located approximately 30 miles east of the city of Modesto along the Stanislaus River and approximately 1 mile north of Highway 182 and 108. The Project APE is along Lynde Street in Knights Ferry, Stanislaus County, California (Figure 1-1). The APE is on the U.S. Geological Survey (USGS) 7.5-minute Knights Ferry, California, topographic quadrangle in Township 1 South, Range 12 East, Mount Diablo Base and Meridian (Figure 1-2).

The Project proposes to construct improvements and/or replace exist infrastructure at the Knights Ferry Water Treatment Plant (WTP). The Project proposes to add a package style water filtration system that includes an up-flow adsorption clarifier adjacent to a mixed media filter, such as the Tri-Mite Package Water Treatment Plant (Tri-Mite) system.

The Project would include installation of the Tri-Mite treatment system as well as a pumping station to allow sufficient flow among the treatment system and for adequate storage to meet maximum day demand and fire flow. The existing 30,000-gallon storage tank onsite, which has been inoperable, would be demolished as part of the Project. With installation of the Tri-Mite system, the existing flocculation and sedimentation, chlorine contact tanks, and existing multi-media filters would no longer be necessary and would be demolished as well. Other improvements would include site modifications for safety and efficient operations such as parking and onsite security measures with lighting as needed.

The Project includes the following components:

- Installation of the Tri-Mite packaged filter system consisting of one (1) 80-gpm unit
- A transfer pumping station
- Cleaning and recoating of the existing 110,000-gallon storage tank
- Installations of 100,000-gallon storage tank (for finished water)

- Construction of a chemical storage and filter building
- A high service pumping station
- A backwash pumping station
- Demolition of the existing 30,000-gallon finished water storage tank
- Demolition of the existing flocculation and sedimentation tanks
- Demolition of the existing CT tanks
- Demolition of the existing multi-media filters
- Disposal of disconnected water treatment infrastructure (i.e., the abandoned clarifier)

The following components/existing infrastructure would remain in place:

- The raw water intake pump station
- Raw water supply lines to the plant
- 5,000-gallon raw water storage tank
- The building housing the multi-media filters
- Residuals management system (sludge drying bed)
- Existing 110,000-gallon finished water storage tank
- Standby generator
- Existing storage shed

The Area of Potential Effects (APE) of an undertaking is defined in 36 CFR 800.16 (d) as the "geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking." The total horizontal APE is estimated to be 0.90 acres (Figure 1-3) and encompasses the construction footprint. The vertical APE is anticipated to be up to 10 feet below ground surface for pipeline trenching.

1.2 REGULATORY SETTING

In this report "cultural resources" are defined as prehistoric or historical archaeological sites as well as historical objects, buildings, or structures. In accordance with 30 Code of Federal Regulations (CFR) §60.4, "historical" in this report applies to cultural resources which are at least 50 years old. The significance or importance of a cultural resource is dependent upon whether the resource qualifies for inclusion at the local or state level in the California Register of Historical Resources (CRHR), or at the federal level in the National Register of Historic Places (NRHP). Cultural resources that are determined to be eligible for inclusion in the CRHR are called "historical resources" (California Code of Regulations [CCR] 15064.5[a]). Under this statue the determination of eligibility is partially based on the consideration of the criteria of significance as defined in 14 CCR 15064.5(a)(3). Cultural resources eligible for inclusion in the NRHP are deemed "historic properties".

1.2.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT

Pursuant to CEQA, a historical resource is a resource listed in, or determined to be eligible for listing in, the CRHR. Historical resources may include, but are not limited to, "any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically or archaeologically significant" (PRC §5020.1[j]). In addition, a resource included in a local register of historical resources or identified as significant in a local survey conducted in accordance with the state guidelines are also considered historic resources under California Public Resources Code (PRC) Section 5020.1.

CEQA details appropriate measures for the evaluation and protection of cultural resources in §15064.5 of the CEQA Guidelines. According to CEQA guidelines §15064.5 (a)(3), criteria for listing on the CRHR includes the following:

> *(1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.*
> *(2) Is associated with the lives of persons important in our past.*
> *(3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.*
> *(4) Has yielded, or may be likely to yield, information important in prehistory or history.*

According to CEQA guidelines §21074 (a)(1), criteria for tribal cultural resources includes the following:

> *(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:*
> *(A) included or determined to be eligible for inclusion in the California Register of Historical Resources.*
> *(B) included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.*

Protection of cultural resources within California is additionally regulated by PRC §5097.5, which prohibits destruction, defacing, or removal of any historic or prehistoric cultural features on land under the jurisdiction of State or local authorities.

1.2.2 NATIONAL HISTORIC PRESERVATION ACT OF 1966

The National Historic Preservation Act (NHPA) (16 U.S.C. 470 ET SEQ.) was enacted in 1966 and created a national policy of historic preservation. The law established several programs, administered by the Secretary of the Interior, to encourage the achievement of preservation goals at local, state, and federal levels. The NHPA authorized the creation and expansion of the National Register of Historic Places (NRHP), formed the position of State Historic Preservation Officer (SHPO), allowed for the creation of State Review Boards to set up methods for local

governments to enact the NHPA at a local level, assisted Native American tribes with preserving their heritage, and established the Advisory Council on Historic Preservation (ACHP).

The NHPA established criteria for determining if a historic property is eligible for inclusion in the NRHP. These criteria are set forth in 36 CFR 60.4 as follows:

> *The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and*
>
> *(A) that are associated with events that have made a significant contribution to the broad patterns of our history; or*
>
> *(B) that are associated with the lives of persons significant in our past; or*
>
> *(C) that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or*
>
> *(D) that have yielded, or may be likely to yield, information important in prehistory or history.*

1.2.3 SECTION 106 OF NHPA

Section 106 of NHPA states that any federal agency with direct or indirect jurisdiction over federally assisted or proposed federal action will take into account the effect the action will have on any historic property that is on, or eligible to be included in, the NRHP. The NHPA provides the Advisory Council on Historic Preservation and the relevant SHPO the opportunity to provide comments on the federal action in regard to potential impacts to historic properties.

1.3 PROFESSIONAL QUALIFICATIONS

Archaeologist Consuelo Y. Sauls (M.A.), a Registered Professional Archaeologist (RPA 41591505), managed the assessment and compiled this report for the Project. Ms. Sauls also conducted the records search, literature review, requested Sacred Lands File and performed the pedestrian field survey of the APE. Ms. Sauls meets the Secretary of the Interior's Standards for Professional Qualifications in Archaeology. Statement of Qualifications for key personnel is provided in Appendix A.



Figure 1-1 Project vicinity in Stanislaus County, California.

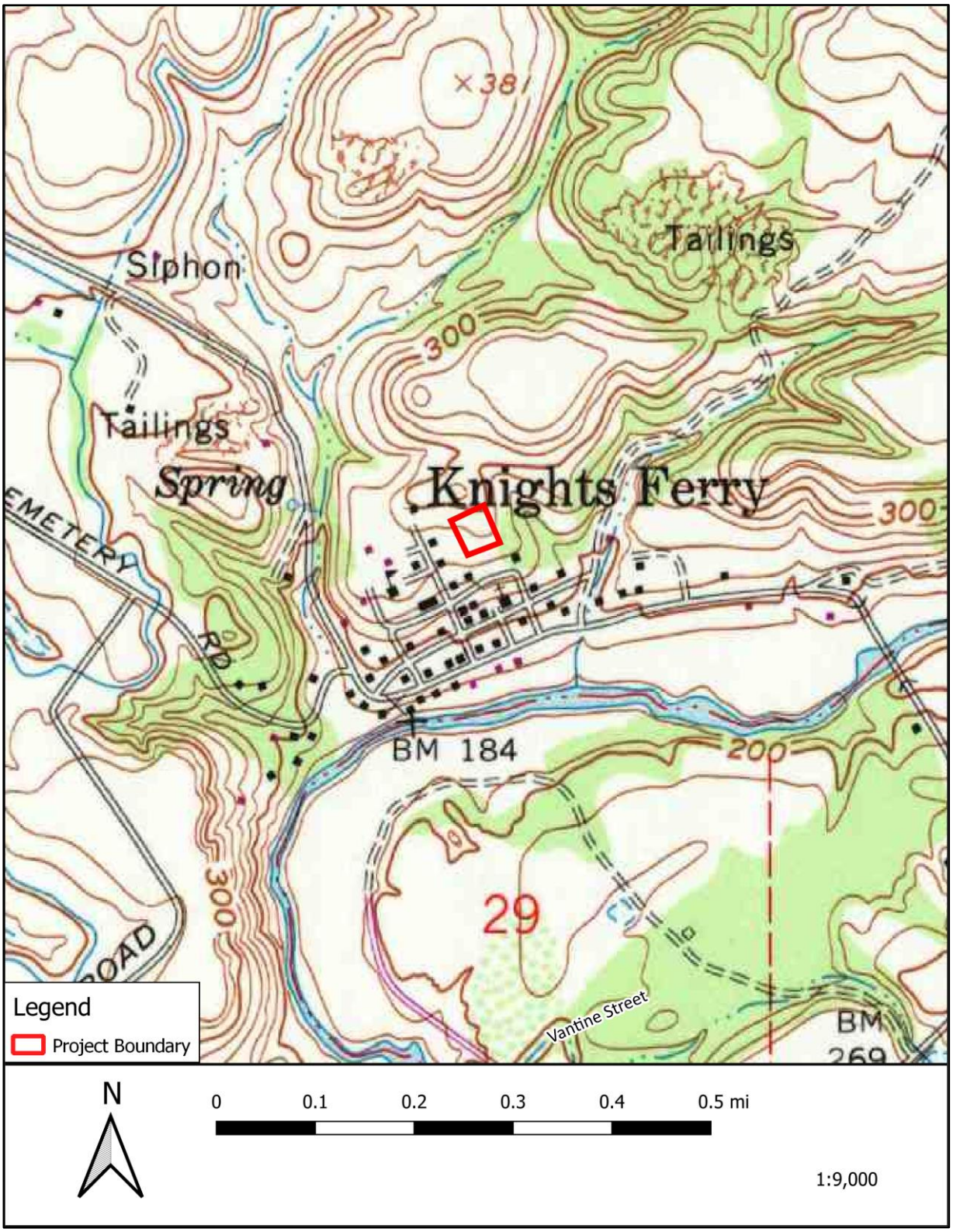


Figure 1-2 Project location on the USGS Knights Ferry, CA 7.5-minute quadrangle.



Figure 1-3 Aerial view of the APE.

1.4 REPORT STRUCTURE

This report documents the results of an archaeological survey of the APE. In order to comply with Section 106 of the NHPA, the following specific tasks were completed: (1) requesting a records search from the Central California Information Center (CCAIC) of the California Historical Resources Information System (CHRIS), at California State University, Stanislaus; (2) requesting a Sacred Lands File Search and list of interested parties from the Native American Heritage Commission (NAHC) and initiating outreach to local Native American individuals and tribal representatives; (3) conducting an archaeological pedestrian survey, (4) preparing this technical report and (5) preparing Department of Parks and Recreation (DPR) 523 series forms for an existing cultural resource.

Taylored Archaeology prepared this report following the California Office of Historic Preservation standards in the 1990 Archaeological Resources Management Report Recommended Contents and Format. Chapter 1 describes the introduction of the Project and its location, and identifies the key personnel involved in this report. Chapter 2 summarizes the Project setting, including the natural, prehistoric, historic, and ethnographic background for the Project area and surrounding area. Chapters 3 details the methods used for cultural records search, archival research, local Native American outreach, and archaeological pedestrian survey. Chapter 4 summarizes the results of the cultural resource investigation. Chapter 5 discusses the Project results and offers management recommendations. Chapter 6 is a bibliography of references cited within this report. The report also contains the following appendices: Qualifications of key personnel (Appendix A), the CHRIS records search results (Appendix B), and the NAHC letter of the SLF results (Appendix C) and preparing Department of Parks and Recreation (DPR) 523 series forms (Appendix D).

2
PROJECT SETTING

2.1 NATURAL ENVIRONMENT

The Project is located within California's Central Valley. Specifically, the site is within the community of Knight's Ferry within the east edge of the upper San Joaquin Valley in eastern Stanislaus County. This valley forms the southern half of the Central Valley of California. The Central Valley dominates the landscape within Central and Northern California, running approximately 450 miles from north to south, and ranging east to west between 40 to 60 miles with an average width of 55 miles (Frayer et al. 1989). The Central Valley is divided into two subunits named after the primary rivers within each area, the Sacramento Valley in the north and the San Joaquin Valley in the south (Madden 2020). Climate within the San Joaquin Valley is classified as a hot Mediterranean climate, with hot and dry summers, and cool damp winters characterized by periods of dense fog known as tule fog (Prothero 2017).

