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# Plan for Agricultural Preservation

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for the Founders Point East  
Specific Plan

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August 2025

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## 1.1 Introduction & Purpose

Agriculture is a leading industry in Stanislaus County. Accordingly, changes to the urban development boundary that would lead to the conversion of existing agricultural lands to uses other than agricultural uses, must be evaluated such that growth and vitality of agriculture within the County is maintained and encouraged.

LAFCO's mission is to "discourage sprawl, preserve open space and prime agricultural lands, promote the efficient provision of government services and encourage the orderly formation of local agencies."

Consistent with the legislative intent, Stanislaus County LAFCO adopted the Agricultural Preservation Policy on September 26, 2012. The goals of the policy are as follows:

Guide development away from agricultural lands where possible and encourage efficient development of existing vacant lands and infill properties within the agency's boundaries prior to conversion of additional agricultural lands.

Fully consider the impacts a proposal will have on existing agricultural lands.

Minimize the conversion of agricultural lands to other uses.

Promote preservation of agricultural lands for continued agricultural uses while balancing the need for planned, orderly development and the efficient provision of services.

In order for LAFCO to determine how a development proposal meets the stated goals of the Agricultural Preservation Policy, a Plan for Agricultural Preservation must be provided with the LAFCO application requirements. This document contains the Plan for Agriculture Preservation associated with the annexation of the Founders Point East Specific Plan area.

## 1.2 Project Setting & History

The Founders Point East Specific Plan area is composed of twelve (12) parcels bounded by Pelandale Avenue, Tully Road, the Union Pacific Rail Road right-of-way (UPRR), and Kiernan Avenue (SR219). The property abuts the existing City limits and is adjacent to existing development to the south, east and west. Surrounded by improved roadways and an old rail road right-of-way, signalized intersections at Tully Road/Pelandale Avenue, and a four way stop at Bangs Avenue/Tully Road provide access to the Plan Area.

The Plan Area is within the LAFCO-approved sphere of influence of the City of Modesto, in unincorporated Stanislaus County, and has been slated for development since the adoption of the Urban Growth Policy in 1974:

The Plan Area has been within the City's sphere of influence since 1985.

The Plan Area was designated as Urban Reserve in 1975, and has been designated as Business Park since August of 1995 (Modesto Urban Area General Plan).

The Plan Area is a part of the Kiernan/McHenry Comprehensive Planning District (CPD).

The Founders Point East Specific Plan and Mitigated Negative Declaration (MND) were adopted by the City on June 24, 2025.

### **1.2.1 Project Description**

The Founders Point East Specific Plan is a comprehensively-planned development of up to 408 single-family residential units on approximately 70-acres of land, and approximately 150 acres of Business Park. The plan proposes a diverse mix of housing types and densities, for low density residential (from about 4 to 8 dwelling units per acre). The residential units are adjacent to an approximately 2.5 acre park that includes the project's storm water infiltration basin and recreational areas, creating a functional neighborhood and a desirable way of life.

### **1.2.2 Agricultural Resources**

The approximately 70 acre residential area (APNs 046-002-001 & 002) consist of about 64 net acres of agricultural land, currently planted in almonds. The 150-acre Business Park area is a mixture of open land, agricultural uses and developed commercial industrial lands. For the entire area, about 53 acres of the site (APNs 046-001-014, 016 & 017) are developed with industrial uses; about 58 acres (APNs 046-001-012 & 046-012-003 & 004) of the area is planted in almonds; the 14-acre parcel (APN 046-012-008) is open ground; the Holy Family Catholic Church occupies about 19 acres (APNs 046-012-001 & 007); and, finally, the City of Modesto has a water tank on about 6 acres (APN 046-012-006).

Approval and annexation of the Founders Point East Specific Plan would result in the permanent conversion of farmland. Development of the Plan's residential area would result in the permanent conversion of approximately 64 acres of Prime Farmland. Further discussion of soil types and important farmland mapping is found in the MND associated with the Founders Point East Specific Plan, and the City's Urban Area General Plan EIR (UAGP EIR).

### 1.2.3 Williamson Act Lands

Five (5) parcels in the Plan Area are currently under Williamson Act contracts, (see below). The contracts were protested by the City of Modesto and the protests were upheld by LAFCO. Subject to LAFCO approval, upon annexation into the City of Modesto all these Williamson Act contracts will terminate where the City does not succeed the contracts.

