



DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT
1010 10TH Street, Suite 3400, Modesto, CA 95354
Planning Phone: (209) 525-6330 Fax: (209) 525-5911
Building Phone: (209) 525-6557 Fax: (209) 525-7759

CEQA INITIAL STUDY

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

1. **Project title:** Rezone Application No. PLN2021-0112 – Top Shelf Mega Storage
SCH No. 2022010243
2. **Lead agency name and address:** Stanislaus County
1010 10th Street, Suite 3400
Modesto, CA 95354
3. **Contact person and phone number:** Kristin Doud, Deputy Director
(209) 525-6330
4. **Project location:** 4401 West Barnhart Road, on the northeast corner of West Barnhart Road and North Golden State Boulevard, in the Keyes area. (APN: 045-052-031).
5. **Project sponsor's name and address:** Brian Demello, Top Shelf Mega Storage
201 N. Hopper Road, Modesto, CA 95357
6. **General Plan designation:** Planned Development
7. **Zoning:** Planned Development (P-D) (261)
8. **Description of project:**

Request to amend the zoning designation of a 10 acre parcel from Planned Development (P-D) (261) to a new P-D to allow for development of a recreational vehicle (RV) storage facility in two phases. Phase 1 is proposed to include 3 to 3.5 acres and will include a 560 square-foot office with restroom, eight-foot perimeter wrought iron fencing, perimeter landscaping consisting of redwood trees and low growing shrubs, a freestanding sign at the corner of West Barnhart Road and North Golden State Boulevard 40 feet in height, a monument sign at the Golden State Boulevard entrance, four customer parking spaces, and 96 covered RV parking spaces, ranging in size between 12 and 16 feet wide, to be contained within approximately 70,000 square feet of enclosed building area. Phase 1 is proposed to commence within 18 months of project approval and to be completed within three years of project approval. Phase 2 will include the remaining acreage and will include another 225 RV parking spaces contained within approximately 140,000 square feet of building storage area. However, this area may also be utilized during Phase 1 for uncovered RV parking spaces. All storage buildings are proposed to be a maximum of 20 feet in height. No vehicle maintenance or dumping services will occur on-site. Building areas and drive aisles are proposed to be paved and any remaining uncovered parking spaces will be graveled. Hours of operation are proposed to be seven days a week from 7:00 a.m. to 10:00 p.m. with one on-site manager and an additional employee for maintenance of the grounds on-site as needed. However, the site will be open to customers through a secured access gate 24 hours a day, seven days a week. The project anticipates between 5-10 customers will visit the site per day. Lighting will include wall lighting on the storage buildings and LED lighting at ground level around the landscaped perimeter. Main access is proposed to be taken from North Golden State Boulevard, with a secondary access available from West Barnhart Road. The project is proposed to be served with public water by the Keyes Community Services District (CSD) and to have a private on-site septic system. All stormwater will be maintained on-site. P-D (261) was approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner. However, the uses approved on the 10 acre project site were limited to agricultural uses only. Accordingly, a rezone is required in order to approve development of the site with non-agricultural uses. In addition to RV storage, the project also proposes to maintain the ability to conduct uses permitted in the A-2 zoning district.

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9. **Surrounding land uses and setting:** Vacant and agricultural land to the east and north; State Route 99 and light industrial development to the west and south; the Community of Keyes to the northwest.
10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):** San Joaquin Valley Air Pollution Control District
Stanislaus County Department of Public Works
Stanislaus County Department of Environmental Resources
11. **Attachments:**
1. Air Quality, Health Risk Analysis, and Greenhouse Gas Technical Memorandum, prepared by Johnson Johnson & Miller Air Quality Consulting Services, dated March 30, 2022
 2. Central California Information Center records search, dated January 5, 2022
 3. Mitigation Monitoring and Reporting Program (MMRP) for the Keyes Community Plan, adopted April 18, 2000 (MMRP Keyes)

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

- | | | |
|--|--|---|
| <input checked="" type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology / Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology / Water Quality | <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Mineral Resources |
| <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- I find that the proposed project **MAY** have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature on File _____
 Prepared by Kristin Doud, Deputy Director

_____ Date
 May 5, 2022

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, than the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration.

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

a) **Earlier Analysis Used.** Identify and state where they are available for review.

b) **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

c) **Mitigation Measures.** For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). References to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

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

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

9) The explanation of each issue should identify:

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

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

ISSUES

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

Discussion: The site itself is not considered to be a scenic resource or unique scenic vista. The project site is currently vacant. Phase 1 is proposed to include 3 to 3.5 acres and will include a 560 square-foot office with restroom, eight-foot perimeter wrought iron fencing, perimeter landscaping consisting of redwood trees and low growing shrubs, a freestanding sign at the corner of West Barnhart Road and North Golden State Boulevard 40 feet in height, a monument sign at the Golden State Boulevard entrance, four paved customer parking spaces, and 96 covered RV parking spaces, ranging in size between 12 and 16 feet wide. Phase 2 will include the remaining acreage and will include another 225 RV covered parking spaces contained within approximately 140,000 square feet of building storage area. However, this area may also be utilized during Phase 1 for uncovered RV parking spaces. All storage buildings are proposed to be a maximum of 20 feet in height. Lighting will include wall lighting on the storage buildings and LED lighting at ground level around the landscaped perimeter. The project site is required to annex into the Golden State Lighting District for street lighting, per a referral response received from the Department of Public Works.

Though the project is located outside the City of Turlock's Sphere of Influence (SOI), it is located within one-mile of the City's SOI and within the City's General Plan area which requires referral to the city in accordance with Policy Twenty-Six of the Land Use Element of the Stanislaus County General Plan. A referral response received from the City of Turlock did not request landscaping, signage, or other development standards to meet City of Turlock standards. A development standard will be applied to the project, requiring a landscape and signage plan be submitted to County Planning for review and approval and that the height, site area, and setbacks be in compliance with Section 21.48.040 of the County Zoning Ordinance.

Only the southwestern portion of the site is located within the Keyes Community Plan; however, P-D (261), approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner incorporated the mitigation measures from the Keyes Community Plan into the land use approval. The Keyes Community Plan, adopted by the Board of Supervisors in April of 2000, identifies the project site as a Gateway area to Keyes, visible from State Route 99, that should be designed and landscaped to improve and enhance the appearance of the site and area. There is no existing design criteria for the Keyes Community; however, the Keyes Community Plan encourages attractive and orderly development which preserves a small town atmosphere; the development of large, non-residential sites, with generous landscaping and Highway Commercial type uses along State Route 99/Keyes Road Interchange; and the development of "Gateway" treatments and positive, high quality landscaped edges along State Route 99 and major roads.

The Mitigation Monitoring and Reporting Program adopted with the Keyes Community Plan requires that all existing and future exterior lighting to be shielded and be aimed downward and towards the site so as to provide adequate illumination without off-site light spillage or a glare effect to adjacent properties and that the use of reflective surfaces on new multi-story development be oriented in such a way as to reduce glare to the adjacent roadways. With these mitigation measures applied to the project, aesthetic impacts associated with the project are considered to be less than significant with mitigation included.

Mitigation:

1. New multi-story development shall minimize the use of reflective surface and have those reflective surfaces which are used to be oriented in such a manner so as to reduce glare impacts along roadways.
2. New development shall include cut-off luminaries and/or shields. All exterior lighting shall be designed (aimed down and towards the site) to provide adequate illumination without a glare effect. Low intensity lights shall be used to minimize the visibility of the lighting from nearby areas, and to prevent "spill over" of light onto adjacent residential properties.

References: Application materials; P-D (261) was approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner; Keyes Community Plan, EIR and MMRP adopted April 2000; Referral response received from the Department of Public Works, dated May 10, 2022; Stanislaus County Zoning Ordinance; the Stanislaus County General Plan; and Support Documentation¹.

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

Discussion: In addition to RV storage, the project also proposes to maintain the ability to conduct uses permitted in the A-2 zoning district.

The USDA Natural Resources Conservation Service's Eastern Stanislaus County Soil Survey indicates that the property is made up of Dinuba sandy loam (92.4% DrA and 4.2% DsA), with an Index Rating ranging between 43-77 and a Grade ranging between 2 and 3. The remaining 3.4% of the project site is made up of Tujunga sandy loam (TuA), which has an Index Rating of 76 and a Grade of 2. The California Department of Conservation's Important Farmland Maps identifies the site as grazing land. The majority of the site is made up of soils that qualify as prime soils.

