

OAKDALE 2030 GENERAL PLAN AND CAP

CEQA Findings and Statement of Overriding Considerations

Prepared for
City of Oakdale

April 2013



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OAKDALE 2030 GENERAL PLAN AND CLIMATE ACTION PLAN

CEQA Findings and Statement of Overriding Considerations

Introduction

The project consists of an update to the City of Oakdale General Plan (also referred to as the Oakdale 2030 General Plan and the Oakdale Climate Action Plan. The Oakdale 2030 General Plan updates and reorganizes the City’s general plan policies and documents as discussed below. The 2030 General Plan will serve as a “blueprint” for growth; that is, it establishes the general pattern of land use and adopts goals and policies to guide the City in future land use decision-making. The goals and policies established by the General Plan address a range of related topics, including, but not limited to Land Use, Economic Vitality, Mobility, Public Facilities, Community Services, Natural Resources, Public Health and Safety, and Noise (See Draft Environmental Impact Report (“Draft EIR” or DEIR) Section 3.0, “Project Description”, for further details).

Oakdale is the lead agency as defined in the California Environmental Quality Act (CEQA). (Public Resource Code §21067).

The Final Environmental Impact Report for the Oakdale 2030 General Plan and the Climate Action Plan (also referred to as the “Final EIR” or FEIR) evaluates the environmental effects associated with implementation of the 2030 General Plan and the Climate Action Plan. The FEIR is identified by State Clearinghouse Number (SCH#) 2011082051. The FEIR serves as an informational document for public agency decision-makers and the general public regarding the environmental effects of the 2030 General Plan and the Climate Action Plan. The FEIR also identifies feasible mitigation measures (referred to as “Required Additional Mitigating Policies and Implementation Measures”) and alternatives that would reduce or eliminate significant impacts of the proposed project. The scope of the FEIR includes the potential approval of two specific plans consistent with the 2030 General Plan: the Crane Crossing Specific Plan (CCSP) and the Sierra Pointe Specific Plan (SPSP). Approval of these two specific plans will be considered subsequent to the 2030 General Plan, and will be the subject of separate findings.

The FEIR is the primary reference document for the development and implementation of a mitigation monitoring plan for the proposed project. Environmental impacts cannot always be mitigated to a level that is considered less than significant. In accordance with the CEQA Guidelines (Cal. Code Regs., title 14, §15000 et seq.), if a lead agency approves a project that has significant impacts that are not substantially mitigated (i.e., significant unavoidable impacts), the agency shall state in

writing the specific reasons for approving the project based on the final CEQA documents and any other information in the public record for the project. (CEQA Guidelines, §15093, subd. (b).) This is called a “statement of overriding considerations”. (CEQA Guidelines, §15093.) (DEIR, page 1-9)

The FEIR consists of the following contents:

- Chapter 1, “Introduction and Readers’ Guide”;
- Chapter 2, “Comments on the Draft EIR,” includes a copy of each of the comment letters received during the public review period. The individual comment letter numbers correspond to those responses provided in Chapter 3;
- Chapter 3, “Responses to Comments on the Draft EIR,” contains the written responses to the individual comments received during the public review period for the DEIR along with written responses to those comments;
- Chapter 4, “Minor Revisions to the Draft EIR,” contains minor changes and edits to the text of the DEIR made in response to the comments; and
- Chapter 5, “Mitigation Monitoring and Reporting Program,” the reporting and monitoring program ensures that measures adopted to reduce or avoid significant environmental impacts are implemented.

Chapters 6 and 7 of the FEIR include the Mitigation Monitoring and Reporting Programs for the two specific plans. Chapter 8 provides the list of preparers.

This document includes the CEQA Findings for approval of the 2030 General Plan and Climate Action Plan, consistent with CEQA Guidelines section 150901, and includes the Statement of Overriding Considerations, consistent with CEQA Guidelines section 15093.

Project Description Summary

Project Setting

The City of Oakdale is located at the base of the foothills of the Sierra Nevada Mountains in eastern Stanislaus County, California. Oakdale is approximately 15 miles northeast of Modesto and 30 miles southeast of Stockton. Other smaller cities surrounding Oakdale include Escalon (9 miles northwest), Riverbank (5 miles west), Waterford (10 miles southeast), Hughson (13 miles south), and Ceres (18 miles southwest). The geographic extent of environmental analysis included in the EIR for the proposed project is the 2030 Planning Area, which is shown on Figure 3-1 Planning Boundaries in the DEIR. This area is over 16 square miles and includes the current Oakdale City limits and the City’s existing and future sphere of influence (SOI), which encompass the City’s two proposed specific plan areas and other potential new growth areas (i.e., Future Specific Plan Areas 2, 5, and 8, and the Area of Concern).

The CCSP area is located along the northwestern edge of the City, approximately 2 miles west of Downtown along Highway 108/ West F Street. The Plan Area consists of two separate geographic areas, linked by Crane Road. Planning Area 1, the “North Area,” is approximately 171 acres and is located to the north of Pontiac Street, east of its intersection with Crane Road. Planning Area 3,

the “South Area,” is approximately 92 acres and is located along the north side of Highway 108/West F Street, at the intersection with Crane Road. The boundaries for the North Area and the South Area are shown on Figure 3-1 in the DEIR.

The SPSP is located along the eastern edge of the City of Oakdale, approximately 1½ miles east of the Downtown district along Highway 120/ East F Street. The SPSP area is generally bounded by Highway 120 to the north, South Stearns Road to the east, Orsi Road to the west, and Sierra Avenue to the south. The SPSP area boundaries are shown on Figure 3-1 in the DEIR.

Project Background

The general plan is a state-required legal document (Government Code §65300) that provides guidance to local elected officials when making determinations pertaining to the allocation of resources and the future physical form and character of development. The City of Oakdale’s current 2015 General Plan was adopted in January of 1994. This plan has not been comprehensively updated since its adoption, although amendments have occurred as recently as December of 2003. Because much of the data, analyses, and policies in the 2015 General Plan do not reflect the current conditions in the City, a comprehensive update of the General Plan was necessary to accommodate future growth in Oakdale. In 2009, the City of Oakdale began the process of developing a new General Plan, which included outreach to the public. Specifically, there were three public workshops held to: solicit input on the community’s vision for the future; identify issues facing the City; formulate Citywide land use alternatives; provide input on the land use plans for CCSP and SPSP; and help define policy direction. Several joint City Council and Planning Commission Study Sessions were held throughout the update process to provide input on major milestones and confirm direction of the proposed project. Each of these study sessions were open to the public and served as an opportunity for the community to provide input. Additional public outreach efforts included stakeholder interviews, distribution of project newsletters, and a website dedicated to the 2030 General Plan where the community could obtain information on the project, as well as provide any comments.

The City of Oakdale has historically been an agricultural community with a rich rural ranching heritage. Over the years, the City has experienced a steady and healthy rate of growth, emerging as a distinct freestanding small urban community. Existing land uses within the City are generally characterized by residential, commercial, industrial, public/semi public, and parkland uses. The predominant existing land use in the existing and future SOI is agriculture, with some residential uses. These agricultural areas are distinguished by large lot suburban or rural estate homes and active agricultural lands with field crops, orchards, dairy production, pastureland, and/or livestock grazing.

Project Objectives

The following objectives have been established for the proposed project and will aid decision makers in their review of the project and associated environmental impacts:

2030 General Plan

- Provide a comprehensive update to the City’s General Plan to more effectively address the issues facing Oakdale, and reflect the current values and vision of the community;

- Maintain the City’s small town character and sense of community;
- Establish General Plan boundaries that allow for the planning of quality, managed and sustainable growth;
- Meet the housing needs of existing and future residents through a variety of housing types and designs;
- Preserve and enhance existing neighborhoods;
- Promote a vital downtown district with a mix of uses that attract local residents and tourists that include retail, office, residential, entertainment, and cultural uses;
- Provide additional opportunities for industry and employment to strengthen and diversify the economic base of the City; and
- Improve circulation and safety for vehicles and pedestrians.

Climate Action Plan

- Adopt a Climate Action Plan that will comply with the intent of State law, advance sustainability in the City, and reflect community values;
- Identify how the City will reduce annual GHG emissions by 29% below business-as-usual emissions by 2020;
- Provide clear guidance to City staff and decision makers regarding how to implement key actions to reduce GHG emissions; and
- Encourage residents and businesses to participate in community efforts to reduce GHG emissions.

Procedural Compliance with CEQA

Environmental Review and Public Participation

In accordance with section 15082(a) of the CEQA Guidelines, the City prepared and circulated a Notice of Preparation (NOP) of an EIR. The NOP was circulated for a 30-day comment period, which began on August 19, 2011, and ended on September 19, 2011. The City received eight (8) scoping comment letters, which were considered in the preparation of the Draft EIR (see DEIR Appendix A).

The Draft EIR was released on July 25, 2012 for a 45-day public review period. The review period closed on September 17, 2012. Sixteen (16) written comment letters were received during the review period, and two letters were received after. These comments are included in their entirety in Chapter 2 of the FEIR. Substantive issues raised in the comment letters were addressed in the FEIR.

The FEIR was released on April 17, 2013. While CEQA does not require the circulation of an FEIR for public comment, Public Resources Code section 21092.5(a) requires that the lead agency provide a written response to comments received from a public agency at least ten (10) days prior to certifying the EIR. This FEIR has been distributed to the commenting public agencies to meet the requirements of section 21092.5(a).

Certification of the Environmental Impact Report

The City certifies the following in accordance with CEQA Guideline section 15090:

1. This FEIR has been completed in compliance with CEQA;
2. This FEIR was presented to the City Council, and the City Council reviewed and considered the information contained in the FEIR prior to approving the proposed project; and
3. This FEIR reflects the City's independent judgment and analysis.

Mitigation Monitoring and Reporting Programs

A Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the proposed project, and shall be adopted by the City Council when approving the proposed project. (See Pub. Resources Code, § 21081.6, subd. (a)(1); CEQA Guidelines, § 15097.) The City will use the MMRP to track compliance with the proposed project mitigation measures.

Custodian of the Record of Proceedings

The City of Oakdale Community Development Department is the custodian of the FEIR, the documents related to the preparation of the FEIR, and the approval of the proposed project. The Department's offices are located at 120 South Sierra Avenue, Oakdale, CA, 95361

Environmental Impacts and Findings

CEQA Requirements

Public Resources Code section 21002 provides that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects. The required procedures are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects. In the event that specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof. (Public Resources Code §21002.)

The requirements set forth in Public Resources Code section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See Pub. Resources Code §21081, subd. (a); CEQA Guidelines, § 15091, subd. (a).)

The EIR included a detailed analysis of impacts in multiple environmental disciplines, analyzing the proposed project and alternatives, including a No Project Alternative. The EIR discloses the environmental impacts expected to result from implementation of the proposed project. Where possible, mitigation measures were identified to avoid or minimize significant environmental

effects. The mitigation measures identified in the EIR are measures proposed by the lead agency, and other measures proposed by the lead agency or responsible or trustee agencies or other persons that were not included in the proposed project but could reasonably be expected to reduce adverse impacts if required as conditions of approving the proposed project, as required by CEQA Guidelines section 15126.4(a)(1)(A). Public Resources Code section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors." CEQA Guidelines section 15364 adds another factor: "legal" considerations. (See also *Citizens of Goleta Valley v. City Council "Goleta II"* (1990) 52 Cal.3d 553, 565.)

The concept of "feasibility" also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417.) "[F]easibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors." (Id.; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715.) Alternatives and mitigation measures may also be determined to be infeasible if they do not "fully satisfy the objectives associated with a proposed project" or are "undesirable from a policy standpoint." (*California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957.)

With respect to a project for which significant impacts are not avoided or substantially lessened, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's "benefits" rendered "acceptable" its "unavoidable adverse environmental effects." (CEQA Guidelines, §15093, §15043, subd. (b); see also Pub. Resources Code, § 21081, subd. (b).)

Pursuant to Public Resources Code section 21081 and CEQA Guidelines section 15091, no public agency shall approve or carry out a project for which a FEIR has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless the public agency makes one or more of the following findings with respect to each significant impact:

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

The City has made one or more of these specific written findings regarding each significant impact associated with the proposed project. These findings set forth the evidentiary and policy basis for the City Council's decision to approve the proposed project in a manner consistent with the requirements of CEQA. Those findings are presented below in **Table 1**, along with a presentation of facts in support of the findings.