APN	Acres	Contract Number
046-001-012	19.45	75-1982
046-002-001	22.63	75-1981
046-002-002	40.93	76-2108
046-012-003	20.09	75-2108
046-012-004	18.42	75-2109

## 1.3 Vacant Land Inventory & Absorption Study

The City of Modesto 6<sup>th</sup> Cycle Housing Element has been approved, and establishes the City's 2023-2031 RHNA at 11,248 housing units. These housing units are further broken down by income group as i) 1,403 extremely low; ii) 1,404 very low; iii) 1,943 low; iv) 1,981 moderate; and v) 4,517 above moderate. In general, extremely low housing units are produced as subsidized units through a public/private partnership. Very low and low income units are often apartments, while the moderate and above moderate units are typically market rate detached single family units. To meet its RHNA requirements, at a minimum, the City of Modesto needs zoned land able to produce up to 1,403 extremely low income units, up to 3,347 very low and low income units (usually apartments), and up to 6,498 moderate and above moderate units (usually single-family detached).

To deliver these units, not only is it critical to have enough land, but the City should have 50% to 100% more than the minimum necessary recognizing realities such as inefficient parcel shapes and sizes, ownership issues (when some owners do not want to allow development), and other such issues that create development inefficiencies.

Modesto typically develops through the preparation and adoption of Specific Plans, which allow detailed master planning and aid in the efficient delivery of services. For this vacancy analysis, infill areas, which are generally small and inefficient lots, and which haven't developed in many years, will be ignored. Modesto has Specific Plans which could provide housing stock as follows:

- 1) The Fairview Specific Plan (1,075 to 2,150 sf and 220-440 mf units);
- 2) The Kiernan Business Park Specific Plan (189 sf and 862 mf);

- 3) The Woodglen Specific Plan (now Founders Point) (138 sf and 166 mf);
- 4) The Tivoli Specific Plan (1,909 sf and 352 mf); and,
- 5) The Village One Specific Plan (782 sf and 750 mf).

An inventory of these plan areas shows that Modesto has the ability to provide up to 2,570 apartment units and 5,168 single-family units based on existing vacant lands and zoning. These are not enough vacant lands to provide the 3,343 apartment units and 6,498 single-family units set forth in the City's RHNA. Adding an additional 408 single-family units will move the City closer to meeting its RHNA obligations.

As to Business Park lands, the City of Modesto has a small amount of Business Park designated land to offer to new or growing businesses. While there are thousands of acres of Business Park, Industrial or Light Industrial zoned throughout the County, the City has few. Most are small lots and in-fill development areas. For larger users, Modesto is limited to space locations like the old FMC site (33 acres), about 43 acres in Village One, about 65 acres in the Kiernan Business Park, and a couple small sites along Crows Landing Road and near Glenn Avenue. Modesto designated some lands in the Kiernan Business Park as Mixed Use, to allow for workforce housing, and those units are counted above in the residential vacant land discussion. As such Modesto needs to add Business Park land to the City, so that shovel ready lands can be available to attract business when the opportunity arises.

The Founders Point East project has about 150 acres of non-residential land uses. Almost 53 acres of this 150 acres is currently developed with industrial uses (warehouses), the Holy Family Catholic Church occupies about 19 acres, and the City of Modesto has a 6-acre water tank site. As such about 72 acres of the area could develop with Business Park uses. While this is a small amount, relative to Modesto's need, it is a step in the right direction.

Further, as to locating growth away from prime soils, the subject site is adjacent to City development to the west, (south of Bangs), all along the southern boundary, and is adjacent to County development along the eastern boundary. The County has approved industrial development within the area over the years, as well as the Holy Family Catholic Church. The City of Modesto has constructed a water tank within the area. While the area is prime soils, and has some agricultural production, it is also partially urbanized, with urban services. As such the development is logical, orderly, and reasonable when considering the partially developed nature of the site, and the surrounding land uses.

## 1.4 Regulatory Framework & Policy Consistency

The Plan Area must be assessed in accordance to the regulations of the jurisdiction and the region. City, county and regional planning policies apply to the Plan Area and may potentially affect the type of development allowed within the Plan Area. To follow is a list of relevant policies, regulations and programs for which the Plan Area must comply.