The project site is currently vacant. Agricultural land is adjacent to the parcel to the east and north. State Route 99 and light industrial development are adjacent to the site to the west and south and the Community of Keyes is northwest of the site. The nearest parcel under Williamson Act Contract, which is currently in the non-renewal process, is a 59-acre parcel to the northeast of the project site.

All new or expanding uses approved by discretionary permit in the A-2 zoning district or on a parcel adjoining the A-2 zoning district are required to incorporate a minimum 150-foot-wide agricultural buffer setback, or 300-foot-wide buffer setback for people intensive uses. Public roadways, utilities, drainage facilities, rivers and adjacent riparian areas, landscaping, parking lots, and similar low people intensive uses are permitted uses within the buffer setback area. Phase 2 of the proposed project includes buildings at the eastern property line which borders an A-2 zoned property; however, the building will be utilized for RV parking, which is a permitted use within the agricultural setback area.

A referral response received from the Turlock Irrigation District (TID) indicated that the site currently does not receive irrigation water or have irrigation facilities on-site. The response also indicated that if irrigation water service was required in the future an application is required to be submitted to TID.

Though the project is located outside the City of Turlock's Sphere of Influence (SOI), it is located within one-mile of the City's SOI and within the City's General Plan area which requires referral to the city in accordance with Policy Twenty-Six of the Land Use Element of the Stanislaus County General Plan. A referral response received from the City of Turlock was received which requested that ag mitigation per the requirements incorporated into P-D (261) and the Keyes Community Plan be applied to the project.

Only the southwestern portion of the site is located within the Keyes Community Plan; however, P-D (261), approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner incorporated the mitigation measures from the Keyes Community Plan into the land use approval. The EIR for the Keyes Community Plan identified loss of farmland as an impact that could not be mitigated to a level of insignificance and as part of the approval process a Statement of Overriding Considerations with respect to loss of prime farmland was adopted. The Mitigation Monitoring Plan (MMP) called for a mitigation measure to address the conversion of Prime Farmland to non-agricultural use. Although the Initial Study prepared for the P-D (217) zoning district did not include ag mitigation, a requirement for agricultural mitigation was added to the project by the Planning Commission who approved P-D (217) with a caveat that the adjacent 10.19 acre parcel (the current project site) be restricted to agricultural uses only and if it were to convert that agricultural mitigation be provided at a 2:1 rate. Accordingly, agricultural mitigation in the amount of the project site (10 acres) and the adjacent site developed under the P-D (217) zoning district (20.19 acres) is required to be provided prior to issuance of a building or grading permit.

Impacts to agricultural resources are considered to be less than significant with mitigation.

Mitigation:

3. Farmland mitigation shall be provided in the amount of 20.19 acres (an amount equivalent to the project site plus the agricultural preserve applied to Use Permit Application No. 2003-33 - Piranha Produce). The mitigation may be met through a long-term agricultural easement or through the payment of an in-lieu fee to a Land Trust, determined to be acceptable by the County Planning Director, and shall be in compliance with the County's adopted Farmland Mitigation Program Guidelines.

References: Application materials; Referral response received from the City of Turlock, dated February 15, 2022; Referral response from Turlock Irrigation District (TID), dated February 7, 2022; P-D (261), approved by the Board of Supervisors on December 18, 2001, General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner; Keyes Community Plan, EIR and MMRP adopted April 2000; United States Department of Agriculture NRCS Web Soil

Survey; California State Department of Conservation Farmland Mapping and Monitoring Program - Stanislaus County Farmland 2018; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: The proposed project is located within the San Joaquin Valley Air Basin (SJVAB) and, therefore, falls under the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD). In conjunction with the Stanislaus Council of Governments (StanCOG), the SJVAPCD is responsible for formulating and implementing air pollution control strategies. The SJVAPCD's most recent air quality plans are the 2007 PM10 (respirable particulate matter) Maintenance Plan, the 2008 PM2.5 (fine particulate matter) Plan, and the 2007 Ozone Plan. These plans establish a comprehensive air pollution control program leading to the attainment of state and federal air quality standards in the SJVAB, which has been classified as "extreme non-attainment" for ozone, "attainment" for respirable particulate matter (PM-10), and "non-attainment" for PM 2.5, as defined by the Federal Clean Air Act.

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

Construction activities associated with new development can temporarily increase localized PM10, PM2.5, volatile organic compound (VOC), nitrogen oxides (NOX), sulfur oxides (SOX), and carbon monoxide (CO) concentrations a project's vicinity. The primary source of construction-related CO, SOX, VOC, and NOX emission is gasoline and diesel-powered, heavy-duty mobile construction equipment. Primary sources of PM10 and PM2.5 emissions are generally clearing and demolition activities, grading operations, construction vehicle traffic on unpaved ground, and wind blowing over exposed surfaces.

The project was referred to SJVAPCD, who responded with a request for additional analysis on construction and operational emissions, on health risks, and odor impacts.

Though the project is located outside the City of Turlock's Sphere of Influence (SOI), it is located within one-mile of the City's SOI and within the City's General Plan area which requires referral to the city in accordance with Policy Twenty-Six of the Land Use Element of the Stanislaus County General Plan. A referral response received from the City of Turlock was received which requested that an air study be prepared.

An Air Quality (AQIA), Health Risk Analysis (HRA), and Greenhouse Gas (GhGIA) Technical Memorandum, prepared by Johnson Johnson & Miller Air Quality Consulting Services, dated March 30, 2022. The AQIA/HRA/GhGIA Memo analyzed construction and operational emissions. Operational emissions were based on an assumption of 104.3 weekday trips, 123.9 trips for Saturdays, and 105 trips for Sundays for Phase 1; 208.6 weekday trips, 247.8 trips for Saturdays, and 210 trips for Sundays for Phase 2; and 312.9 weekday trips, 371.7 trips for Saturdays, and 315 trips for Sundays at max build out (Phases 1 and 2 combined). The California Air Resources Board's (CARB) San Joaquin Valley Air Quality Plan (AQP)

includes control measures that are required for construction activities and for various operational activities including Rule 2201, Rule 4201, Rule 4309, Rule 4601, Rule 4641, Rule 9510, Regulation VIII. The AQIA/HRA/GhGIA Memo found that emissions of ROG, NOX, CO, SOX, PM10, and PM2.5 associated with the proposed project would not exceed the SJVAPCD's significance thresholds and that the proposed project would not obstruct implementation of CARB's San Joaquin Valley AQP. The AQIA/HRA/GhGIA Memo also found that the project would comply with all applicable rules and regulations from the applicable air quality plans. Assuming adherence to applicable Air District rules and regulations, the analysis found that the project would not be considered inconsistent with CARB's San Joaquin Valley AQP, that the project's regional emissions would not exceed the applicable regional criteria pollutant emissions quantitative thresholds, and would not result in significant cumulative health impacts. In summary, the project would not exceed SJVAPCD localized emission daily screening levels for any criteria pollutant. The project is not a significant source of TAC emissions during construction or operation. The project is not in an area with suitable habitat for Valley fever spores and is not in area known to have naturally occurring asbestos. Therefore, the project would not result in significant impacts to sensitive receptors. Although the project is less than one mile from the nearest sensitive receptor, the project is not expected to be a significant source of odors.

The SJVAPCD's Small Project Analysis Level (SPAL) Analysis indicates that the minimum threshold of significance for industrial projects is 1,506 trips per day. The Air Study completed for this project assumed a maximum of 371.7 additional trips per day during full build out. This is below the District's thresholds of significance for emissions.

Only the southwestern portion of the site is located within the Keyes Community Plan; however, P-D (261), approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner incorporated the mitigation measures from the Keyes Community Plan into the land use approval. The Mitigation Monitoring and Reporting Program (MMRP) prepared for the April 2000 update to the Keyes Community Plan included several mitigation measures regarding air impacts associated with construction and the operation of projects developed within the Keyes Community Plan to ensure Air District standards are met. However, the mitigation measures identified in the Keyes Community Plan MMRP are already required to be met through applicable Air District permitting and through enforcement of the California Building Code. Accordingly, Air Quality requirements are not applied as mitigation, but instead will be applied as development standards applicable to the project, which require that all applicable Air District permits be obtained and that California Green Building Code be met.