The APE is located at approximately 275 feet above mean sea level at the eastern edge of the northern half of the San Joaquin Valley. The San Joaquin Valley consists of a structural trough created approximately 65 million years ago and is filled with nearly 6 miles of sediment (Bull 1964). The San Joaquin Valley ranges from Stockton and the San Joaquin-Sacramento River Delta in the north to Wheeler Ridge to the south (Zack 2017). It is split by late Pleistocene alluvial fans between the San Joaquin River hydrologic area in the north and the Tulare Lake Drainage Basin in the south (Rosenthal et al 2007). The Project is located within the latter of these two hydrologic units. In the eastern portion of the San Joaquin Valley, sediments are primarily deposited from the Sierra Nevada Mountains and consist of highly permeable sands with medium to coarse grains within the broad alluvial fans. These deposits range from the coarsest near the upper parts of the alluvial fan to the east, to the finest nearest the lowest and central portions of the valley (USGS 1998).

The Project site is in eastern Stanislaus County on the edge of the San Joaquin Valley, within the transitional zone between the broader plains and the start of the western foothills of the Sierra Nevada. The Project site is located 800 feet north of the Stanislaus River, with surface hydrology sloping downhill to the south and west (Google Earth 2025). Aside from the development of the town of Kight's Ferry and the introduction of invasive annual grasses by Europeans in the 1800s, the surrounding landscape is relatively similar to pre-European contact, with prairie grasslands with scattered oak tree savannas near the foothills, and riparian forests along the various streams and drainages (Preston 1981).

Prior to European contact, riparian environments would also have been present along various waterways, including drainages and marshes. Riparian forest vegetation would have been comprised of multiple layers of dense undergrowth. The upper canopy species would have consisted of California sycamore (*Platanus racemosa*), willow (*Salix* spp.), valley oak (*Quercus lobata*), and Fremont cottonwood (*Populus fremonti*) (Katibah 1984). Intermediate layers were likely dominated by Oregon ash (*Fraxinus latifolia*), willows, and box elder (*Acernegundo* subsp.

californicum), while riparian forest undergrowth would have included wild grape (*Vitis californica*), poise oak (*Rhus diversiloba*), mugwort (*Artemisia douglasiana*), wild rose (*Rosa californica*), and blackberry (*Rubus* spp.) Drier portions of the southern end of the San Joaquin Valley would have been dominated by saltbrush (*Atriplex* spp.) desert. (Katibah 1984).

The region around the Project site and the lower Stanislaus River was largely dominated by annual grasslands in drier upland habitat, and riparian forest, rivers and marshland near the river. Historically, these habitats provided a lush environment for a variety of animals, including rodents, insects, reptiles, birds and other waterfowl, grizzly bear (*Ursus arctos californicus*), tule elk (*Cervus* sp.), pronghorn (*Antilocapra americana*), mule deer (*Odocoileus hemionus*), black bear (*Ursus americanus*), and mountain lion (*Puma concolor*) (Preston 1981). Native trees and plants observed in the Project vicinity include various blue, live, and white oaks (*Quercus* sp.), cottonwood (*Populus aegiros*), and willow (*Salix* sp.). The introduction of agriculture to the region resulted in large animals being forced out of their habitat. Common land mammals now include valley coyote (*Canis latrans*), bobcat (*Lynx rufus*), gray fox, kit fox (*Vulpes macrotis*), and rabbits (*Leporidae*).

Rivers and lakes throughout the valley provide habitat for freshwater fish, including rainbow trout (*Oncorhynchus mykiss*), Sacramento sucker (*Catostomidae* sp.), and Sacramento perch (*Archoplites interruptus*) (Preston 1981). Chinook salmon (*Oncorhynchus tshawytscha*) were also found throughout the valley, including as far south as the San Joaquin River, and occasionally the Kings River, though it is estimated that chinook salmon have lost as much as 72 percent of their original habitat throughout the Central Valley (Yoshiyama et al. 2001).

2.2 PREHISTORIC SETTING

Much of the archaeological research surrounding the Project area and the lower Stanislaus River in eastern Stanislaus county stems from nearly two decades (1968-1981) of archaeological investigations related to the New Melones Dam and Reservoir project approximately 15 miles upstream from Knight's Ferry (Moratto 1984). As part of the project, the United States Army Corps of Engineers acquired properties along the Stanislaus River, including one near Knight's Ferry. During construction of the property, human remains were encountered and exhumed (Johnson and Decater 1985). Multiple additional archaeological site investigations were conducted at the Buena Vista Rancheria site on the south side of the Stanislaus River opposite the town of Knight's Ferry (Swernoff 1982).

In the interest of maintaining cohesiveness with modern anthropological research, the dates of any chronologies in years B.C. have been adapted into years before present (B.P.). By 1984, observations from the New Melones Dam and Reservoir project archaeological investigations resulted in the following information (Moratto 1984):

1. The archaeological sequence along the upper Stanislaus River spans an estimated 8000 to 9000 years and included multiple prehistoric cultural phases, including the Chowchilla Phase (2300 – 1700 B.P.), Raymond Phase (1700-500 B.P.), and Madera Phase (500-175 B.P.).

2. Stratified and seriated components reflect both cultural and environmental changes through time.
3. Some cultural changes such as the invention of the bow and arrow circa 1500 B.P. may represent trait diffusion while others are linked to in situ adaptive shifts or to population replacement.
4. Nearly all tested Native American sites include components less than 500 years old and most of these are single-component sites. This recent proliferation of settlements likely reflects Miwok expansion after circa 400 B.P.
5. After the Gold Rush, Native American use of traditional foods, milling equipment, houses, mortuary practices, and ceremonial structures persisted until the 1880s and later (Van Bueren 1982). There is evidence parts of the New Melones project area may have been refugium from displaces Native Americans from the surrounding area.

Moratto's prehistoric cultural phase of the region is based largely off both the archaeological investigations from the New Melones Dam and Reservoir project, and from excavations from the Buchanan Reservoir in the Madera County foothills along the Chowchilla River. The following phases were synthesized by Moratto by 1972 and further presented in his 1984 volume on California archaeology (Moratto 1984).

The Chowchilla Phase (2300-1700 B.P.) marks an era of relative prosperity with numerous settlements found near the Buchanan Reservoir. Most occupations within the area within located within a few large villages adjacent to rivers with relatively large populations. Subsidence consisted of hunting, fishing, and gathering hard seeds with some limited use of acorns. Tools often consisted of atlatl and dart with large projectile points, and ornamentation consisted often of abundant *Olivella* shell beads, *Acmaea* rings, and *Haliotis* ornaments. Mortuary practices were extended and semi extended primary burials with copious grave goods and ochre in graves.

The Raymond Phase (1700-500 B.P.) consisted of sporadic occupation of old sites near rivers with relatively small populations. Subsistence practices consisted of acorns and hard seeds emphasizes with hunting, and limited evidence of fishing. Tool usage included bow and arrow replacing atlatl and darts, with medium projectile points. Expansion of bedrock mortar and cobble pestle introduced and additional use of milling stones. Few *Olivella* shell beads are found, and mortuary practices appear to have consisted of tightly or loosely flexed primary burials with few mortuary artifacts.

Finally, the Madera Phase (500-175 B.P.) was indicated by a village community pattern with large main villages near rivers and smaller4 settlements in remote areas with large populations throughout the region. Acorns were exploited intensively along with other seeds, bulbs, greens and berries. Hunting continued with the use of elk, deer, and smaller game. Tool usage included bow and arrow with smaller and more refined projectile points than previous periods, as well and continued and increased use of bedrock mortar and cobble pestles. Ornamentation consisted of abundant steatite disk beads, *Saxidomus* disks, and limited *Olivella* beads.

2.3 ETHNOGRAPHY

The ethnography of the region surrounding Knight's Ferry is a complex one, as it is often placed at the ethnographic division between the Central Sierra Miwok and the Northern Valley Yokuts. To further complicate matters, the area surrounding Knight's Ferry in the 1800's served as a refuge for many displaced Native Americans from the region, further serving as a melting pot for Yokut, Miwok, and other groups (Kroeber 1925). Though ethnographers such as Levy (1978) align the Project site near the western boundary of the Central Sierra Miwok, multiple other ethnographers have placed the area within the Northern Valley Yokuts. While group boundaries were never static, the ethnography of the Northern Valley Yokuts is presented below.

The Yokuts were generally divided into three major groups, the Northern Valley Yokuts, the Southern Valley Yokuts, and the Foothill Yokuts. The Yokuts are a sub-group of the Penutian language that covers much of coastal and central California and Oregon (Callaghan 1958). The Yokuts language contained multiple dialects spoken throughout the region, though many of them were mutually understandable (Merriam 1904).

The Yokuts have been extensively researched and recorded by ethnographers, including Powers (1877), Kroeber (1925), Gifford and Schenck (1926, 1929), Gayton (1930, 1945), Driver (1937), Harrington (1957), Latta (1977), and Wallace (1978). Much of the research from these ethnographers focuses on the central Yokuts tribes due to the northernmost tribes being impacted by Euro-Americans during the California Gold Rush of the mid 1800s, and by the southernmost tribes often being removed and relocated by the Spanish to various Bay Area or coastal missions. The central Yokuts tribes, and especially the western Sierra Nevada foothill tribes, were the most intact at the time of ethnographic study.

Based upon Kroeber's map of Southern and Central Yokuts (1925), the area of Knights Ferry is likely the site of village of *Tuyiwu-nu* and the Takin Rancheria. Primary Yokuts villages were typically located along lakeshores and major stream courses, with scattered secondary or temporary camps and settlements located near gathering areas in the foothills. The Yokuts were known for using controlled burns to actively maintain tule grass marshlands, clover fields, oak savannas for hunting, gathering, and land management practices (Anderson 2005).

Each local tribe was a land-owning group that was organized around a central village and shared common territory and ancestry. Most local tribe populations ranged from 150 to 500 people (Kroeber 1925). These local tribes were often led by a chief, who was often advised by a variety of assistants including the winatum, who served as a messenger and assistant chief (Gayton 1930). Early studies by Kroeber (1925), Gifford and Schenck (1926), and Gayton (1930) concluded that social and political authority within local tribes was derived from male lineage and patriarchy. However, more recent reexaminations (Dick-Bissonnette 1998) argue that this assumption of patriarchal organization was based on male bias by early 20th century researchers, and instead the Yokuts sociopolitical authority was matriarchal in nature and centered around matrilineal use-rights and women's work groups.

2.4 HISTORIC SETTING

2.4.1 California History

European contact in modern-day California first occurred in 1542 with the arrival of a Spanish expedition led by Juan Rodríguez Cabrillo into the San Diego Bay (Engstrand 1997). Expeditions along the California coast continued throughout the sixteenth century and primarily focused on finding favorable harbors for further expansion and trade across the Pacific. However, rocky shorelines, unfavorable currents, and wind conditions made traveling north from New Spain to the upper California coast a difficult and time-consuming journey (Eifler 2017). The topography of California, with high mountains, large deserts, and few natural harbors lead to European expansion into California only starting in the 1760s. As British and Russian expansion through fur trading encroached on California from the north, Spain established a system of presidios, pueblos, and missions along the California coast to defend its claim, starting with Mission San Diego de Alcalá in 1769 (Engstrand 1997).

2.4.2 San Joaquin Valley History

The San Joaquin Valley did not experience contact with Europeans until the late 1700s (Starr 2007). Life at the California missions was hard and brutal for Native Americans, with many dying of disease, poor conditions, and many fleeing to areas not under direct Spanish control (Jackson and Castillo 1995). The earliest exploration of the San Joaquin Valley by Europeans was likely by the Spaniards when in the fall of 1772 a group known as the Catalonian Volunteers entered the valley through Tejon Pass in search of deserters from the Southern California Missions (Zack 2017). However, the group only made it as far north as Buena Vista Lake in modern day Kern County before turning around due to the extensive swamps.

Additional excursions to the valley were for exploration such as those led by Lieutenant Bariel Moraga in 1806, but also to find sites for suitable mission sites and to track down Native Americans fleeing the coastal missions (Cook 1958). The first European exploration of the Stanislaus River occurred in fall of 1808 when the Alferez Gabriel Moraga Expedition made a second visit to the upper San Joaquin Valley and explored local rivers, including the Stanislaus River (Brotherton 1982). Moraga boasted in letters to his superiors of converting 200 Yokuts in a single day, though closer examination of his diary showed few if any converted (Gray 2014).

Subsequent expeditions were also sent to pursue outlaws from the coast who would often flee to the valley for safety or Native Americans fleeing missions. By 1829, multiple expeditions had been sent to track down the notorious Estanislao from the Yokut Lacquisimes tribe, a leader of many Native Americans fleeing the Spanish Missions near the coast. It took three expeditions before he was defeated by General Mariano Vallejo in 1829 at a battle near the future town of Knight's Ferry (Gray 2014). As the legend of Estanislao grew, the river *Rio Lacquisimes* was later renamed to Stanislaus after Estanislao.