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
4.1 Land Use and Agricultural Resources				
Impact 4.1.1: The proposed project could divide the physical arrangement of an established community.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: The proposed project has been developed with the primary goal of insuring that future growth will occur in a concise, orderly pattern consistent with the economic, social, and environmental needs of the specific communities that can accommodate future planned population growth.</p>	LTS
Impact 4.1.2: The proposed project could conflict with other applicable adopted land use plans.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: The intent of the proposed project is to ensure that existing and future land uses function without imposing a nuisance, hazard, or unhealthy condition upon adjacent uses. Commercial, residential, and office uses are usually compatible if building scale and character are consistent, pedestrian connections are provided, and auto-oriented uses are limited. Uses within development areas are expected to be compatible with one another because 2030 General Plan policies establish requirements for compatible development, including buffering, screening, controls and performance standards, as demonstrated by various policies that encourage the placement of compatible land uses and the use of buffers to minimize a variety of negative land use impacts.</p>	LTS
Impact 4.1.3: The proposed project would result in the substantial conversion of important farmlands (Prime Farmland, Unique Farmland, and Farmland of Statewide Importance) to non-agricultural uses and would involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses.	PS	No Additional Feasible Mitigation Available	<p>Finding: The City finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains <i>significant and unavoidable</i>.</p> <p>Rationale: A primary impact to the City's agricultural</p>	SU

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
			lands includes the loss of productive agricultural lands due to the conversion of important farmlands (i.e., Prime Farmland, Unique Farmland, and Farmland of Statewide Importance) to other uses. Future growth resulting from implementation of the proposed 2030 General Plan would result in both the direct and indirect conversion of additional important farmlands to urban and other non-farming uses that include residential, commercial, and industrial uses. General Plan policies LU-8I2, LU-8.4, NR-2.2, NR-2.3, and NR-2.4 would lessen, but not avoid, these potentially significant impacts. No other feasible measures are available at the programmatic (general plan) level.	
Impact 4.1.4: The proposed project could conflict with existing zoning for agricultural use or the provisions of Williamson Act contracts.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: One of the functions of the Williamson Act is to encourage orderly development while discouraging premature development of agricultural lands (with active Williamson Act contracts). This purpose is also reflected in the 2030 General Plan, which contains policies to focus future growth within established community or specific plan areas in an effort to minimize the conversion of important farmlands.</p>	LTS
Impact 4.1.5: The proposed project could result in a cumulative impact to land use and agricultural resources.	PS	No Additional Feasible Mitigation Available	<p>Finding: The City finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Numerous General Plan policies would lessen, but not avoid, these potentially significant impacts. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains <i>significant and unavoidable</i>.</p> <p>Rationale: Because cumulative agricultural resource impacts throughout Stanislaus County would be significant, and because the proposed project's</p>	SU

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4.2 Cultural Resources				
Impact 4.2.1: The proposed project could cause a substantial adverse change in the significance of a historical resource as defined in section 15064.5.	PS	No Additional Feasible Mitigation Available	<p>incremental agricultural resource impacts are significant, the proposed project’s incremental agricultural resource impacts are also cumulatively considerable and are significant and unavoidable.</p> <p>Finding: The City finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale: Implementation of the proposed project could directly or indirectly result in a “substantial adverse change” (physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings) through various development activities for which no possible mitigation may be available to maintain the historic integrity of the affected resource or its surroundings. General Plan policies NR-7.1, NR-7.4, NR-7.6, NR-7.7, NR-7.8, and NR-7.10 would promote preservation and reduce impacts to cultural resources. However, The policies would not eliminate the possibility of demolition or substantial alteration to a resource. For this reason, impacts to historical resources would still result in a significant and unavoidable impact.</p>	SU
Impact 4.2.2: The proposed project could cause a substantial adverse change in the significance of a unique archaeological resource pursuant to section 15064.5	LTS	None Required	<p>Finding: The City hereby finds that this impact will be less-than-significant.</p> <p>Rationale: Compliance with applicable federal and State regulations along with the applicable policies identified as part of the 2030 General Plan will reduce the impact to a less-than-significant level.</p>	LTS

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
Impact 4.2.3: Implementation of the proposed project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: General Plan Policies NR-7.1, NR-7.3, NR-7.9 and General Plan Implementation Program NR-IP9 require the identification and protection of paleontological resources, and specify that if such resources are discovered during excavation or construction, proper protocols shall be adhered to. Specifically, Implementation Program NR-IP9, would require the performance of professionally accepted and legally compliant procedures for the discovery of paleontological resources. Implementation of these policies and implementation program will reduce this impact to a less than significant level.</p>	LTS
Impact 4.2.4: Implementation of the proposed project could result in a cumulative impact to cultural resources.	PS	Implement Mitigation Measures 4.2.a and 4.2.b	<p>Finding: The City finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains <i>significant and unavoidable</i>.</p> <p>Rationale: Because the proposed project's incremental cultural resource impacts are significant, the proposed project's incremental impacts to historical resources are cumulatively considerable and this is considered a significant and unavoidable cumulative impact. General Plan Policies NR-7.1, NR-7.4, NR-7.6, NR-7.7, NR-7.8, and NR-7.10 would promote preservation and reduce impacts to cultural resources. However, The policies would not eliminate the possibility of demolition or substantial alteration to a resource that would be cumulatively significant.</p>	SU

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
4.3 Public Services and Safety				
Impact 4.3.1: The proposed project would increase the need or use of law enforcement services in the City.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: The City's Capital Facilities Fee will ensure that future project applicants will contribute a fair share fee for any required public service infrastructure improvements. Adequate law enforcement service will also be provided and funded through the City's Public Safety CFD that applies citywide. With implementation of the General Plan policies and implementation programs, as well as collection of the Capital Facilities Fees and contribution to the Public Safety CFD, this impact is considered less than significant.</p>	LTS
Impact 4.3.2: The proposed project would increase the need or use of fire protection services in the City.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: The City's Capital Facilities Fee will ensure that future project applicants will contribute a fair share fee for any required public service infrastructure improvements, which includes fire protection infrastructure. Adequate fire protection service will also be provided and funded through the City's Public Safety Community Facilities District that applies citywide. With implementation of General Plan policies and implementation programs, as well as collection of the Capital Facilities Fees and contribution to the Public Safety CFD, this impact is considered less than significant.</p>	LTS
Impact 4.3.3: The proposed project would increase the need or use of school services or facilities.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: With payment of state-mandated school impact fees, impacts on school facilities are deemed to mitigate to less-than-significant levels.</p>	LTS

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
Impact 4.3.4: The proposed project would increase the need or use of libraries and other community facilities.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: Policies and implementation programs included as part of the General Plan address the need for additional library and other community services. For example, Policy CS-5.1 indicates the City shall support Stanislaus County in the modernization and provision of adequate library services, facilities, and programs that meet the needs of all residents. Policies CS-5.2, CS-5.3, CS-5.4, and CS-5.5 indicate the City shall ensure that library and community services are adequate, accessible, multifunctional, and distributed equitably. With implementation of these policies, this impact is considered less than significant.</p>	LTS
Impact 4.3.5: The proposed project would increase the need or use of park and recreation facilities.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: The City's Capital Facilities Fee will ensure that future project applicants will contribute a fair share fee for any required public service infrastructure improvements, which includes parks and recreation. With implementation of General Plan policies and implementation programs and payment of Capital Facility Fees, this impact is considered less than significant.</p>	LTS
Impact 4.3.6: The proposed project could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: The Public Health and Safety Element of the General Plan provides a number of policies that address emergency services planning in the City. For example, policies have been developed to ensure that the City continues to maintain and improve emergency services planning within the City and adjacent areas (see Policy PHS-1.1) and to ensure a coordinated emergency response system is maintained with other agencies (see Policy PHS-1.2 and Policy PHS-1.3). Policy PHS-1.4 directs the City to regularly review and update the adequacy of evacuation routes for the public's use in the</p>	LTS

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
<p>Impact 4.3.7: The proposed project could expose people or structures to a significant risk of loss, injury, or death involving wildland fires.</p>	LTS	None Required	<p>event of an emergency. Policy PHS-1.5 requires the City to plan for the continued function of critical facilities such as hospitals, fire stations, and emergency command centers following a major disaster to facilitate post-disaster recovery. With implementation of these policies and implementation programs, this impact is considered less than significant.</p> <p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: Policies are included as part of the General Plan that address the need for fire safety and fire prevention services. For example, Policies CS-2.1 through CS-2.13 require the City to plan for and expand fire protection services and facilities to meet current and future community needs. Policy CS-2.14 requires the City to enforce the City’s weed/hazard abatement program and other relevant codes and ordinances designed to abate fire hazards. Policy CS-2.15 requires new development within or adjacent to fire hazard zones to be designed and constructed to reduce exposure to fire hazards and to facilitate fire suppression efforts in the event of a wildfire. Policy PS-2.16 requires the City to educate the public about wildland fire prevention techniques to minimize wildland fire hazards. In addition, policies have been developed to ensure that the City continues to maintain and improve emergency services planning within the City and adjacent areas (see Policy PHS-1.1) and to ensure a coordinated emergency response system is maintained with other agencies (see Policy PHS-1.2 and Policy PHS-1.3). Policy PHS-1.4 directs the City to regularly review and update the adequacy of evacuation routes for the public’s use in the event of an emergency. Policy PHS-1.5 requires the City to plan for the continued function of critical facilities such as hospitals, fire stations, and emergency command centers following a major disaster to facilitate post-disaster recovery. With implementation of these policies and implementation programs, this impact is considered less than significant.</p>	LTS

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
Impact 4.3.8: The proposed project could expose people or structures to a cumulatively significant risk of loss, injury, or death involving wildland fires.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: In consideration of the potential effects of all cumulative scenario projects and planning, implementation of the proposed project would not result in a cumulatively considerable impact to law enforcement services, fire protection services, schools, libraries, parks and recreation facilities, airport safety, or wildland fire threats.</p>	LTS
4.4 Utilities				
Impact 4.4.1: The proposed project would require new or expanded water supplies, facilities, and entitlements.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: Implementation of the proposed project would result, upon buildout, in a total annual water demand of approximately 9,240 AF/Y. This volume of water represents approximately 64% of the total water supply capacity that is currently available to the City: 14,519 AF/Y. Therefore, implementation of the proposed project would not require additional water supplies beyond existing system capacity, and new water supply infrastructure would not be required within the City.</p>	LTS
Impact 4.4.2: The proposed project could result in wastewater treatment demand in excess of planned capacity that cannot be met by new or expanded facilities.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: The City's Capital Facilities Fee Program will ensure that future project applicants will contribute a fair share fee for any required future utility infrastructure improvements. Consequently, with implementation of General Plan policies and programs, this impact is considered less than significant.</p>	LTS
Impact 4.4.3: The proposed project could exceed the capacity of existing or planned stormwater drainage systems.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: Because all new development is required to construct, dedicate and/or pay its fair share contribution to the storm drainage system necessary to serve the demands created by that development and with</p>	LTS

**TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS**

Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
<p>Impact 4.4.4: The proposed project could produce substantial amounts of solid waste that could exceed the permitted capacity of a landfill serving the City.</p>	PS	No Additional Feasible Mitigation Available	<p>implementation of General Plan policies, this impact is considered less than significant.</p> <p>Finding: The City finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains <i>significant and unavoidable</i>.</p> <p>Rationale: The proposed project includes a number of policies and implementation programs designed to promote future City-wide recycling efforts and ensure the continued provision of solid waste recovery and collections services (General Plan Policies PF-4.1, PF-4.2, PF-4.3, PF-4.4, PF-4.5, PF-4.6, PF-4.7, PF-4.8 and PF-4.9). Additionally, the City will continue to implement solid waste reduction programs in compliance with AB 939. However, to accommodate future solid waste needs resulting from additional growth associated with buildout of the proposed project, additional landfill capacity or waste disposal locations may be required for the City. It is assumed that Gilton and the Forward Landfill would continue to maximize the use of existing disposal options and plan for future waste disposal opportunities once existing disposal options reach their capacity, although future waste disposal opportunities may require greater handling costs depending on their location and method of transfer. Consequently, because of the uncertain availability of where and what these future waste disposal options may be to address buildout of the proposed project, there may be indirect environmental impacts related to future waste disposal that are beyond the control of the City. Therefore, this impact is considered significant and unavoidable. No additional technologically or economically feasible mitigation measures are currently available to reduce this impact to a less-than-significant level.</p>	SU

**TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS**

Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
Impact 4.4.5: The proposed project would comply with all federal, State, and local statutes and regulations related to solid waste.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: Policies included as part of the proposed project address the continued need to promote local and State solid waste and recycling programs. For example, Policy PF-4.1 requires the City to support efforts to maintain adequate solid waste facilities and services by working with the local solid waste collection, disposal, and recycling service provider and Policy PF-4.2 require that new development is approved contingent upon its ability to be served with sufficient solid waste processing, recycling, transportation, and disposal. Policy PF-4.3 encourages the City to continue to participate in the Stanislaus County Regional Solid Waste Planning Agency to further partner, plan for and document compliance with AB 939 source reduction, diversion and recycling requirements. Policies PF-4.4, PF-4.5, and PF-4.6 promote recycling including encouraging the City to support and work with the local solid waste service provider to implement a residential recycling program for multi-family residential uses and to improve the existing recycling program for single-family residential uses to minimize the solid waste stream to landfills; work with the local solid waste service provider to establish and improve commercial, industrial, and construction recycling programs to minimize the solid waste stream to landfills; and encourage the use of recycled materials in new construction. Consequently, this impact is considered less than significant.</p>	LTS
Impact 4.4.6: The proposed project could result in a cumulative impact on utilities.	PS	No Additional Feasible Mitigation Available	<p>Finding: The City finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains <i>significant and unavoidable</i>.</p>	SU

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SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS**

Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
4.5 Transportation and Circulation				
Impacts 4.5.7: The proposed project would result in a substantial increase in vehicular traffic. This would result in a significant impact to various intersections and road segments within the study area.	PS	<p>Implement Measures 4.5.1c to 4.5.1i, 4.5.4c to 4.5.4f, 4.5.4h</p> <p>Mitigation Measure 4.5.7a: This impact could be mitigated by adding a southbound right-turn lane and modifying signal operations at the intersection to include right-turn overlap phasing on the northbound and southbound approaches. This mitigation would improve operations in the PM peak hour from LOS F to LOS D. Funding for this improvement could come from development impact fees.</p> <p>Mitigation Measure 4.5.7b: This impact could be mitigated by modifying the traffic signal timings at F Street (SR 108) / Willowood Drive. This mitigation would improve operations from unacceptable LOS D to acceptable LOS C. Funding for this relatively low-cost improvement could come from development impact fees.</p> <p>Mitigation Measure 4.5.7c: This impact could be mitigated by widening F Street (SR 108) to create an additional lane in each direction at the intersection. This improvement is partially funded by the City's CIP; if full funding could be identified, implementation of this mitigation would reduce the impact to less than</p>	<p>Rationale: A significant cumulative solid waste impact would result if the combination of impacts of the proposed project and the anticipated impacts from adopted plans and population projections (identified in Table 6-1 of the DEIR) within the San Joaquin Valley region were significant when combined together, even if not independently significant. The General Plan contains policies to reduce the impacts of this (Policies PF-4.1, PF-4.2, PF-4.3, PF-4.4, PF-4.5, PF-4.6, PF-4.7, PF-4.8 and PF-4.9). However, due to the uncertain availability of where and what future waste disposal options may be by 2030, this impact remains significant and unavoidable at the project-level and is also considered a significant cumulative impact.</p> <p>Finding: Although implementation of Mitigation Measures would reduce Impact 4.5.7, the impact would still be significant and unavoidable. The City of Oakdale finds that specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or project alternatives to reduce Impact 4.5.7 to a less than significant level.</p> <p>Rationale: As described in the DEIR (pages 4.5-71 to 4.5-81), there are various road widening and intersection improvements that could reduce the impact to less than significant. Due to lack of funding guarantees and jurisdictional constraints (the City cannot guarantee construction of improvements outside its jurisdiction), this impact is considered significant and unavoidable.</p>	SU

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SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS**

Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
		<p>significant. However, this is a Caltrans facility and Caltrans has no plans to widen this segment, but does plan to relinquish F Street to the City after construction of the North County Corridor. Adopting the proposed General Plan Policy M-2.7 would reduce the City's LOS standard at this intersection from LOS D to LOS F. While this would eliminate any policy conflicts, the impact to traffic operations would remain significant relative to Caltrans' significance criteria.</p> <p>Mitigation Measure 4.5.7d: This impact could be mitigated by modifying the intersection at F Street (SR 108/SR 120) / South Stearns Road to install a traffic signal and add the following lanes:</p> <ul style="list-style-type: none"> ▪ Eastbound approach – left-turn lane, through lane, and right-turn lane ▪ Westbound approach – through lane ▪ Northbound approach – left-turn lane <p>This would improve operations from unacceptable LOS F to acceptable LOS D or better during both peak hours. These improvements could be primarily funded by developer impact fees from the Sierra Pointe Specific Plan. Additionally, the City's CIP identifies funding for up to ten signalized intersections whose locations are not identified. Funding for signaling the intersection may be available from that program.</p> <p>Mitigation Measure 4.5.7e: This impact could be mitigated by installing a traffic signal at SR 108/SR 120 / Wamble Road and adding left-turn lanes on the eastbound and westbound approaches. Implementation of this mitigation measure would reduce the impact to less than significant.</p> <p>Mitigation Measure 4.5.7f: This impact could be mitigated by modifying the traffic signal timings. Implementation of this mitigation measure would reduce delay at this intersection to LOS C levels during the PM peak hour.</p> <p>Mitigation Measure 4.5.7g: The addition of the following lanes at Yosemite Avenue / J Street would</p>		

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
		<p>reduce delay at this intersection to LOS C during both the AM and PM peak hours:</p> <ul style="list-style-type: none"> ▪ Westbound approach – left-turn lane ▪ Northbound approach – through lane and right-turn lane ▪ Southbound approach – through lane <p>The width of the roadway on the northbound approach is sufficient to accommodate the right-turn lane. However, the other improvements are considered infeasible due to physical constraints. Adopting General Plan Policy M-2.7 would reduce the LOS standard at this intersection from LOS C to LOS F.</p> <p>Mitigation Measure 4.5.7h: The addition of a southbound right-turn lane at Yosemite Avenue / Greger Street/Wakefield Drive would reduce delay at this intersection to LOS C levels during the PM peak hour. This improvement is considered feasible. Adopting the proposed General Plan Policy M-2.7 would reduce the City’s LOS standard on this segment of roadway from LOS D to LOS F. While this would eliminate any policy conflicts, the impact to traffic operations would remain significant relative to the currently adopted threshold (the 2015 General Plan) unless the physical improvement described above is constructed.</p> <p>Mitigation Measure 4.5.7i: This impact could be mitigated by modifying the intersection at Greger Street / Kaufman Road to install a traffic signal. This would improve operations from unacceptable LOS F to acceptable LOS C or better during both peak hours. The City’s CIP identifies funding for up to ten signalized intersections whose locations are not identified. Funding for signalizing the intersection may be available from that program.</p> <p>Mitigation Measure 4.5.7j: This impact could be mitigated by modifying the intersection at Fifth Avenue / J Street to install a traffic signal and changing the configuration to include a left-turn lane and a shared through/right-turn lane on each approach. This mitigation is considered feasible and would likely only require minor increases in right-of-way and/or parking</p>		

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
		<p>restrictions. This would improve operations from unacceptable LOS F to acceptable LOS D during both peak hours. The City's CIP identifies funding for up to ten signalized intersections whose locations are not identified. Funding for signalizing the intersection may be available from that program.</p> <p>Mitigation Measure 4.5.7k: This impact could be mitigated by converting the Maag Avenue / Sierra Road intersection to all-way stop control. This mitigation is considered feasible. This would improve operations from unacceptable LOS F to acceptable LOS B during the PM peak hour.</p> <p>Mitigation Measure 4.5-7l: This impact could be mitigated by modifying the intersection at South Stearns Road / Sierra Road to install a traffic signal and the following lanes:</p> <ul style="list-style-type: none"> ▪ Eastbound approach – Left-turn lane and right-turn lane ▪ Westbound approach- Left-turn lane ▪ Southbound approach – Left-turn lane and right-turn lane ▪ Northbound approach- Left-turn lane <p>This would improve operations from unacceptable LOS F to acceptable LOS C or better during both peak hours. These improvements could be primarily funded by developer impact fees. Additionally, the City's CIP identifies funding for up to ten signalized intersections whose locations are not identified. Funding for signalizing the intersection may be available from that program.</p> <p>Mitigation Measure 4.5.7m: This impact could be mitigated by widening Crane Road to four lanes. A portion of this widening is already in place. This improvement is partially funded by the City's CIP.</p> <p>Mitigation Measure 4.5.7n: This impact could be mitigated by improving Maag Avenue from a two-lane collector to a two-lane arterial. This improvement would improve operations on the segment from LOS E to LOS D.</p>		

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
<p>Impacts 4.5.8: The proposed project would result in increased conflicts between vehicles/pedestrians and vehicles/bicycles which could result in unsafe conditions.</p>	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: Development of the proposed project would cause an increase in vehicle/pedestrian and vehicle/bicycle conflicts. As development occurs, pedestrian and bicycle facilities should be constructed to meet demand. This impact could be mitigated with implementation of the City’s Bicycle Master Plan. Funding for these improvements could come from development impact fees. Therefore, this impact is considered less than significant.</p>	LTS
<p>Impacts 4.5.9: The proposed project would result in increased conflicts between trains and vehicles, pedestrians, and bicycles which could result in unsafe conditions.</p>	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: The proposed project would cause an increase in travel demand across existing at-grade railroad crossings. The proposed General Plan Policies</p>	LTS

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SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS**

Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
<p>Impacts 4.5.10, 4.5.13: The proposed project would result in a substantial increase in vehicular traffic. This would result in a significant impact to various intersections and road segments within the study area.</p>		No Additional Feasible Mitigation Available	<p>M-5.5 and M-5.6 address the safety and operational integrity of railroad crossings through ongoing maintenance and improvement of at-grade crossing and pursuit of railroad grade separations, in response to planned growth. This impact is considered less than significant.</p>	
<p>2030 General Plan with NCC Southern Alignment (Impact 4.5.10)</p>	PS	No Additional Feasible Mitigation Available	<p>Finding: The City finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale: As described in the DEIR (pages 4.5-101 to 4.5-105), there are various road widening and intersection improvements that could reduce the impact to less than significant. Due to lack of funding guarantees and jurisdictional constraints (the City cannot guarantee construction of improvements outside its jurisdiction) this impact is considered significant and unavoidable.</p>	SU
<p>2030 General Plan with NCC Northern Alignment (Impact 4.5.13)</p>	PS	No Additional Feasible Mitigation Available	<p>Finding: The City finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and</p>	SU

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
			<p>unavoidable.</p> <p>Rationale: As described in the DEIR (pages 4.5-109 to 4.5-113), there are various road widening and intersection improvements that could reduce the impact to less than significant. Due to lack of funding guarantees and jurisdictional constraints (the City cannot guarantee construction of improvements outside its jurisdiction) this impact is considered significant and unavoidable.</p>	
<p>Impact 4.5.11, 4.5.14: The proposed project would result in increased conflicts between vehicles/pedestrians and vehicles/bicycles which could result in unsafe conditions.</p>				
<p>2030 General Plan with NCC Southern Alignment (Impact 4.5.11)</p>	<p>LTS</p>	<p>None Required</p>	<p>Finding: The City hereby finds that this impact will be less-than-significant.</p> <p>Rationale: Development of the proposed project would cause an increase in vehicle/pedestrian and vehicle/bicycle conflicts. As development occurs, pedestrian and bicycle facilities should be constructed to meet demand. Full implementation of the City's Bicycle Master Plan would reduce this impact to less than significant.</p>	<p>LTS</p>
<p>2030 General Plan with NCC Northern Alignment (Impact 4.5.14)</p>	<p>LTS</p>	<p>None Required</p>	<p>Finding: The City hereby finds that this impact will be less-than-significant.</p> <p>Rationale: Development of the proposed project would cause an increase in vehicle/pedestrian and vehicle/bicycle conflicts. As development occurs, pedestrian and bicycle facilities should be constructed to meet demand. Full implementation of the City's Bicycle Master Plan would reduce this impact to less than significant.</p>	<p>LTS</p>

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
Impacts 4.5.12, 4.5.15: The proposed project would result in increased conflicts between trains and vehicles, pedestrians, and bicycles which could result in unsafe conditions.				
2030 General Plan with NCC Southern Alignment (Impact 4.5.12)	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: The proposed project would cause an increase in travel demand across existing at-grade railroad crossings. The proposed General Plan Policies M-5.5 and M-5.6 address the safety and operational integrity of railroad crossings through ongoing maintenance and improvement of at-grade crossing and pursuit of railroad grade separations, in response to planned growth. This impact is considered less than significant.</p>	LTS
2030 General Plan with NCC Northern Alignment (Impact 4.5.15)	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: The proposed project would cause an increase in travel demand across existing at-grade railroad crossings. The proposed General Plan Policies M-5.5 and M-5.6 address the safety and operational integrity of railroad crossings through ongoing maintenance and improvement of at-grade crossing and pursuit of railroad grade separations, in response to planned growth. This impact is considered less than significant.</p>	LTS
4.6 Air Quality				
Impact 4.6.1: The proposed project could expose a variety of sensitive land uses to construction-related air quality emissions.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: The City will implement a construction emissions policy that would minimize construction-related air quality impacts. In addition, a number of regulations and standards exist that target construction-related air quality pollutants. The City will ensure that future CEQA documentation be prepared for individual projects (with project-specific data) that will (if technically possible) mitigate any construction-related air quality impact to a less-than-significant level.</p>	LTS

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
Impact 4.6.2: The proposed project would result in a cumulatively considerable net increase of criteria air pollutants that result in a violation of an air quality standard.	PS	No Additional Feasible Mitigation Available	<p>Finding: The City finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale: The City will implement numerous policies to address air quality issues, including reducing vehicle miles travelled and energy conservation. These policies are listed on page 4.6-29 and 4.6-30 of the DEIR. Depending on the feasibility and level of implementation as applied to individual development projects consistent with the General Plan, the inclusion of additional trip reduction measures would help to further reduce vehicle-related emissions. Future project-specific compliance with SJVAPCD regulations and permitting would also help to reduce air quality emissions associated with individual projects. In addition, the City will ensure that future CEQA documentation be prepared for individual projects (with project-specific data) that will (if technically possible) mitigate any potential air quality impacts to a less-than-significant level. However, even with implementation of the above mentioned policies and regulations, at the programmatic (citywide) level, implementation of the 2030 General Plan would result in a significant and unavoidable impact.</p>	SU
Impact 4.6.3: The proposed project could conflict with or obstruct implementation of an applicable air quality plan.	PS	No Additional Feasible Mitigation Available	<p>Finding: The City finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p>	SU

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
			<p>Rationale: The City will implement a variety of policies designed to address air quality issues (see pages 4.6-29 and 4.6-30 of the DEIR). In addition, the City will ensure that future CEQA documentation be prepared for individual projects (with project-specific data) that will (if technically possible) mitigate any potential air quality impacts to a less-than-significant level. However, even with implementation of the above mentioned policies and regulations, implementation of the 2030 General Plan would result in a significant and unavoidable impact. No additional feasible mitigation is currently available.</p>	
<p>Impact 4.6.4: The proposed project could expose sensitive receptors to substantial pollutant concentrations that could affect public health.</p>	LTS	None Required	<p>Finding: The City hereby finds that this impact will be less-than-significant.</p> <p>Rationale: The City will implement a variety of policies designed to address air quality and land use compatibility issues, including the appropriate siting of new sensitive land uses (e.g., residences and schools) an adequate distance from sources of TACs (e.g., industrial uses, loading docks, freeways), as well as the appropriate siting of new potential sources of TACs an adequate distance from existing sensitive land uses. In addition, the City will ensure that future CEQA documentation be prepared for individual projects (with project-specific data) that will (if technically possible) mitigate any potential air quality impacts to a less-than-significant level. This impact is considered less than significant. No mitigation is required.</p>	LTS
<p>Impact 4.6.5: The proposed project could create objectionable odors affecting a substantial number of people.</p>	LTS	None Required	<p>Finding: The City hereby finds that this impact will be less-than-significant.</p> <p>Rationale: The City will implement a variety of policies designed to help reduce air pollutant emissions and address a variety of nuisance issues (including odor concerns) associated with the inappropriate siting of incompatible land uses. In addition, the City will ensure that future CEQA documentation be prepared for individual projects (with project-specific data) that will (if technically possible) mitigate any nuisance impacts to a less-than-significant level. This impact is considered less than significant. No mitigation is required.</p>	LTS

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
4.7 Noise				
Impact 4.7.1: Future development of noise-sensitive uses may be impacted by existing and/or future noise exposure from neighboring uses (stationary/non-transportation sources).	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: Noise exposure at proposed noise-sensitive uses would be reviewed on a project-by-project basis as part of the City’s development review process. In addition, implementation of the proposed 2030 General Plan Noise Element Goals, Policies, and Programs would ensure that noise impacts on future development of noise-sensitive uses within project areas that are either currently affected by noise or are in areas which may be affected by noise would be less than significant.</p>	LTS
Impact 4.7.2: Future development of noise-producing uses near noise-sensitive uses may result in potentially significant noise impacts (stationary/non-transportation sources).	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: Implementation of the proposed General Plan Noise Element Goals, Policies, and Programs would ensure that noise impacts on existing or future noise-sensitive uses from future noise-producing uses within project area would be less than significant. New stationary noise sources would be required to mitigate noise impacts on noise-sensitive uses when the noise from that source alone exceeds exterior levels specified in the proposed Noise Element. New industrial or other high noise-generating uses are required to be located away from noise-sensitive land uses and minimize excessive noise through project design features. Therefore, this impact is less than significant.</p>	LTS
Impact 4.7.3: Implementation of the proposed project would result in increased traffic noise exposure at existing noise-sensitive uses within the Planning Area (traffic/transportation source).	PS	<p>Mitigation Measure 4.7.3a: The City shall require the use of noise-reducing pavement to the extent feasible on noise-impacted street segments, including but not limited to:</p> <ul style="list-style-type: none"> ▪ Crane Road south of F Street ▪ Pontiac Street from Crane Road to Oak Avenue ▪ Greger Street from Crane Road to Yosemite Avenue ▪ Sierra Road from Yosemite Avenue to Stearns 	<p>Finding: Although implementation of Mitigation Measure 4.7.3a would reduce Impact 4.7.3, the impact would still be significant and unavoidable. The City of Oakdale finds that specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or project alternatives to reduce Impact 4.7.3 to less than significant.</p> <p>Rationale: Implementation of Mitigation Measure 4.7.3a would reduce noise impacts for some roadway segments but not all. In addition, the timing of Measure 4.7.3a is</p>	SU