An early consultation referral response received from the Department of Public Works indicated that a grading, drainage, and erosion/sediment control plan for the project will be required, subject to Public Works review and Standards and Specifications. The project will be required to meet all applicable air district standards and to obtain all applicable Air District permits. Both of these requirements will be incorporated into the project as development standards.

Air impacts associated with the project are considered to be less-than significant.

Mitigation: None.

References: Application materials; P-D (261) was approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner; Keyes Community Plan, EIR and MMRP adopted April 2000; Referral response received from the City of Turlock, dated February 15, 2022; Referral response received from the Department of Public Works, dated May 10, 2022; Referral response received from the San Joaquin Valley Air Pollution Control District, dated February 2, 2022; Air Quality, Health Risk Analysis, and Greenhouse Gas Technical Memorandum, prepared by Johnson Johnson & Miller Air Quality Consulting Services, dated March 30, 2022; San Joaquin Valley Air Pollution Control District - Regulation VIII Fugitive Dust/PM-10 Synopsis; www.valleyair.org; and the Stanislaus County General Plan and Support Documentation¹.

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

Discussion: The project is located within the Ceres Quad of the California Natural Diversity Database. There are nine animal species which are state or federally listed, threatened, or identified as species of special concern or a candidate of special concern within the Ceres CNDDDB Quad. Animal species include Swainson's hawk (SWHA), tricolored blackbird, burrowing owl, riffle sculpin, hardhead, chinook salmon - Central Valley fall / late fall-run ESU, valley elderberry longhorn beetle and Townsend's big-eared bat.

Only the southwestern portion of the site is located within the Keyes Community Plan; however, P-D (261), approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner incorporated the mitigation measures from the Keyes Community Plan into the land use approval. The Mitigation Monitoring and Reporting Program for the Keyes Community Plan does include mitigation measures regarding biological resources; however, the property is currently vacant and disturbed and there are no trees or creeks, ponds, canals, or other bodies of water on-site. Based on the location and lack of suitable habitat on-site, the likelihood for special status species to exist on site are very low. An early consultation referral response was sent to the California Department of Fish and Game (CDFG); however, no response has been received to date. The project will not conflict with a Habitat Conservation Plan, a Natural Community Conservation Plan, or other locally approved conservation plans. Impacts to biological resources are considered to be less-than significant.

Mitigation: None.

References: Application materials; California Department of Fish and Wildlife's Natural Diversity Database Quad Species List; P-D (261) was approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner; Keyes Community Plan, EIR and MMRP adopted April 2000; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: As this project is not a General Plan Amendment it was not referred to the tribes listed with the Native American Heritage Commission (NAHC), in accordance with SB 18. Tribal notification of the project was not referred to any tribes in conjunction with AB 52 requirements, as Stanislaus County has not received any requests for consultation from the tribes listed with the NAHC. A records search conducted by the Central California Information Center (CCIC) indicated that there are no historical, cultural, or archeological resources recorded on-site and that the site has a low sensitivity for the discovery of such resources. A development standard will be added to the project which requires if any cultural or tribal resources are discovered during project-related activities, all work is to stop, and the lead agency and a qualified professional are to be consulted to determine the importance and appropriate treatment of the find. Cultural Impacts are considered to be less-than significant.

Mitigation: None.

References: Application materials; Central California Information Center Report for the project site, dated January 5, 2022; Stanislaus County General Plan and Support Documentation¹.

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

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

The project was referred to SJVAPCD, who responded with a request for additional analysis on construction and operational emissions, on health risks, and odor impacts.

Though the project is located outside the City of Turlock's Sphere of Influence (SOI), it is located within one-mile of the City's SOI and within the City's General Plan area which requires referral to the city in accordance with Policy Twenty-Six of the Land Use Element of the Stanislaus County General Plan. A referral response received from the City of Turlock was received which requested that an air study be prepared.

An Air Quality (AQIA), Health Risk Analysis (HRA), and Greenhouse Gas (GhGIA) Technical Memorandum, prepared by Johnson Johnson & Miller Air Quality Consulting Services, dated March 30, 2022. The AQIA/HRA/GhGIA Memo analyzed construction and operational emissions, which included an analysis of energy usage. Operational emissions, including

indirect energy consumption associated with water and wastewater services, for the year 2023 were modeled using CalEEMod. CalEEMod assumes compliance with some, but not all, applicable rules and regulations regarding energy efficiency, vehicle fuel efficiency, renewable energy usage, and other GHG reduction policies. Specifically, Pavley I and Pavley II (LEV III) motor vehicle emission standards, CARB Medium and Heavy-Duty Vehicle Regulations, and Title 24 Energy Efficiency Standards. Operational emissions were based on an assumption of 104.3 weekday trips, 123.9 trips for Saturdays, and 105 trips for Sundays for Phase 1; 208.6 weekday trips, 247.8 trips for Saturdays, and 210 trips for Sundays for Phase 2; and 312.9 weekday trips, 371.7 trips for Saturdays, and 315 trips for Sundays at max build out (Phases 1 and 2 combined). The emissions associated with the building electricity and natural gas usage (non-hearth) were estimated based on the land use type and size. Values for a project served by Pacific Gas and Electric (PG&E) were used in the analysis. Phase 1 is proposed to include construction of a 560 square-foot office with restroom and 96 covered RV parking spaces, ranging in size between 12 and 16 feet wide, to be contained within approximately 70,000 square feet of enclosed building area. Phase 2 will include the remaining acreage and will include another 225 RV parking spaces contained within approximately 140,000 square feet of building storage area. However, this area may also be utilized during Phase 1 for uncovered RV parking spaces. The AQIA/HRA/GhGIA Memo found the project's construction and operational emissions, for criteria pollutants and other pollutants such as greenhouse gas emissions, to be below the threshold of significance.

The site is proposed to be served by the Turlock Irrigation District (TID) for electrical services. A referral response received from TID indicated that the District currently has single phase overhead distribution on the south side of W. Barnhart Road. The District has the ability to build new overhead or underground line north along the east side of N. Golden Stat Blvd. to serve the project and that the developer should consult with District Electrical Engineering for an application for new service and a design for the project. Facility changes are performed at developer's expense.

All construction must meet California Green Building Standards Code (CALGreen Code), which includes mandatory provisions applicable to all new residential, commercial, and school buildings. The intent of the CALGreen Code is to establish minimum statewide standards to significantly reduce the greenhouse gas emissions from new construction. The Code includes provisions to reduce water use, wastewater generation, and solid waste generation, as well as requirements for bicycle parking and designated parking for fuel-efficient and carpool/vanpool vehicles in commercial development. It is the intent of the CALGreen Code that buildings constructed pursuant to the Code achieve at least a 15 percent reduction in energy usage when compared to the State's mandatory energy efficiency standards contained in Title 24. The Code also sets limits on VOCs (volatile organic compounds) and formaldehyde content of various building materials, architectural coatings, and adhesives. A development standard will be added to this project to address compliance with Title 24, Green Building Code, which includes energy efficiency requirements.

Senate Bill 743 (SB743) requires that the transportation impacts under the California Environmental Quality Act (CEQA) evaluate impacts by using Vehicle Miles Traveled (VMT) as a metric. Stanislaus County has currently not adopted any significance thresholds for VMT, and projects are treated on a case-by-case basis for evaluation under CEQA. However, the State of California - Office of Planning and Research (OPR) has issued guidelines regarding VMT significance under CEQA. One of the guidelines, presented in the December 2018 document Technical Advisory on Evaluating Transportation Impacts in CEQA, states that locally serving retail would generally redistribute trips from other local uses, rather than generate new trips. The proposed project fits this description of locally serving retail and therefore is presumed to create a less-than significant transportation impact related to VMT.

Only the southwestern portion of the site is located within the Keyes Community Plan; however, P-D (261), approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner incorporated the mitigation measures from the Keyes Community Plan into the land use approval. The Mitigation Monitoring and Reporting Program (MMRP) prepared for the April 2000 update to the Keyes Community Plan included several mitigation measures regarding impacts to air quality during construction and operation of projects developed within the Keyes Community Plan to ensure Air District standards are met. However, the mitigation measures identified in the Keyes Community Plan MMRP are already required to be met through applicable Air District permitting and through enforcement of the California Building Code. Accordingly, Air Quality requirements are not applied as mitigation, but instead will be applied as development standards applicable to the project, which require that all applicable Air District permits be obtained and that California Green Building Code be met.