Mexican period occupation of the local area resulted in the area being incorporated into part of the 48,000-acre Racho del Rio Estanislao land grant in 1843 from Governor Manuelo Micheltorena to Francisco Rico and Jose Castro (Robinson 1948). Mexican control of California however was short lived, and by 1848 California became part of the United States as part of the Treaty of Guadalupe Hidalgo after the cessation of the Mexican-American War (Starr 2007). With the discovery of gold at Sutter's Mill in 1848, hundreds of thousands of immigrants flooded into California through San Francisco and spread throughout the Central Valley and western Sierra Nevada along rivers including the Stanislaus River (Eifler 2017). By 1850 California because a state, and Stanislaus County was formed in 1854. The county seat moved multiple times in the first few years from Adamsville to Empire to La Grange, and Knights Ferry in 1862 before moving to Modesto in 1871 (Branch 1881).

2.4.3 Local History- Knight's Ferry

In 1843, the area surrounding the project was granted by the Mexican government to Francisco Rico and Jose Antonio Castro as part of the Rancho Del Rio Estanislao, and a portion surrounding the community of Knights Ferry was purchased by Abraham Schell who resided in Knights Ferry in 1856 (Branch 1881). In the northeastern portion of Stanislaus County along the north end of the Stanislaus River is the community of Knight's Ferry. The community, also known as Dentville or Dent's Ferry, was established in 1849 by William Knight (Branch 1881). William Knight was an active participant of the Bear Flag revolt, and he set up the ferry on the Stanislaus River as a natural progression into the Gold Rush mines in the upper Stanislaus River in the Central Sierra Nevada. He also created a hotel and soon the town grew as a stop along the Gold Rush route into the upper mountains. By 1862 the town was formed into the Stanislaus county seat until the seat was relocated to Modesto in 1871. Mining also occurred throughout the local area in the 1850s and 1860s including on Goat Hill northeast of the Project site, which forced Native Americans to the south side of the Stanislaus River to the boom town of Buena Vista (Brotherton 1982). The town of Knight's Ferry was heavily damaged in the great flood of 1861 (Branch 1881). A covered bridge was built across the river in 1863 when the town was still the County seat. After numerous floods in the early 1860s however, the county seat was relocated to Modesto and the community remained a small town to present day.

3
METHODS

3.1 RECORDS SEARCH

On June 19, 2025, Taylored Archaeology requested a cultural resource records search from the CCAIC of the CHRIS at California State University in Turlock, California. The purpose of this request was to identify and review prior cultural resource investigations completed in or near the APE and identify any prehistoric or historical resources that had been previously recorded within the APE and a 0.5-mile radius of the surrounding area. CCAIC staff researched historical USGS topographic maps, reports of previous cultural resource investigations, archaeological site and survey base maps, cultural resource records (DPR forms) as well as listings of the Historic Properties Directory of the Office of Historic Preservation, General Land Office Maps, Archaeological Determinations of Eligibility, and the California Inventory of Historic Resources (Appendix B).

3.2 ARCHIVAL RESEARCH

Archival research was conducted to investigate the historical background for any potential archaeological deposits, historical deposits or built environment properties that may exist in the APE. Historical maps, historical aerial photographs, historical US Geological Survey (USGS) topographic maps, Google Street View photos, books, scholarly articles, and other records were used to better understand the prehistory and history of the APE and surrounding area. Research data was used to identify potential areas within the APE where archaeological deposits may exist, or historical buildings, structures or objects may exist. The results of this research are presented in Chapter 4.

3.3 NATIVE AMERICAN OUTREACH

Taylored Archaeology requested a Sacred Lands File (SLF) search from the NAHC on June 19, 2025. The SLF search was requested to identify whether there are previously known or recorded sensitive or sacred tribal cultural resources in the vicinity of the APE that could be affected by the proposed Project. The NAHC also included contact information of local Native American representatives who may have knowledge or interest in sharing information of resources of sacred significance present in or near the APE. On July 2, 2025, an outreach letter and a map describing the Project and its location was sent to the following representatives from the list provided by NAHC:

1. Vice-Chairperson Ed Ketchum of Amah Mutsun Tribal Band
2. Chairperson Valentin Lopez of Amah Mutsun Tribal Band
3. THPO Jesse Galvan of Buena Vista Rancheria of Me-Wuk Indians
4. Chairperson Jessalynn Pastran of Buena Vista Rancheria of Me-Wuk Indians
5. Tribal Cultural Resources Specialist Debra Grimes of Calaveras Band of Mi-Wuk Indians
6. Chairperson Gloria Grimes of Calaveras Band of Mi-Wuk Indians

7. Tribal Cultural Resources Assistant Adam Lewis of Calaveras Band of Mi-Wuk Indians
8. Interim Chairperson Antoinette Del Rio of California Valley Miwok Tribe
9. Cultural Specialist Lawrence Wilson Jr. of California Valley Miwok Tribe
10. Treasurer Anthony Wilson of California Valley Miwok Tribe
11. Cultural Manager Cynthia Reyes of Chicken Ranch Rancheria of Me-Wuk
12. Environment & Planning Manager Jaonna Portillo-Hsu of Chicken Ranch Rancheria of Me-Wuk Indians
13. Tribal Administrator Monica Fox of Chicken Ranch Rancheria of Me-Wuk Indians
14. Community & Resources Development Director Stephanie Suess of Chicken Ranch Rancheria of Me-Wuk Indians
15. Cultural Resources Coordinator Jereme Dutschke of Ione Band of Miwok Indians
16. Chairperson Sara Dutschke of Ione Band of Miwok Indians
17. Cultural Preservation Representative Rolland Fillmore of Jackson Rancheria Band of Miwuk Indians
18. Chairperson Adam Dalton of Jackson Rancheria Band of Miwuk Indians
19. Chairperson Cosme Valdez Dominguez of Nashville Enterprise Miwok-Maidu-Nishinam Tribe
20. Cultural Resources Leland Valdez of Nashville Enterprise Miwok-Maidu-Nishinam Tribe
21. Chairperson Katherine Perez of Northern Valley Yokut/Ohlone Tribe
22. Tribal Compliance Officer Timothy Perez of the Northern Valley Yokut/Ohlone Tribe
23. Chairperson Tina Goodwin of the Pakan'yani Maidu of Strawberry Valley Rancheria
24. Chairperson Neil Peyron of the Tule River Tribe
25. Environmental Department Kerri Vera of the Tule River Indian Tribe
26. Cultural Preservation Department of Wilton Rancheria
27. Tribal Historic Preservation Officer Steven Hutchason of Wilton Rancheria
28. Executive Director of Cultural Preservation Michelle St. Clair of Wilton Rancheria
29. Chairperson Kenneth Woodrow of the Wuksachi Indian Tribe/Eshom Valley Band

As part of this archaeological investigation, nongovernmental outreach letters and location maps were sent to each individual listed above on July 2, 2025. The letter was followed up via email on July 15, 2025. The NAHC letter of SLF results, contact log and copies of the Native American outreach documentation are included in Appendix C.

3.4 ARCHAEOLOGICAL PEDESTRIAN SURVEY

Archaeologist Consuelo Sauls conducted an intensive pedestrian survey of the ground surface on June 28, 2025. The APE consists of a shed, water tanks, and storage facility. The survey consisted of parallel transects spaced 5 meters apart. Scraping away dry grasses allowed for increased visibility in areas of dense coverage. Ms. Sauls examined all exposed ground surfaces for evidence of cultural resources (e.g., prehistoric and historical archaeological sites, isolated artifacts, features and structures). The ground surface, buildings and structures were photographed within the APE using an iPhone 11 Pro digital camera. Ms. Sauls recorded observations on field notes and collected locational data on a Gaia Global Positioning System application.

The identification and location of any discovered sites should they be present are recorded using DPR 523 forms.

4
RESULTS

4.1 RECORDS SEARCH

The CCAIC provided a CHRIS records search results of previously documented cultural resources and cultural resources reports in a letter dated June 23, 2025 (Records Search File No. 133394N; Appendix B). The records search results identified three prior cultural resource studies within the Project area and 13 additional studies completed within a ½-mile of the Project area. One prior study, ST-2802, was an archaeological survey and report conducted directly on the Project site in 1996. That investigation resulted in recording cultural resource P-50-000082.

According to the records search results, two cultural resources (P-50-000082 and P-50-000545) were previously recorded within the Project area, and 38 were recorded within a ½-mile radius of the APE. Both cultural resources were historic-era, one a building and the other was a district. P-50-000082 is the KFCSD's outbuilding and is within the APE. This resource is a former pre-1930's outhouse which was relocated to the APE in 1970, placed on a concrete slab, and expanded to serve as a storage shed (Francis 1996). The storage shed was previously recorded but not evaluated for inclusion in the NRHP or the CRHR. P-50-0000545 is the Knights Ferry District covers the entire town including the APE. According to report ST-00921, Knights Ferry District was nominated for the NRHP in March of 1975 and placed on the Register on April 23, 1975. Also, it was stated in ST-00921 that the value of Knights Ferry has also been recognized by the State of California as California State Registered Landmark Number 347 (Orlins 1977). The list of the records results are provided in Appendix B.

4.2 ARCHIVAL RESEARCH

The earliest available historical maps of the Project area date to 1857, with a plat map of the Rancheria del Rio Estanislao (Stakes 1857). The rancho map shows the community of Knights Ferry on the north side of the Stanislaus River with the ferry crossing, and two bridges crossing the river. The names of the bridges are too small to decipher in the available map. The next available map is an 1886 map of irrigated lands in Stanislaus County (Hammond 1886). The map shows the community of Knights Ferry on the northern side of the Stanislaus River surrounded by the Rancho del Río Estanislao to the west, and the community of Buena Vista to the southeast across the river. Taylored Archaeology additionally searched historical USGS topographic maps from 1916 to 2021, and historical aerial photographs from 1957 to present covering the Project boundary (NETROnline 2025). Topographic maps from 1916 to 1987 show the area largely similar to present day, except for the development of the Sonora Road Bridge, which first appears in topographic maps in 2012.

The first available historical photograph of Knights Ferry dates from 1863 (Figure 4-1; Lawrence & Houseworth 1863). The photograph shows the community of Knights Ferry from a hill west of the town, with the view facing east. The community and the Knights Ferry Covered Bridge are shown in the photograph. The Project site is shown as an empty hillside north of the town. A

1957 historic aerial image shows the Project site as an empty hillside surrounded by residences to the west and south (NETROnline 2025). Historic aerial photographs between 1959 to 1983 show the Project site and surrounding area in a similar configuration. In a 1984 aerial image the Project site appears to have a small water treatment facility in a similar configuration to the buildings presently on site in the southeast corner of the Project site. By 2003, the Project site looks similar to its present-day configuration (Google Earth 2025).



Figure 4-1 Knights Ferry in 1863 looking north (Lawrence & Houseworth 1863)

4.3 NATIVE AMERICAN OUTREACH

The NAHC responded and sent an email of the SLF results letter on June 20, 2025. The SLF letter stated that the results were positive and indicated that there were recorded places of tribal importance in the Project area or surrounding 0.5-mile area. The NAHC recommended contacting the tribes on the list for more information (Appendix C).

On July 2, 2025, outreach letters were sent via email to all the groups or individuals listed in Section 3.3. The letters included a description of the proposed Project and a topographic map of the location. Follow-up by emails were sent on July 15, 2025.

On July 2, 2025, an email was received from Valentin Lopez, Chairperson of the Amah Mutsun Tribal Band, stated that this project is outside of the tribe's territory and they have no comments.

On July 2, 2025, an email was received from Katherine Perez, Chairperson of the Northern Valley Yokut/Ohlone Tribe, stated that the Northern Valley Yokut/Costanoan Tribe would like to consult on the proposed project. They are aware of the cultural sensitivity of the area and the tribe is recommending that the prosed project implement cultural awareness training and have a qualified archaeologist and a Native American monitor on board during all ground disturbance as part of the mitigation measures.

On July 2, 2025, an email was received from the Wilton Rancheria Department of Cultural Preservation stating that while the Project is within the ancestral territory of the Wilton Rancheria, they do not have any comment or additional information. The rancheria also requested to be contacted if there were any Project updates or changes.

On July 3, 2025, an email was received from Adam Lewis, Cultural Resources Assistant of the Calaveras Band of Mi-Wuk Indians, stated that the information the tribe holds is of great importance. The ground disturbance should be looked at thoroughly.

On July 21, 2025, an email was received from Jereme Dutschke, Cultural Resources Coordinator of the Ione Band of Miwok Indians, stated that the Ione Band of Miwok Indians has no comment on this project.

On July 23, 2025, an email was received from Jesse Galvan, THPO of the Buena Vista Rancheria of Me-Wuk Indians, stated that the tribe want to extend this opportunity to local tribes in the area. The tribe also stated that if any cultural resources are inverted to not hesitate to contact the Buena Vasta Rancheria of Me-Wuk Indians and to take further measures to ensure that the cultural resources are handled and protected.

As of the date of this report, no other responses have been received. Correspondence with Native American individuals and groups at the time of writing may be found in Appendix C.