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
		Road <ul style="list-style-type: none"> ▪ Maag Avenue south of F Street ▪ River Road west of Yosemite Avenue ▪ Wamble Road south of SR120/SR 108 ▪ Warnerville Road east of Smith Road ▪ G Street west of Yosemite Avenue ▪ I Street west of Yosemite Avenue This mitigation measure shall be incorporated into an implementation program under General Plan Policy NR-1.8, Transportation Noise Mitigation. The implementation of noise reducing pavement should be considered within the established road maintenance schedule.	uncertain, given that the resurfacing of some streets may take several years. The near-term resurfacing of all identified streets is economically infeasible and technically infeasible (due to traffic disruptions within the City). Therefore, this impact remains significant and unavoidable.	
Impact 4.7.4: Future development of noise-sensitive uses may be impacted by existing and/or future noise exposure from traffic, train, and/or aircraft noise sources (transportation sources).	LTS	None Required	Finding: The City hereby finds that this impact will be <i>less-than-significant</i> . Rationale: Implementation of the proposed General Plan Noise Element would ensure that noise impacts on future development of noise-sensitive uses within project areas that are either currently affected by transportation noise or are in areas which may be affected by this noise would be less than significant.	LTS
Impact 4.7.5: Future development of acoustically-sensitive uses may be impacted by existing and/or future groundborne vibration associated with traffic or train sources (transportation sources).	LTS	None Required	Finding: The City hereby finds that this impact will be <i>less-than-significant</i> . Rationale: The proposed 2030 General Plan would add acoustically sensitive uses (i.e., residential) to developed areas of the City, as well as undeveloped areas such as Future Specific Plan Areas 2, 5, and 8. These uses would not be within 100 feet of significant groundborne vibration producing sources (i.e., SR 108, SR 120, railroad tracks). Therefore, these uses would not experience groundborne vibration levels in excess of the criteria presented in Table 4.7-8 of the DEIR. This impact would be less than significant.	LTS

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
Impact 4.7.6: Implementation of the proposed project (Alternative 1) in combination with regional growth and traffic conditions would result in increased traffic noise exposure at existing noise-sensitive uses within the Planning Area (traffic/transportation source).	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: Project-related traffic noise exposure increases would not be significant relative to Cumulative traffic noise conditions. Therefore, this impact is less than significant.</p>	LTS
Impact 4.7.7: Implementation of the proposed project (Alternative 2) in combination with regional growth and traffic conditions would result in increased traffic noise exposure at existing noise-sensitive uses within the Planning Area (traffic/transportation source).	PS	Implement Mitigation Measure 4.7.3a	<p>Finding: The City of Oakdale finds that implementation of Mitigation Measure 4.7.3a would reduce Impact 4.7.7 to a less than significant level.</p> <p>Rationale: Application of noise-reducing pavements has been found to provide approximately 3-5 dB of noise level reduction over standard pavements. If considered, the installation of such pavement near impacted residences on Sierra Road east of S. Stearns Road would effectively mitigate the noise impact. This road segment is identified in Mitigation Measure 4.7.3a. In the cumulative (future) scenario, it is reasonable to assume that this measure would have been implemented, given the normal resurfacing/reconstruction schedule for City roads. Therefore this impact is less than significant with implementation of Mitigation Measure 4.7.3a.</p>	LTS
4.8 Hazardous Materials				
Impact 4.8.1: The proposed project could create a significant hazard to the public or the environment from the transportation, use, or disposal of hazardous materials.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: The General Plan includes a number of policies that help ensure the safety of its residents, visitors, and businesses. For example, the Public Health & Safety Element provides a number of policies that have been developed to address hazardous materials concerns including the safe storage, use, transportation, and disposal of hazardous materials (see Policy PHS-4.1); continued efforts to identify sites previously used for hazardous materials storage and disposal (see Policy PHS-4.2); requiring new development in known contamination areas to perform soil and groundwater assessments and if required undertake remediation procedures consistent with county, regional, and State</p>	LTS

**TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS**

Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
<p>Impact 4.8.2: The proposed project could include uses that emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of school sites.</p>	LTS	None Required	<p>regulations prior to site disturbance or development (see Policy PHS-4.3); encouraging industries, businesses, and residents to utilize best practices and technologies that reduce the use of hazardous materials and generation of hazardous wastes (see Policy PHS-4.4); continuing to work with Stanislaus County to encourage homeowners to dispose of household hazardous waste and E-waste at special collection events and the County's collection center (see Policy PHS-4.5); promoting public education efforts regarding the proper use, storage, and disposal of hazardous materials (see Policy PHS-4.6); and coordinating with the State and other relevant agencies to designate truck routes on City roadways and State highways that minimize the transport of hazardous materials through residential and other sensitive land use areas (see Policy PHS-4.7).</p> <p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: The proposed project includes a number of policies that help ensure the safety of its residents (including school children), visitors, and businesses. For example, the Public Health & Safety Element provides a number of policies that have been developed to address general hazardous materials concerns including: the safe storage, use, transportation, and disposal of hazardous materials (see Policy HS-4.1); continued efforts to identify sites previously used for hazardous materials storage and disposal (see Policy PHS-4.2); requiring new development in known contamination areas to perform soil and groundwater assessments and if required undertake remediation procedures consistent with county, regional, and State regulations prior to site disturbance or development (see Policy PHS-4.3); encouraging industries, businesses, and residents to utilize best practices and technologies that reduce the use of hazardous materials and generation of hazardous wastes (see Policy PHS-4.4); continuing to work with Stanislaus County to encourage homeowners to dispose of household hazardous waste and E-waste at special collection events and the</p>	LTS

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SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS**

Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
Impact 4.8.3: Development under the proposed project could be located on a hazardous waste site.	LTS	None Required	County's collection center (see Policy PHS-4.5); promoting public education efforts regarding the proper use, storage, and disposal of hazardous materials (see Policy PHS-4.6); and by coordinating with the State and other relevant agencies to designate truck routes on City roadways and State highways that minimize the transport of hazardous materials through residential and other sensitive land use areas (see Policy PHS-4.7).	LTS
			Finding: The City hereby finds that this impact will be <i>less-than-significant</i> .	
			Rationale: The proposed project includes a number of policies that help ensure the safety of its residents, visitors, and businesses. For example, the Public Health & Safety Element provides a number of policies that have been developed to address general hazardous materials concerns including: the safe storage, use, transportation, and disposal of hazardous materials (see Policy HS-4.1); continued efforts to identify sites previously used for hazardous materials storage and disposal (see Policy PHS-4.2); requiring new development in known contamination areas to perform soil and groundwater assessments and if required undertake remediation procedures consistent with county, regional, and State regulations prior to site disturbance or development (see Policy PHS-4.3); encouraging industries, businesses, and residents to utilize best practices and technologies that reduce the use of hazardous materials and generation of hazardous wastes (see Policy PHS-4.4); continuing to work with Stanislaus County to encourage homeowners to dispose of household hazardous waste and E-waste at special collection events and the County's collection center (see Policy PHS-4.5); promoting public education efforts regarding the proper use, storage, and disposal of hazardous materials (see Policy PHS-4.6); and by coordinating with the State and other relevant agencies to designate truck routes on City roadways and State highways that minimize the transport of hazardous materials through residential and other sensitive land use areas (see Policy PHS-4.7).	

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SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS**

Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
Impact 4.8.4: Development under the proposed project could result in a cumulative impact with regard to hazards and hazardous materials.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: Local, regional, State and federal regulations would apply to development within the Study Area, which combined with Mitigation Measures 4.8.1a through 4.8.1e, reduce the potential for cumulative impacts associated with hazards and hazardous materials to a less-than-significant level. The proposed project’s incremental contribution to cumulative impacts would be less than significant.</p>	LTS
4.9 Hydrologic Resources				
Impact 4.9.1: The proposed project could violate water quality standards or waste discharge requirements during construction-related activities.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: Specific BMPs to be implemented would be determined prior to acquisition of coverage under the NPDES General Permit, in coordination with the CVRWQCB. Adherence to BMPs required under the NPDES General Permit would be required as a condition of the permit, and would substantially reduce or prevent construction related waterborne pollutants from entering natural waters, per CVRWQCB standards. Policy NR-4.4 relates specifically to monitoring construction activities through NPDES enforcement, requiring the use of BMPs, and other mitigation measures designed to control erosion and protect surface water and groundwater from the adverse effects of construction activities. Implementation of these mandatory measures would be adequate to ensure that stormwater quality would not be degraded during construction, as a result of implementing the general plan. With implementation of this policy and the BMPs designed to address water quality impacts, this impact is considered less than significant.</p>	LTS
Impact 4.9.2: The proposed project could result in other water quality degradation.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: Stormwater quality degradation associated with pollutants from non-industrial types of development are addressed through General Plan policies. Specifically, the</p>	LTS

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
<p>Impact 4.9.3: The proposed project could deplete groundwater supplies or interfere with groundwater recharge.</p>	PS	<p>Implementation Program PF-IP2 and revised Implementation Program PF-IP3</p>	<p>Public Facilities element includes policies that support implementation of a stormwater management program and incorporate Low Impact Development (LID) measures for stormwater quality protection. The Natural Resources element includes policies requiring compliance with the City’s NPDES permit including application of BMPs to proposed development; regulation of stormwater runoff requiring that pollutants have been reduced to the maximum extent practicable; stormwater treatment requirements for new development including site design, stormwater treatment, LID, and BMP measures; as well as regional coordination and public education. With implementation of these policy and the BMPs designed to address water quality impacts, this impact is considered less than significant.</p> <p>Finding: Although Implementation Programs PF-IP2 and PF-IP3 would reduce Impact 4.9.3, the impact would still be significant and unavoidable. The City of Oakdale finds that specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or project alternatives to reduce Impact 4.9.3 to less than significant.</p> <p>Rationale: The revised Implementation Program PF-3 is considered an important action in addressing long-term reductions in groundwater recharge conditions. However, the effectiveness of future groundwater management efforts, and whether or not these efforts will eventually reverse declining groundwater levels is uncertain at this time. No additional technologically or economically feasible mitigation measures are currently available to reduce this impact to a less-than-significant level. Consequently, this impact is considered significant and unavoidable.</p>	SU
<p>Impact 4.9.4: The proposed project could alter existing drainage patterns resulting in increased erosion or siltation, or could increase surface runoff in a manner that would result in flooding on or off site.</p>	LTS	<p>None Required</p>	<p>Finding: The City hereby finds that this impact will be less-than-significant.</p> <p>Rationale: Policies included in the Public Facilities Element would require implementation of adequate stormwater control facilities; ongoing storm drainage</p>	LTS

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
<p>Impact 4.9.5: The proposed project could result in the construction of housing within areas that are subject to 100-year flooding.</p>	LTS	None Required	<p>planning and management; requirements for demonstration of no net increase in stormwater flows associated with new development; prioritization of new storm drainage infrastructure where deficient service exists; detention basin siting specifications; stormwater detention and drainage system design criteria, stormwater quality management, and other measures. Policies included in the Natural Resources Element provide for the minimization of stormwater flows and water quality pollutants, including incorporation of Low Impact Development measures for stormwater and erosion management; and preservation of natural open space areas that provide drainage and flood control benefits. With implementation of the water quality/drainage measures identified under these policies, this impact is considered less than significant.</p> <p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: Policies included in the Public Health and Safety Element support the protection of housing and residents from risks associated with flooding. For example, Policy PHS-2.1 requires the City to continue participation in the National Flood Insurance Program. Additionally policies require the City to maintain eligibility for flood insurance; developments are required to provide a minimum of 100-year flood protection, and development would be regulated in accordance with local, state, and federal requirements with respect to flooding. New development would be required to provide a minimum of 200-year flood protection within three years of adoption of the Central Valley Flood Protection Plan and development within flood hazard zones will be avoided, or shall be constructed in accordance with applicable regulations in order to minimize potential flood damage. With implementation of these measures designed to reduce flooding risk included in general plan policies, this impact is considered less than significant.</p>	LTS

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
<p>Impact 4.9.6: The proposed project could result in the construction of facilities within areas that are subject to flooding, which could redirect or impede flood flows.</p>	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: Policies included in the Public Facilities Element would require implementation of adequate stormwater control facilities; ongoing storm drainage planning and management; requirements for demonstration of no net increase in stormwater flows associated with new development; prioritization of new storm drainage infrastructure where deficient service exists; detention basin siting specifications; stormwater detention and drainage system design criteria, stormwater quality management, and other measures. Policy NR-4.7 provides for the minimization of stormwater flows and water quality pollutants, including incorporation of Low Impact Development measures that provide drainage and flood control benefits. Additional policies from the Public Health and Safety Element (Policies PHS-2.1 through PHS-2.7) require new development to provide a minimum of 200-year flood protection within three years of adoption of the Central Valley Flood Protection Plan and require new development within flood hazard zones to be constructed in accordance with applicable regulations in order to minimize potential flood damage. With implementation of the water flood risk/drainage measures identified under these policies, this impact is considered less than significant.</p>	LTS
<p>Impact 4.9.8: The proposed project could result in a cumulative impact on hydrological resources.</p>	PS	No Additional Feasible Mitigation Available	<p>Finding: The City finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains <i>significant and unavoidable</i>.</p> <p>Rationale: Implementation of the proposed project would cumulatively contribute to the withdrawal of</p>	SU