The project will be required to meet all applicable Air District standards and to obtain all applicable Air District permits. The proposed project would be consistent with all applicable renewable energy or energy efficiency requirements. Impacts related to Energy are considered to be less-than significant.

Mitigation: None.

References: Application materials; P-D (261) was approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner; Keyes Community Plan, EIR and MMRP adopted April 2000; Referral response from Turlock Irrigation District (TID), dated February 7, 2022; Referral response received from the City of Turlock, dated February 15, 2022; Referral response received from the Department of Public Works, dated May 10, 2022; Referral response received from the San Joaquin Valley Air Pollution Control District, dated February 2, 2022; Air Quality, Health Risk Analysis, and Greenhouse Gas Technical Memorandum, prepared by Johnson & Miller Air Quality Consulting Services, dated March 30, 2022; 2016 California Green Building Standards Code Title 24, Part 11(Cal Green); 2016 California Energy Code Title 24, Part 6; State of California - Office of Planning and Research (OPR) guidelines regarding VMT significance under CEQA; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: The USDA Natural Resources Conservation Service's Eastern Stanislaus County Soil Survey indicates that the property is made up of Dinuba sandy loam (92.4% DrA and 4.2% DsA) and 3.4% Tujunga sandy loam (TuA). As contained in Chapter 5 of the General Plan Support Documentation, the areas of the County subject to significant geologic hazard are located in the Diablo Range, west of Interstate 5; however, as per the California Building Code, all of Stanislaus County is located within a geologic hazard zone (Seismic Design Category D, E, or F) and a soils test may be required at building permit application. Results from the soils test will determine if unstable or expansive soils are present. If such soils are present, special engineering of the structure will be required to compensate for the soil deficiency. This will be evaluated with the building permit process which is required as a development standard applied to the project.

The Department of Public Works reviewed the project and responded that a grading and drainage plan shall be submitted for review and approval which includes drainage calculations which verify compliance with the current State of California National Pollutant Discharge Elimination System (NPDES) General Construction Permit. The project proposes to utilize a private on-site septic system, and to maintain storm drainage on-site through a storm drain basin. The storm drainage basin

is also utilized by Fresh Point, a produce warehouse, which is also located within the P-D (261) zoning district (General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner) adjacent to the project site to the northwest. There is an existing easement for shared use of the storm drainage basin which will remain. These requirements will be incorporated into the project as development standards.

Only the southwestern portion of the site is located within the Keyes Community Plan; however, P-D (261), approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner incorporated the mitigation measures from the Keyes Community Plan into the land use approval. The Mitigation Monitoring and Reporting Program (MMRP) prepared for the April 2000 update to the Keyes Community Plan included mitigation measures regarding the preparation of geotechnical reports and regarding septic systems prior to construction to ensure that they are developed appropriately based on the project site's soil type. The Building Permits Division reviews building permits and determines if geotechnical reports are required with submission of building permits. However, a referral response received from DER indicated that the site would be subject to installing a Measure X septic system that would require the approval of the Department of Environmental Resources (DER) through the building permit process, which also takes soil type into consideration within the specific design requirements. DER's requirements will be applied to the project as a development standard, not a mitigation measure, as the requirements are regulatory.

Impacts to Geology and Soils associated with the project are considered to be less than significant.

Mitigation: None.

References: Application materials; P-D (261) was approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner; Keyes Community Plan, EIR and MMRP adopted April 2000; Referral response received from the Department of Public Works, dated May 10, 2022; Referral response received from the Department of Environmental Resources, dated February 2, 2022; Will-serve letter received from the Keyes Community Services District, dated January 3, 2022; Title 24 California Code of Regulations; Stanislaus County General Plan and Support Documentation¹.

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

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

The project was referred to SJVAPCD, who responded with a request for additional analysis on construction and operational emissions, on health risks, and odor impacts.

Though the project is located outside the City of Turlock's Sphere of Influence (SOI), it is located within one-mile of the City's SOI and within the City's General Plan area which requires referral to the city in accordance with Policy Twenty-Six of the Land Use Element of the Stanislaus County General Plan. A referral response received from the City of Turlock was received which requested that an air study be prepared.

An Air Quality (AQIA), Health Risk Analysis (HRA), and Greenhouse Gas (GhGIA) Technical Memorandum, prepared by Johnson Johnson & Miller Air Quality Consulting Services, dated March 30, 2022. The AQIA/HRA/GhGIA Memo analyzed construction and operational emissions, which included an analysis of energy usage. Operational emissions, including indirect energy consumption associated with water and wastewater services, for the year 2023 were modeled using CalEEMod. CalEEMod assumes compliance with some, but not all, applicable rules and regulations regarding energy efficiency, vehicle fuel efficiency, renewable energy usage, and other GHG reduction policies. Specifically, Pavley I and Pavley II (LEV III) motor vehicle emission standards, CARB Medium and Heavy-Duty Vehicle Regulations, and Title 24 Energy Efficiency Standards. Operational emissions were based on an assumption of 104.3 weekday trips, 123.9 trips for Saturdays, and 105 trips for Sundays for Phase 1; 208.6 weekday trips, 247.8 trips for Saturdays, and 210 trips for Sundays for Phase 2; and 312.9 weekday trips, 371.7 trips for Saturdays, and 315 trips for Sundays at max build out (Phases 1 and 2 combined). The emissions associated with the building electricity and natural gas usage (non-hearth) were estimated based on the land use type and size. Values for a project served by Pacific Gas and Electric (PG&E) were used in the analysis. Phase 1 is proposed to include construction of a 560 square-foot office with restroom and 96 covered RV parking spaces, ranging in size between 12 and 16 feet wide, to be contained within approximately 70,000 square feet of enclosed building area. Phase 2 will include the remaining acreage and will include another 225 RV parking spaces contained within approximately 140,000 square feet of building storage area. However, this area may also be utilized during Phase 1 for uncovered RV parking spaces. The AQIA/HRA/GhGIA Memo found the project's construction and operational emissions, for criteria pollutants and other pollutants such as greenhouse gas emissions, to be below the threshold of significance.

Senate Bill 743 (SB743) requires that the transportation impacts under the California Environmental Quality Act (CEQA) evaluate impacts by using Vehicle Miles Traveled (VMT) as a metric. Stanislaus County has currently not adopted any significance thresholds for VMT, and projects are treated on a case-by-case basis for evaluation under CEQA. However, the State of California - Office of Planning and Research (OPR) has issued guidelines regarding VMT significance under CEQA. One of the guidelines, presented in the December 2018 document Technical Advisory on Evaluating Transportation Impacts in CEQA, states that locally serving retail would generally redistribute trips from other local uses, rather than generate new trips. The proposed project fits this description of locally serving retail and therefore is presumed to create a less-than significant transportation impact related to VMT.

Only the southwestern portion of the site is located within the Keyes Community Plan; however, P-D (261), approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner incorporated the mitigation measures from the Keyes Community Plan into the land use approval. The Mitigation Monitoring and Reporting Program (MMRP) prepared for the April 2000 update to the Keyes Community Plan included several mitigation measures regarding air quality impacts from construction and operation of projects developed within the Keyes Community Plan to ensure Air District standards are met. However, the mitigation measures identified in the Keyes Community Plan MMRP are already required to be met through applicable Air District permitting and through enforcement of the California Building Code. Accordingly, Air Quality requirements are not applied as mitigation, but instead will be applied as development standards applicable to the project, which require that all applicable Air District permits be obtained and that California Green Building Code be met.

The project will be required to meet all applicable Air District standards and to obtain all applicable Air District permits. Impacts associated with Greenhouse Gas Emissions are expected to have a less-than significant impact.

Mitigation: None.