### 1.4.1 Stanislaus County Local Agency Formation Commission Policies

In consideration of changes to city and district boundaries, including spheres of influence, LAFCO must consider the possible loss of agricultural lands, and adherence with the Government Code 56377:

LAFCO policies direct that the development or use of land for uses other than open space will be guided away from existing prime agricultural lands, unless such actions would not promote the planned, orderly, efficient development of an area; and that urban uses will be directed to within existing local agency jurisdiction or sphere of influence.

The comprehensively-planned community stipulates orderly and efficient development of the Plan Area through the regulatory document, the Founders Point East Specific Plan. The Founders Point East Specific Plan is within the sphere of influence and promotes planned, orderly development as a logical extension of the surrounding neighborhood.

### 1.4.2 Stanislaus County Policies

The Stanislaus County General Plan provides the following relevant policies related to agricultural land, and for which the Plan Area already complies:

Policy 2.4: To reduce development pressures on agricultural lands, higher density development and infilling shall be encouraged. (County General Plan, Agricultural Element)

Policy 2.11: The County recognizes the desire of cities and unincorporated communities to grow and prosper and shall not oppose reasonable requests consistent with city and county agreements to expand, providing the resultant growth minimizes impact to adjacent agricultural land. (County General Plan, Agricultural Element)

Policy 2.13: In recognition that unincorporated land within the sphere of influence of cities or community services districts and sanitary districts serving unincorporated communities ultimately urbanize, the County shall cooperate with cities and unincorporated communities in managing development in the sphere of influence areas. (County General Plan, Agricultural Element)

### 1.4.3 City of Modesto Policies

The City's Urban Area General Plan provides the following relevant policies related to agricultural land, and for which the Plan Area already complies:

#### Agriculture Policies—Planned Urbanizing Area

The following policies apply to new development proposed in the Planned Urbanizing Area:

- a. Do not annex agricultural land unless urban development consistent with the General Plan has been approved by the City.
- b. Support the continuation of agricultural uses on lands designated for urban uses until urban development is imminent.
- c. Encourage the County to retain agricultural uses on lands surrounding the General Plan area and on lands within the General Plan area pending their annexation to the City or development by mutual agreement with the County.
- d. Where necessary to promote planned City growth, encourage development of those agricultural lands that are already compromised by adjacent urban development or contain property required for the extension of infrastructure or other public facilities, before considering urban development on agricultural lands that are not subject to such urban pressures.
- e. For any subsequent project that is adjacent to an existing agricultural use, the project proponent may incorporate measures to reduce the potential for conflicts with the agricultural use. Potential measures to be implemented may include the following: Chapter VII. Environmental Resources, Open Space and Conservation City of Modesto Urban Area General Plan VII-8 March 2019
  - (1) Include a buffer zone of sufficient width between proposed residences and the agricultural use; and,
  - (2) Inform residents about the possible exposure to agricultural chemicals.
- f. Require development projects to comply with current LAFCo policy(ies) regarding preservation of agricultural resources.

The City's Urban Area General Plan stipulates a land use intensity as a range of typical densities on an area-wide basis (Modesto Urban Area General Plan, Chapter 3). The General Plan promotes a minimum density of 6.6 dwelling units per gross acre.



The City Council has approved multiple resolutions related to agricultural preservation. In January 2012 the “Agricultural Preservation Plan 2050,” a regional approach to preserving agricultural land in Stanislaus County, was brought before City Council. The approved resolution (No. 2012-43, January 24, 2012) established the City of Modesto’s General Plan boundary for the Agricultural Preservation Plan 2050, and encouraged other participating Cities to justify and explain an increase in their General Plan urban growth boundaries.

#### **1.4.4 Regional Planning Efforts**

StanCOG participated in the San Joaquin Valley Blueprint Plan along with eight other Valley Regional Planning Agencies. The Blueprint Plan establishes a vision for future growth in the San Joaquin Valley and provides a framework for implementing that growth. Early on in this multi-year planning process, 12 Smart Growth Principles were established as the core values of the Valley and the basis for future Blueprint planning and implementation:

- Create a range of housing opportunities and choices
- Create walkable neighborhoods
- Encourage community and stakeholder collaboration
- Foster distinctive, attractive communities with a strong sense of place
- Make development decisions predictable, fair and cost-effective
- Mix land uses
- Preserve open space, farmland, natural beauty, and critical environmental areas
- Provide a variety of transportation choices
- Strengthen and direct development towards existing communities
- Take advantage of compact building design
- Enhance the economic vitality of the region
- Support actions that encourage environmental resource management

The Founders Point East Specific Plan is consistent with the 12 Smart Growth Principles established by the Blueprint and exemplifies the core vision for future development within the San Joaquin Valley—an efficient, sustainable and livable community.