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
			<p>groundwater from the Modesto groundwater subbasin, wherein a trend of groundwater level reduction has been observed over recent decades. The groundwater subbasin located immediately north of the Stanislaus River, the Northeastern San Joaquin groundwater subbasin, has also shown a general decline in water levels over recent decades, as documented in the Eastern San Joaquin Integrated Regional Water Management Plan (IRWMP). Additional groundwater pumping would further draw down the aquifer, even with implementation of the policies and mitigation specified with respect to groundwater preservation, as discussed in this section. Other regional projects that would rely on groundwater, including projects located in the Modesto and the Northeastern San Joaquin groundwater subbasin, could also contribute to additional drawdown within the vicinity of the Planning Area or region, including the Modesto and Northeastern San Joaquin subbasins. While pumping would not result in exceedance of any adjudicated or other institutionalized groundwater management threshold (see cumulative Water Supply and Delivery discussion above), groundwater levels would still draw down. Therefore, when viewed in consideration of all cumulative scenario projects relevant to the proposed project, implementation of the proposed project would result in a significant cumulative impact to groundwater levels. As noted in Impact 4.9.3, several new and revised policies and programs would reduce, but not avoid this impact (including Policies NR-4.2, NR-4.3, PF-3.10, PF-1.5, PF-1.6, PF-1.7, PF-1.8, PF-1.11, PF-1.12, PF-1.13, PF-1.14 and Implementation Programs, PF-IP1, PF-IP2 and PF-IP3). It cannot be determined that these policies and programs would avoid the cumulative effects to groundwater. No additional mitigation is available at the programmatic (citywide) level.</p>	

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
4.10 Geology, Soils, Seismicity, and Mineral Resources				
Impact 4.10.1: The proposed project could result in substantial soil erosion or the loss of topsoil.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: Erosion-related effects can be minimized through implementation of the policies provided as part of the Natural Resources and Public Health and Safety Elements. Policy NR-4.4 relates specifically to monitoring construction activities through NPDES enforcement, requiring the use of Best Management Practices (BMPs), and other mitigation measures designed to control erosion and protect surface water and groundwater from the adverse effects of construction activities. Other policies from the Public Health and Safety Element (see Policies PHS-3.1 and PHS-3.3) require a detailed geotechnical study be prepared by a certified geotechnical engineer for development, recommendation measures to avoid or minimize risks, and review and enforce the minimum seismic and geologic safety standards included in the Uniform Building Code. With implementation of the above mentioned goals and policies, this impact is considered less than significant.</p>	LTS
Impact 4.10.2: The proposed project could expose people to injury or structures to damage from potential rupture of a known earthquake fault, strong groundshaking, seismic-related ground failure, or landslide.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: The proposed project includes several policies designed to address a variety of public health and safety issues resulting from seismic hazards. For example, the Public Health and Safety Element provides policies that have been developed to ensure a safe environment for the City's residents, visitors, and businesses. These policies and implementation programs include continued compliance with all applicable development requirements and building in compliance with the Uniform Building Code (Policy PHS-3.1), seismic retrofitting of structures (Policy PHS-3.2), and requiring geotechnical investigations for new development (Policy PHS-3.3). With implementation of the above mentioned goals and policies, this impact is considered less than significant.</p>	LTS

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
Impact 4.10.3: The proposed project could result in potential structural damage from development on a potentially unstable geologic unit or soil.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: The proposed project includes policies and implementation programs that have been developed to ensure a safe environment for its residents, visitors, and businesses. Policy PHS 3.3 requires the preparation of geotechnical studies for all new development proposals areas of potential soil instability. Policy PHS 3.1 and PHS 3.2 requires adherence and retrofit of buildings to all applicable State and local building codes and regulations and implementation of the policies and implementation measures contained in the proposed Health and Safety Element, impacts associated with on- or off-site landslide, subsidence, liquefaction, or collapse would be minimized. Consequently, with implementation of the below mentioned policies, this impact is considered less than significant.</p>	LTS
Impact 4.10.4: The proposed project could increase the potential for structural damage from development on expansive soil.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: The proposed project includes policies that have been developed to ensure a safe environment for residents, visitors, and businesses. For example, policies include continued compliance with all applicable development requirements including the California Building Code (see Policies PHS 3.1 and 3.2). Policy PHS 3.3 requires the preparation of geotechnical studies for all new development proposals in areas of potential soil instability. With adherence to these codes and regulations and implementation of the policies and implementation measures contained in the Health and Safety Element, geologic hazard impacts associated with expansive soils would be minimized. With implementation of the above mentioned policies, this impact is considered less than significant.</p>	LTS

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
Impact 4.10.5: The proposed project could result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site, or a known oil and/or gas resource that would be of value to the region and residents of the State.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: The proposed project includes policies in the Natural Resources Element designed to conserve important mineral resources. For example, Policy NR-5.1 requires the protection of access and availability of mineral resources identified by the State as a significant resource. Policy NR-5.2 serves to minimize impacts on adjacent uses from future extraction and transport operations. With implementation of the mentioned policies intended to promote the efficient use of resources and compatible development, this impact is considered less than significant.</p>	LTS
Impact 4.10.6: The proposed project could result in a cumulative impact to geology, soils, and seismicity.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: As growth occurs throughout the region, additional people would be exposed to risks associated with geology, soils, and seismicity hazards. Additional people may also result in an increased use of mineral resources. However, local, regional, State and federal regulations would apply to development and any mineral extraction activities countywide, thereby reducing the potential for cumulative impacts associated with geologic and soil hazards, as well as to mineral resources to a less-than-significant level. The proposed project's incremental contribution to these cumulative impacts would be less than significant.</p>	LTS
4.11 Biological Resources				
Impact 4.11.1: Have a substantial adverse effect, either directly or through habitat modifications, on any special-status species.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: There are a number of federal and State regulations in place to protect biological resources (including special status species) within the Planning Area. In addition, the 2030 General Plan includes a number of policies designed to address potential impacts to biological resources. For example, Policy NR-1.3 highlights the importance of the Stanislaus River</p>	LTS

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
<p>Impact 4.11.2: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFG¹ or USFWS.</p>	LTS	None Required	<p>Corridor and the preservation of its natural open space and biological resources which include sensitive special status species, common wildlife/plant species, and sensitive habitats. Additionally, Policy NR-1.4 calls for the preservation of unique and valuable resources and associated habitats, including special status species, in coordination with federal, state and local resource agencies. Policy NR-1.5 requires discretionary development proposals that could potentially impact natural resources to conduct a biological resources assessment to ensure that project related impacts are considered and mitigated consistent with local, state and federal regulations. Compliance with applicable federal and State regulations along with the applicable policies identified as part of the 2030 General Plan will reduce the impact to a less-than-significant level.</p> <p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: There are a number of federal and State regulations in place to protect biological resources (including special status species) within the Planning Area. For example, individual projects that may result in impacts to sensitive natural communities will be required to apply for a Lake or Streambed Alteration Agreement from the California Department of Fish and Game per Section 1602 of the Fish and Game Code and comply with a variety of habitat avoidance or compensation measures. In addition, the 2030 General Plan includes a number of policies designed to address potential impacts to sensitive natural communities. Policy NR-1.8 requires the preservation of significant native and heritage trees, and mitigation through replanting programs. Policy NR-1.9 also requires the preservation and enhancement of wildlife corridors (including the Stanislaus River Corridor). Policies NR-1.4 and NR-1.5 require the future evaluation and preservation of habitat areas that support both special status species along with common wildlife/plant</p>	LTS

¹ Effective January 1, 2013, the California Department of Fish and Game is now called the California Department of Fish and Wildlife.

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Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
			species. Policy NR-1.3 highlights the importance of the Stanislaus River Corridor and the preservation of its natural open space and biological resources. Compliance with applicable federal and State regulations along with the applicable policies identified as part of the 2030 General Plan will reduce the impact to a less-than-significant level.	
Impact 4.11.3: Have a substantial adverse effect on federally protected wetlands as defined by section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: There are a number of federal and State regulations in place to protect biological resources (including wetlands and or waters of the U.S.) within the Planning Area. In addition, the 2030 General Plan includes a number of policies designed to address potential impacts to wetlands and or waters of the U.S. For example, Policy NR-1.3 highlights the importance of the Stanislaus River Corridor and the preservation of its natural open space and biological resources which include wetlands and associated habitats and species. Policy NR-1.9 also requires the preservation and enhancement of wildlife corridors (including the Stanislaus River Corridor). Additionally, Policies NR-1.4 and NR-1.5 require the future evaluation and preservation of habitat areas including wetlands and or waters of the U.S. Compliance with applicable federal and State regulations along with the applicable policies identified as part of the 2030 General Plan will reduce the impact to a less-than-significant level.</p>	LTS
Impact 4.11.4: Interfere substantially with the movement of any native resident or migratory fish or wildlife corridors, or impede the use of native wildlife nursery sites.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: There are a number of federal and state regulations in place to protect biological resources (including wildlife migratory corridors) within the Planning Area. In addition, the 2030 General Plan includes a number of policies designed to address potential impacts to wildlife corridors, wetlands and/or waters of the U.S. For example, Policy NR-1.9 specifically calls for interconnected open space and</p>	LTS

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			natural areas to be created, preserved and enhanced to provide for wildlife movement and protect biodiversity. Policy NR-1.3 highlights the importance of the Stanislaus River Corridor and the preservation of its natural open space and biological resources which include sensitive special status species, common wildlife/plant species, and sensitive habitats. Compliance with applicable federal and State regulations along with the applicable policies identified as part of the 2030 General Plan will reduce the impact to a less-than-significant level.	
Impact 4.11.5: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, or any local ordinances protecting biological resources.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be less-than-significant.</p> <p>Rationale: The Planning Area and surrounding area is not currently under the jurisdiction of an adopted Habitat Conservation Plan or a Natural Conservation Community Plan. Implementation of the proposed project would not conflict with any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or any other adopted biological resources recovery or conservation plan of any federal or State agency. Development under the 2030 General Plan and CAP would be consistent with the Oakdale Tree Preservation Ordinance, and would require developers to obtain a Tree Removal Permit prior to removing any trees that meet the criteria of the ordinance. Consequently, this impact is considered to be less than significant.</p>	LTS
Impact 4.11.6: Implementation of the proposed project could result in a cumulative impact on biological resources.	PS	No Additional Feasible Mitigation Available	<p>Finding: The City finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale: Cumulative development would result in the</p>	SU

**TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS**

Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
4.12 Visual Resources	PS	No Additional Feasible Mitigation Available	<p>conversion of open habitat landscapes to smaller patches of habitat surrounded by urban development, which would make riverine and seasonal wetland habitat more vulnerable to the effect of habitat fragmentation and other indirect impacts (predator introduction, degradation of water quality, hydrologic alterations, and reduction of habitat functions of on-site wetlands and downstream wetlands). Therefore the proposed project would result in a cumulatively considerable contribution towards the loss of the aforementioned habitats in the region if full buildout occurred without mitigation. The 2030 General Plan includes a number of policies designed to address potential impacts to sensitive natural communities. Policy NR-1.8 requires the preservation of significant native and heritage trees, and mitigation through replanting programs. Policy NR-1.9 also requires the preservation and enhancement of wildlife corridors (including the Stanislaus River Corridor). Policies NR-1.4 and NR-1.5 require the future evaluation and preservation of habitat areas that support both special status species along with common wildlife/plant species. Policy NR-1.3 highlights the importance of the Stanislaus River Corridor and the preservation of its natural open space and biological resources. However, indirect effects described above may still occur as a result of cumulative development in the region (including development beyond the jurisdiction of the lead agency). Thus, the proposed project's incremental contribution to these cumulative impacts would be significant and unavoidable.</p>	SU
<p>Impact 4.12.1: The proposed project could change the visual character of an area and its surroundings, which could degrade the existing visual character or quality.</p>			<p>Finding: The City finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and</p>	

**TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS**

Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
			<p>unavoidable.</p> <p>Rationale: The City will continue to pursue a variety of measures to preserve the existing visual character or quality of Oakdale (including Policies LU-1.3, LU-2.5, LU-3.1, LU-6.3, LU-8.1, NR-1.1, NR-1.3, NR-1.8, NR-2.1, NR-2.3, NR-6.2, NR-6.3, NR-6.4). However, even with implementation of the policies included in the General Plan, new development along the periphery of the City would change the existing visual character of an area, which could degrade the existing visual character or quality of a particular site and its surroundings through the introduction of developed uses within areas currently used for open space/agricultural activities. As a result, the impact remains significant and unavoidable. No additional feasible mitigation is currently available at the programmatic (citywide) level.</p>	
<p>Impact 4.12.2: The proposed project could have a substantial adverse effect on a scenic vista or substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.</p>	LTS	None Required	<p>Finding: The City hereby finds that this impact will be less-than-significant.</p> <p>Rationale: A review of the Caltrans Map of Designated Scenic Routes indicates that there are no highways designated as eligible or officially designated scenic highways within or adjacent to the Planning Area. While implementation of the proposed project would affect the existing visual character or quality of the Planning Area, this issue is addressed under Impact 4.12.1. Consequently, this impact is considered less than significant.</p>	LTS
<p>Impact 4.12.3: The proposed project would create a new source of substantial light or glare which would adversely affect day or nighttime views in the Planning Area.</p>	PS	No Additional Feasible Mitigation Available	<p>Finding: The City finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale: Even with implementation of the policies included in the General Plan (including the new Policy</p>	SU

**TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS**

Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
Impact 4.12.4: The proposed project could result in a cumulative impact on visual resources.	PS	No Additional Feasible Mitigation Available	<p>NR-6.5 Minimize Lighting Impacts), new development would result in new sources of light and glare within areas currently used for a variety of open space/agricultural activities. Although individual developments may have a less-than-significant effect on adjacent sensitive receptors (viewers), the effect of the general buildout would be a substantial increase in overall lighting levels, despite the implementation of technologically and economically feasible mitigation measures. Consequently, this impact is considered significant and unavoidable.</p> <p>Finding: The City finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale: Implementation of the proposed project along with increases in regional growth, land use changes, and transportation network improvements would result in additional opportunities for adverse impacts on panoramic views, views of significant landscape features, scenic highways, visual character, and light and glare to occur. The combination of the direct and cumulative aesthetic and visual resource-related impacts from the projects and adopted plans described above that would affect the San Joaquin Valley region could result in significant cumulative aesthetic and visual impacts. Because cumulative aesthetic and visual resource impacts throughout the San Joaquin Valley region would be significant, and because the proposed project's incremental aesthetic and visual resource impacts are significant, the proposed project's incremental aesthetic and visual resource impacts are also cumulatively considerable and significant and unavoidable.</p>	SU

**TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS**

Impact	Level of Significance Before Mitigation	Adopted Policies and/or Mitigation Measures	Findings/Rationale for Finding	Level of Significance after Mitigation
4.13 Energy and Global Climate Change				
Impact 4.13.1: The proposed project could result in the wasteful, inefficient, or unnecessary consumption of energy by residential, commercial, industrial, or public uses associated with increased demand due to anticipated development in the City.	LTS	None Required	<p>Finding: The City hereby finds that this impact will be <i>less-than-significant</i>.</p> <p>Rationale: Implementation of goals, policies, and implementation programs in the 2030 General Plan would assist in minimization of energy consumption associated with urban development. In particular, policies in the proposed Public Facilities Element require the installation of energy efficient lighting and appliances, as well as renewable energy systems, by large employers and in City facilities, where feasible. Other policies include strategies to improve energy conservation and encourage the use of alternative modes of transportation to reduce vehicular travel.</p>	LTS
Impact 4.13.2: The proposed project could generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment or could potentially conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions.	PS	<p>Measure 4.13.2: Implement the City of Oakdale Climate Action Plan. As previously discussed, the Oakdale CAP contains many GHG reduction goals and strategies related to 5 broad topics: energy efficiency, transportation and land use, solid waste reduction, and water and wastewater use. For example, energy reduction strategies include promoting energy efficiency rebates, programs, and benchmarking for residential, commercial, and industrial users. All industrial users over 3,000 sf will be required to offset 20% of their building energy consumption with on-site renewable energy or 40% of their energy with off-site renewable energy by 2019. CAP strategies encourage higher-density development and commute trip reduction programs, as well as building out the proposed bicycle network and 75% solid waste diversion by 2020. With implementation of the above City policies and the City of Oakdale CAP reduction strategies, buildout of the 2030 General Plan Update would achieve more than a 29% reduction compared to BAU and would thus not generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment, nor would the General Plan conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions.</p>	<p>Finding: The City of Oakdale finds that implementation of Mitigation Measure 4.13.2 would reduce Impact 4.13.2 to a less than significant level.</p> <p>Rationale: As discussed in the Draft CAP, the City of Oakdale is adopting a community-wide emissions reduction target of 29% below “business-as-usual” (BAU) Forecasts for 2020, following guidance from the California Air Resources Board (CARB). This reduction is deemed by CARB and the California Attorney General to be consistent with the statewide AB 32 goal of reducing emissions to 1990 levels. This commitment also aligns with guidance from the SJVAPCD.</p>	LTS

Findings - Project Alternatives

Alternative Selection Process

The CEQA Guidelines recommend that an EIR briefly describe the rationale for selecting the alternatives to be discussed, identify any alternatives that were considered by the lead agency but were rejected as infeasible, and briefly explain the reasons underlying the lead agency's determination (CEQA Guidelines, § 15126.6(c)).

The alternatives addressed in this EIR were selected in consideration of one or more of following factors:

- the extent to which the alternative would accomplish most of the basic goals and objectives of the proposed project (shown in Chapter 3.0 Project Description);
- the extent to which the alternative would avoid or lessen any of the identified significant effects of the proposed project;
- the feasibility of the alternative, taking into account site suitability, economic viability, availability of infrastructure, General Plan consistency, and consistency with other applicable plans and regulatory limitations;
- the appropriateness of the alternative in contributing to a “reasonable range” of alternatives necessary to permit a reasoned choice; and
- the requirement of the CEQA Guidelines to consider a “no project” alternative and to identify an “environmentally superior” alternative in addition to the no-project alternative (CEQA Guidelines, § 15126.6(e)).

Alternatives Screened Out from Detailed Consideration in the DEIR

The following alternatives were eliminated from further consideration:

- **Alternative Location.** None of the alternatives includes consideration of an alternative location. The CEQA Guidelines section 15126.6 (f) (2) recommend considering an alternative location to reduce potential impacts of a project. However, the goals and policies of the proposed project are specific to the geographic context of the City's 2030 Planning Area. Buildout consistent with the goals and policies of the proposed project at another location does not make sense for a general plan that applies to all properties within the City limits and its associated Planning Area. Thus, this DEIR does not evaluate an Alternative Location Alternative.
- **Development of Planning Area 6.** The existing 2015 General Plan identified Planning Area 6, north of the Stanislaus River, as a potential growth area. Planning Area 6 was designated for lower density residential, commercial, office, park and school uses by the 2015 General Plan. The previous allocation of urban land uses to Planning Area 6 was based on the assumption that a bypass of the SR 120 corridor was going to pass through the area. Following adoption of the 2015 General Plan, plans for a bypass of SR 120 north of the City were abandoned. As part of the 2030 General Plan Update process, the City reevaluated the desire to retain urban uses within Planning Area 6. This evaluation

included an assessment of market demand, as well as infrastructure constraints. The analysis concluded that: (1) Planning Area 6 was not needed to accommodate projected growth through the 2030 General Plan horizon year; and (2) significant infrastructure challenges exist for development in Planning Area 6 including the need for an additional bridge across the Stanislaus River and the extension of water and wastewater services. Given that a bypass is no longer planned through Planning Area 6, the area is not needed to accommodate projected horizon year growth, and significant infrastructure issues would need to be overcome to support development, Planning Area 6 has been eliminated from further consideration as an alternative for purposes of this DEIR.

The City finds that all of the alternatives eliminated from further consideration in the Draft EIR are infeasible, would not meet most project objectives and/or would not reduce or avoid any of the significant effects of the proposed project.

Alternatives Analyzed in the EIR

The DEIR and FEIR examined a reasonable range of alternatives to the proposed project to determine whether any of these alternatives could meet most or all of the proposed project's objectives, while avoiding or substantially lessening its significant, unavoidable impacts.

The following three alternatives were selected for further examination:

- Alternative 1: No Project Alternative/2015 Oakdale General Plan;
- Alternative 2: Reduced Intensity Alternative (North); and
- Alternative 3: Reduced Intensity Alternative (South).

Alternative 1: No Project Alternative/2015 Oakdale General Plan

Description

Section 15126.6(e) of the CEQA Guidelines requires that an EIR evaluate and analyze the environmental impacts of the "No Project" Alternative. Under this alternative current development patterns are assumed to occur in accordance with the adopted 2015 General Plan.

The currently adopted 2015 General Plan allows for a full range of urban uses within the 16.6 acre Primary Study Area (shown in Figure 3-4 Adopted General Plan Land Use), which includes the City, its SOI, and unincorporated County land. The 2015 General Plan assumes full buildout of Planning Areas 1, 3, and 9, as well as Future Specific Plan Areas 2, 5, and 8. In addition, Planning Area 6, located north of Stanislaus River, was also designated for general commercial and low density residential uses. The 2030 General Plan designates land uses for a smaller area when compared to the 2015 General Plan, and excludes Planning Area 6 from the 2030 Planning Area. The 2030 General Plan assumes Planning Area 6 would revert back to Stanislaus County General Plan land uses and remain as agriculture. As a result, more intense development would occur under the adopted 2015 General Plan alternative when compared to the 2030 General Plan, as shown in Table 5-1.

Ability to Meet Project Objectives

Under the No Project Alternative, the City would continue with implementation of its adopted 2015 General Plan, which would remain as the adopted long-range planning policy document for the City. Current development patterns would continue to occur in accordance with the 2015 General Plan, and more compact and diverse development that is located adjacent to a mix of uses, as well as services, schools, and parks concentrated within designated growth areas would not occur. Consequently, this alternative would fundamentally fail to meet a majority of the Project Objectives described in Chapter 3.0 Project Description. Failure to update the City's 2015 General Plan will not result in a comprehensive update to the City's existing goals and policies to help incorporate current planning, environmental, and regulatory trends and objectives. By not incorporating these updated goals and policies, it could make it more difficult to protect the City's small town character and sense of community, as well as to preserve and enhance existing neighborhoods. The City's mobility system would not serve as many different types of users or operate as efficiently under the No Project Alternative. The lack of updated economic vitality policies or programs may also make it more difficult to strengthen and diversify the City's economic base. However, it is assumed that the City would continue to coordinate and cooperate with other local agencies and organizations on a variety of relevant land management issues whether the proposed project is implemented or not.

Summary of Environmental Impacts

Land Use and Agricultural Resources

Neither the No Project Alternative nor the 2030 General Plan would result in the division or alteration of an existing community. However, under the adopted 2015 General Plan, the City would have less of an ability to direct specific development changes to ensure that new development is well-connected and compatible with surrounding uses. Similar to the 2030 General Plan, development proposed under the No Project Alternative would still need to be consistent with existing plans and policies. Existing General Plan policies would generally ensure that new development is compatible with surrounding land uses. For these reasons, the land use impacts of the No Project Alternative are considered to be similar to those of the 2030 General Plan and are less than significant.

Implementation of this alternative would result in a larger development footprint and allow urban development north of Stanislaus River in Planning Area 6, when compared to the proposed project. Planning Area 6 currently contains a small amount of Prime Farmland and Unique Farmland, and the remainder of the area contains Farmland of Local Importance, Grazing Land, and rural residential uses. Implementation of this alternative would result in a greater amount of important farmland converted to non-agricultural uses. Impacts would be slightly greater in magnitude when compared to the proposed project, and are potentially significant.

Cultural Resources

Land that has been used for various types of agricultural or open space uses that do not require extensive excavation and/or grading activities may be more likely to contain previously undiscovered cultural resources, particularly near local waterways. Urbanized areas may also contain a variety of historic resources (i.e., buildings, bridges, etc.). The existing 2015 General Plan does not have

the full range of policies designed to address cultural resources. Policies provided as part of the 2030 General Plan are considerably more comprehensive and detailed, including, in particular, those related to historic resources. Similar to the 2030 General Plan, urbanization associated with future growth under this alternative could damage or destroy a variety of cultural resources during various construction-related activities. Additionally, development under the No Project Alternative would expand urban development north of the Stanislaus River into Planning Area 6, which is primarily used for agriculture and potentially disturb a larger area. As such, impacts under the No Project Alternative would be greater in magnitude than those under the proposed project and are potentially significant for historical resources and less than significant for archaeological and paleontological resources.

Public Services and Safety

Buildout under the adopted 2015 General Plan would have a larger development footprint and would result in more dwelling units, residents, nonresidential uses and employees than under the 2030 General Plan. The additional personnel and materials costs required to serve development under the existing 2015 General Plan would be offset through the increased revenue, and fees, generated by future development. In addition, future projects will be reviewed by the City on an individual basis and will be required to comply with requirements (i.e., impact fees, etc.) in effect at the time building permits are issued. However, public service personnel would be required to serve a larger area under implementation of the 2015 General Plan, and would likely necessitate a second bridge at Crane Road to cross the Stanislaus River to effectively serve the development in Planning Area 6. Therefore, impacts to public services under the No Project Alternative would be greater than those of the 2030 General Plan Update but are less than significant.

Utilities

Buildout under the 2015 General Plan would have a larger development footprint and would result in more dwelling units, residents, nonresidential uses and employees than under the 2030 General Plan. Most utilities to serve new development would be partially funded through the City's existing Capital Facilities Fee. However, with more development allowed north of the Stanislaus River, additional utilities such as water and wastewater infrastructure across the River may be necessary to more efficiently serve new development under the No Project Alternative. Impacts would be slightly greater under the No Project when compared to the proposed project and are less than significant.

In addition, with more development, more solid waste would be generated which could exceed the permitted capacity of the landfill serving the City. As such, impacts to solid waste under the No Project Alternative would be greater than those of the 2030 General Plan and are potentially significant.

Transportation and Circulation

Buildout of the No Project Alternative allows a substantial amount of land use growth north of the Stanislaus River, as well as north and south of River Road. Development north of the River would require supporting transportation infrastructure, such as a second bridge, which would result in high costs. Roadway improvement assumptions are the same between the No Project

Alternative and the Cumulative Plus Project Alternative 1 scenario, so the difference in traffic impacts is attributable to differences in land use between the two scenarios. Similar to the proposed project, several roadway segments throughout the Planning Area would operate unacceptably under the No Project Alternative and is potentially significant.

Air Quality

Under the No Project Alternative, the City would continue to function under the direction of the existing General Plan. Consequently, buildout under the existing General Plan would result in a larger development footprint as well as more dwelling units and residents than the 2030 General Plan. These increases in dwelling units and other types of development would result in increased levels of construction emissions, criteria air pollutants and toxic air contaminants from mobile, area, and stationary sources, as well as exposure of residents to odors. Thus, implementation of the No Project Alternative would be similar but slightly greater in magnitude when compared to the proposed project and result in potentially significant impacts because growth would still contribute to air pollutant emissions that would exceed the daily SJVAPCD thresholds and could conflict with applicable air quality plans.

Noise

Under the No Project Alternative, the City would continue to function under the direction of the adopted 2015 General Plan. Consequently, buildout under the 2015 General Plan would result in a larger development footprint as well as more dwelling units, residents, nonresidential square footage, and employees than under the 2030 General Plan. These increases would result in an approximate 22% increase in traffic trips, which would increase noise levels from mobile sources. Thus, implementation of the No Project Alternative would also result in greater impacts than the proposed project and impacts are potentially significant because growth would contribute additional sources of noise that could exceed local standards.

Hazardous Materials

The No Project Alternative proposes development that is similar in nature to that anticipated under the 2030 General Plan. The No Project Alternative would not include the additional hazardous materials and public safety policies and implementation programs contained as part of the 2030 General Plan. However, hazardous materials generation, storage and clean-up are heavily regulated by federal, State and local regulations that would apply to both the No Project Alternative and the proposed project. For this reason, hazards and hazardous materials impacts under the No Project Alternative are considered to be similar but slightly greater than those of the proposed project and are less than significant.

Hydrologic Resources

Under the No Project Alternative, development would convert more open space and agricultural land to urban uses than under the 2030 General Plan. As with the 2030 General Plan, the creation of impervious surfaces associated with urbanization would increase the amount of runoff, which could affect water quality. An increase in impervious surfaces could also reduce groundwater recharge potential within the Planning Area. In addition, greater amount of development would

also result in an increase in water demand, which could affect groundwater supplies. As such, impacts to groundwater levels and groundwater recharge potential would be similar but slightly greater than the proposed project and are potentially significant.

Development under this alternative would expose more residents and employees to potential hazards related to dam failure inundation zones. Impacts under the No Project Alternative would be similar but slightly greater than the proposed project and are potentially significant.

Geology, Soils, Seismicity, and Mineral Resources

The No Project Alternative proposes development that is similar in nature to that anticipated under the 2030 General Plan. Current State and federal regulations require specific engineering and design criteria to avoid impacts related to geologic, soils, and seismic hazards, which would apply to development under both the No Project Alternative and the 2030 General Plan. Any mineral resource extraction activities are regulated by the State. For this reason, geologic, soils, seismicity, and mineral resource impacts under the No Project Alternative are considered to be similar but slightly greater than those of the 2030 General Plan and are less than significant.