References: Application materials; P-D (261) was approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner; Keyes Community Plan, EIR and MMRP adopted April 2000; Referral response received from the city of Turlock, dated February 15, 2022; Referral response received from the Department of Public Works, dated May 10, 2022; Referral response received from the San Joaquin Valley Air Pollution Control District, dated February 2, 2022; Air Quality, Health Risk Analysis, and Greenhouse Gas Technical Memorandum, prepared by Johnson Johnson & Miller Air Quality Consulting Services, dated March 30, 2022; 2016 California Green Building Standards Code Title 24, Part 11(Cal Green); 2016 California Energy Code Title 24, Part 6; State of California - Office of Planning and Research (OPR) guidelines regarding VMT significance under CEQA; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: The project was referred to the DER Hazardous Materials (Haz Mat) Division who responded with a requirement that the project is subject to Haz Mat permitting and submittal of hazardous business information into the California Electronic Reporting System (CERS) and preparation and approval of a Risk Management Prevention Program if the project will be handling acutely hazardous materials or will be generating hazardous waste. Per the application, the operation will not include or generate any hazardous wastes associated with the project. No dumping or maintenance will occur on-site. If hazardous materials were to be stored on-site, the project would be required to obtain all applicable permits through Haz Mat. The applicant is required to use, store, and dispose of any hazardous materials in accordance with all applicable federal, state, and local regulations. These requirements will be applied to the development standards for the project.

Pesticide exposure is a risk in areas located in the vicinity of agriculture. Sources of exposure include contaminated groundwater, which is consumed, and drift from spray applications. Application of sprays is strictly controlled by the Agricultural Commissioner and can only be accomplished after first obtaining permits. Additionally, agricultural buffers are intended to reduce the risk of spray exposure to surrounding people. The project was referred to the Stanislaus County Agricultural Commissioner and no comments have been received to date.

The project site is not listed on the EnviroStor database managed by the CA Department of Toxic Substances Control or within the vicinity of any airport. The groundwater is not known to be contaminated in this area. The project does not interfere with the Stanislaus County Local Hazard Mitigation Plan, which identifies risks posed by disasters and identifies ways to minimize damage from those disasters. The site is located in a Local Responsibility Area (LRA) for fire protection and is served by Keyes Fire Protection District. The project was referred to the District, however no response was received.

Only the southwestern portion of the site is located within the Keyes Community Plan; however, P-D (261), approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner incorporated the mitigation measures from the Keyes Community Plan into the land use approval. The Mitigation Monitoring and Reporting Program for the Keyes Community Plan included several mitigation measures that were specific

to hazards and hazardous materials. However, only the non-regulatory mitigation measure to stop work in the event previously unidentified contamination is discovered during construction has been applied to the project as a mitigation measure as the other mitigation measure regarding a Phase 1 or 2 study is based on regulatory requirements.

Project impacts related to Hazards and Hazardous Materials are considered to be less-than significant impact with mitigation.

Mitigation:

4. Construction contracts shall include a stop-work provision in the event previously unidentified contamination is discovered during construction so that appropriate actions can be taken to reduce potential human health and environmental hazards.

References: Application materials; P-D (261) was approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner; Keyes Community Plan, EIR and MMRP adopted April 2000; Referral response received from the San Joaquin Air Pollution Control District, dated February 2, 2022; Referral response received from the Department of Environmental Resources, dated February 2, 2022; Referral response received from the Department of Environmental Resources – Hazardous Materials Division, dated January 25, 2022; California Department of Toxic Substance Control's EnviroStor database; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: The project proposes to hook up to the Keyes CSD for water services, to utilize a private on-site septic system, and to maintain storm drainage on-site through a storm drain basin. The storm drainage basin is also utilized by Fresh Point, a produce warehouse, which is also located within the P-D (261) zoning district (General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner) adjacent to the project site to the northwest. There is an existing

easement for shared use of the storm drainage basin which will remain. Keyes CSD provided a will serve letter that states the project site can hook up to the District for water provided they meet all Keyes CSD standards for public water services. The project site is located within the West Turlock Subbasin and is covered by the Turlock Subbasin Groundwater Sustainability Management Agency. The Keyes CSD is required to meet any applicable state or regional Groundwater Sustainability Agency requirements. A referral response received from the Department of Environmental Resources (DER) indicating that the on-site septic system is required to meet Measure X standards for on-site private waste systems. DER reviews and approves septic systems through the building permit process, which takes setbacks, soil type, and water table depth into consideration within the specific design requirements. All of these requirements will be incorporated into the project as development standards.

This project was referred to the Regional Water Quality Control Board (RWQCB) which responded with a list of permitting programs that the project maybe subject to. The Department of Public Works reviewed the project and responded with a request that a grading and drainage plan be submitted for review and approval which includes drainage calculations that verify compliance with the current State of California National Pollutant Discharge Elimination System (NPDES) General Construction Permit. A referral response received from the Turlock Irrigation District (TID) indicated that the site currently does not receive irrigation water or have irrigation facilities on-site. The response also indicated that if irrigation water service was required in the future an application is required to be submitted to TID. These requirements will be applied to the development standards required for project implementation. Additionally, a development standard will be applied to the project that requires the landscaping plans comply with the California State Water Model Ordinance.

Areas subject to flooding have been identified in accordance with the Federal Emergency Management Act (FEMA). Run-off is not considered an issue because of several factors which limit the potential impact. These factors include the relatively flat terrain of the subject site, and relatively low rainfall intensities in the Central Valley. Areas subject to flooding have been identified in accordance with the Federal Emergency Management Act. The project site itself is located in Zone X (outside the 0.2% floodplain) and, as such, exposure to people or structures to a significant risk of loss/injury/death involving flooding due levee/dam failure and/or alteration of a watercourse, at this location is not an issue with respect to this project. Flood zone requirements are enforced through the building permit process. The Building Permits Division also reviews building permits and determines if geotechnical reports are required with submission of building permits. A requirement to obtain all applicable building permits will be incorporated into the project's development standards.

Only the southwestern portion of the site is located within the Keyes Community Plan; however, P-D (261), approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner incorporated the mitigation measures from the Keyes Community Plan into the land use approval. The Mitigation Monitoring and Reporting Program (MMRP) prepared for the April 2000 update to the Keyes Community Plan included mitigation measures regarding hydrology and water quality and to ensure septic systems are developed appropriately based on the project site's soil type; however, the mitigation measures are all covered by regulatory requirements which will be enforced through the review of grading and building permits required to be obtained as development standards required to be met for project implementation.

As a result of the development standards required for this project, impacts associated with drainage, water quality, and runoff are expected to have a less-than significant impact.

Mitigation: None.

References: Application materials; P-D (261) was approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner; Keyes Community Plan, EIR and MMRP adopted April 2000; Referral response received from the Department of Public Works, dated May 10, 2022; Referral response from Turlock Irrigation District (TID), dated February 7, 2022; Referral response received from the Department of Environmental Resources (DER), dated February 2, 2022; Referral response received from the Regional Water Quality Control District, dated January 31, 2022; Will-serve letter received from the Keyes Community Services District, dated January 3, 2022; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: This is a request to Request to amend the zoning designation of a 10 acre parcel from Planned Development (P-D) (261) to a new P-D to allow for development of a recreational vehicle (RV) storage facility in two phases. The project is proposed to be served with public water by the Keyes Community Services District (CSD) and to have a private on-site septic system. All stormwater will be maintained on-site. P-D (261) was approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner. However, the uses approved on the 10 acre project site were limited to agricultural uses only. Accordingly, a rezone is required in order to approve development of the site with non- agricultural uses. In addition to RV storage, the project also proposes to maintain the ability to conduct uses permitted in the A-2 zoning district.

The Land Use Element describes the Planned Development designation as a designation intended for land which, because of demonstrably unique characteristics, may be suitable for a variety of uses without detrimental effects on other property. To approve a Rezone, the Planning Commission must find that it is consistent with the General Plan. Pursuant to the General Plan, the Planned Development zoning designation is consistent with the Planned Development General Plan Land Use designation.

Though the project is located outside the City of Turlock's Sphere of Influence (SOI), it is located within one-mile of the City's SOI and within the City's General Plan area which requires referral to the city in accordance with Policy Twenty-Six of the Land Use Element of the Stanislaus County General Plan. A referral response received from the City of Turlock was received which requested that ag mitigation per the requirements incorporated into P-D (261) and the Keyes Community Plan we applied to the project. The City of Turlock response also requested that a community plan amendment be included in the project to incorporate the entire parcel in the Keyes Community Plan and that a traffic and air study be prepared. An air study was prepared, and the agricultural mitigation was incorporated into the project. However, staff deferred to the Stanislaus County Public Works Department to determine whether or not to require a traffic study. County Public Works confirmed that a traffic study was not warranted based on the proposed trips for the project. Additionally, a community plan amendment has not been included in the project as the project already has a general plan designation of planned development which is consistent with the requested development.