The San Joaquin Valley Blueprint Plan established a preferred growth scenario, B+. This growth scenario seeks to protect environmental resources and agricultural lands by emphasizing compact growth within existing communities. The preferred scenario serves as a guideline for Valley cities and encourages increased densities in all eight valley counties. The preferred growth scenario recommends that Stanislaus County achieve 5.6 dwelling units per gross acre on average.

### **1.5 Analysis of Mitigation Measures**

As a proposed residential development on Prime Farmland, methods or strategies for minimizing the loss of agricultural lands must be proposed. The Founders Point East MND provides:

#### **Mitigation Measure AG-1:**

Prior to the issuance of grading permits, the Project applicant shall secure permanent protection of offsite farmland based on a 1:1 ratio to the amount of gross Farmland converted because of development, consistent with the requirements of the Stanislaus County Local Agency Formation Commission (LAFCo) Agricultural Preservation policy. The acreage requiring agricultural mitigation shall be equal to the portion of the site dedicated to residential uses which would be subject to the discretionary development entitlement for lands designated as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland. Permanent preservation shall consist of the purchase of agricultural conservation easements granted in perpetuity from willing seller(s), enforceable deed restrictions, purchase of banked mitigation credits, or other conservation mechanisms acceptable to the City. The permanent protection of farmland shall be accomplished by either: (1) the landowner/developer working directly with an established farmland trust or similar organization, and providing certification satisfactory to the City that such lands have been permanently preserved at the specified ratio; or (2) working with a qualified land trust or similar organization, to establish a fee for agricultural land conservation easements.

The residential portion of the Founders Point Specific Plan will mitigate for the loss of approximately 64 acres of prime farm land.

## 1.6 Method for Minimizing the Loss of Agricultural Lands

To meet the requirements of the LAFCO Agricultural Preservation Policy, the Plan for Agricultural Preservation must specify a method or strategy to minimize the loss of agricultural lands. As such, the Founders Point East Specific Plan area will provide agricultural mitigation at a ratio of 1:1, consistent with the LAFCO Strategy No. 2 and Mitigation Measure AG-1 from above.

## 1.7 Conclusion

The following justifications are offered in conclusion of the Plan for Agricultural Preservation for the Founders Point East Specific Plan.

1. *The project is slated for development, consistent with the City's General Plan and Zoning and is within the Sphere of Influence.* The Founders Point East Specific Plan is identified as a "Planned Urbanizing Area" in the City's General Plan and is within an urban transition (UT) zone of the A-2-10 County zoning designation, which specifically designates land for conversion from agriculture to urban land uses. In addition, the Plan Area is within the LAFCO-approved sphere of influence for the City of Modesto (1984). Therefore urban development is planned, consistent with the intent of LAFCO, the City of Modesto, and Stanislaus County.
2. *The project provides needed residential land.* As identified in the Urban Growth Review (2015), the City must maintain a "Five-Year Target Inventory" of lands available for residential development. This "Five-Year Target Inventory" assures available land to meet the region's housing needs and reduce over-inflation of land values. The Founders Point East Specific Plan contributes to the residential inventory to meet the City's Regional Housing Needs Allocation.
3. *The project is consistent with the San Joaquin Valley Blueprint Plan.* The Founders Point East Specific Plan implements the 12 Smart Growth Principles established by the Blueprint and exemplifies the core vision for future development within the San Joaquin Valley. The Founders Point East Specific Plan proposes compact development with a range of housing types; walking paths that connect the neighborhood to the central open space amenity; and adjacent transportation corridors that provide bicyclists with

Class II facilities, which connect to a planned Class I bike path on the south side of the Palendale right-of-way.