Biological Resources

Under the No Project Alternative, the City would continue to function under the direction of the adopted 2015 General Plan. Consequently, buildout under the 2015 General Plan would result in a larger development footprint as well as more dwelling units and residents than the proposed project. Buildout of the 2015 General Plan under this alternative relative to the 2030 General Plan would result in more development that could result in adverse impacts to sensitive habitats, wetlands, riparian areas, wildlife movement, and significant trees. In addition, the new goals and policies included as part of the 2030 General Plan to protect federal and State listed and threatened species are more comprehensive than those in the 2015 General Plan. Therefore, as with the 2030 General Plan, the No Project Alternative would also result in growth that would occur over currently undeveloped or habitat land and would result in the overall reduction of a plant or wildlife species habitat. Impacts would be greater under this alternative when compared to the proposed project and are potentially significant.

Visual Resources

The No Project Alternative proposes development that is similar in nature to that anticipated under the proposed project. The 2015 General Plan includes some policy guidance with respect to community appearance; however, the proposed goals and policies provided as part of the 2030 General Plan are considerably more comprehensive and detailed than those in the 2015 General Plan. Similar to the proposed project, development under this alternative would degrade the existing visual character of and introduce new sources of light to the area and result in potentially significant impacts.

Energy and Climate Change

Under the No Project Alternative, the City would continue to function under the direction of the 2015 General Plan. Consequently, buildout under the 2015 General Plan would result in a larger

development footprint as well as more dwelling units and residents than the proposed project. These increases in dwelling units and other types of development would result in increased energy demand and greenhouse gas emissions from direct and indirect sources (such as on-road transportation, off-road equipment and vehicles, energy generation, etc.). In addition, under the No Project Alternative, the Climate Action Plan (CAP) and the corresponding greenhouse gas emission reduction measures would not be implemented. Thus, the increased development of the No Project Alternative, in comparison to the proposed project, would not be able to achieve the target 29 percent reduction at buildout without compliance with the CAP. Thus, implementation of the No Project Alternative would not comply with the AB 32 reduction goal and result in greater impacts when compared to the proposed project. This impact would be significant.

Finding/Rationale:

The City finds that this alternative is infeasible. Specifically, this alternative would fundamentally fail to meet all the Project Objectives described above because failure to update the City's 2015 General Plan will not result in a comprehensive update to the City's existing goals and policies to help incorporate current planning, environmental, and regulatory trends and objectives. Failure to incorporate these updated goals and policies would make it more difficult to provide the necessary planning framework to develop standards for the protection of open space areas, habitats, agricultural areas, and scenic landscapes. This alternative is also rejected as being infeasible on the grounds that it does not represent the desired policy of the City. (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957)

Alternative 2: GP - Reduced Intensity Alternative (North)

Description

A Reduced Intensity Alternative (North) to the 2030 General Plan is evaluated in this DEIR, which assumes no additional development would occur north of Highway 108 in Future Specific Plan Areas 2 and 8, which are located outside of the City limits but within the City's existing SOI. Planning Area 2 is approximately 143 acres and located on the western edge of Oakdale, while Future Specific Plan Area 8 is approximately 330 acres and located on the eastern end of the City. The Future Specific Plan areas are shown in Figure 3-1 of Chapter 3.0 Project Description.

Future Specific Plan Area 2 is located just south of Stanislaus River and contains open space and agricultural land. Future Specific Plan Area 8 is comprised primarily of agricultural land with low density residential uses and a small amount of park and open space land. These existing uses would remain with implementation of the Reduced Intensity Alternative (North), while the remainder of the Planning Area would build out in accordance with the 2030 General Plan. Under this alternative, 314 fewer single family residential units in Plan Area 2, and 797 fewer single family and 126 fewer multi-family residential units in Plan Area 8 would be built when compared to implementation of the 2030 General Plan, as shown in Figure 3-1 Planning Boundaries in Chapter 3.0 Project Description.

Ability to Meet Project Objectives

The Reduced Intensity Alternative (North) assumes no additional development would occur north of Highway 108 in Future Specific Plan Areas 2 and 8. Under this alternative, 314 fewer single family residential units in Plan Area 2, and 797 fewer single family and 126 fewer multi-family residential units in Plan Area 8 would be built when compared to implementation of the 2030 General Plan. Implementation of this alternative would meet most of the project objectives except that it may not be able to meet the housing needs of the existing and future residents. A total of 1,237 fewer residential single-family and multi-family residential units would be developed under this alternative.

Summary of Environmental Impacts

The environmental impacts of the Reduced Intensity Alternative (North) are summarized below.

Land Use

Neither the Reduced Intensity Alternative (North) nor the 2030 General Plan would result in the division or alteration of an existing community. Under the Reduced Intensity Alternative (North), the City would have the same ability to direct specific development changes to ensure that new development is well-connected and compatible with surrounding uses. However, similar to the 2030 General Plan, development proposed under the Reduced Intensity Alternative (North) would still need to be consistent with existing plans and policies. 2030 General Plan policies would generally ensure that new development is compatible with surrounding land uses. For these reasons, the land use impacts of the Reduced Intensity Alternative (North) are considered to be similar to those of the proposed project and are less than significant.

Future Specific Plan Areas 2 and 8 currently contain lands under Williamson Act contracts, as well as Prime and Unique Farmland. Implementation of this alternative would result in the preservation of these important farmlands. However, conversion of important farmland to other urban uses would occur in the remainder of the Planning Area. Therefore, impacts to agricultural resources would be less in magnitude under this alternative but would still be potentially significant.

Cultural Resources

Land that has been used for various types of agricultural or open space uses that do not require extensive excavation and/or grading activities may be more likely to contain previously undiscovered cultural resources, particularly near local waterways. Urbanized areas may also contain a variety of historic resources (i.e., buildings, bridges, etc.). The Reduced Intensity Alternative (North) would result in less conversion of agricultural land and open space than the proposed project. However, similar to the 2030 General Plan, urbanization associated with the Reduced Intensity Alternative (North) could damage or destroy a variety of cultural resources during various construction-related activities. As a result, impacts would be slightly less in magnitude under this alternative but would be potentially significant for historical resources, and less than significant for archaeological and paleontological resources.

Public Services and Safety

Buildout under the Reduced Intensity Alternative (North) would have a smaller development footprint and result in slightly fewer dwelling units and residents than under the proposed project. This lower level of population growth and development would result in similar although slightly lower impacts to public services in the City that would be required to adequately serve the levels of development projected under the Reduced Intensity Alternative (North). The additional personnel and materials costs required to serve development under the Reduced Intensity Alternative (North) would be offset through the increased revenue, and fees, generated by future development. In addition, future projects will be reviewed by the City on an individual basis and will be required to comply with requirements and pay any applicable fees. For these reasons, impacts to public services of the Reduced Intensity Alternative (North) are considered to be similar but slightly less in magnitude when compared to the 2030 General Plan and are considered less than significant.

Utilities

Buildout under the Reduced Intensity Alternative (North) would have a smaller development footprint and would result in slightly fewer dwelling units and residents than the 2030 General Plan. This lower level of population growth and development would result in similar although slightly lower impacts on utilities in the City that would be required to adequately serve the levels of development projected under the Reduced Intensity Alternative (North). As far as most utilities are concerned, the infrastructure necessary to serve new urban uses would be partially funded through the City's existing Capital Facilities Fee, which applies to all development, resulting in less-than-significant impacts. However, because of the uncertain availability of where and what future waste disposal options may be available by buildout of the Reduced Intensity Alternative (North), this solid waste impact would be similar but slightly less in magnitude when compared to the proposed project and is potentially significant.

Transportation and Circulation

The Reduced Intensity (North) alternative assumes no additional development would occur north of Highway 108 in Future Specific Plan Areas 2 and 8. These areas are located outside of the City limits but within the City's existing SOI. Future Specific Planning Area 2 is approximately 143 acres and located on the western edge of Oakdale, while Future Specific Plan Area 8 is approximately 330 acres and located on the eastern end of the City. This alternative results in 1,236 fewer dwelling units and no changes to the non-residential development.

The Reduced Intensity Alternative (North) would result in lower trip generation compared to the proposed project. With the decrease in trip generation occurring in Future Specific Plan Areas 2 and 8, traffic volume reductions would be most noticeable on the roadways providing direct access to these areas. For Future Specific Planning Area 8, the largest volume reductions would occur on Maag Avenue, Stearns Road, and F Street (SR 120). For Future Specific Planning Area 2, the largest volume reductions could be expected on Walnut Street, Pontiac Street, Crane Road, Oak Avenue, and other residential collector streets that provide access to SR 108.

Impacts with the Reduced Intensity North alternative, measured in terms of traffic volumes on study roadways, vehicle travel measured in terms of vehicle miles of travel and vehicle hours of travel are anticipated to be less than but similar to the proposed project. Impacts associated with traffic are potentially significant.

Air Quality

Buildout under the Reduced Intensity Alternative (North) would result in a smaller development footprint as well as fewer dwelling units and residents than the proposed project. These decreases in dwelling units and other types of development would result in decreased levels of construction emissions, criteria air pollutants and toxic air contaminants from mobile, area, and stationary sources, as well as exposure of people to odors, in comparison to the 2030 General Plan. However, implementation of the Reduced Intensity Alternative (North) would still result in potentially significant impacts because the substantial growth would still contribute to air pollutant emissions that could exceed the daily SJVAPCD thresholds and could conflict with applicable air quality plans.

Noise

Buildout under this alternative would result in a smaller development footprint as well as fewer dwelling units and residents than under the proposed project. These decreases in dwelling units and other types of development would result in decreased levels of both mobile and stationary noise sources relative to the 2030 General Plan. However, implementation of the Reduced Intensity Alternative (North) would still increase traffic noise which could affect noise-sensitive uses. As such, this impact would be slightly less in magnitude when compared to the proposed project but is potentially significant because growth would still contribute additional sources of noise that could exceed local standards.

Hazardous Materials

The Reduced Intensity Alternative (North) proposes development that is similar in nature to that anticipated under the 2030 General Plan. Implementation of the Reduced Intensity Alternative (North) would include the additional hazardous materials and public safety policies and implementation programs contained as part of the 2030 General Plan to protect Oakdale from hazards. In addition, hazardous materials generation, storage and clean-up are heavily regulated by federal, State and local regulations that would apply to both the Reduced Intensity Alternative (North) and the proposed project. For this reason, hazards and hazardous materials impacts under the Reduced Intensity Alternative (North) are considered to be similar to but slightly less in magnitude when compared to those of the 2030 General Plan and are less than significant.

Hydrologic Resources

Under the Reduced Intensity Alternative (North), development would convert less open space land to urban uses than the proposed project. As with the 2030 General Plan, the creation of impervious surfaces associated with urbanization would increase the amount of runoff, which could affect water quality. An increase in impervious surfaces could also reduce groundwater recharge potential. Because land conversion would be less than the 2030 General Plan, fewer

impervious surfaces would be developed. Less development under this alternative would also require less demand for groundwater. However, hydrologic impacts to groundwater levels and groundwater recharge potential under the Reduced Intensity Alternative (North) are considered to be similar but slightly less in magnitude than those of the 2030 General Plan and are potentially significant.

Development under this alternative would expose fewer residents and employees to potential hazards related to dam failure inundation zones. Impacts under this alternative would be similar but slightly less in magnitude than the proposed project and are potentially significant.

Geology, Soils, Seismicity, and Mineral Resources

The Reduced Intensity Alternative (North) proposes urban development that is similar in nature to that anticipated under the 2030 General Plan. Current State and federal regulations require specific engineering and design criteria to avoid impacts related to geologic, soils, and seismic hazards, which would apply to both the Reduced Intensity Alternative (North) and the proposed project. Any mineral resource extraction activities are also regulated by the State. For this reason, geologic, soils, seismic, and mineral resource impacts under the Reduced Intensity Alternative (North) are slightly less in magnitude than the proposed project and are less than significant.

Biological Resources

Under the Reduced Intensity Alternative (North), development would convert less open space and agricultural land to urban uses than under the proposed project. Therefore, buildout of the Reduced Intensity Alternative (North) relative to the 2030 General Plan would result in less development that could result in adverse impacts to sensitive habitats, wetlands, riparian areas, wildlife movement, and significant trees. However, as with the proposed project, the Reduced Intensity Alternative (North) would also result in growth that would occur on currently undeveloped or habitat land and would result in the overall reduction of a plant or wildlife species habitat. Impacts would be similar but slightly less in magnitude than the proposed project and are potentially significant.

Visual Resources

The Reduced Intensity Alternative (North) proposes development that is similar in nature to that under the proposed project. The proposed goals and policies provided as part of the 2030 General Plan would apply under the Reduced Intensity Alternative (North). Although less development would occur under the Reduced Intensity Alternative (North) and would result in slightly fewer impacts when compared to the proposed project, development would still degrade the existing visual character of and introduce new sources of light to the area. Impacts are potentially significant.

Energy and Climate Change

Buildout under the Reduced Intensity Alternative (North) would result in a smaller development footprint as well as fewer dwelling units and residents than the proposed project. These decreases in dwelling units and other types of development would result in decreased energy demand and greenhouse gas emissions from direct and indirect sources (such as on-road transportation, off-

road equipment and vehicles, energy generation, etc.). Since implementation of the 2030 General Plan would result in less-than-significant GHG impacts with implementation of the CAP, buildout of decreased development under the Reduced Intensity Alternative (North) would also be considered less than significant after CAP compliance and less in magnitude when compared to the proposed project.

Finding/Rationale:

The City finds that this alternative is infeasible. Specifically, this alternative would not fully satisfy all the Project Objectives such as meeting the housing needs of future residents, as discussed above. This alternative is also rejected as being infeasible on the grounds that it does not represent the desired policy of the City. (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957)

Alternative 3: GP - Reduced Intensity Alternative (South)

Description

Under the Reduced Intensity Alternative (South), no development would occur in Future Specific Plan Area 5, while the rest of the Planning Area would build out in accordance with the 2030 General Plan. Plan Area 5 is approximately 680 acres, most of which currently contains agricultural land. Under this alternative, there would be 2,281 single family residential units, 1,493 multifamily residential units, and over 207,000 sf of retail uses that would not be constructed when compared to implementation of the 2030 General Plan. In addition, without development in these areas, future growth may occur in other areas outside of the Future Specific Plan area, which could affect the City's ability to plan for quality, managed, and sustainable growth. Future Specific Plan Area 5 is shown in Figure 3-1 Planning Boundaries in Chapter 3.0 Project Description.