Only the southwestern portion of the site is located within the Keyes Community Plan; however, P-D (261), approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner incorporated the mitigation measures from the Keyes Community Plan into the land use approval. The Mitigation Monitoring and Reporting Program for the Keyes Community Plan included mitigation measures addressing lighting, air quality, hydrology, hazardous materials, noise, biological resources, agricultural resources, traffic, public facilities, fire and school fees, and geology and soils. All of the mitigation measures applicable to the project, that are not already covered by regulatory programs or permitting, which will be required through the application of development standards, have been applied to the project. Those mitigation measures have been incorporated into the Aesthetics, Agricultural Resources, Hazards and Hazardous Materials, and Noise Sections of this initial study.

The project will not physically divide an established community nor conflict with any habitat conservation plans. Project impacts related to land use and planning are considered to be less than significant.

Mitigation: None.

References: Application materials; P-D (261) was approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner; Keyes Community Plan, EIR and MMRP adopted April 2000; Referral response received from the City of Turlock, dated February 15, 2022; Stanislaus County General Plan and Support Documentation¹.

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

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

No significant impacts related to Mineral Resources have been identified.

Mitigation: None.

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

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

Discussion: The Stanislaus County General Plan identifies noise levels up to 70 dB Ldn (or CNEL) as the normally acceptable level of noise for industrial, manufacturing, utilities, and agriculture uses. The site itself is impacted by the noise generated from State Route 99. On-site grading resulting from this project may result in a temporary increase in the area's ambient noise levels; however, noise impacts associated with on-site activities and traffic are not anticipated to exceed the normally acceptable level of noise. No construction is proposed, but if construction were to occur in the future noise associated with the construction work would be required to meet the noise ordinance and Noise Element standards. Proposed operating hours are 24-hours a day, seven days a week, with a maximum of two employees on-site per shift, and an estimated 10-15 customers per day (2-3 maximum during peak hours). The site is not located within an airport land use plan. Noise impacts are considered to be less-than significant with mitigation included.

Only the southwestern portion of the site is located within the Keyes Community Plan; however, P-D (261), approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner incorporated the mitigation measures from the Keyes Community Plan into the land use approval. The Mitigation Monitoring and Reporting Program for the Keyes Community Plan included several mitigation measures that were specific to noise. Those mitigation measures applicable to the project which have to do with mitigating potential noise impacts during construction have been applied to the project.

Impacts associated with noise are considered to be less than significant with mitigation.

Mitigation:

- 5. Hours of construction on the project site shall be limited to 7:00 a.m. to 6:00 p.m. Monday thru Friday, with no construction allowed on holidays.
- 6. Any noisy construction equipment shall be located away from sensitive receptors, and, if necessary, temporary noise barriers shall be constructed between noise sources and sensitive receptors. All construction equipment shall be fitted with properly functioning mufflers.

References: Application materials; P-D (261) was approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner; Keyes Community Plan, EIR and MMRP adopted April 2000; Stanislaus County Noise Control Ordinance, General Plan, and Support Documentation¹.

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

Discussion: The site is not included in the vacant sites inventory for the 2016 Stanislaus County Housing Element, which covers the 5th cycle Regional Housing Needs Allocation (RHNA) for the county and will therefore not impact the County's ability to meet their RHNA. No population growth will be induced, nor will any existing housing be displaced as a result of this project.

Impacts related to Population and Housing are considered to be less-than significant.

Mitigation: None.

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

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

Discussion: The project site is served by the Keyes Fire District for fire protection services, the Keyes Union and Turlock Unified school districts for school services, the Stanislaus County Sheriff Department for police protection, the Keyes

Community Services District for public water and sewer, Stanislaus County Parks and Recreation Department for parks facilities, and the Turlock Irrigation District (TID) for power. County adopted Public Facilities Fees, as well as fire and school fees are required to be paid based on the development type prior to issuance of a building permit. Payment of the applicable district fees will be required prior to issuance of a building permit.

Only the southwestern portion of the site is located within the Keyes Community Plan; however, P-D (261), approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner incorporated the mitigation measures from the Keyes Community Plan into the land use approval. The Mitigation Monitoring and Reporting Program (MMRP) prepared for the April 2000 update to the Keyes Community Plan included mitigation measures regarding the payment of applicable fire, parks, and public facility fees. Development standards regarding the payment of public facility and fire fees will be applied to the project. Residential subdivisions are required to pay park in lieu fees or to dedicate parkland based on the policies included in the State of California's Quimby Act and the Stanislaus County's Conservation and Open Space Element. However, as a highway commercial use the proposed development will only be responsible for paying the parks fees identified in the public facility fee schedules adopted by the Board of Supervisors. Development standards also require that the project site annex into the Golden State Lighting District for streetlights and that TID standards be met for the connection to electrical services.

The project proposes to hook up to the Keyes CSD for water services, to utilize a private on-site septic system, and to maintain storm drainage on-site through a storm drain basin. The storm drainage basin is also utilized by Fresh Point, a produce warehouse, which is also located within the P-D (261) zoning district (General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner) adjacent to the project site to the northwest. There is an existing easement for shared use of the storm drainage basin which will remain. Keyes CSD provided a will serve letter that states the project site can hook up to the District for water provided they meet all Keyes CSD standards for public water services. A referral response received from the Department of Environmental Resources (DER) indicating that the on-site septic system is required to meet Measure X standards for on-site private waste systems. DER reviews and approves septic systems through the building permit process, which takes setbacks, soil type, and water table depth into consideration within the specific design requirements. The project site is also required to annex into the Golden State Lighting District for street lighting, per a referral response received from the Department of Public Works. All of these requirements will be incorporated into the project as development standards.

The project is not anticipated to have any significant adverse impact on public services.

Mitigation: None.

References: Application materials; P-D (261) was approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner; Keyes Community Plan, EIR and MMRP adopted April 2000; Referral response received from the Department of Environmental Resources, dated February 2, 2022; Referral response from Turlock Irrigation District (TID), dated February 7, 2022; Referral response letter received from the Department of Public Works, dated May 10, 2022; Will-serve letter received from the Keyes Community Services District, dated January 3, 2022; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: This project does not include any recreational facilities and is not anticipated to increase demands for recreational facilities, as such impacts typically are associated with residential development.

Only the southwestern portion of the site is located within the Keyes Community Plan; however, P-D (261), approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner incorporated the mitigation measures from the Keyes Community Plan into the land use approval. The Mitigation Monitoring and Reporting Program for the Keyes Community Plan included a mitigation measure regarding the payment of a fair share towards parks. Non-residential development pays parks fees through the payment of public facilities fees, which are collected during the issuance of a building permit. This requirement will be incorporated into the project as a development standard.

No significant impacts related to Recreation were identified.

Mitigation: None.

References: Application materials; P-D (261) was approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner; Keyes Community Plan, EIR and MMRP adopted April 2000; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: Phase 1 of the project is proposed to include construction of a 560 square-foot office with restroom and 96 covered RV parking spaces, ranging in size between 12 and 16 feet wide, to be contained within approximately 70,000 square feet of enclosed building area. Phase 2 will include the remaining acreage and will include another 225 RV parking spaces contained within approximately 140,000 square feet of building storage area. However, this area may also be utilized during Phase 1 for uncovered RV parking spaces. An Air Quality (AQIA), Health Risk Analysis (HRA), and Greenhouse Gas (GhGIA) Technical Memorandum, prepared by Johnson Johnson & Miller Air Quality Consulting Services, dated March 30, 2022. The AQIA/HRA/GhGIA Memo was based on an assumption of 104.3 weekday trips, 123.9 trips for Saturdays, and 105 trips for Sundays for Phase 1; 208.6 weekday trips, 247.8 trips for Saturdays, and 210 trips for Sundays for Phase 2; and 312.9 weekday trips, 371.7 trips for Saturdays, and 315 trips for Sundays at max build out (Phases 1 and 2 combined).