4.4 ARCHAEOLOGICAL PEDESTRIAN SURVEY RESULTS

Taylored Archaeology conducted an intensive pedestrian survey of the entire APE on June 28, 2025 (Figure 4-2). The topography of the APE slopes to the south and west. Most of the ground surface was highly disturbed by development and most of the site contained gravel, scattered and mowed annual grasses, doveweed, starthistle, and other invasive plants (Figure 4-3). Overall, the ground visibility within the APE ranged from poor to fair (5 to 20 percent) depending on the vegetation density (Figure 4-4 and 4-5). Grasses and some gravel were primary factors limiting surface visibility in the vegetated area, however, scraping away dry grasses and occasional patches of soil afforded more visibility. The soil observed in the APE consisted of is fine sandy loam that contained small fine grain pebble and the soil was grayish brown.

No evidence of prehistoric archaeological sites, isolated artifacts, or features were identified within the Project's APE during the survey. While past development activities may have

potentially destroyed or obscured ground surface evidence of archaeological resources within the APE, intact archaeological resources may potentially exist below the ground surface.

The existing workshed (P-50-000082) was observed and present within the APE as part of the Knights Ferry facility (Figure 4-6). The resource was recorded on a DPR as an update.



Figure 4-2 Survey coverage of the APE.



Figure 4-3 Open field in northern portion of APE, facing northeast.



Figure 4-4 Northwest corner of APE, facing west.



Figure 4-5 Drying bed in southwest corner of APE, facing south.



Figure 4-6 Outbuilding on site within the APE, facing south.

5
CONCLUSIONS AND RECOMMENDATION

Taylored Archaeology performed a Phase I Cultural Resources Assessment for the Knights Ferry Community Services District Project. The CCAIC reported two cultural resources that were previously recorded within the APE and 38 within a ½-mile radius of the APE. The CCAIC also reported that three cultural resources studies were previously conducted within the APE and 13 within the ½ mile buffer. The two previously recorded cultural resources within the APE were P-50-000082 and P-50-0000545. P-50-000082 is the KFCSD's outbuilding and is within the APE. This resource is a former pre-1930's outhouse which was relocated to the APE in 1970, placed on a concrete slab, and expanded to serve as a storage shed (Francis 1996). The storage shed was previously recorded but not evaluated for inclusion in the NRHP or the CRHR. P-50-0000545 is the Knights Ferry District which covers the entire town including the Project APE. This district is listed on the NRHP and is also a California State Registered Landmark.

The NAHC's Sacred Lands File search results were positive and outreach to Native American representatives listed by the NAHC resulted in six responses. The Amah Mutsun Tribal Band stated the Project is outside the tribe's territory and had no further comment. The Northern Valley Yokut/Ohlone Tribe stated they would like to consult on the Project; the area is culturally sensitive and requested a cultural awareness training and archaeological and Native American monitoring during ground disturbing activities. The Wilton Rancheria Department of Cultural Preservation stated the Project area is within their ancestral territory, but the tribe had no comments. The Calaveras Band of Mi-Wuk Indians stated the area is of great importance and ground disturbance should be carefully examined. The Ione Bank of Miwok Indians state they had no comment. Finally, the THPO of the Buena Vista Rancheria of Me-Wuk Indians deferred to more local tribes near the Project site and asked to be contacted if cultural resources are discovered during construction.

No prehistoric resources were found on the ground surface in the APE during the pedestrian survey. One previously recorded cultural resource (storage shed/P-50-000082) was confirmed present and intact with no modification since its previous recording. Taylored Archaeology did not discover any other historic-era resources during the pedestrian survey. According to the Project description, the storage shed will remain in place with no proposed modifications.

The undertaking is anticipated to result in a finding of no historic properties affected under Section 106 of the NHPA.

Based on the results of this investigation, Taylored Archaeology recommends the following best management practices be implemented during Project construction:

- Should the storage shed (P-50-000082) is moved or changed in any way, the resource should be further recorded and evaluated by a qualified architectural historian.

- If previously unidentified archaeological resources are encountered during development or ground-moving activities in the APE, all work should be halted until a qualified archaeologist can identify the discovery and assess its significance.

- If human remains are uncovered during construction, the local county coroner is to be notified to investigate the remains and arrange proper treatment and disposition. If the remains are identified on the basis of archaeological context, age, cultural associations, or biological traits to be those of a Native American, California Health and Safety Code 7050.5 and PRC 5097.98 require that the coroner notify the NAHC within 24 hours of discovery. The NAHC will then identify the Most Likely Descendent who will be afforded an opportunity to make recommendations regarding the treatment and disposition of the remains.

6
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APPENDIX A

Personnel Qualifications

Consuelo Sauls, M.A., RPA 41591505
Archaeologist

csaulsarchaeo@gmail.com
559.797.1572

Areas of Expertise

- Cultural Resource Management
- CEQA and Federal regulations
- Prehistoric Archaeology
- Laboratory Management
- Technical Writing
- Phase I Assessments

Years of Experience

- 16

Education

- M.A., Archaeology, University of Durham, 2014
- B.A., Anthropology, California State University, Fresno, 2009

Registrations/Certifications

- Registered Professional Archaeologist 41591505

Professional Affiliations

- Coalition for Diversity in California Archaeology
- Society for American Archaeology
- Society for California Archaeology
- Society of Black Archaeologists

Professional Experience

2019 –Present	Principal Investigator, Taylored Archaeology, Fresno, California
2018 – 2019	Staff Archaeologist, Applied EarthWorks, Inc., Fresno, California
2016 – 2018	Principal Investigator, Soar Environmental Consulting, Inc., Fresno, California
2015	Archivist/Database Technician, Development and Conservation Management, Inc., Laguna Beach, California
2013	Laboratory Research Assistant, Durham University Archaeology Department and Archaeology Museum, Durham, England, UK
2011 – 2012	Laboratory Technician, University of Pennsylvania Museum of Archaeology and Anthropology, Philadelphia, Pennsylvania
2008 – 2009	Laboratory Technician, California State University, Fresno
2008	Field School, California State University, Fresno

Technical Qualifications

Ms. Sauls meets the Secretary of the Interior's Professional Qualification Standards as an archaeologist. She has conducted pedestrian surveys, supervised Extended Phase I survey, authored technical reports, and completed the Section 106 process with the State Historic Preservation Officer and Tribal Historic Preservation Officer. Her experience includes data recovery excavation at Western Mono sites and processing recovered artifacts in the laboratory as well as conducting archival research about prehistory and ethnography of Central California. Ms. Sauls has authored and contributed to technical and letter reports in compliance with of the National Historical Preservation Act (NHPA) Section 106 and the California Environmental Quality Act (CEQA). She also has supported NHPA tribal consultation and responded to Assembly Bill 52 tribal comments. Ms. Sauls also has an extensive background supervising laboratory processing, cataloging, and conservation of prehistoric and historical archaeological collections. In addition, she worked with the Rock Art Heritage Group in the management, preservation, and presentation of rock art in museums throughout England, including a thorough analysis of the British Museum's rock art collections. At Durham University Archaeology Museum, Ms. Sauls processed the excavated skeletal remains of 30 individuals from the seventeenth century.

APPENDIX B

Records Search Results

CENTRAL CALIFORNIA INFORMATION CENTER

California Historical Resources Information System

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

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

Date: 6/23/2025

Records Search File No.: 13394N
Project: Knights Ferry Project
APN# 002-039-010

Consuelo Sauls
Taylored Archaeology
6083 N. Figarden Drive, Suite 616
Fresno, CA 93722
949-298-0249 csaulsarchaeo@gmail.com

The Central California Information Center received your record search request for the project area referenced above, located on the Knight Ferry 7.5' quadrangle in Stanislaus County. The following reflects the results of the records search for the project study area and radius:

As per data currently available at the CCaIC, the locations of resources/reports are provided in the following format: ☒ custom GIS maps ☐ GIS Data/shape files

Summary Data:

Resources within the project area:	2: P-50-000082, 545
Resources within the 1/2-mile radius:	38: See Resource Database List
Reports within the project area:	3: ST-00922, 2802, 4958
Reports within the 1/2-mile radius:	13: See Report Database List

Resource Database Printout (list):	☒ enclosed	☐ not requested	☐ nothing listed
Resource Database Printout (details):	☒ enclosed	☐ not requested	☐ nothing listed
Resource Digital Database Records:	☒ enclosed	☐ not requested	☐ nothing listed
Report Database Printout (list):	☒ enclosed	☐ not requested	☐ nothing listed
Report Database Printout (details):	☒ enclosed	☐ not requested	☐ nothing listed
Report Digital Database Records:	☒ enclosed	☐ not requested	☐ nothing listed
Resource Record Copies:	☒ enclosed	☐ not requested	☐ nothing listed

Report Copies: ☒ enclosed ☐ not requested ☐ nothing listed

OHP Historic Properties Directory: New Excel File: Built Environment Resource Directory (BERD) Dated 11/17/2021
Not all resources listed in the BERD are mapped in GIS, nor do we have records on file for; if you identify additional resources in the BERD that you need copies of, contact the IC.
See listings ☒ enclosed ☐ not requested ☐ nothing listed

Archaeological Determinations of Eligibility: ☐ enclosed ☐ not requested ☒ nothing listed

CA Inventory of Historic Resources (1976): ☒ enclosed ☐ not requested ☐ nothing listed
P-50-000545

Caltrans Bridge Survey: ☐ enclosed ☒ not requested ☐ nothing listed

Ethnographic Information: ☒ enclosed ☐ not requested ☐ nothing listed

See data in report PDFs

Historical Literature: ☒ enclosed ☐ not requested ☐ nothing listed

See data in report PDFs

Historical Maps: ☒ enclosed ☐ not requested ☐ nothing listed

Knights Ferry 7.5' (1962)
Stanislaus County Map (1906)

Local Inventories: ☐ enclosed ☐ not requested ☒ nothing listed

GLO and/or Rancho Plat Maps: ☐ enclosed ☒ not requested ☐ nothing listed

Shipwreck Inventory: ☒ not available at CCIC; please go to http://shipwrecks.slc.ca.gov/ShipwrecksDatabase/Shipwrecks_Database.asp

Soil Survey Maps: ☒ not available at CCIC; please go to

http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx

Please forward a copy of any resulting reports from this project to the office as soon as possible. Due to the sensitive nature of archaeological site location data, we ask that you do not include resource location maps and resource location descriptions in your report if the report is for public distribution. If you have any questions regarding the results presented herein, please contact the office at the phone number listed above.

The provision of CHRIS Data via this records search response does not in any way constitute public disclosure of records otherwise exempt from disclosure under the California Public Records Act or any other law, including, but not limited to, records related to archeological site information maintained by or on behalf of, or in the possession of, the State of California, Department of Parks and Recreation, State Historic Preservation Officer, Office of Historic Preservation, or the State Historical Resources Commission.

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search

area. Additionally, Native American tribes have historical resource information not in the CHRIS Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

Should you require any additional information for the above referenced project, reference the record search number listed above when making inquiries. Requests made after initial invoicing will result in the preparation of a separate invoice.

Thank you for using the California Historical Resources Information System (CHRIS).

Note: Billing will be transmitted separately via email by our Financial Services office *($831.20), payable within 60 days of receipt of the invoice.

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

https://commerce.cashnet.com/ANTHROPOLOGY

Sincerely,

E. A. Greathouse

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

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

APPENDIX C

Native American Outreach

NATIVE AMERICAN HERITAGE COMMISSION

CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki, Nomlaki

SECRETARY
Sara Dutschke
Miwok

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Reid Milanovich
Cahuilla

COMMISSIONER
Bennae Calac
Pauma-Yuima Band of Luiseño Indians

COMMISSIONER
Vacant

ACTING EXECUTIVE SECRETARY
Steven Quinn

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710

June 20, 2025

Consuelo Sauls
Taylored Archaeology

Via Email to: csaulsarchaeo@gmail.com

Re: Knights Ferry Project, Stanislaus County

To Whom It May Concern:

As requested, a record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed based on information submitted for the above referenced project. The results were positive. Please contact the tribes on the attached list for more information. Please note that tribes do not always record their sacred sites in the SLF, nor are they required to do so. As such, a SLF search is not a substitute for consultation with all tribes that are traditionally and culturally affiliated with a project's geographic area.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. Please contact all of those listed; if they cannot supply information, they may recommend others with specific knowledge. If within two weeks of notification, a response has not been received, the Commission requests that you follow-up with a telephone call or email to ensure that the project information was received.

If you receive notification of a change of address or phone number from a tribe, please notify the NAHC so that we can assure that our lists contain current information.

In addition to engaging in tribal consultation, you should consult the appropriate regional California Historical Research Information System (CHRIS) archaeological Information Center to determine whether it has information regarding the presence of recorded archaeological sites within the project area.

If you have any questions or need additional information, please contact me at Pricilla.Torres-Fuentes@nahc.ca.gov .