Ability to Meet Project Objectives

Under the Reduced Intensity Alternative (South), no additional development would occur north of Highway 108 in Future Specific Plan Area 5. Under this alternative, there would be 2,281 single family residential units, 1,493 multifamily residential units, and over 207,000 sf of retail uses that would not be constructed when compared to implementation of the 2030 General Plan in Plan Area 5. Implementation of this alternative would meet most of the project objectives except that it would not be able to meet the housing needs of the existing and future residents and provide a variety of housing types. A total of 3,774 fewer residential single-family and multi-family residential units would be developed under this alternative. In addition, without development in this area, future growth may occur in other areas outside of the Future Specific Plan area, which could affect the City's ability to plan for quality, managed, and sustainable growth.

Summary of Environmental Impacts

The environmental impacts of the Reduced Intensity Alternative (South) are summarized below.

Land Use

Neither the Reduced Intensity Alternative (South) nor the 2030 General Plan would result in the division or alteration of an existing community. Under the Reduced Intensity Alternative (South), the City would have the same ability to direct specific development changes to ensure that new development is well-connected and compatible with surrounding uses. Furthermore, development proposed under the Reduced Intensity Alternative (South) would still need to be consistent with 2030 General Plan policies and implementation programs, which would generally ensure that new development is compatible with surrounding land uses. For these reasons, the land use impacts of the Reduced Intensity Alternative (South) are considered to be similar to those of the proposed project and are less than significant.

Future Specific Plan Area 5 contains lands under Williamson Act contracts, as well as significant farmlands. Implementation of this alternative would result in the preservation of these important farmlands within Future Specific Plan Area 5. However, conversion of important farmland to other urban uses would occur in the remainder of the Planning Area. Therefore, impacts to agricultural resources would be less in magnitude under this alternative but are potentially significant.

Cultural Resources

Land that has been used for various types of agricultural or open space uses that do not require extensive excavation and/or grading activities may be more likely to contain previously undiscovered cultural resources, particularly near local waterways. Urbanized areas may also contain a variety of historic resources (i.e., buildings, bridges, etc.). The Reduced Intensity Alternative (South) would result in less conversion of agricultural land and open space than the 2030 General Plan. However, similar to the 2030 General Plan, urbanization associated with the Reduced Intensity Alternative (South) could damage or destroy a variety of cultural resources during various construction-related activities. As a result, impacts would be slightly less in magnitude under this alternative when compared to the proposed project but are potentially significant for historical resources, and less than significant for archaeological and paleontological resources.

Public Services and Safety

Buildout under the Reduced Intensity Alternative (South) would have a smaller development footprint and would result in slightly fewer dwelling units and residents than the 2030 General Plan. This lower level of population growth and development would result in similar although slightly lower impacts to public services in the City that would be required to adequately serve the levels of development projected under the Reduced Intensity Alternative (South). The additional personnel and materials costs required to serve development under the Reduced Intensity Alternative (South) would be offset through the increased revenue and fees, generated by future development. In addition, future projects will be reviewed by the City on an individual basis and will be required to comply with requirements and pay any applicable fees. For these reasons, impacts to public services of the Reduced Intensity Alternative (South) are considered to be similar but less in magnitude when compared to those of the proposed project and are less than significant.

Utilities

Buildout under the Reduced Intensity Alternative (South) would have a smaller development footprint and would result in slightly fewer dwelling units and residents than the 2030 General Plan. This lower level of population growth and development would result in similar although slightly lower impacts on utilities in the City that would be required to adequately serve the levels of development projected under the Reduced Intensity Alternative (South). As far as most utilities are concerned, the infrastructure necessary to serve new urban uses would be partially funded through the City's existing Capital Facilities Fee, which applies to all development, resulting in less-than-significant impacts. However, because of the uncertain availability of where and what future waste disposal options may be available by buildout of the Reduced Intensity Alternative (South), this solid waste impact would be similar but slightly less in magnitude when compared to the proposed project and is potentially significant.

Transportation and Circulation

The Reduced Intensity (South) alternative assumes that no additional development would occur in Future Specific Plan Area 5, while the rest of the Planning Area would build out in accordance with the proposed project. Area 5 is approximately 680 acres and would include 2,281 single family residential units, 1,493 multifamily residential units, and over 207,000 square feet of retail uses that would not be constructed compared to implementation of the 2030 General Plan.

The reduction in development would lead to a decrease in gross trip generation of about 3,200 trips in the a.m. peak hour, 3,500 trips in the p.m. peak hour, and 31,600 daily trips. The decrease in trip generation in Planning Area 5 could lead to fewer vehicles on city streets used to access the area, such as Crane Road, Willowood Drive and Greger Street, also improving operations and reducing impacts. Further, the decrease in trips would likely reduce travel and congestion on SR 120 and SR 108.

Impacts with the Reduced Intensity South alternative, measured in terms of traffic volumes on study roadways, vehicle travel measured in terms of vehicle miles of travel and vehicle hours of travel are anticipated to be less than the proposed project but considered potentially significant.

Air Quality

Buildout under the Reduced Intensity Alternative (South) would result in a smaller development footprint as well as fewer dwelling units and residents than the 2030 General Plan. In addition, 31,600 fewer vehicle trips would occur under this alternative. These decreases in vehicle trips, dwelling units and other types of development would result in associated decreased levels of construction emissions, criteria air pollutants and toxic air contaminants from mobile, area, and stationary sources, as well as exposure of people to odors, in comparison to the 2030 General Plan. However, implementation of the Reduced Intensity Alternative (South) would also result in a potentially significant impact because the substantial growth would still contribute to air pollutant emissions that could exceed the daily SJVAPCD thresholds and could conflict with applicable air quality plans.

Noise

Buildout under the Reduced Intensity Alternative (South) would result in a smaller development footprint as well as fewer dwelling units and residents than the 2030 General Plan. In addition, 31,600 fewer vehicle trips would occur under this alternative. These decreases in vehicle trips, dwelling units and other types of development would result in associated decreased levels of both mobile and stationary noise sources relative to the proposed project. However, implementation of the Reduced Intensity Alternative (South) would still result in potentially significant impacts because growth would contribute additional sources of noise that could exceed local standards.

Hazardous Materials

The Reduced Intensity Alternative (South) proposes development that is similar in nature to that anticipated under the 2030 General Plan. The Reduced Intensity Alternative (South) would include the additional hazardous materials and public safety policies and implementation programs contained as part of the 2030 General Plan. In addition, hazardous materials generation, storage and clean-up are heavily regulated by federal, State and local regulations that would apply to both the Reduced Intensity Alternative (South) and the 2030 General Plan. For this reason, hazards and hazardous materials impacts under the Reduced Intensity Alternative (South) are considered to be similar but slightly less in magnitude when compared to those of the 2030 General Plan and are less than significant.

Hydrologic Resources

Under the Reduced Intensity Alternative (South), development would convert less open space land to urban uses than the proposed project. As with the 2030 General Plan, the creation of impervious surfaces associated with urbanization would increase the amount of runoff, which could affect water quality. An increase in impervious surfaces could also reduce groundwater recharge potential. Because land conversion would be less than under the proposed project, fewer impervious surfaces would be created. Less development under this alternative would also require less demand for groundwater. However, hydrologic impacts to groundwater levels and groundwater recharge potential under the Reduced Intensity Alternative (South) are considered to be similar but less in magnitude when compared to those of the 2030 General Plan and are potentially significant.

Development under this alternative would expose fewer residents and employees to potential hazards related to dam failure inundation zones. Impacts under this alternative would be similar but slightly less in magnitude when compared to the proposed project and are potentially significant.

Geology, Soils, Seismicity, and Mineral Resources

The Reduced Intensity Alternative (South) proposes development that is similar in nature to that anticipated under the 2030 General Plan. Current State and federal regulations require specific engineering and design criteria to avoid impacts related to geologic, soils, and seismic hazards, which would apply to both the Reduced Intensity Alternative (South) and the 2030 General Plan. Any mineral resource extraction activities are also regulated by the State. For this reason, geologic, soils, seismicity, and mineral resource impacts under the Reduced Intensity Alternative (South)

are considered to be similar but slightly less in magnitude when compared to those of the 2030 General Plan and are less than significant.

Biological Resources

Under the Reduced Intensity Alternative (South), development would convert less open space land to urban uses than the 2030 General Plan. Therefore, buildout of the Reduced Intensity Alternative (South) relative to the proposed project would result in less development that could result in adverse impacts to sensitive habitats, wetlands, riparian areas, wildlife movement, and significant trees. However, as with the proposed project, the Reduced Intensity Alternative (South) would also result in growth that would occur on currently undeveloped or habitat land, and would result in the overall reduction of a plant or wildlife species habitat. Impacts would be slightly less in magnitude under this alternative when compared to the proposed project and is potentially significant.

Visual Resources

The Reduced Intensity Alternative (South) proposes development that is similar in nature to that anticipated under the 2030 General Plan. The proposed goals, policies, and implementation programs provided as part of the 2030 General Plan would apply under the Reduced Intensity Alternative (South). Although less development would occur under this alternative and would result in slightly less in magnitude impacts when compared to the proposed project, development would still degrade the existing visual character of the City and would also result in increased sources of nighttime light and glare. Impacts are potentially significant.

Energy and Climate Change

Buildout under the Reduced Intensity Alternative (South) would result in a smaller development footprint as well as fewer dwelling units and residents than the 2030 General Plan. These decreases in dwelling units and other types of development would result in decreased energy demand and greenhouse gas emissions from direct and indirect sources (such as on-road transportation, off-road equipment and vehicles, energy generation, etc.). Since the 2030 General Plan would result in less-than-significant GHG impacts with implementation of the CAP, buildout of decreased development under the Reduced Intensity Alternative (South) would be slightly less in magnitude than under the proposed project and is less than significant after CAP compliance.

Finding/Rationale:

The City finds that this alternative is infeasible. Specifically, this alternative would not fully satisfy all the Project Objectives, such as not being able to meet the housing needs of the existing and future residents and provide a variety of housing types, as discussed above. This alternative is also rejected as being infeasible on the grounds that it does not represent the desired policy of the City. (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957)

Adoption of a Mitigation Monitoring and Reporting Program

Public Resources Code section 21081.6 requires the City to adopt a monitoring or reporting program regarding the changes in the project and mitigation measures imposed to lessen or avoid significant effects on the environment. The MMRP is adopted because it fulfills the CEQA mitigation monitoring requirements:

- The MMRP is designed to ensure compliance with the changes in the Project and mitigation measures imposed on the Project during Project implementation.
- Measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures.

The proposed project MMRP is included as Chapter 5 of the Final EIR.

Findings on Disagreement among Experts

To the extent the comment letters and correspondence submitted by the public or outside agencies or organizations are considered expert opinion, the City Council finds that the assumptions, data, methodology, and analysis included in the FEIR (not including the comment letters) prepared by the City and its Consultants, is supported by substantial evidence and was the appropriate assumption, data, methodology, and analysis to use to support the impact conclusion reached in the FEIR.

The City further finds that the following do not change the impact conclusions reached in the FEIR or otherwise trigger recirculation under CEQA: (1) information submitted and incorporated into the FEIR; (2) revisions incorporated into the proposed project after release of the Draft EIR; (3) all oral and written comments and testimony received by the City.

Statement of Overriding Considerations

As set forth in the preceding sections, the City Council's approval of the Project will result in significant adverse environmental impacts that cannot be avoided even with the adoption of all feasible mitigation measures.

In the City's judgment, the benefits of the proposed project, as approved, outweigh its unavoidable significant effects. Having adopted all feasible mitigation measures, rejected as infeasible alternatives to the proposed project discussed above, and recognized all significant, unavoidable impacts, the City has weighed the economic, legal, social, technological, and other benefits of the Oakdale 2030 General Plan against unavoidable significant environmental impacts in determining whether to approve the proposed project.

Specific benefits of the proposed project include:

- Orderly development for the planning horizon. Due to the age of the existing general plan, future development under the existing plan may not provide the necessary facilities, amenities, economic benefit, and community welfare that the residents of Oakdale desire.

- Environmental benefit. Although future development is associated with potentially significant and unavoidable environmental effects, the proposed plan includes additional policies and implementation measures that would reduce the overall environmental impacts compared to existing plans (see discussion of the No Project Alternative, above).
- Compliance with State Law. Several new requirements in State planning law would be implemented by the proposed general plan. These requirements include updating the Public Safety Element with the most recent flood hazard data and including a comprehensive set of goals, policies, and implementation programs to protect the community and reduce the risk of flooding, consistent with Government Code section 65302 (g). In addition, 200-year flood protection is required of all new development by 2015 in the Central Valley and is now addressed in the 2030 General Plan. The 2030 General Plan also addresses climate change to be consistent with the goals of AB32 – California Global Warming Solutions Act by including policies that reduce GHG. These policies include correlating land use and mobility, conserving water, requiring energy efficiency, reducing solid waste generation, and increasing recycling. In addition, a CAP was also prepared as part of the proposed project, and implements the 2030 General Plan. The 2030 General Plan also addresses multi-modal transportation for a variety of users to be consistent with the “Complete Streets Act.” The Mobility Element now plans for a variety of transportation modes and provides goals, policies, and programs to support walking, biking and transit use, consistent with Government Code section 65302 (b) (2) (A). Also in compliance with State law (Government Code § 65580), the 2030 General Plan will provide additional housing for existing and future residents of Oakdale to assist the City in meeting its share of the regional housing allocation. Lastly, the new General Plan also addresses “fringe” communities, unincorporated communities within the City’s future Sphere of Influence. The Land Use Element provides a discussion on the current level of public services and utilities in these fringe communities, what improvements would be needed to bring them to City standards, and how these improvements could be financed, consistent with Government Code section 65302.10.
- Economic benefit. The 2030 General Plan would provide economic benefits, including increased property taxes and sales tax revenue by creating a fiscally positive land use balance, as determined by the Fiscal Impact Analysis prepared as part of the proposed project.

In accordance with section 15093 of the CEQA Guidelines, the City hereby finds that the benefits of the proposed project outweigh its unavoidable adverse environmental effects such that the adverse environmental effects may be considered “acceptable.”