Though the project is located outside the City of Turlock's Sphere of Influence (SOI), it is located within one-mile of the City's SOI and within the City's General Plan area which requires referral to the city in accordance with Policy Twenty-Six of the Land Use Element of the Stanislaus County General Plan. A referral response received from the City of Turlock was received which requested that a traffic study be prepared. However, staff deferred to the Stanislaus County Public Works Department to determine whether or not to require a traffic study. County Public Works confirmed that a traffic study was not warranted based on the proposed trips for the project.

A response received from the Department of Public Works indicated that frontage improvements along Golden State Boulevard shall match the improvements to the north, including curb, gutter, and sidewalk. A grading, drainage, and erosion/sediment control plan for the project site shall be submitted that includes drainage calculations and enough information to verify that runoff from project will not flow onto adjacent properties and Stanislaus County road right-of-way and is in compliance with the current State of California National Pollutant Discharge Elimination System (NPDES) General Construction Permit. The response also included requirements for annexation into the Golden State Boulevard Lighting District, for roadway dedication, encroachment permits, undergrounded utilities, the payment of applicable public facility

regional transportation impact fees, and for installation of signage at the developers cost if requested. All of these requirements will be applied to the project as development standards.

Senate Bill 743 (SB743) requires that the transportation impacts under the California Environmental Quality Act (CEQA) evaluate impacts by using Vehicle Miles Traveled (VMT) as a metric. Stanislaus County has currently not adopted any significance thresholds for VMT, and projects are treated on a case-by-case basis for evaluation under CEQA. However, the State of California - Office of Planning and Research (OPR) has issued guidelines regarding VMT significance under CEQA. One of the guidelines, presented in the December 2018 document Technical Advisory on Evaluating Transportation Impacts in CEQA, states that locally serving retail would generally redistribute trips from other local uses, rather than generate new trips. The proposed project fits this description of locally serving retail and therefore is presumed to create a less-than significant transportation impact related to VMT.

Only the southwestern portion of the site is located within the Keyes Community Plan; however, P-D (261), approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner incorporated the mitigation measures from the Keyes Community Plan into the land use approval. The Mitigation Monitoring and Reporting Program (MMRP) prepared for the April 2000 update to the Keyes Community Plan included mitigation measures regarding the payment of a traffic mitigation fee for roadway projects identified in the Keyes Community Plan. Payment of this fee has not been incorporated into this project as only a portion of the site is included in the Keyes Community Plan the Department of Public Works did not request that the fee be required. Public Facility Fees, which includes funding for the Regional Transportation Impact Fee (RTIF) that provides funding for identified County roads projects throughout the County, will be required to be paid prior to issuance of a building permit.

Impacts associated with Transportation are expected to have a less-than significant impact.

Mitigation: None.

References: Application materials; P-D (261) was approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner; Keyes Community Plan, EIR and MMRP adopted April 2000; Referral response received from the Department of Public Works, dated May 10, 2022; Air Quality, Health Risk Analysis, and Greenhouse Gas Technical Memorandum, prepared by Johnson Johnson & Miller Air Quality Consulting Services, dated March 30, 2022; Referral response received from the Stanislaus County Environmental Review Committee, dated February 2, 2022; Referral response received from the City of Turlock, dated February 15, 2022; Stanislaus County General Plan and Support Documentation¹.

XVIII. TRIBAL CULTURAL RESOURCES - Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California native American tribe, and that is:			X	
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or			X	

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set for the in subdivision (c) of Public Resource Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X	
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Discussion: As this project is a General Plan Amendment it was referred to the tribes listed with the Native American Heritage Commission (NAHC), in accordance with SB 18. No tribes responded with a request for consultation or with any project comments. Tribal notification of the project was not referred to any tribes in conjunction with AB 52 requirements, as Stanislaus County has not received any requests for consultation from the tribes listed with the NAHC. A records search conducted by the Central California Information Center (CCIC) indicated that there are no historical, cultural, or archeological resources recorded on-site and that the site has a low sensitivity for the discovery of such resources. A development standard will be added to the project which requires if any cultural or tribal resources are discovered during project-related activities, all work is to stop, and the lead agency and a qualified professional are to be consulted to determine the importance and appropriate treatment of the find. Cultural Impacts are considered to be less-than significant.

Mitigation: None.

References: Application materials; Central California Information Center Report for the project site, dated January 5, 2022; County General Plan and Support Documentation¹.

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

Discussion: Limitations on providing services have not been identified. The project proposes to hook up to the Keyes CSD for water services, to utilize a private on-site septic system, and to maintain storm drainage on-site through a storm drain basin. The storm drainage basin is also utilized by Fresh Point, a produce warehouse, which is also located within the P-D (261) zoning district (General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner) adjacent to the project site to the northwest. There is an existing easement for shared use of the storm drainage basin which will remain. Keyes CSD provided a will serve letter that states the project site can hook up to the District for water provided they meet all Keyes CSD standards for public water services. A referral response received from the Department of Environmental Resources (DER) indicating that the on-site septic system is required to meet Measure X standards for on-

site private waste systems. DER reviews and approves septic systems through the building permit process, which takes setbacks, soil type, and water table depth into consideration within the specific design requirements. The project site is also required to annex into the Golden State Lighting District for street lighting, per a referral response received from the Department of Public Works. All of these requirements will be incorporated into the project as development standards.

The site is proposed to be served by the Turlock Irrigation District (TID) for electrical services. A referral response received from TID indicated that the District currently has single phase overhead distribution on the south side of W. Barnhart Road. The District has the ability to build new overhead or underground line north along the east side of N. Golden Stat Blvd. to serve the project and that the developer should consult with District Electrical Engineering for an application for new service and a design for the project. Facility changes are performed at developer's expense. Additionally, the response indicated that a 10-foot Public Utility Easement is required to be dedicated along all street frontages for electrical utility service and that the front building setback is to be a minimum of 15-feet from the property line and a minimum of 15-feet from the back-of-sidewalk to enable the safe placement of utilities. Further, the TID response stated that the site currently does not receive irrigation water or have irrigation facilities on-site and that if irrigation water service was required in the future an application is required to be submitted to TID. These requirements will be incorporated into the project's development standards.

Only the southwestern portion of the site is located within the Keyes Community Plan; however, P-D (261), approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner incorporated the mitigation measures from the Keyes Community Plan into the land use approval. The Mitigation Monitoring and Reporting Program (MMRP) prepared for the April 2000 update to the Keyes Community Plan included mitigation measures regarding stormwater, water supply and quality, and regarding the preparation of geotechnical reports prior to installation of an on-site septic system. The water supply will be provided by Keyes CSD which makes the mitigation regarding on-site well inapplicable. The remaining mitigation measures are being met through the grading and building permit review process, which will be incorporated into the project as a requirement per the development standards applied to the project.

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

Mitigation: None.

References: Application materials; P-D (261) was approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner; Keyes Community Plan, EIR and MMRP adopted April 2000; Referral response received from the Department of Public Works, dated May 10, 2022; Referral response from Turlock Irrigation District (TID), dated February 7, 2022; Referral response received from the Department of Environmental Resources (DER), dated February 2, 2022; Will-serve letter received from the Keyes Community Services District, dated January 3, 2022; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: The Stanislaus County Local Hazard Mitigation Plan identifies risks posed by disasters and identifies ways to minimize damage from those disasters. With the Wildfire Hazard Mitigation Activities of this plan in place, impacts to an adopted emergency response plan or emergency evacuation plan are anticipated to be less-than significant. The terrain of the site is relatively flat, and the site has access to a County-maintained road. The site is located in a Local Responsibility Area (LRA) for fire protection, the majority of the site is designated as non-urban and the southwestern portions are designated as urban, and is served by Keyes Fire Protection District. The project was referred to the District, but no response was received. California Building Code establishes minimum standards for the protection of life and property by increasing the ability of a building to resist intrusion of flame and embers. All construction is required to meet fire code, which will be verified through the building permit review process. A grading and drainage plan will be required for the RV parking area and all fire protection, and emergency vehicle access standards met. These requirements will be applied as development standards for the project.