Sincerely,

Pricilla Torres-Fuentes

Pricilla Torres-Fuentes
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Native American Contact List
Stanislaus County
6/20/2025

County	Tribe Name	Fed (F) Non-Fed (N)	Contact Person	Contact Address	Phone #	Email Address	Cultural Affiliation	Counties	Last Updated
Stanislaus	Amah Mutsun Tribal Band	N	Ed Ketchum, Vice-Chairperson		(530) 578-3864	aerieways@aol.com	Costanoan Northern	Alameda,Calaveras,Contra Costa,Fresno,Madera,Mariposa,Merced,Monter	7/20/2023
	Amah Mutsun Tribal Band	N	Valentin Lopez, Chairperson	P.O. Box 5272 Galt, CA, 95632	(916) 743-5833	vjltestingcenter@aol.com	Costanoan Northern Valley Yokut	Alameda,Calaveras,Contra Costa,Fresno,Madera,Mariposa,Merced,Monterey,San Benito,San Francisco,San Joaquin,San	7/20/2023
	Buena Vista Rancheria of Me-Wuk Indians	F	Jesse Galvan, THPO	1418 20th Street, Suite 200 Sacramento, CA, 95811	(916) 491-0011	Jesus@bvtribe.com	Me-Wuk	Alpine,Amador,Calaveras,Contra Costa,El Dorado,Fresno,Madera,Mariposa,Merced,Mono,Sacramento,San	5/15/2024
	Buena Vista Rancheria of Me-Wuk Indians	F	Jessalynn Pastran, Chairperson	1418 20th Street, Suite 200 Sacramento, CA, 95811	(916) 491-0011	Jessalynn@bvtribe.com	Me-Wuk	Alpine,Amador,Calaveras,Contra Costa,El Dorado,Fresno,Madera,Mariposa,Merced,Mono,Sacramento,San	5/15/2024
	Calaveras Band of Mi-Wuk Indians	N	Debra Grimes, Tribal Cultural Resources Specialist	P.O. Box 899 West Point, CA, 95255	(209) 470-8688	calaverasmiwukpreservation@gmail.com	Mi-wuk	Alpine,Amador,Calaveras,Contra Costa,El Dorado,Fresno,Madera,Mariposa,Merced,Mono,Sacramento,San	4/8/2024
	Calaveras Band of Mi-Wuk Indians	N	Gloria Grimes, Chairperson	P.O. Box 899 West Point, CA, 95255	(209) 419-5675	calaverasband.miwukindians@gmail.com	Mi-wuk	Alpine,Amador,Calaveras,Contra Costa,El Dorado,Fresno,Madera,Mariposa,Merced,Mono,Sacramento,San	4/8/2024
	Calaveras Band of Mi-Wuk Indians	N	Adam Lewis, Tribal Cultural Resources Assistant	6286 Jensworld Blvd. Murphys, CA, 95247	(209) 273-8188	Adam2191983@gmail.com	Mi-wuk	Alpine,Amador,Calaveras,Contra Costa,El Dorado,Fresno,Madera,Mariposa,Merced,Mono,Sacramento,San	4/8/2024
	California Valley Miwok Tribe	F	Antoinette Del Rio, Interim Chairperson	P.O. Box 695 San Andreas, CA, 95249	(209) 607-8336	antoinette.cvmt@gmail.com	Miwok	Alpine,Amador,Calaveras,Contra Costa,El Dorado,Fresno,Madera,Mariposa,Merced,Mono	4/10/2025
	California Valley Miwok Tribe	F	Lawrence Wilson Jr., Cultural Specialist	P.O. Box 695 San Andreas, CA, 95249	(209) 304-2307	l.ewilson@yahoo.com	Miwok	Alpine,Amador,Calaveras,Contra Costa,El Dorado,Fresno,Madera,Mariposa,Merced,Mono,Sacramento,San	4/10/2025
	California Valley Miwok Tribe	F	Anthony Wilson, Treasurer	P.O. Box 695 San Andreas, CA, 95249	(530) 458-1675	awanata426@gmail.com	Miwok	Alpine,Amador,Calaveras,Contra Costa,El Dorado,Fresno,Madera,Mariposa,Merced,Mono,Sacramento,San	4/10/2025
	Chicken Ranch Rancheria of Me-Wuk Indians	F	Cynthia Reyes, Cultural Manager	P.O. Box 1159 Jamestown, CA, 95327	(209) 984-9066	creyes@crtribal.com	Me-Wuk	Alpine,Amador,Calaveras,Contra Costa,El Dorado,Fresno,Madera,Mariposa,Merced,Mono,Sacramento,San	4/26/2024
	Chicken Ranch Rancheria of Me-Wuk Indians	F	Joanna Portillo-Hsu, Environmental & Planning Manager	P.O. Box 1159 Jamestown, CA, 95327	(209) 984-9066	jportillo@crtribal.com	Me-Wuk	Alpine,Amador,Calaveras,Contra Costa,El Dorado,Fresno,Madera,Mariposa,Merced,Mono,Sacramento,San	4/26/2024
	Chicken Ranch Rancheria of Me-Wuk Indians	F	Monica Fox, Tribal Administrator	P.O. Box 1159 Jamestown, CA, 95327	(209) 984-9066	mfox@crbtribal.com	Me-Wuk	Alpine,Amador,Calaveras,Contra Costa,El Dorado,Fresno,Madera,Mariposa,Merced,Mono,Sacramento,San	4/26/2024
	Chicken Ranch Rancheria of Me-Wuk Indians	F	Stephanie Suess, Community & Resources	P.O. Box 1159 Jamestown, CA, 95327	(209) 984-9066	ssuess@crtribal.com	Me-Wuk	Alpine,Amador,Calaveras,Contra Costa,El Dorado,Fresno,Madera,Mariposa,Merced,Mono,Sacramento,San	4/26/2024
	Ione Band of Miwok Indians	F	Jereme Dutschke, Cultural Resources Coordinator	P.O. Box 699 Plymouth, CA, 95669	(209) 781-3325	jereme@ionemiwok.net	Miwok Nisenan	Alpine,Amador,Calaveras,Contra Costa,El Dorado,Sacramento,San Joaquin,Solano,Stanislaus,Yolo	8/26/2024
	Ione Band of Miwok Indians	F	Sara Dutschke, Chairperson	P.O. Box 699 Plymouth, CA, 95669	(209) 255-8005	consultation@ionemiwok.net	Miwok Nisenan	Alpine,Amador,Calaveras,Contra Costa,El Dorado,Sacramento,San Joaquin,Solano,Stanislaus,Yolo	8/26/2024
	Jackson Rancheria Band of Miwuk Indians	F	Rolland Fillmore, Cultural Preservation Representative	P.O. Box 1090 Jackson, CA, 95642	(209) 223-8370		Miwok	Alpine,Amador,Calaveras,Contra Costa,El Dorado,Fresno,Madera,Mariposa,Merced,Mono,Sacramento,San	8/16/2017

Native American Heritage Commission
Native American Contact List
Stanislaus County
6/20/2025

County	Tribe Name	Fed (F) Non-Fed (N)	Contact Person	Contact Address	Phone #	Email Address	Cultural Affiliation	Counties	Last Updated
	Jackson Rancheria Band of Miwuk Indians	F	Adam Dalton, Chairperson	P.O. Box 1090 Jackson, CA, 95642	(209) 223-8370	adalton@jacksoncasino.com	Miwok	Alpine,Amador,Calaveras,Contra Costa,El Dorado,Fresno,Madera,Mariposa,Merced,Mono,Sacramento,San	
	Nashville Enterprise Miwok-Maidu-Nishinam Tribe	N	Cosme Valdez, Chairperson	P.O. Box 580986 Elk Grove, CA, 95758-0017	(916) 396-1173	valdezcome@comcast.net	Miwok	Alpine,Amador,Calaveras,Contra Costa,El Dorado,Fresno,Madera,Mariposa,Merced,Mono,Sacramento,San	7/17/2023
	Nashville Enterprise Miwok-Maidu-Nishinam Tribe	N	Leland Valdez, Cultural Resources		(916) 429-8047		Miwok	Alpine,Amador,Calaveras,Contra Costa,El Dorado,Fresno,Madera,Mariposa,Merced,Mono	7/17/2023
	Northern Valley Yokut / Ohlone Tribe	N	Katherine Perez, Chairperson	P.O. Box 717 Linden, CA, 95236	(209) 649-8972	canutes@verizon.net	Costanoan Northern Valley Yokut	Alameda,Calaveras,Contra Costa,Fresno,Madera,Mariposa,Merced,Sacramento,San Benito,San Joaquin,Santa	4/30/2024
	Northern Valley Yokut / Ohlone Tribe	N	Timothy Perez, Tribal Compliance Officer	P.O. Box 717 Linden, CA, 95236	(209) 662-2788	huskanam@gmail.com	Costanoan Northern Valley Yokut	Alameda,Calaveras,Contra Costa,Fresno,Madera,Mariposa,Merced,Sacramento,San Benito,San Joaquin,Santa	11/21/2023
	Pakan'yani Maidu of Strawberry Valley Rancheria	N	Tina Goodwin, Chairperson	P.O. Box 984 Marysville, CA, 95901	(617) 417-2166	tinagoodwin@washoetanf.org	Maidu Miwok	Alpine,Amador,Butte,Calaveras,Contra Costa,El Dorado,Fresno,Lassen,Madera,Mariposa,Merce	
	Tule River Indian Tribe	F	Neil Peyron, Chairperson	P.O. Box 589 Porterville, CA, 93258	(559) 781-4271	neil.peyron@tulerivertribe-nsn.gov	Yokut	Alameda,Amador,Calaveras,Contra Costa,Fresno,Inyo,Kern,Kings,Madera,Mariposa,Merced,Monterey,Sacramento,San	
	Tule River Indian Tribe	F	Kerri Vera, Environmental Department	P. O. Box 589 Porterville, CA, 93258	(559) 783-8892	kerri.vera@tulerivertribe-nsn.gov	Yokut	Alameda,Amador,Calaveras,Contra Costa,Fresno,Inyo,Kern,Kings,Madera,Mariposa,Merced,Monterey,Sacramento,San	7/22/2016
	Wilton Rancheria	F	Cultural Preservation Department,	9728 Kent Street Elk Grove, CA, 95624	(916) 313-4493	cpd@wiltonrancheria-nsn.gov	Nisenan Miwok	Alameda,Alpine,Amador,Contra Costa,El Dorado,Mono,Nevada,Placer,Sacramento,San Joaquin,Solano,Stanislaus,Sutter,Yolo,Yuba	2/12/2025
	Wilton Rancheria	F	Steven Hutchason, Tribal Historic Preservation Officer	9728 Kent Street Elk Grove, CA, 95624	(916) 683-6000	shutchason@wiltonrancheria-nsn.gov	Nisenan Miwok	Alameda,Alpine,Amador,Contra Costa,El Dorado,Mono,Nevada,Placer,Sacramento,San Joaquin,Solano,Stanislaus,Sutter,Yolo,Yuba	2/12/2025
	Wilton Rancheria	F	Michelle St. Clair, Executive Director of Cultural Preservation	9728 Kent Street Elk Grove, CA, 95624	(916) 683-6000	mstclair@wiltonrancheria-nsn.gov	Nisenan Miwok	Alameda,Alpine,Amador,Contra Costa,El Dorado,Mono,Nevada,Placer,Sacramento,San Joaquin,Solano,Stanislaus,Sutter,Yolo,Yuba	2/12/2025
	Wuksachi Indian Tribe/Eshom Valley Band	N	Kenneth Woodrow, Chairperson	1179 Rock Haven Ct. Salinas, CA, 93906	(831) 443-9702	kwood8934@aol.com	Foothill Yokut Mono	Alameda,Calaveras,Contra Costa,Fresno,Inyo,Kings,Madera,Marin,Mariposa,Merced,Mono,Monterey,San Benito,San	6/19/2023

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Knights Ferry Project, Stanislaus County.

Record: PROJ-2025-003312
Report Type: List of Tribes
Counties: Stanislaus
NAHC Group: All

Taylored Archaeology

EXAMPLE

July 2, 2025

Gloria Grimes, Chairperson
Debra Grimes, Tribal Cultural Resources Specialist
Adam Lewis, Tribal Cultural Resources Assistant
Calaveras Band of Mi-Wuk Indians
P.O. Box 899
West Point, CA 95255

RE: Knights Ferry Community Services District Water Treatment Project, Knights Ferry, Stanislaus County, California

Dear Gloria Grimes, Debra Grimes and Adam Lewis

Taylored Archaeology, under contract to Provost & Pritchard Consulting Group, is providing cultural resource services for the proposed Knights Ferry Community Services District Water Treatment Project (Project) in Knights Ferry, Stanislaus County, California. The Project is proposing infrastructure improvements at the current Knights Ferry Water Treatment Plant, including a full water treatment system. The Project site is less than 1 acre and consists of the current water treatment plant property. Because the Project may receive federal funding, it is subject to Section 106 of the National Historic Preservation Act (NHPA) in addition to the California Environmental Quality Act (CEQA). The Project boundary is in Township 1 South, Range 12 East, Mount Diablo Meridian of the Knights Ferry, California 7.5-minute USGS quadrangle (see attached map).