4. *The project is surrounded by urban corridors and urban infrastructure.* The Plan Area is surrounded by an existing transportation network which can accommodate the proposed development. Pelendale Avenue, a six-lane expressway, was expanded to accommodate developments that surround the Founders Point East Specific Plan area. The Plan Area is the only property adjacent to Pelendale Avenue, between State Highway 99 and State Highway 108 (McHenry Avenue) that has not yet been developed. Additionally, the Plan Area is the only property on the south side of Bangs Avenue, between Dale Road and State Highway 108 (McHenry Avenue) that has not yet been developed.

To the south and west of the Plan Area are other existing single-family and multi-family residential neighborhoods. In this context, the Founders Point East community is merely a logical expansion of the existing surrounding neighborhoods with sufficient transportation corridors and existing City services that extend to the site.

5. *The project incorporates policies and regulations that limit development pressure on Prime Farmland.* By proposing compact development with higher densities that are near to existing transportation and services, the Plan Area is guiding development away from other existing prime farmlands that lies to the north and east in unincorporated Stanislaus County.
6. *Preservation of agricultural lands is encouraged through increased density and infill development.* The Founders Point East Specific Plan achieves an overall density of approximately 6.4 dwelling units per acre, almost perfectly matching the City's Urban Area General Plan goal of 6.6 dwelling units per acre, and exceeding the San Joaquin Valley Blueprint Plan (5.6 dwelling units per acre).
7. *The project is a model community for compact, mixed housing-type development with increased residential density.* Within the low density residential (LDR) area, a variety of lot and home sizes and types are envision, including small lots, alley homes, conventionally front-loaded homes, and more; the LDR area yields an overall density of 6.4 dwelling units per acre.

8. *The project does not create impacts beyond what was anticipated in the UAGP EIR associated with the City's General Plan, and addressed by the MND.* The Plan Area and surrounding lands are planned for residential and business park development consistent with the intensity proposed by the project, as part of the Kiernan/McHenry Comprehensive Planning District of the General Plan. Impacts of the Founders Point East Specific Plan are within the scope of what was anticipated by the UAGP EIR and are therefore addressed by its Statements of Overriding Considerations.

In conclusion, the provisions set forth in this Plan for Agricultural Preservation require the Founders Point East project to provide 1:1 agricultural mitigation, a strategy identified by the LAFCO Agricultural Preservation Policy. Based on this methodology and the analysis provided in this document, the Founders Point East Specific Plan area complies with LAFCO requirements for minimizing the loss of agricultural lands.

# FOUNDERS POINT EAST ANNEXATION TO THE CITY OF MODESTO

## PLAN FOR SERVICES

Pursuant to Government Code Section 56653, the following Plan for Services to be extended to the affected territory has been prepared for the Founders Point East Annexation.

A. The project site is part of the Planned Urbanizing Area, as described in the Modesto Urban Area General Plan, adopted March 5, 2019. As part of the approval, community facilities and services were analyzed in detail in Initial Study Environmental Checklist (C&ED No. 2024-14). These services include traffic and circulation, waste water collection, water delivery, storm water drainage, solid waste disposal, schools, parks, fire protection, and police protection. The City of Modesto is a full service city that intends to provide the following services.

1. Traffic and Circulation: The bulk of the external roadway network is already constructed. The annexation area is bordered by Pelandale Avenue to the south, Kiernan Avenue to the north, Tully Road to the west, and the former Tidewater Railroad/future Virginia Trail Corridor to the east. Pelandale Avenue is a Class-B Expressway with six lanes and a center median. Kiernan Avenue is also California State Highway CA- 219, a six-lane highway with a center median. Tully Road is a Minor Arterial street currently comprised of two lanes with left and right turn lanes at the intersections of Kiernan Avenue and Pelandale Avenue, and is designated to be a four-lane Minor Arterial street in the Circulation Element of the General Plan. The applicant or developer will be required to dedicate and construct any necessary roadway improvements along those project frontages upon development.
2. Waste Water Collection: Upon annexation, the site will annex to Modesto's Sewer District No. 1. Sewer service will be provided to the subject site from existing lines in Bangs Avenue, Tully Road and Pelandale Avenue to the west and south of the site.

The City of Modesto's 27-inch North Trunk sewer line in Bangs Avenue currently terminates at Tully Road. This line conveys waste water flows to the west, then ultimately south to the City's wastewater treatment plant (WWTP). This line is currently in design for extension to the east as part of the waster water master plan and may be constructed with this development.