Only the southwestern portion of the site is located within the Keyes Community Plan; however, P-D (261), approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner incorporated the mitigation measures from the Keyes Community Plan into the land use approval. The Mitigation Monitoring and Reporting Program for the Keyes Community Plan included a mitigation measure regarding the payment of fire district fees. Fire fees are collected prior to the issuance of a building permit. This requirement will be incorporated into the project as a development standard.

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

Mitigation: None.

References: Application materials; P-D (261) was approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner; Keyes Community Plan, EIR and MMRP adopted April 2000; California Building Code Title 24, Part 2, Chapter 7; Stanislaus County Local Hazard Mitigation Plan; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: The site is currently bordered by West Barnhart Road and North Golden State Boulevard, in the unincorporated community of Keyes, just east of State Route 99. The site has a General Plan designation of Planned Development, a portion of the site has a Keyes Community Plan designation of Highway Commercial, and a zoning designation of Planned Development (P-D) (261), approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner, to allow for the development of various

Highway Commercial uses. However, the uses approved on the 10 acre project site were limited to agricultural uses only. Accordingly, a rezone is required in order to approve development of the site with non- agricultural uses. In addition to RV storage, the project also proposes to maintain the ability to conduct uses permitted in the A-2 zoning district.

The project is proposed to be served with public water by the Keyes Community Services District (CSD) and to have a private on-site septic system. All stormwater will be maintained on-site.

Though the project is located outside the City of Turlock's Sphere of Influence (SOI), it is located within one-mile of the City's SOI and within the City's General Plan area which requires referral to the city in accordance with Policy Twenty-Six of the Land Use Element of the Stanislaus County General Plan. The City of Turlock is located approximately ½ mile south of the project site. A referral response received from the City of Turlock was received which requested that ag mitigation per the requirements incorporated into P-D (261) and the Keyes Community Plan be applied to the project. The City of Turlock response also requested that a community plan amendment be included in the project to incorporate the entire parcel in the Keyes Community Plan and that a traffic and air study be prepared. An air study was prepared, and the agricultural mitigation was incorporated into the project. However, staff deferred to the Stanislaus County Public Works Department to determine whether or not to require a traffic study. County Public Works confirmed that a traffic study was not warranted based on the proposed trips for the project. Additionally, a community plan amendment has not been included in the project as the project already has a general plan designation of planned development which is consistent with the requested development.

Only the southwestern portion of the site is located within the Keyes Community Plan; however, P-D (261), approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner incorporated the mitigation measures from the Keyes Community Plan into the land use approval. The Mitigation Monitoring and Reporting Program for the Keyes Community Plan included mitigation measures addressing lighting, air quality, hydrology, hazardous materials, noise, biological resources, agricultural resources, traffic, public facilities, fire and school fees, and geology and soils. All of the mitigation measures applicable to the project, that are not already covered by regulatory programs or permitting, which will be required through the application of development standards have been applied to the project. Those mitigation measures have been incorporated into the Aesthetics, Agricultural Resources, Hazards and Hazardous Materials, and Noise Sections of this initial study.

Vacant and agricultural land, with a General Plan designation of Agriculture and a zoning designation of General Agriculture (A-2-40), surround the site to the east and north; State Route 99 and light industrial development to the west and south; and the Community of Keyes to the northwest. There are several rezone applications being processed proposing highway commercial development on vacant parcels located north of the project site, within the Keyes Community Plan boundary. Further development of the Keyes area would be subject to an amendment of the Keyes Community Plan, which would require environmental review, including a cumulative impact analysis. Review of this project has not indicated any potential for cumulative impacts which might significantly impact the environmental quality of the site and/or the surrounding area.

Mitigation: None.

References: Application materials; P-D (261) was approved by the Board of Supervisors on December 18, 2001 under General Plan Amendment No. 2001-01 and Rezone No. 2001-01 – Jim Messner; Keyes Community Plan, EIR and MMRP adopted April 2000; Initial Study; Stanislaus County General Plan and Support Documentation¹.

¹Stanislaus County General Plan and Support Documentation adopted in August 23, 2016, as amended. **Housing Element** adopted on April 5, 2016.

Stanislaus County
Planning and Community Development

1010 10th Street, Suite 3400
Modesto, CA 95354

Phone: (209) 525-6330
Fax: (209) 525-5911

Mitigation Monitoring and Reporting Program

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

May 5, 2022

- | | |
|---|---|
| 1. Project title and location: | Rezone Application No. PLN2021-0112 – Top Shelf Mega Storage

4401 W Barnhart Road, on the northeast corner of W Barnhart Road and N Golden State Boulevard, in the Keyes area (APN 045-052-031). |
| 2. Project Applicant name and address: | Brian Demello, Top Shelf Mega Storage
201 N. Hopper Road, Modesto, CA 95357 |
| 3. Person Responsible for Implementing Mitigation Program (Applicant Representative): | Brian Demello, Top Shelf Mega Storage |
| 4. Contact person at County: | Kristin Doud, Deputy Director of Planning
(209) 525-6330 |

MITIGATION MONITORING AND REPORTING PROGRAM:

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

I. AESTHETICS

- | | |
|---|---|
| No. 1 Mitigation Measure: | New multistory development shall minimize the use of reflective surface and have those reflective surfaces which are used to be oriented in such a manner so as to reduce glare impacts along roadways. |
| Who Implements the Measure: | Applicant/Developer. |
| When should the measure be implemented: | During building design. |
| When should it be completed: | Prior to issuance of the Final Occupancy Permit. |
| Who verifies compliance: | Stanislaus County Planning and Community Development Department, Planning Division. |
| Other Responsible Agencies: | None. |
| No. 2 Mitigation Measure: | New development shall include cut-off luminaries and/or shields. All exterior lighting shall be designed (aimed down and towards the site) to provide adequate illumination without a glare effect. Low intensity lights shall be used to minimize the visibility of the lighting from nearby areas, and to prevent "spill over" of light onto adjacent residential properties. |

Who Implements the Measure: Applicant/Developer.
When should the measure be implemented: During building design.
When should it be completed: Prior to issuance of the Final Occupancy Permit.
Who verifies compliance: Stanislaus County Planning and Community Development Department, Planning Division.
Other Responsible Agencies: None.

II. AGRICULTURE AND FOREST RESOURCES

No. 3 Mitigation Measure: Farmland mitigation shall be provided in the amount of 20.19 acres (an amount equivalent to the project site plus the agricultural preserve applied to Use Permit Application No. 2003-33 - Piranha Produce). The mitigation may be met through a long-term agricultural easement or through the payment of an in-lieu fee to a Land Trust, determined to be acceptable by the County Planning Director, and shall be in compliance with the County's adopted Farmland Mitigation Program Guidelines.

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

IX. HAZARDS AND HAZARDOUS MATERIALS

No. 4 Mitigation Measure: Construction contracts shall include a stop-work provision in the event previously unidentified contamination is discovered during construction so that appropriate actions can be taken to reduce potential human health and environmental hazards.

Who Implements the Measure: Applicant/Developer.
When should the measure be implemented: Prior to grading and construction activity.
When should it be completed: When grading and construction activities are completed.
Who verifies compliance: Stanislaus County Planning and Community Development Department, Planning Division.
Other Responsible Agencies: Stanislaus County Department of Environmental Resources, Hazardous Materials Division.

XIII. NOISE

No. 5 Mitigation Measure: Hours of construction on the project site shall be limited to 7:00 a.m. to 6:00 p.m. Monday thru Friday, with no construction allowed on holidays.

Who Implements the Measure: Applicant/Developer.
When should the measure be implemented: During grading and construction activity.
When should it be completed: When grading and construction activities are completed.
Who verifies compliance: Stanislaus County Planning and Community Development Department, Planning Division.
Other Responsible Agencies: None.

No. 6 Mitigation Measure: Any noisy construction equipment shall be located away from sensitive receptors, and, if necessary, temporary noise barriers shall be constructed between noise sources and sensitive receptors. All construction equipment shall be fitted with properly functioning mufflers.

Who Implements the Measure: Applicant/Developer.
When should the measure be implemented: During grading and construction activity.
When should it be completed: When grading and construction activities are completed.
Who verifies compliance: Stanislaus County Planning and Community Development Department, Planning Division.
Other Responsible Agencies: None.

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

Signature on File _____ May 19, 2022
Person Responsible for Implementing MMRP _____ Date