A search of the Native American Heritage Commission's (NAHC) Sacred Lands File was positive for the presence of tribal or cultural resources in the general Project area. Taylored Archaeology also requested a records search of the Project site at the California Historic Resources Information System (CHRIS), Central California Information Center (CCIC) located at the California State University, Stanislaus. The records search results identified two cultural resources within the Project area - an outhouse at the Knights Ferry Water Treatment Plant and the Knights Ferry Historic District which also includes the Project site. The search also resulted in 38 cultural resources within a half-mile radius. The CHRIS identified three previous reports in the Project boundary, and 13 within the surrounding half-mile radius. Taylored Archaeology completed an intensive pedestrian survey of the Project boundary to identify and record cultural resources present at the ground surface level. No archaeological resources were encountered during the survey.

The NAHC provided your name and address as someone who may have interest in sharing information regarding sacred sites, tribal cultural resources, or other resources of importance in the project area. Please note this outreach letter is research for a cultural resources investigation and is not government-to-government consultation under Assembly Bill 52 or Section 106. Taylored Archaeology understands and takes measures to protect the confidentiality of archaeological site locations, cemeteries, or sacred places, as required by law. Taylored Archaeology will not disclose locational information in any document available to the general public.

6083 N Figarden Dr., Ste. 616, Fresno, CA 93722
559.797.1572 / csaulsarchaeo@gmail.com

Taylored Archaeology

If you have information that you would like to share, have questions, or would like more information about the project, please contact me by email at csaulsarchaeo@gmail.com, or send a letter to my attention at 6083 N. Figarden Dr., Ste. 616, Fresno, CA 93722. Any response by July 16, 2025, would be greatly appreciated.

Sincerely,

Consuelo Y. Sauls, M.A., RPA # 41591505
Archaeologist

6083 N Figarden Dr., Ste. 616, Fresno, CA 93722
559.797.1572 / csaulsarchaeo@gmail.com

Native American Outreach Log

Knights Ferry Community Services District Water Treatment Project, Knights Ferry, Stanislaus County, California

Organization	Name	Position	Address	Contact Information	Letter	E-Mail	Contact Summary
Native American Heritage Commission	Pricilla Torres-Fuentes	Culutral Resources Analyst	1550 Harbor Boulevard Suite 100 West Sacramento, California 95691	(916) 373-3710 nahc@nahc.ca.gov	6/19/2025	N/A	In a letter dated June 20, 2025, the NAHC stated that the results of the SLF results were positive and suggested to contact the local Native American representatives on the list provided.
Amah Mutsun Tribal Band	Ed Ketchum	Vice Chairperson		(530) 578-3864 aerieways@aol.com	7/2/2025	7/15/2025	Valentin Lopez spoke on behalf of the tribe.
Amah Mutsun Triabl Band	Valentin Lopez	Chairperson	P.O. Box 5272 Galt, CA, 95632	(916) 743-5833 vjltestingcenter@aol.com	7/2/2025	7/15/2025	Received response via email from Valentin Lopez on 7/2/2025. She stated that the projecct is outside the tribe's territory and they have no comments.
Buena Vista Rancheria of Me-Wuk Indians	Jesse Galvin	THPO	1418 20th Street, Suite 200 Sacramento, CA, 95811	(916) 491-0011 Jesus@bvtribe.com	7/2/2025	7/15/2025	Received email from Jesse Galvan. Galvan stated that the tribe want to extend this opportunity to local tribes in the area. The tribe also stated that if any cultural resources are inverted to not hesitate to contact the Buena Vasta Rancheria of Me-Wuk
Buena Vista Rancheria of Me-Wuk Indians	Jessalynn Pastran	Chairperson	1418 20th Street, Suite 200 Sacramento, CA, 95811	(916) 491-0011 shane.ratchford@coldspringsrancheria.gov	7/2/2025	7/15/2025	Address not found.
Calaveras Band of Mi-Wuk Indians	Debra Grimes	Tribal Cultural Resources Specialist	P.O. Box 899 West Point, CA, 95255	(209) 470-8688 calaverasmiwukpreservation@gmail.com	7/2/2025	7/15/2025	No response.
Calaveras Band of Mi-Wuk Indians	Gloria Grimes	Chairperson	115 Radio Street Bakersfield, CA 93305	(626) 339-6785 2deedominguez@gmail.com	7/2/2025	7/15/2025	No response.
Calaveras Band of Mi-Wuk Indians	Adam Lewis	Tribal Cultural Resources Assistant	6286 Jensworld Blvd. Murphys, CA, 95247	(209) 273-8188 Adam2191983@gmail.com	7/2/2025	N/A	Received response via email from Adam Lewis on July 3, 2025. He stated that the information his tribe holds is a great importance. The ground disturbance should be looked at thoroughly.
California Valley Miwok Tribe	Antoinette Del Rio	Interim Chairperson	P.O. Box 695 San Andreas, CA, 95249	(209) 607-8336 antoinette.cvmt@gmail.com	7/2/2025	7/15/2025	No response.
California Valley Miwok Tribe	Lawrence Wilson Jr.	Cultural Specialist	P.O. Box 695 San Andreas, CA, 95249	(209) 304-2307 l.ewilson@yahoo.com	7/2/2025	7/15/2025	No response.
California Valley Miwok Tribe	Anthony Wilson	Treasurer	P.O. Box 695 San Andreas, CA, 95249	(530) 458-1675 awanata426@gmail.com	7/2/2025	7/15/2025	No response.
Chicken Ranch Rancheria of Me-Wuk Indians	Cynthia Reyes	Cultural Manager	P.O. Box 1159 Jamestown, CA, 95327	(209) 984-9066 creyes@crtribal.com	7/2/2025	7/15/2025	No response.
Chicken Ranch Rancheria of Me-Wuk Indians	Joanna Portillo-Hsu	Environmental & Planning Manager	P.O. Box 1159 Jamestown, CA, 95327	(209) 984-9066 jportillo@crtribal.com	7/2/2025	7/15/2025	No response.

Native American Outreach Log

Knights Ferry Community Services District Water Treatment Project, Knights Ferry, Stanislaus County, California

Chicken Ranch Rancheria of Me-Wuk Indians	Monica Fox	Tribal Administrator	P.O. Box 1159 Jamestown, CA, 95327	(209) 984-9066 mfox@crbtribal.com	7/2/2025	7/15/2025	Address not found.
Chicken Ranch Rancheria of Me-Wuk Indians	Stephanie Suess	Community & Resourc	P.O. Box 1159 Jamestown, CA, 95327	(209) 984-9066 ssuess@crtribal.com	7/2/2025	7/15/2025	No response.
Ione Band of Miwok Indians	Jereme Dutschke	Cultural Resources Coo	P.O. Box 699 Plymouth, CA, 95669	(209) 781-3325 jereme@ionemiwok.net	7/2/2025	7/15/2025	Received response via email from Jereme Dutschke on July 21, 2025. He stated that the Ione Band of Miwok Indians has no comment on this project.
Ione Band of Miwok Indians	Sara Dutschke	Chairperson	P.O. Box 699 Plymouth, CA, 95669	(209) 255-8005 consultation@ionemiwok.net	7/2/2025	7/15/2025	Jereme Dutschke responded on behalf of the tribe on July 21, 2025. He stated that the Ione Band of Miwok Indians has no comment on this project.
Jackson Rancheria Band of Miwuk Indians	Rolland Fillmore	Cultural Preservation R	P.O. Box 1090 Jackson, CA, 95642	(209) 223-8370	7/2/2025	7/15/2025	No response.
Jackson Rancheria Band of Miwuk Indians	Adam Dalton	Chairperson	P.O. Box 1090 Jackson, CA, 95642	(209) 223-8370 adalton@jacksoncasino.com	7/2/2025	7/15/2025	No response.
Nashville Enterprise Miwok-Maidu-Nishinam Tribe	Cosme Valdez	Chairperson	P.O. Box 580986 Elk Grove, CA, 95758-0017	(916) 396-1173 valdezcome@comcast.net	7/2/2025	7/15/2025	No response.
Nashville Enterprise Miwok-Maidu-Nishinam Tribe	Leland Valdez	Cultural Resources		(916) 429-8047	7/2/2025	7/15/2025	No response.
Northern Valley Yokut / Ohlone Tribe	Katherine Perez	Chairperson	P.O. Box 717 Linden, CA, 95236	(209) 649-8972 canutes@verizon.net	7/2/2025	N/A	Received response via email from Katerine Perez on 7/2/2025. She stated that the tribe would like to consult on the proposed project. The tribe is aware of the cultural sensitivty of the area. The tribe is recommending that the proposed project implement cultural awareness training and have a qualified archaeologist and Native American monitor on board during all ground disturbance as part of the mitigation measures.
Northern Valley Yokut / Ohlone Tribe	Timothy Perez	Tribal Compliance Offic	P.O. Box 717 Linden, CA, 95236	(209) 662-2788 huskanam@gmail.com	7/2/2025	N/A	Katherine Perez responded on behalf of the tribe.

Native American Outreach Log

Knights Ferry Community Services District Water Treatment Project, Knights Ferry, Stanislaus County, California

Pakan'yani Maidu of Strawberry Valley Rancheria	Tina Goodwin	Chairperson	P.O. Box 984 Marysville, CA, 95901	(617) 417-2166 tinagoodwin@washoetanf.org	7/2/2025	7/15/2025	Email box full. Mailed letter on 7/2/2025. Followed up again and email box is full.
Tule River Indian Tribe	Kerri Vera	Environmental Department Director	P.O. Box 589 Porterville, CA 93258	(559) 783-8892 kerri.vera@tulerivertribe-nsn.gov	7/2/2025	7/15/2025	No response.
Tule River Indian Tribe	Shine Nieto	Chairperson	P.O. Box 589 Porterville, CA 93258	(559) 781-4271 Shine.Nieto@tulerivertribe-nsn.gov	7/2/2025	7/15/2025	No response.
Wilton Rancheria	Cultural Preservation Department		9728 Kent Street Elk Grove, CA, 95624	(916) 313-4493 cpd@wiltonrancheria-nsn.gov	7/2/2025	N/A	Received response via email from the Cultural Preservation Department of the Wilton Rancheria on 7/2/2025, stating Although the project is within the ancestral territory of the Wilton Rancheria, we do not have any comments and do not have additional information on cultural resources that the Tribe wish to share at this time.
Wilton Rancheria	Steven Hutchason	Tribal Historic Preservation Officer	9728 Kent Street Elk Grove, CA, 95624	(916) 683-6000 shutchason@wiltonrancheria-nsn.gov	7/2/2025	N/A	The Wilton Rancheria Cultural Preservation Department responded for the Wilton Rancheria.
Wilton Rancheria	Michelle St. Clair	Executive Director of Cultural Preservation	9728 Kent Street Elk Grove, CA, 95624	(916) 683-6000 mstclair@wiltonrancheria-nsn.gov	7/2/2025	N/A	The Wilton Rancheria Cultural Preservation Department responded for the Wilton Rancheria.
Wuksache Indian Tribe/Eshom Valley Band	Kenneth Woodrow	Chairperson	1179 Rock Haven Ct. Salinas, CA 93906	(831) 443-9702 kwood8934@aol.com	7/2/2025	7/15/2025	No response.

Gmail **Consuelo Sauls <csaulsarchaeo@gmail.com>**

Native American Outreach - Knights Ferry CSD Water Treatment Project, Stanislaus County

3 messages

Consuelo Sauls <csaulsarchaeo@gmail.com> Wed, Jul 2, 2025 at 8:50 AM
To: "Calaverasband.miwukindians@gmail.com" <Calaverasband.miwukindians@gmail.com>, "CalaverasMiwukPreservation@gmail.com" <CalaverasMiwukPreservation@gmail.com>, "adam2191983@gmail.com" <adam2191983@gmail.com>

Dear Gloria Grimes, Debra Grimes and Adam Lewis,

Please find attached a letter and a map location addressed to the Calaveras Band of Mi-Wuk Indians for Native American outreach regarding the Knights Ferry Community Services District Water Treatment Project in Knights Ferry, Stanislaus County.

The NAHC provided your name and address as someone who may have interest in sharing information regarding sacred sites, tribal cultural resources, or other resources of importance in the project area. Taylored Archaeology is conducting this outreach for research as part of the cultural resources investigation. Your response is greatly appreciated.

Respectively,

Consuelo Sauls

--
Consuelo Sauls, M.A., RPA 41591505
Archaeologist
Taylored Archaeology
6083 N. Figarden Dr., Ste. 616
Fresno, CA 93722
csaulsarchaeo@gmail.com
(559) 797-1572

2 attachments

Gloria Grimes Outreach Letter- Knights Ferry Project.pdf
140K

Knights Ferry 1962 topo map.pdf
3655K

Adam Lewis <adam2191983@gmail.com> Thu, Jul 3, 2025 at 6:57 AM
To: Consuelo Sauls <csaulsarchaeo@gmail.com>

The information my tribe holds of knight's fairy of ethno History is of great importance the ground disturbance should be looked at thoroughly. For these locations for hidden deposits that had been studied throughout the Stanislaus and calaveras county thank you.