There is a 21-inch subtrunk sewer in Tully Road south of Bangs Avenue, and a 10-inch sewer line in Pelandale Avenue. Both Tully Road and Pelandale Avenue provide potential sewer connection locations for the lands south of Bangs Avenue.

For the properties north of Bangs Avenue a subtrunk line will be extended up Tully Road to serve the remainder of the Specific Plan area. All lines will be gravity fed, and no lift stations are required.

3. Water Delivery: The City has an adequate supply of water to serve the commercial, industrial and residential development expected to occur on the property. The City has an existing water tank located within the Specific Plan area north of Bangs Avenue (APN 046-012-006). The tank is served by a 24-inch transmission line in Bangs Avenue that delivers water to the tank.

There are also water lines in the area as follows:

- i. A 16-inch line in Bangs Avenue;
- ii. A 12-inch line in Tully Road south of Bangs Avenue; and
- iii. A 16-inch line in the railroad right-of-way.

In addition, there is a 12-inch water line in Tully Road north of Bangs Avenue that currently serves the Holy Family Catholic Church (APN 046-012-007) and the existing industrial building (APN 046-001-014). These uses have received approval for out of boundary water service from LAFCO, and have executed agreements to annex to the City of Modesto. In the future, the City expects to extend water lines in Kiernan Avenue, as needed, to complete a water loop to provide water system redundancy and enhanced reliability.

4. Storm Water Drainage: Storm water drainage for this project must be contained on site, as the City does not have a positive storm drain system serving the area. Prior to the approval of any development, the City must approve the storm water drainage system to ensure its adequacy to City Standards. The storm water drainage system will be constructed by the applicant at the applicant's expense.
5. Solid Waste Disposal: Weekly pickup will be extended to the annexation area upon the effective date of annexation.
6. Fire Protection: Currently, the annexation area is served by the Salida Fire Protection District. Upon annexation, Fire Protection will be provided by the City of Modesto Fire Department and the Salida Fire Protection District per an agreement between the City of Modesto and Salida Fire enacted in 2022. No detachment from the Salida Fire Protection District is proposed with the annexation. Unless the Local Agency Formation Commission (LAFCO) approves detachment of the annexation area from the Salida Protection District, both agencies will be jointly responsible for fire suppression and prevention as provided by the abovementioned Agreement.

Development within the project area will join the Salida Fire District Community Facilities District (CFD) to assist in the funding of fire protection services. Development impact fees will be paid to the City of Modesto. Both entities will receive property taxes as determined appropriate by the County Tax Collector.

Primary service will be provided from City of Modesto Fire Station No. 11 located 0.50 miles away at 4225 Carver Road. Secondary service would be feasible and available from the Salida Fire Protection District station

located approximately four miles away at 4820 Broadway Avenue in Salida, in addition to Modesto Fire Station No. 5 at 200 West Briggsmore Avenue and Modesto Fire Station No. 6 located at the corner of Standiford Avenue and Hahn Drive.

7. Police Protection: The Modesto Police Department is able to provide adequate service to the subject site without additional staffing, as industrial property does not require substantial additional policing.

**B. Level and range of services**

The City of Modesto is a full-service provider of municipal services and intends to provide the complete service for those areas identified above.

**C. When can services be provided?**

The above-described services can be provided upon the effective date of annexation. In the case of Police and Fire services, these services can be provided immediately. With respect to water, sewer, and storm drainage, the provision of services may be subject to the construction of some utility extensions. These extensions will occur as development occurs. For water, a connection to existing lines will be needed, and lines may be extended or looped where necessary, as determined by the City. No additional sources of water (wells or tanks) are required. For sewer, adequate capacity exists in the sewer line in Bangs Avenue and at the City's WWTP to serve the site. Only sewer line connections or extensions will be required. For storm drainage, each project will be required to construct on-site storm drainage at the time of development. Refer to section A of this Plan for Services for more detail on these utilities.

**D. Improvements required as a condition of annexation**

No improvements are required as a condition of annexation. The following improvements will be required as a condition of development:

- Prior to issuance of a building permit, the applicant(s) shall construct roadway improvements to the satisfaction of the City Engineer.
- Prior to approval of development, the City must approve the storm water drainage system.

**E. How will services be financed?**

Services will be financed through City fees and the establishment of a new Community Facilities District for the Specific Plan.