Calaveras band of mi-wuk Indians
Adam Lewis Tribal chairman

[Quoted text hidden]

Consuelo Sauls <csaulsarchaeo@gmail.com> Thu, Jul 3, 2025 at 3:04 PM
To: Adam Lewis <adam2191983@gmail.com>

Hi Adam,

Thank you very much for your response. I will include your comments in my report.

Kind regards,

Consuelo Sauls
[Quoted text hidden]

Gmail

Consuelo Sauls <csaulsarchaeo@gmail.com>

Native American Outreach - Knights Ferry CSD Water Treatment Project, Stanislaus County

Cultural Preservation Department Inbox <cpd@wiltonrancheria-nsn.gov> Tue, Jul 15, 2025 at 8:38 AM
To: Consuelo Sauls <csaulsarchaeo@gmail.com>, "Michelle St. Clair" <MStClair@wiltonrancheria-nsn.gov>, Steven Hutchason <shutchason@wiltonrancheria-nsn.gov>

Dear Consuelo,

Thank you for your letter dated July 2, 2025, regarding the proposed project. Wilton Rancheria ("Tribe") is a federally recognized Tribe as listed in the Federal Register, Vol. 74, No. 132, p. 33468-33469, as "Wilton Rancheria of Wilton, California". The Tribe's
Service Delivery Area ("SDA") as listed in the Federal Register, Vol. 78, No. 176, p. 55731, is Sacramento County. The Tribe's Trust Lands are in Sacramento County however, the Tribe's ancestral territory spans from Sacramento County to portions of the surrounding
Counties.

Although your project is within the ancestral territory of the Wilton Rancheria, we do not have any comments and do not have any additional information on cultural resources that we wish to share at this time. We appreciate your continued outreach and/ or consultation
for future projects and respectfully request that you contact us if there are any project updates or changes.

Thank you,

Wilton Rancheria
Department of Cultural Preservation
Front Desk: 916-313-4493
cpd@wiltonrancheria-nsn.gov

From: Consuelo Sauls <csaulsarchaeo@gmail.com>
Sent: Tuesday, July 15, 2025 8:00 AM
To: Michelle St. Clair <MStClair@wiltonrancheria-nsn.gov>; Steven Hutchason <shutchason@wiltonrancheria-nsn.gov>; Cultural Preservation Department Inbox <cpd@wiltonrancheria-nsn.gov>
Subject: Re: Native American Outreach - Knights Ferry CSD Water Treatment Project, Stanislaus County

Some people who received this message don't often get email from csaulsarchaeo@gmail.com. Learn why this is important

[Quoted text hidden]

Gmail **Consuelo Sauls <csaulsarchaeo@gmail.com>**

Native American Outreach - Knights Ferry CSD Water Treatment Project, Stanislaus County

4 messages

Consuelo Sauls <csaulsarchaeo@gmail.com> Wed, Jul 2, 2025 at 9:04 AM
To: consultation@ionemiwok.net, "jereme@ionemiwok.net" <jereme@ionemiwok.net>

Dear Sara Dutschke and Jereme Dutschke,

Please find attached a letter and a map location addressed to the Ione Band of Miwok Indians for Native American outreach regarding the Knights Ferry Community Services District Water Treatment Project in Knights Ferry, Stanislaus County.

The NAHC provided your name and address as someone who may have interest in sharing information regarding sacred sites, tribal cultural resources, or other resources of importance in the project area. Taylored Archaeology is conducting this outreach for research as part of the cultural resources investigation. Your response is greatly appreciated.

Respectively,

Consuelo Sauls

--
Consuelo Sauls, M.A., RPA 41591505
Archaeologist
Taylored Archaeology
6083 N. Figarden Dr., Ste. 616
Fresno, CA 93722
csaulsarchaeo@gmail.com
(559) 797-1572

2 attachments

Jereme Dutschke Outreach Letter- Knights Ferry Project.pdf
140K

Knights Ferry 1962 topo map.pdf
3655K

Consuelo Sauls <csaulsarchaeo@gmail.com> Tue, Jul 15, 2025 at 8:00 AM
To: consultation@ionemiwok.net, "jereme@ionemiwok.net" <jereme@ionemiwok.net>

Dear Sarah Dutschke and Jereme Dutschke,

I am following up on a letter I sent to you by email on July 2, 2025. I am conducting a cultural resources assessment for the Knights Ferry Community Services District Water Treatment Project in Knights Ferry, Stanislaus County, California.

I want to confirm my letter was received and to offer you the opportunity to share any information regarding the project area. If you have any questions, please contact me at csaulsarchaeo@gmail.com. Thank you for your time.

Respectively,
Consuelo Sauls
[Quoted text hidden]

Jereme Dutschke <jereme@ionemiwok.net> Mon, Jul 21, 2025 at 3:29 PM
To: Consuelo Sauls <csaulsarchaeo@gmail.com>, Consultation <consultation@ionemiwok.net>

Hello,

Thank you for following up, yes, the letter has been received. The Ione Band of Miwok Indians has no comment on this project.

The Tribe has asked the Native American Heritage Commission to remove Stanislaus County from our contact list. There is no need to send notifications or information requests to the Tribe for Stanislaus County at this time.

Thank you,

Ione Band of Miwok Indians

Jeremie Dutschke
Cultural Resources Coordinator
Ione Band of Miwok Indians
9252 Bush Street
Plymouth, CA 95669-0699
Direct: 209-249-5104
Cell: 209-781-3325
Email: jereme@ionemiwok.net

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[Quoted text hidden]

Consuelo Sauls <csaulsarchaeo@gmail.com> Mon, Jul 21, 2025 at 3:41 PM
To: Jereme Dutschke <jereme@ionemiwok.net>
Cc: Consultation <consultation@ionemiwok.net>

Hello Jereme,

Thank you very much for your response. I will make sure to keep your information in mind for any future Stanislaus County work I may do.

Kind regards,
Consuelo Sauls
[Quoted text hidden]

Gmail **Consuelo Sauls <csaulsarchaeo@gmail.com>**

Native American Outreach - Knights Ferry CSD Water Treatment Project, Stanislaus County

5 messages

Consuelo Sauls <csaulsarchaeo@gmail.com> Wed, Jul 2, 2025 at 8:44 AM
To: jesssalynn@bvtribe.com, jesus@bvtribe.com

Dear Jessalynn Pastran and Jesse Galvan,

Please find attached a letter and a map location addressed to the Buena Vista Rancheria of Me-Wuk Indians for Native American outreach regarding the Knights Ferry Community Services District Water Treatment Project in Knights Ferry, Stanislaus County.

The NAHC provided your name and address as someone who may have interest in sharing information regarding sacred sites, tribal cultural resources, or other resources of importance in the project area. Taylored Archaeology is conducting this outreach for research as part of the cultural resources investigation. Your response is greatly appreciated.

Respectively,

Consuelo Sauls

--
Consuelo Sauls, M.A., RPA 41591505
Archaeologist
Taylored Archaeology
6083 N. Figarden Dr., Ste. 616
Fresno, CA 93722
csaulsarchaeo@gmail.com
(559) 797-1572

2 attachments

Jessalynn Pastran Outreach Letter- Knights Ferry Project.pdf
140K

Knights Ferry 1962 topo map.pdf
3655K

postmaster@bvtribe.com <postmaster@bvtribe.com> Wed, Jul 2, 2025 at 8:47 AM
To: csaulsarchaeo@gmail.com

Office 365

Your message to jesssalynn@bvtribe.com couldn't be delivered.

jesssalynn wasn't found at bvtribe.com.

csaulsarchaeo	Office 365	jesssalynn
Action Required		Recipient

Unknown To address

How to Fix It

The address may be misspelled or may not exist. Try one or more of the following:

- Send the message again following these steps: In Outlook, open this non-delivery report (NDR) and choose **Send Again** from the Report ribbon. In Outlook on the web, select this NDR, then select the link "**To send this message again, click here.**" Then delete and retype the entire recipient address. If prompted with an Auto-Complete List suggestion don't select it. After typing the complete address, click **Send**.

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=?us-ascii?Q?p56zsszD8dn3OqXLtHPESe+PE4x7L0RQ8JuKoi802BdnmT8YmYG/DrTIXckl?=
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=?us-ascii?Q?uJXvsAsRZMwHnIojU429+0ekljj5V3tP8bwXHeRFwQRCUVfI6YVOd/58CoAG2?=
=?us-ascii?Q?I3K6alqNYc+SqVgGHhPC9xYkZHAD1359rf3FqXD51ANRfPA1+tB1vE6j85MO?=
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=?us-ascii?Q?OB8=3D?=
X-Forefront-Antispam-Report:
CIP:2a01:111:f403:34::202;CTRY:;LANG:en;SCL:1;SRV:;IPV:NLI;SFV:NSPM;H:NAM11-DM6-obe.outbound.protection.outlook.com;PTR:mail-dm6nam11lp20202.outbound.protection.outlook.com;CAT:NONE;SFS:(13230040)(35042699022)(7093399015)(2040899013)(8096899003)(4053099003)(13003099007);DIR:INB;
X-MS-Exchange-ATPSafeLinks-Stat: 0
X-OriginatorOrg: bvtribe.com
X-MS-Exchange-CrossTenant-OriginalArrivalTime: 02 Jul 2025 15:47:32.8863 (UTC)
X-MS-Exchange-CrossTenant-Network-Message-Id: bb18a458-7f9b-4c6c-098a-08ddb97fc28c
X-MS-Exchange-CrossTenant-Id: 60a08ecd-3a95-46cc-b1e9-d43c84c869c6
X-MS-Exchange-CrossTenant-AuthSource:
CH2PEPF0000013D.namprd02.prod.outlook.com
X-MS-Exchange-CrossTenant-AuthAs: Anonymous
X-MS-Exchange-CrossTenant-FromEntityHeader: Internet
X-MS-Exchange-Transport-CrossTenantHeadersStamped: CH3PR12MB9343

Final-Recipient: rfc822;jesssalynn@bvtribe.com
Action: failed
Status: 5.4.14
Diagnostic-Code: smtp;554 5.4.14 Hop count exceeded - possible mail loop ATTR34 [BY1PEPF0001AE18.namprd04.prod.outlook.com 2025-07-02T15:47:42.845Z 08DDB91711F01B47]
Remote-MTA: dns;BY1PEPF0001AE18.mail.protection.outlook.com

---------- Forwarded message ----------
From: Consuelo Sauls <csaulsarchaeo@gmail.com>
To: jesssalynn@bvtribe.com, jesus@bvtribe.com
Cc:
Bcc:
Date: Wed, 2 Jul 2025 08:44:02 -0700
Subject: Native American Outreach - Knights Ferry CSD Water Treatment Project, Stanislaus County

You don't often get email from csaulsarchaeo@gmail.com. Learn why this is important

Dear Jessalynn Pastran and Jesse Galvan,

Please find attached a letter and a map location addressed to the Buena Vista Rancheria of Me-Wuk Indians for Native American outreach regarding the Knights Ferry Community Services District Water Treatment Project in Knights Ferry, Stanislaus County.

The NAHC provided your name and address as someone who may have interest in sharing information regarding sacred sites, tribal cultural resources, or other resources of importance in the project area. Taylored Archaeology is conducting this outreach for research as part of the cultural resources investigation. Your response is greatly appreciated.

Respectively,

Consuelo Sauls

--
Consuelo Sauls, M.A., RPA 41591505
Archaeologist
Taylored Archaeology
6083 N. Figarden Dr., Ste. 616
Fresno, CA 93722
csaulsarchaeo@gmail.com
(559) 797-1572

2 attachments

Jessalynn Pastran Outreach Letter- Knights Ferry Project.pdf
140K

Knights Ferry 1962 topo map.pdf
3655K

Consuelo Sauls <csaulsarchaeo@gmail.com> Tue, Jul 15, 2025 at 8:00 AM
To: jesssalynn@bvtribe.com, jesus@bvtribe.com

Dear Jessalynn Pastran and Jesse Galvan,

I am following up on a letter I sent to you by email on July 2, 2025. I am conducting a cultural resources assessment for the Knights Ferry Community

Services District Water Treatment Project in Knights Ferry, Stanislaus County, California.

I want to confirm my letter was received and to offer you the opportunity to share any information regarding the project area. If you have any questions, please contact me at csaulsarchaeo@gmail.com. Thank you for your time.

Respectively,
Consuelo Sauls
[Quoted text hidden]

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postmaster@bvtribe.com <postmaster@bvtribe.com> Tue, Jul 15, 2025 at 8:01 AM
To: csaulsarchaeo@gmail.com

Office 365

Your message to jesssalynn@bvtribe.com couldn't be delivered.

jesssalynn wasn't found at bvtribe.com.

csaulsarchaeo	**Office 365**	**jesssalynn**
Action Required		Recipient

Unknown To address

How to Fix It

The address may be misspelled or may not exist. Try one or more of the following:

- Send the message again following these steps: In Outlook, open this non-delivery report (NDR) and choose **Send Again** from the Report ribbon. In Outlook on the web, select this NDR, then select the link "**To send this message again, click here.**" Then delete and retype the entire recipient address. If prompted with an Auto-Complete List suggestion don't select it. After typing the complete address, click **Send**.
- Contact the recipient (by phone, for example) to check that the address is correct.
- The recipient may have set up email forwarding to an incorrect address. Ask them to check that any forwarding they've set up is working correctly.
- Clear the recipient Auto-Complete List in Outlook or Outlook on the web by following the steps in this article: Fix email delivery issues for error code 5.1.1 in Office 365, and then send the message again. Retype the entire recipient address before selecting **Send**.

Was this helpful? Send feedback to Microsoft.

More Info for Email Admins

Status code 554 5.4.14

Typically this error occurs because the recipient email address is incorrect or doesn't exist at the destination domain. This can usually be fixed by the sender. However, sometimes the issue needs to be fixed by the recipient or the recipient's email admin. If the steps in the **How to Fix It** section above don't fix the problem, and you're the email admin for the recipient, try one or more of the following:

The email address exists and is correct - Confirm that the recipient address exists, is correct, and is accepting messages.

Date: Tue, 15 Jul 2025 08:00:00 -0700
Subject: Re: Native American Outreach - Knights Ferry CSD Water Treatment Project, Stanislaus County

You don't often get email from csaulsarchaeo@gmail.com. Learn why this is important

Dear Jessalynn Pastran and Jesse Galvan,

I am following up on a letter I sent to you by email on July 2, 2025. I am conducting a cultural resources assessment for the Knights Ferry Community Services District Water Treatment Project in Knights Ferry, Stanislaus County, California.

I want to confirm my letter was received and to offer you the opportunity to share any information regarding the project area. If you have any questions, please contact me at csaulsarchaeo@gmail.com. Thank you for your time.

Respectively,
Consuelo Sauls

On Wed, Jul 2, 2025 at 8:44 AM Consuelo Sauls <csaulsarchaeo@gmail.com> wrote:

> Dear Jessalynn Pastran and Jesse Galvan,
>
> Please find attached a letter and a map location addressed to the Buena Vista Rancheria of Me-Wuk Indians for Native American outreach regarding the Knights Ferry Community Services District Water Treatment Project in Knights Ferry, Stanislaus County.
>
> The NAHC provided your name and address as someone who may have interest in sharing information regarding sacred sites, tribal cultural resources, or other resources of importance in the project area. Taylored Archaeology is conducting this outreach for research as part of the cultural resources investigation. Your response is greatly appreciated.
>
> Respectively,
>
> Consuelo Sauls
>
> --
> **Consuelo Sauls, M.A., RPA 41591505**
> **Archaeologist**
> **Taylored Archaeology**
> **6083 N. Figarden Dr., Ste. 616**
> **Fresno, CA 93722**
> csaulsarchaeo@gmail.com
> (559) 797-1572

--
Consuelo Sauls, M.A., RPA 41591505
Archaeologist
Taylored Archaeology
6083 N. Figarden Dr., Ste. 616
Fresno, CA 93722
csaulsarchaeo@gmail.com
(559) 797-1572

Jesus "Jesse" Galvan <jesus@bvtribe.com> Wed, Jul 23, 2025 at 2:13 PM
To: Consuelo Sauls <csaulsarchaeo@gmail.com>, "jesssalynn@bvtribe.com" <jesssalynn@bvtribe.com>
Cc: Mike DeSpain <mike@bvtribe.com>

Hello Consuelo,

Thank you for reaching out to us at the Buena Vista Rancheria of Me-Wuk Indians. We appreciate your efforts and would like to offer our support on behalf of the Tribe.

We want to extend this opportunity to local Tribes in the area. If any Cultural Resources are inverted, please do not hesitate to contact us at the Buena Vista Rancheria of Me-Wuk Indians. To take further measures to ensure that the cultural resources are handled and protected.

Thank you and have a wonderful day!

Best regards,

Jesse Galvan

THPO Coordinator | Cultural Heritage Specialist

Buena Vista Rancheria of Me-Wuk Indians (Tribe)

4650 Coal Mine Rd,

Ione, CA 95640

Office: (916) 491-0011 ex: 255

Fax: (916) 491- 0012

Cell (209) 751-7785

jesus@bvtribe.com

Sent: Tuesday, July 15, 2025 8:00 AM
To: jesssalynn@bvtribe.com; Jesus "Jesse" Galvan <jesus@bvtribe.com>
Subject: Re: Native American Outreach - Knights Ferry CSD Water Treatment Project, Stanislaus County

You don't often get email from csaulsarchaeo@gmail.com. Learn why this is important

[Quoted text hidden]

Gmail **Consuelo Sauls <csaulsarchaeo@gmail.com>**

Native American Outreach - Knights Ferry CSD Water Treatment Project, Stanislaus County

3 messages

Consuelo Sauls <csaulsarchaeo@gmail.com> Wed, Jul 2, 2025 at 9:14 AM
To: Katherine Perez <canutes@verizon.net>, Timothy Perez <huskanam@gmail.com>

Dear Katherine Perez and Timothy Perez,

Please find attached a letter and a map location addressed to the Northern Valley Yokut / Ohlone Tribe for Native American outreach regarding the Knights Ferry Community Services District Water Treatment Project in Knights Ferry, Stanislaus County.

The NAHC provided your name and address as someone who may have interest in sharing information regarding sacred sites, tribal cultural resources, or other resources of importance in the project area. Taylored Archaeology is conducting this outreach for research as part of the cultural resources investigation. Your response is greatly appreciated.

Respectively,

Consuelo Sauls

--
Consuelo Sauls, M.A., RPA 41591505
Archaeologist
Taylored Archaeology
6083 N. Figarden Dr., Ste. 616
Fresno, CA 93722
csaulsarchaeo@gmail.com
(559) 797-1572

2 attachments

Katherine Perez Outreach Letter- Knights Ferry Project.pdf
141K

Knights Ferry 1962 topo map.pdf
3655K

Katherine Perez <canutes@verizon.net> Wed, Jul 2, 2025 at 1:16 PM
To: Consuelo Sauls <csaulsarchaeo@gmail.com>

Hello Consuelo,

We (Northern Valley Yokut / Costanoan Tribe) would like to consult on the proposed Knights Ferry Community Services District Water Treatment Project in Stanislaus County, CA.
We are aware of the cultural sensitivity of the area. The tribe is recommending that the proposed project implement cultural awareness training and have a qualified archaeologist and a Native American monitor on board during all ground disturbance as part of the mitigation measures.

Katherine Perez, President
Nototomne Cultural Preservation
Northern Valley Yokut Tribe
Email: canutes@verizon.net
Cell: (209) 649-8972

[Quoted text hidden]

Consuelo Sauls <csaulsarchaeo@gmail.com> Thu, Jul 3, 2025 at 3:01 PM
To: Katherine Perez <canutes@verizon.net>

Hello Katherine,

Thank you so much for letting me know. I will pass your comments and request on to the lead agency and include your response in my report.

Kind regards,

Consuelo Sauls

[Quoted text hidden]

Gmail **Consuelo Sauls <csaulsarchaeo@gmail.com>**

Native American Outreach - Knights Ferry CSD Water Treatment Project, Stanislaus County

3 messages

Consuelo Sauls <csaulsarchaeo@gmail.com> Wed, Jul 2, 2025 at 8:38 AM
To: vjltestingcenter@aol.com, Ed Ketchum <aerieways@aol.com>

Dear Valentin Lopez and Ed Ketchum,

Please find attached a letter and a map location addressed to the Amah Mutsun Tribal Band for Native American outreach regarding the Knights Ferry Community Services District Water Treatment Project in Knights Ferry, Stanislaus County.

The NAHC provided your name and address as someone who may have interest in sharing information regarding sacred sites, tribal cultural resources, or other resources of importance in the project area. Taylored Archaeology is conducting this outreach for research as part of the cultural resources investigation. Your response is greatly appreciated.

Respectively,

Consuelo Sauls

--
Consuelo Sauls, M.A., RPA 41591505
Archaeologist
Taylored Archaeology
6083 N. Figarden Dr., Ste. 616
Fresno, CA 93722
csaulsarchaeo@gmail.com
(559) 797-1572

2 attachments

Valentin Lopez Outreach Letter- Knights Ferry Project.pdf
141K

Knights Ferry 1962 topo map.pdf
3655K

Valentin Lopez <vjltestingcenter@aol.com> Wed, Jul 2, 2025 at 8:56 AM
To: Consuelo Sauls <csaulsarchaeo@gmail.com>

This project is outside our traditional tribal territory, we have no comments.

Valentin Lopez, Chair
Amah Mutsun Tribal Band

[Quoted text hidden]

Consuelo Sauls <csaulsarchaeo@gmail.com> Thu, Jul 3, 2025 at 2:58 PM
Draft To: Valentin Lopez <vjltestingcenter@aol.com>

Thank you very much for your response.

Si
[Quoted text hidden]

Gmail **Consuelo Sauls <csaulsarchaeo@gmail.com>**

Native American Outreach - Knights Ferry CSD Water Treatment Project, Stanislaus County

3 messages

Consuelo Sauls <csaulsarchaeo@gmail.com> Wed, Jul 2, 2025 at 9:22 AM
To: mstclair@wiltonrancheria-nsn.gov, shutchason@wiltonrancheria-nsn.gov, cpd@wiltonrancheria-nsn.gov

Dear Steven Hutchason and Michelle St. Clair,

Please find attached a letter and a map location addressed to the Wilton Rancheria for Native American outreach regarding the Knights Ferry Community Services District Water Treatment Project in Knights Ferry, Stanislaus County.

The NAHC provided your name and address as someone who may have interest in sharing information regarding sacred sites, tribal cultural resources, or other resources of importance in the project area. Taylored Archaeology is conducting this outreach for research as part of the cultural resources investigation. Your response is greatly appreciated.

Respectively,

Consuelo Sauls

--
Consuelo Sauls, M.A., RPA 41591505
Archaeologist
Taylored Archaeology
6083 N. Figarden Dr., Ste. 616
Fresno, CA 93722
csaulsarchaeo@gmail.com
(559) 797-1572

2 attachments

Michelle St. Clair Outreach Letter- Knights Ferry Project.pdf
141K

Knights Ferry 1962 topo map.pdf
3655K

Consuelo Sauls <csaulsarchaeo@gmail.com> Tue, Jul 15, 2025 at 8:00 AM
To: mstclair@wiltonrancheria-nsn.gov, shutchason@wiltonrancheria-nsn.gov, cpd@wiltonrancheria-nsn.gov

Dear Steven Hutchason and Michelle St. Clair,

I am following up on a letter I sent to you by email on July 2, 2025. I am conducting a cultural resources assessment for the Knights Ferry Community Services District Water Treatment Project in Knights Ferry, Stanislaus County, California.

I want to confirm my letter was received and to offer you the opportunity to share any information regarding the project area. If you have any questions, please contact me at csaulsarchaeo@gmail.com. Thank you for your time.

Respectively,
Consuelo Sauls
[Quoted text hidden]

Cultural Preservation Department Inbox <cpd@wiltonrancheria-nsn.gov> Tue, Jul 15, 2025 at 8:38 AM
To: Consuelo Sauls <csaulsarchaeo@gmail.com>, "Michelle St. Clair" <MStClair@wiltonrancheria-nsn.gov>, Steven Hutchason <shutchason@wiltonrancheria-nsn.gov>

Dear Consuelo,

Thank you for your letter dated July 2, 2025, regarding the proposed project. Wilton Rancheria ("Tribe") is a federally recognized Tribe as listed in the Federal Register, Vol. 74, No. 132, p. 33468-33469, as "Wilton Rancheria of Wilton, California". The Tribe's
Service Delivery Area ("SDA") as listed in the Federal Register, Vol. 78, No. 176, p. 55731, is Sacramento County. The Tribe's Trust Lands are in Sacramento County however, the Tribe's ancestral territory spans from Sacramento County to portions of the surrounding
Counties.

Although your project is within the ancestral territory of the Wilton Rancheria, we do not have any comments and do not have any additional information on cultural resources that we wish to share at this time. We appreciate your continued outreach and/ or consultation
for future projects and respectfully request that you contact us if there are any project updates or changes.

Thank you,

Wilton Rancheria
Department of Cultural Preservation
Front Desk: 916-313-4493
cpd@wiltonrancheria-nsn.gov

From: Consuelo Sauls <csaulsarchaeo@gmail.com>
Sent: Tuesday, July 15, 2025 8:00 AM
To: Michelle St. Clair <MStClair@wiltonrancheria-nsn.gov>; Steven Hutchason <shutchason@wiltonrancheria-nsn.gov>; Cultural Preservation Department Inbox <cpd@wiltonrancheria-nsn.gov>
Subject: Re: Native American Outreach - Knights Ferry CSD Water Treatment Project, Stanislaus County

Some people who received this message don't often get email from csaulsarchaeo@gmail.com. Learn why this is important

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APPENDIX D

Cultural Resource Record Forms